



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

**Prepared by:**  
Roma Youth Organization of Croatia  
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## LIST OF ABBREVIATIONS

AP	Action Plan for NRSF implementation for the period 2021-2022
CMS	Center for Peace Studies
Kali Sara	Union of Roma in the Republic of Croatia Kali Sara(Roma umbrella NGO)
MP	Member of Parliament
NGO	Non-Governmental Organisation
NRCP	National Roma Contact Point (Office for Human and Minority Rights of the Croatian Government)
NRIS	National Roma Inclusion Strategy for the period from 2013 to 2020
NRSF	National Roma Inclusion plan for the period from 2021 to 2027
OMP	Operational Program for National Minorities for the period from 2021-2024
RCM	Roma Civil Monitoring
RCS	Roma Civil Sector
RRC	Roma Reassure Centre
RYO CRO	Roma Youth Organization of Croatia



## EXECUTIVE SUMMARY

The 'National Roma Inclusion Plan for the period from 2021 to 2027' (NRSF)<sup>1</sup> and the 'Action Plan for the Implementation of the NRSF for the period 2021-2022' (AP-NRSF)<sup>2</sup> are more comprehensive and developed than the previous 'National Roma Inclusion Strategy for the period from 2013 to 2020' (NRIS).<sup>3</sup> The main strength of the NRSF and the AP-NRSF is the data that allows for the measurement of the impact and creates the ground for clearly defining the goals. Following recommendations from the external evaluation of the previous NRIS,<sup>4</sup> more stakeholders were involved during the preparation of the NRSF and AP-NRSF, and the number of other governmental institutions and ministries involved in the implementation of the activities increased. The budget is more significant as funds are allocated from European and domestic sources. Additionally, there are funds which are ensured through other policies and documents such as the 'Operational Programme for National Minorities from 2021-2024' (OMP).<sup>5</sup>

Intersectoral cooperation is one of the main obstacles to accomplishing the goals of the previous NRIS and this NRSF. Moreover, many measures do not have associated activities, as the NRSF was adopted in late 2021 when the budget from ministries and governmental institutions was locked. The AP-NRSF lacks funding for Roma-targeted activities in many areas and for those special activities that were supposed to be implemented in the previous NRIS. The NRSF provides a framework which would allow ministries and governmental institutions to ensure the provision of funds, but this ultimately depends on the political will.

The NRSF does not include any specific plan for the desegregation of Roma settlements. While segregation is recognised by the NRSF, the NRSF reflects political populism and focuses on improving the environment and infrastructure within Roma settlements. This means that Roma will not be included in Croatian society, at least those Roma who are living in settlements.

### Participation

Roma participation in the creation of both documents was planned and allowed, but because of the weakness of the Roma civil sector (RCS), this opportunity was not fully taken. The weak RCS will also be a challenge when it comes to the implementation of activities foreseen by the NRSF and AP-NRSF. Monitoring of the implementation of NRSF and AP-NRSF is appropriately defined on paper, however, members of the committee for monitoring implementation are deeply connected to or come directly from Kali Sara (the umbrella Roma association 'Union of Roma in the Republic of Croatia Kali Sara'). This organisation is heavily financed by the government, and the Croatian RCM coalition considers Kali Sara to have a political relationship with the government and not completely

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<sup>1</sup> NRSF available at: <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%20C4%8Divanje%20Roma%202021-2027.pdf>

<sup>2</sup> AP-NRSF available at: <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Akcijski%20plan%20za%20provedbu%20NPUR-a%20za%202021.%20i%202022..pdf>

<sup>3</sup> NRIS available at: <https://www.zagreb.hr/UserDocsImages/arhiva/Nacionalna%20strategija%20za%20uklju%20C4%8Divanje%20Roma%202013-2020.pdf>

<sup>4</sup> External evaluation of NRIS, Dr. Eben Friedman and Mr. Sc. Maja Horvat, April 2015, available at: <https://pravamanjina.gov.hr/UserDocsImages/arhiva/Evaluacija%20Nacionalne%20strategije%20za%20uklju%20C4%8Divanje%20Roma%20u%20RH.pdf>

<sup>5</sup> Operational Program for National Minority from 2021-2024, available at: <https://pravamanjina.gov.hr/UserDocsImages/dokumenti/Operativni%20programi%20nacionalnih%20manjina%20za%20razdoblje%202021.-2024..pdf>

part of the NGO sector. In order to ensure better participation, more focus is needed on the capacity building of the RCS and on ensuring institutional support and more channels for financing non-governmental Roma associations. The activities outlined in the NRSF for empowering the RCS are insufficient, thus, a weak RCS is likely to remain a challenge in the future.

## Relevance

Many goals are ambitiously defined, and there is a high probability that they will not be achieved even if there are, in some areas, Roma-targeted approaches. When it comes to areas covered by the NRSF, the requirements are met. One of the concerning issues is that a focus on Roma children is missing. In the previous RCM report, we noticed that there are no specific activities targeting Roma children in foster care families, children who are in state care, or non-Roma families who have adopted Roma children. Some of these problems are recognised by the current NRSF, but activities do not address this target group properly. The AP-NRSF also fails to outline any kind of activities that address challenges related to segregation and Roma women's employment. We consider that the NRSF and AP-NRSF have missed the opportunity to define a real plan for desegregation and that this is one of the biggest weaknesses of these documents. In some areas, the activities outlined will likely affect other areas as well. For example, the goal of improving the environment in Roma settlements and the living conditions of Roma is listed under the area of housing but could have an impact on Roma health as well. Such connections are not recognised in the NRSF and AP-NRSF. Intersectoral cooperation needs to be improved in order to measure the impact of activities not only within one specific area but across areas. This kind of approach could lead to multiple channels of financing for one specific activity. Moreover, funds also need to be allocated for activities not covered in this AP-NRSF.

## Expected effectiveness

The strength of the previous NRIS has been in monitoring and evaluation, and this is still the case for the current NRSF. A concerning factor is that many of the members of the Commission for Monitoring and Implementation of the NRSF are part of or deeply connected with Kali Sara, which is heavily financed by the government. This could lead to irregularities. The National Roma Contact Point (NRCP, Office for Human and Minority Rights of the Croatian Government) has gathered all the information necessary to produce a high-quality document. They have ensured that the document is in alignment with domestic and European policies. Many lessons learned during the implementation of NRIS are avoided in the NRSF: This time, the indicators measure the impact, the burden of the implementation of activities is shared, and funding has been increased. The barrier that prevents NRCP from creating a more efficient document is that they do not have influence on the political will and the engagement of other stakeholders, especially the ministries and governmental institutions. Thus, they have to rely on soft skills such as good cooperation and the continuous provision of information as well as raising awareness among all the stakeholders who are involved. Empowering the NRCP to guide the other stakeholders would make the whole process more efficient and lead to more activities being added to the AP-NRSF.

## Alignment with the EU strategic framework

The NRSF is aligned with all domestic and European policies and in line with the EU framework and the European Council recommendations. Mainstream and Roma-targeted approaches are mainly combined, but in some areas, only the mainstream approach has been chosen, which is weaker than the targeted approach and could jeopardise attaining the defined goals. Every area should have at least a combined approach. The best results are detected in the area of education, which is associated with the biggest number of Roma-targeted activities. Additionally, Roma diversity is recognised in the NRSF, but many

areas lack activities which target recognised unprivileged groups within the Roma community. The main reason for this is that the budgets of ministries and governmental institutions were locked at the time when the NRSF and AP-NRSF were adopted by the government.

# INTRODUCTION

## *National Roma strategic framework*

The NRSF is a new basic document for the inclusion of Roma, which represents the continuation of Croatian public policies aimed at the inclusion of Roma that began in 2003 with the adoption of the 'National Program for Roma'. The previous basic document for the inclusion of Roma was the NRIS covering the period 2013-2020, and the new NRSF covers the period 2021-2027. The NRSF was adopted later than usual. While all previous documents related to the inclusion of Roma were adopted one year before the period they refer to, the NRSF was adopted in the first year when it was already in effect. The NRSF was adopted in June 2021. The AP-NRSF covering the first two years of implementation of NRSF (2021 and 2022) was adopted at the same time.

After public discussion, NRSF and AP-NRSF were adopted in June 2021.

## *About this report*

This report was written by the RCM coalition of Croatia, whose members are Siniša-Senad Musić (Roma Youth Organization of Croatia), Elizabet Takač (Roma Resource Centre), and Marina Horvat (individual expert and elected member of municipal council). The coordinator of the report is Siniša-Senad Musić, who was also involved in the previous RCM report. He participated in the creation of NRSF and AP-NRSF and served as a member of the committee monitoring the implementation of the NRIS. During the preparatory work, key interviews were conducted with relevant stakeholders and Roma civil sector members.

Interviews were undertaken with the Ombudswomen's office (two persons) and a non-Roma organisation which participated in the creation of NRSF and AP-NRSF (one person). Information was also collected from the MSE (Ministry of Science and Education) through prepared questions (a questionnaire). An interview was conducted with the representative of Međimurje County, who represented the Croatian Counties Community in the working group for developing the NRSF and AP-NRSF. The key interview was implemented with NRCP (two persons), which allowed us to obtain a better understanding of the NRSF and future plans. With RCS, we organised four focus groups, of which three were in-person ones conducted by Marina Horvat (two) and Siniša-Senad Musić (one), and one was online and managed by Siniša-Senad Musić. The total number of participants in focus groups was 25.

In interviews and focus groups, the RCS actors provided similar answers that were largely related to challenges in implementation, while their knowledge about the NRSF and AP-NRSF was limited due to their not having read the respective documents. The fact that many of our interlocutors did not read the NRSF and AP-NRSF beforehand can be seen as a result of the weak RCS in Croatia. Informal groups, Roma activists and small Roma associations do not understand the importance of the NRSF and AP-NRSF, and they see the whole process as a political one. Another problem was that some of the key actors of the RCS did not participate in the focus groups, thus, we conducted additional interviews with four of them. Again, we faced the same problem that they had not read the NRSF and AP-NRSF, which limited their understanding of the matter. This is why we decided to call them on a regular basis to obtain information from them, but very often, we needed to clarify our questions and explain what the NRSF is doing in particular areas.

The diversity among civil society actors is reflected in our interviews. Focus groups and phone calls were conducted with an equal number of women and men, with a slight predominance of women. Interlocutors also came from a variety of different regions in Croatia: Primorsko-goranska County, Istarsta County, Brodsko-posavska County, Osiječko-baranjska County, the City of Zagreb and Međimurska County. The plan was to conduct interviews with Kali Sara and members of the Committee for monitoring the

implementation of the NRSF and AP-NRSF who are all part of Kali Sara or deeply connected with it. However, despite sending e-mails and initiating a phone call with the President of Kali Sara, no answer was received.

# 1. PARTICIPATION

## 1.1. Roma participation in the NRSF preparation

Even before starting the formal process of drafting the NRSF and AP-NRSF, the national Roma contact point (NRCP) involved the general public and Roma through processes which included regional and local level as well as national activities (working groups and consultations). Namely, the process of collecting and analysing data about the implementation of the NRIS, which served as the basis for the creation of this medium-term program document, began with an external evaluation conducted in 2016,<sup>6</sup> and continued until the end of 2020, mainly through the project activities of the NRCP. In addition to the external evaluation of the NRIS, the NRCP implemented three other significant projects during which it collected the necessary data for the creation of a quality NRSF:

- 'Platform for the successful implementation of the National Strategy for Roma inclusion'. The NRCP held four thematic events (focused discussions with a total of 68 participants) on the topic of the priorities associated with the strategic areas of the NRIS and a separate discussion about the needs and priorities of Roma women and children with a total of 16 Roma representatives. Discussions that, among other things, responded to the findings of the external evaluation were held with the aim of reaching a consensus among stakeholders at the national level, including the Roma community. These resulted not only in consensual agreement about short-term priorities but also about the basic principles of creating new implementing documents.
- 'National Platform for Roma'. The NRCP paid special attention to fostering public debate on priorities and goals associated with the strategic areas of NRIS, with an emphasis on including the perspective of Roma members and stakeholders involved in direct work with Roma. A national public debate was organised in which 96 participants took part, and within the framework of the same project, four regional discussions with a total of 190 participants and two national debates with Roma women and young Roma with a total of 39 participants.
- 'Inclusion of Roma in the Croatian Society: Baseline data research'<sup>7</sup> – which was implemented with the ultimate goal of establishing a database for monitoring the success of the implementation of both existing and future program documents for the inclusion of Roma. The NRCP created a comprehensive analytical database about the position of members of the Roma national minority in the Republic of Croatia, as well as identified the short-term and long-term needs of the Roma community in the Republic of Croatia.

In connection with the research listed under point three, the NRCP contracted additional analyses with the ultimate goal of creating a comprehensive analytical basis for the creation of an NRSF. Findings of additional thematic analyses were published in the following publications:

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<sup>6</sup> Evaluation report of NRIS available at:  
<https://pravamanjina.gov.hr/UserDocsImages/arhiva/Evaluacija%20Nacionalne%20strategije%20za%20ukljucivanje%20Roma%20u%20RH.pdf>

<sup>7</sup> Inclusion of Roma in Croatian Society: Baseline data research available at:  
[https://www.cms.hr/system/publication/pdf/108/Uklju\\_ivanje\\_Roma\\_u\\_hrvatsko\\_dru\\_tvo\\_istra\\_ivanje\\_baznih\\_podataka.pdf](https://www.cms.hr/system/publication/pdf/108/Uklju_ivanje_Roma_u_hrvatsko_dru_tvo_istra_ivanje_baznih_podataka.pdf)

- Women, youth, and children;<sup>8</sup>
- Identity, social distance, and the experience of discrimination;<sup>9</sup>
- Education and employment;<sup>10</sup>
- Health care and social care;<sup>11</sup>
- Spatial planning, housing, and environmental protection.<sup>12</sup>

In September 2020, a public call was published for civil society organisations and members of the academic community to submit proposals for the appointment of members and deputy members of the working group for the preparation of NRSF and AP-NRSF.<sup>13</sup> A total of 20 seats are reserved for members of the civil sector (ten members and ten deputy members). Out of the total number of seats reserved for civil society, 12 are reserved for Roma members (six members and six deputy members), and four places are reserved for members of the academic community (two members and two deputy members). Only two Roma associations applied to the call (the Roma Youth Organization of Croatia (RYO CRO) and Kali Sara) – the main reasons for this will be discussed later in this section. After the public call expired, 46 members and 43 deputy members of the working group in charge of drafting the NRSF and AP-NRSF were appointed. In addition to representatives of local and regional authorities, ministries, government institutions and independent institutions, only eight Roma members were appointed (instead of 12 foreseen in the call). All Roma who applied were appointed as members – seven Roma as members (six from Kali Sara and one from RYO CRO) and one as a deputy member from RYO CRO. Additionally, one Roma also participated in the process as a government official in the position of director of the RCP. All the reports and processes involved in the creation of the NRSF and AP-NRSF are available on the official page of RCP.<sup>14</sup>

From the selected members and deputy members of the working group, two specialised working groups were established for the prevention of anti-Roma racism and discrimination and for the area of combating poverty and social exclusion and strengthening the civic participation of Roma. Siniša-Senad Musić, the coordinator of this report, was part of the working group. It can be stated that the process was smooth, and the inclusion of other experts as members was allowed. After the finalisation of the process, the NRSF and AP-NR were open for public discussion for one week, which many

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<sup>8</sup> Publication available at: <https://ukljucivanje-roma.com/assets/other/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%A1vo%20-%20C5%BEene,%20mladi%20i%20djeca.pdf>

<sup>9</sup> Publication available at: <https://ukljucivanje-roma.com/assets/other/Ukljucivanje%20Roma%20u%20hrvatsko%20društvo-identitet,%20socijalna%20distanca%20i%20iskustvo%20diskriminacije.pdf>

<sup>10</sup> Publication available at: <https://pravamanjina.gov.hr/UserDocsImages//arhiva//Ukljucivanje%20Roma%20u%20hrvatsko%20društvo-obrazovanje%20i%20zaposljavanje.pdf>

<sup>11</sup> Publication available at: <https://pravamanjina.gov.hr/UserDocsImages/arhiva/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%BFtvo%20-%20zdravstvena%20za%C5%A1tita%20i%20socijalna%20skrb.pdf>

<sup>12</sup> Publication available at: <https://ukljucivanje-roma.com/assets/other/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%A1vo%20-%20prostorno%20ure%C4%91enje,%20stanovanje%20i%20za%C5%A1tita%20okoli%C5%A1a.pdf>

<sup>13</sup> Public call available at: <https://pravamanjina.gov.hr/vijesti/961>

<sup>14</sup> Development of NRSF and AP-NRSF available at: <https://pravamanjina.gov.hr/izrada-nacionalnog-plana-za-ukljucivanje-roma-2021-2027/973>

stakeholders considered too short.<sup>15</sup> The outcome of public discussion was a total of six comments.

Looking at the participation of Roma in creating the NRSF and AP-NRSF, it needs to be said that NRCP did the external evaluation of the previous NRIS ('National Roma Inclusion Strategy for the period 2013-2020') and outsourced the research into basic Roma data for the efficient implementation of NRIS ('Inclusion of Roma in Croatian Society: Baseline data research'). In those two processes, more than 5,000 Roma were contacted and these data were the basis for improvements in the new strategic document for Roma inclusion. The NRCP considers the fact that a high number of Roma participated in the survey as Roma participation in the development of the NRSF and AP-NRSF.<sup>16</sup> While it is true that a significant number of Roma provided data, we do not consider these processes as strong/meaningful participation. It can be observed that NRCP is making an effort; however, the situation shows that the RCS did not even take up the places which were reserved for them in the open call for the working group drafting the NRSF and AP-NRSF.

The reasons for this situation were seen differently by different stakeholders. During the interviews, some Roma associations claimed that they consider the process of consultation political since a large advantage was given to Kali Sara (e.g., the call gave preference to applicant from Kali Sara). Other associations stated that their knowledge and capacities did not allow them to apply to the call. NRCP considers that there may be another reason: the inability to organise local and regional activities due to the COVID-19 pandemic. Other non-Roma organisations made statements that the problem could have been avoided if the non-formal initiatives and activists without organisations could have applied to the call. Also, the issue of the distribution of information about the call seems to be relevant in this matter, as some Roma activists and small associations claimed that they did not even know about the call. The RCM coalition believes that the biggest problem is the capacity of RCS and that the number of Roma members on paper could have been bigger, but the result would have been the same. This opinion is built on our knowledge and gathering information from the civil sector. RCS is weak, and many individuals who are part of RCS do not have the experience and knowledge to actively participate in the creation of such documents. During the interviews, we gathered the information that more than 90% of them did not read the NRSF and AP-NRSF and that they did not understand the importance of such documents. The RCS sees it as a political process, or they think that the document will not have an impact on Roma inclusion; thus, it is meaningless for them to participate.

In total, there were three big meetings of working groups and two meetings of specialised groups. Looking at the minutes,<sup>17</sup> it can easily be observed that only two Roma participated in these meetings (the president of Kali Sara and the Vice-President of ROM HR). Of the other five Roma members appointed to the working group and proposed by Kali Sara, only one participated in one meeting, and the other did not even attend any of the meetings. Along these lines, the RCM coalition considers that increasing the number of Roma in these processes would not necessarily have implied an increase in the quality of the plan. With

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<sup>15</sup> Public discussion results available at:

<https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=16535><sup>16</sup> NRSF available at <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%C4%8Divanje%20Roma%202021-2027.pdf> (page 09 -11)

<sup>16</sup> NRSF available at <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%C4%8Divanje%20Roma%202021-2027.pdf> (page 09 -11)

<sup>17</sup> Minutes of meetings of working groups for developing the NRSF and AP-NRSF available at: <https://pravamanjina.gov.hr/izrada-nacionalnog-plana-za-ukljucivanje-roma-2021-2027/973>



the aim of ensuring the quality participation of Roma, the NRCP needs to build capacity among RCS and Roma individuals.

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

### Monitoring

On 23 June 2021, the Croatian Government decided to establish a committee for monitoring the implementation of the NRSF. Croatia has had this practice since the first policies for Roma inclusion. The Committee's tasks include systematic monitoring and analysis of the implementation of the NRSF based on reports from bodies and/or other relevant stakeholders, drafting recommendations, opinions, expert explanations, and guidelines regarding the implementation of the NRSF as well as the accompanying AP-NRSF in terms of its implementation. The Committee is entitled to propose amendments to the government and supplement NRSF and the accompanying NRSF-AP, as well as to monitor the schedule and expenditure of funds for implementing NRSF measures. The president of the Committee is the Vice President of the Government of the Republic of Croatia, Boris Milošević, the Vice President of the Committee is the representative of the Roma national minority in the Croatian Parliament, Veljko Kajtazi. Those two seats are reserved for them in accordance with their function. Besides the president and vice president of the Committee, there are an additional 14 members, including seven from ministries and another seven representing Roma civil society. The Roma civil society members were selected based on a public call made by RCP. The Roma have a majority in the committee, as additional to the Roma civil society member, one member also represents the government, Alen Tahiri, the director of the NRCP, declares his Roma ethnicity. Regarding the observations of the RCS (Roma Civil Society), it can be claimed that decisions about Roma members are strongly political as all Roma members of this committee are either members of or deeply connected with Kali Sara. Among the applicants who were not selected were the President of CRNM (Council of Roma National Minority) - Zagreb, the coordinator of the previous and the present RCM who had experience with the development of the NRSF and was a member of the Committee two cycles earlier. The information that we received from NRCP is that the commission was established to review the validity of candidacies for members of the Committee for monitoring the implementation of the NRSF. The members of the commission were a representative of the Council for National Minorities, a representative of the Cabinet of the Vice President of the Government of Croatia and the President of the Commission, and a representative of the RCP. We requested information about the criteria leading to the appointment of members and who proposed the appointed members of the Committee for monitoring the NRSF, but we did not receive this information until the end of this report.

### Evaluation

At the final stage of drafting the NRSF, the implementation of the so-called ex-ante evaluation is planned to ensure an independent expert opinion that the NRSF is as relevant and coherent as possible. This is why, in the period from 29 January 2021 to 12 February 2021, an internal ex-ante evaluation procedure was conducted (by officials functionally independent of the officials who participated in the development of the 'National Plan for Roma Inclusion'), whereby the ex-ante evaluation procedure was focused on a single document, the 'Third Draft Proposal of the National Plan for Roma Inclusion 2021 – 2027', which was the subject of evaluation. The general objective of the ex-ante evaluation was to analyse and assess the justification, relevance, and coherence of the 'National Plan for Roma Inclusion' and its intervention logic, as well as the plans for monitoring implementation and outcomes with a view to adopting an ambitious yet feasible document with achievable planned outcomes. The ex-ante evaluation report of the Third Draft

Proposal of the NRSF is available on the official website of the NRCP.<sup>18</sup> Among the conclusions of the mentioned evaluation, the following two should be singled out:

1. "When creating AP-NRSF measures, special attention should be paid to their contribution to the general goal 'Increase effective equal access to desegregated housing and basic services' since special goals, by themselves, do not guarantee action in the direction of desegregation. Not even the proposal of desirable activities within this development direction excludes investments in segregated settlements. They are implied in the context of ensuring basic living conditions in the period until the prerequisites for inclusive housing are met.
2. During the creation of implementation documents, special attention should be directed to the horizontal goal of 'Encouraging participation through empowerment, cooperation, and trust in public institutions', but also in sectoral goals 'Effective equal access to quality and inclusive education' and 'Effective equal access to appropriate desegregated housing and basic services' since no strategic projects are planned in the mentioned areas. During the preparation of implementation documents, it will be necessary to take care of the development aspects as well as directions in which strategic projects are planned with a limited reach compared to the set general ones the objectives of the document (primarily the field of employment and health)".

In 2024, the NRCP plans to replicate the research on baseline data about Roma for the efficient implementation of the NRSI ('Inclusion of Roma in the Croatian Society: Baseline data research'). The original survey questionnaire in the baseline data study will be minimally adjusted in order to ensure the maximum possible comparability with future studies that will be conducted to assess the effectiveness of the new EU Equality Framework. These studies will be conducted by the European Union Agency for Fundamental Rights to assess the effectiveness of the new 'EU Framework for Roma Equality, Inclusion and Participation'. A mid-term evaluation at the EU level is planned for 2025, and an ex-post evaluation in 2028. Based on the experience with previous research about baseline data of Roma and the external evaluation of NRIS with around 5,000 respondents, we expect similar high-level participation in the studies to come. Another part of the evaluation is expected from the Committee for monitoring the implementation of NRSF, where we also have Roma included. Also, in 2027, an external evaluation of the 'National Plan for Roma Inclusion' and the accompanying implementation documents is planned in order to assess the impact of the implementing measures on the defined areas of intervention.

## Implementation

The NRCP has planned to financially support Roma associations in the implementation of some of the activities, with a focus on local activities. These calls should be published and directly managed by the NRCP and not through the Committee for monitoring the implementation of NRSF. If these calls require significant administration, it will be hard for Roma associations to apply. At the same time, if the big grants are distributed to small associations that do not have sufficient experience, the real impact will not be seen due to the limitations of these smaller entities. It is up to the NRCP to find a way to support the development of the RCS and ensure impact at the same time.

The RCS is weak, and only a few Roma associations have been able to respond to the European calls. Other Roma organisations are primarily dependent on small local grants. Many of them have difficulties when it comes to reporting and administration as they lack a steady income and continuity in project implementation and administrative and financial

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<sup>18</sup> [IZVJEŠĆE O PRETHODNOM VREDNOVANJU NACIONALOG PLANA ZA UKLJUČIVANJE ROMA ZA RAZDOBLJE OD 2021. DO 2027. GODINE \(gov.hr\)](#)

reporting. One of the possibilities for strengthening the NRCP and, at the same time, ensuring quality outcomes would be additional financial support to allow Roma associations to employ experienced project managers, who would probably be non-Roma. This kind of partnership is already deployed in some bigger Roma associations. Kali Sara, for example, faces the challenge of a lack of human resources and employs many non-Roma, especially in positions such as project manager or project coordinator. Alternatively, this issue could be solved by meaningful capacity-building within Roma NGOs in order to help make them eligible for more relevant EU funds. Finally, EU funds could be more sensitive to the financial capacities and resources of Roma NGOs.

### 1.3. System of policy consultation with civil society and stakeholders

The process of consultation with Roma regarding policies is not defined in this NRSF. Roma were expected to participate in the process of drafting the NRSF and AP-NRSF. When new policies are in place that are Roma-targeted, then this is partially the result of Roma advocacy representing the needs of Roma communities. Also, in these cases, Roma were consulted. However, there are also examples when even in such cases, Roma resisted participating.

An example of this may be seen in a new activity whereby the MSE (Ministry of Science and Education) finances the transportation of Roma children from segregated settlements to educational institutions to avoid segregation in education. However, for example, in the city of Slavonski Brod, local Roma oppose the idea that their children should be transferred by bus to educational institutions that are more distant than the educational institutions where Roma children are educated at the moment. The new measure was the product of advocacy of many stakeholders like UNICEF, the Roma Education Fund, Kali Sara and others. But the lack of general education and participation in the civil sector combined with other, regionally specific factors are causing resistance among Roma to measures which are in general good ones. When each change happens, time is needed for people, including Roma, to accept this. The same problem occurred with kindergartens and preschool education. The option to use a Roma curriculum in schools is also a product of long-term advocacy, but only Roma children in one school are using this opportunity.

Other documents like the 'Constitutional Act of Minorities' ensure quite significant forms of political participation for all national minorities. Therefore, we should expect that Roma would be consulted with regard to any policies which could influence them. But many policies are not reviewed by the elected Roma representatives, and their reaction is delayed until after the policies have already negatively impacted them. There are also examples where Roma's reactions and advocacy efforts have been accepted, and policies and laws have been changed. Roma representatives were elected in political processes, but many of them are also part of the RCS through their leadership and membership in Roma associations. When addressing this topic, we must be aware that there are more than 200 Roma associations, and not more than 12 are active, and many of them are part of Kali Sara, which is not part of the NGO sector. We therefore claim that in Croatia it is very hard to distinguish RCS and its members from Roma politicians.

### 1.4. Empowerment of Roma communities at the local level

The NRCP sees the empowerment of the Roma community occurring on the local level through sub-granting and work (meetings, workshops, and training) with Roma at the local and regional levels. These should lead to the empowerment of local communities and the RCS and Roma individuals. These activities have been implemented for a long time through different projects, but there is still a lack of capacity in RCS, especially in terms of active Roma associations and educated individuals working as professionals. Empowering the Roma on the local level will lead to the empowerment of Roma in general, but for this, we need a continuous process of education and reliable channels for financing Roma NGOs. Apart from the capacity building of RCS, other acts and policies ensure the participation of Roma. Nevertheless, in Croatia, there are not enough empowered, interested and educated Roma to take up the positions reserved for them. Roma did not

fill all the places meant for them in the working group for developing the NRSF and AP-NRSF, many Roma associations hire non-Roma persons for professional places, and in some places, Roma representatives on the local level were not elected because nobody from the Roma community ran for the positions. The interviewee from Međimurje County also said that the needs of Roma are not the same in every locality, and she cannot see how one action plan can cover the different and specific needs of the localities. The RCM coalition has the opinion that the local and regional action plan needed to be an obligation instead of a recommendation and that obligations should be enforced for all localities where a bigger number of Roma live. Through local action plans, specific goals based on specific needs should be defined and supported with financial means to activate and empower the community.

### 1.5. Capacity-building of Roma civil society

The NRSF foresees educating and preparing Roma associations to apply for different kinds of open calls for financing their activities in different areas, such as sports. The NRSF also includes the possibility of partnerships with the civil sector in some activities implemented by them or other institutional bodies. The NRSF foresees three activities where they plan to partner with organisations from the civil sector to implement activities. In addition to this, they propose Kali Sara as a partner in one activity and RYO CRO in two activities. For some activities they have proposed partnerships, but the partners are not named, so there is a possibility that the NGO sector may be more included in the implementation of the activities. NRCP also has access to the budget managed by the Committee for monitoring the implementation of NRSF. The budget is disbursed to applicants who apply for funds based on criteria defined by the same Committee. Based on the criteria, organisations and institutions can apply for financial aid for the preparation of projects financed from EU funds in which the target group are Roma and projects that have the goal of improving the environment in Roma settlements. Financial aid is also provided for events on a national level, for education at all levels, including adult education, and for ensuring Roma rights.

In general, the NRSF proposes different kinds of help for building civil society, but in practice, we are concerned about whether this will work. Many of the calls that target Roma associations involve small-scale grants, and most of the time, the same associations apply for and receive these funds. In Croatia, there are relatively few calls which target Roma associations only, and these are small. In art and culture, for example, the maximum is 7,000 HRK (approx. 910 EUR). The Council of National Minorities provides funds for which Roma associations can apply. However, Roma associations have not been successful in competing for these funds against other civil society associations that have more capacity. In order to ensure that some Roma associations obtain these funds, there is now an informal practice that a portion of such funds is reserved for Roma associations only. Local governments provide small amounts of financial help to Roma associations, especially for Roma events like World Roma Day or similar events. A very big portion of these funds goes to Kali Sara or associations that are members of Kali Sara.

In Croatia, all umbrella minority associations are part of the civil sector and are seen as non-governmental organisations. In this sense, Kali Sara is formally part of the civil sector as it is an association. However, other Roma and non-Roma NGOs consider the position of all umbrella minority associations problematic because all of them are related to politics (they are connected with members of parliament who represent minorities), thus Kali Sara is in a privileged position compared to other NGOs. In this way, Kali Sara is related to the member of parliament representing the Roma minority, who, despite not being an official representative of the NGO, is the person 'in the background' who actually manages the organisation. Additionally, this umbrella organisation is heavily financed by the government (according to the 2021 financial report of Kali Sara, of a total income of 7,530,525 HRK (approximately one million EUR) support from the state budget amounted to 6,356,801 HRK (approximately 900,000 EUR)). The RCS is very weak, and it needs

basic training on how to work in civil society and institutional support, such as Kali Sara has from the Croatian government due to their political relations. The NRCP is aware of this and the NRSF is calling for more predictable financing of the RCS, but the AP-NRSF does not include sufficient activities to achieve goals related to capacity building. We think this NRSF is giving more opportunities to Roma associations than the last NRIS, but without a good plan that will ensure the institutional financial support and targeted capacity building of different associations in the NGO sector, we cannot expect to achieve a stable and efficient Roma NGO sector in Croatia. The authors of these reports RYO, RYO CRO, RRC and Marina Horvat, have all had adverse personal experiences working in the civil sector. Many young Roma enter the RCS, but only a few stay long enough to learn the basics of working in associations and even fewer learn how to write and implement the projects. Because of insecure salaries and political implications, young and educated Roma rapidly leave and find jobs in other sectors. Some of them occasionally work in the civil sector when they have the financial incentive to do so, but this kind of practice does not create Roma professionals in the civil sector. In order to have a strong RCS that can compete for the available funds, especially institutional support, and one which is also independent of the government, we need to ensure the provision of long-term education that specifically targets young Roma and Roma who are part of the RCS and ensure the financial means for such an association. One of the good ways of doing this would be offering paid internships to young Roma in the civil sector.

## 2. RELEVANCE

### 2.1. Fighting antigypsyism and discrimination

The Roma in Croatia are one of the groups most discriminated against. The research about baseline data on Roma for efficient implementation of the NRSI ('Inclusion of Roma in Croatian Society: Baseline data research') has shown that among the Roma a feeling of discrimination is significant (23% of Roma reported a feeling of being discriminated against in the year before the research took place).<sup>19</sup> Research from 2016 undertaken by the FRA (Fundamental right agency of the European Union) came up with an even higher number (37% of Roma reported a feeling of being discriminated against in the last year before the research). Research among the majority population by the Ombudswoman's office in 2016 showed that 48% support the statement that Roma live from social benefits and do not want to work, while 27% said that Roma employed in the service sector would lead to a decrease in clients.<sup>20</sup> In the last two months only, we have witnessed several cases of open discrimination against Roma. A nightclub in Međimurje County openly stated on social media that Roma were not allowed to enter. Shortly after, the promotor for one concert also used social media to share the information that tickets for a concert would not be sold to Roma.<sup>21</sup> The President of Croatia claimed that Roma are connected to the garbage business. There was a lot of media attention to this as the Roma MP reacted, and they started to address these claims through the media.<sup>22</sup> The feeling of discrimination among Roma is often related to employment, but we need to be aware that many Roma do not recognise discrimination when they are faced with such practices. We see segregation as one of the products of antigypsyism, and residential and educational segregation as one of the biggest obstacles to the inclusion of Roma into society. Research of baseline data on Roma has also shown that discrimination is not the same in each region and that most discrimination occurs in northern Croatia. Two significant outcomes of this research are that 16.9% of the respondents were victims of hate crimes, and 18.9% had been discriminated against by the police.

The NRSF foresees the following measures for fighting antigypsyism and discrimination:

- Reducing the number of Roma who experience discrimination and hate crime.
- Encouraging integrative processes and strengthening social cohesion between the Roma and the majority population.

In this area, the Ombudsperson Office and the CMS (Center for Peace Studies) state that the baseline data is sufficient and the measures are defined correctly, but the activities specified in the AP-NRSF are insufficient. The Ombudswoman's Office participated in the drafting of the NRSF for the first time and said that they could see improvement in the processes of drafting the NRSF. The Ombudswomen's Office also stated that they see the current activities expressing what is already ensured in mainstream policies and laws.

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<sup>19</sup> Data available at (Page 129): <https://ukljucivanje-roma.com/assets/other/Ukljucivanje%20Roma%20u%20hrvatsko%20drustvo-identitet,%20socijalna%20distanca%20i%20iskustvo%20diskriminacije.pdf>;

<sup>20</sup> Specific data from different pieces of research is available at NRSF, discrimination chapter, page 39: <https://pravamanijina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%20C4%8Divanje%20Roma%202021-2027.pdf>

<sup>21</sup> For these two examples, we cannot provide links as the people published this content in a Facebook story, which was deleted after 24 hours. But one of the authors of this report, Marina Horvat, took a screenshot and made a case out of it, which is being implemented by the IPC (Informative legal centre). During the interview with the Ombudswomen's Office, they also said that they are working on those two cases.

<sup>22</sup> The topic was in the media all the time for a while; one of the articles is available at: <https://net.hr/danas/hrvatska/milanovic-o-mjerama-stednje-ako-cete-staviti-klimu-na-25-onda-je-radije-prodajte-romima-1d84ca84-0e67-11ed-9248-0a6cae356b10>

Alongside these policies, a more Roma-targeted approach would have been needed to address Roma communities properly. Also, the Office called attention to the fact that in cases of discrimination against Roma, not only should victims be addressed, but also the perpetrators who come from mainstream society. It is pivotal to note that not only the Ombudswomen's Office shares this standpoint but also the CMS. CMS also took part in the process of the creation of NRSF and AP-NRSF, but their proposals for activities for fighting antigypsyism and discrimination were not accepted. Most of the proposed activities targeted the majority population. Some proposed activities of the CMS which did not enter the NRSF were:

- Informing and raising awareness of employers, social workers, health workers, education workers, landlords and providers of goods and services in communities where Roma live about the harm of discrimination and its prohibition.
- Informing and raising awareness of the majority population about the legal provisions concerning hate crime.
- Implementation of local campaigns and awareness-raising activities in communities where or near which Roma live.
- Campaigns aimed at employers who operate in areas where Roma live.
- Increasing the availability and quality of social care by increasing the human capacity of the Centres for Social Care responsible for areas where Roma live.

The CMS provided more than 20 activities for this area.

## 2.2. Education

Education is the area where we have seen the most significant progress regarding Roma in Croatia. Comparing the last NRIS with the NRSF, most of the measures and goals are the same, but the big difference is that there are now starting values and targeted values to be achieved. The new NRSF recognises segregation and defines measures to decrease it, although we consider that the measures in these areas should be more structured and concrete. The main problem in education is still segregated education, the gap in educational outcomes between Roma and their non-Roma peers, and the fact that only 31% of Roma aged between 15 and 18 are part of the educational system.<sup>23</sup> Under the area of education, we can find five main measures in the NRSF, as follows:

- Reducing the share of Roma of children attending compulsory preschool programs/primary school education in groups/classes in which most or all of the children are Roma
- Reducing the participation gap in preschool education between Roma and non-Roma children
- Reducing the gap between Roma and non-Roma youngsters in the completion of secondary education
- Increasing the share of young Roma in higher education
- Increasing the share of Roma adults in programs for training and development

One of the most critical areas in education is educational segregation, which is closely related to residential segregation. This connection is clearly explained in the publication 'Inclusion of Roma in Croatian Society – Employment and Education'.<sup>24</sup> One of the activities

<sup>23</sup> NRSF, section: Education, page 28: <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%C4%8Divanje%20Roma%202021-2027.pdf>

<sup>24</sup> Inclusion of Roma in Croatian Society – Education and Employment, Dunja Potočnik, Darja Maslić Seršić, Nenad Karajić, page 179 available at: [https://pravamanjina.gov.hr/UserDocsImages//arhiva//Ukljucivanje%20Roma%20u%20hrvatsko%20drustvo\\_obrazovanje%20i%20zaposljavanje.pdf](https://pravamanjina.gov.hr/UserDocsImages//arhiva//Ukljucivanje%20Roma%20u%20hrvatsko%20drustvo_obrazovanje%20i%20zaposljavanje.pdf)

is the transportation of Roma children to different schools or kindergartens from segregated institutions. This is new and the result of long-term advocacy. The new NRSF foresees financial means for the transportation of Roma children. Another measure is free-of-charge kindergartens, which initiative has been functioning for a longer period. However, we can already see that in some areas, Roma do not want their children to be driven to another educational institution, such as in the case of the City of Slavonski Brod, mentioned above. This could represent an opportunity for a special call for the Roma association to work with the Roma community, especially Roma parents, to raise awareness of integrated education's benefits. Financing transportation is a good direction, however, additional activities are needed to further develop the educational outcomes of Roma. In conversation with Roma students and the Roma civil sector, we managed to define one problem that has not been tackled by the NRSF. Many Roma are educated within special programs that are regulated by the respective Ministry in terms of the number of children allowed to be placed in the same classroom. In the case of Roma in special programs in segregated classrooms, this limitation is not respected, meaning that there are more students in one classroom than allowed by the policy. An additional challenge is that students completing specific programs have no other career pathways. This implies that these students have no opportunity to continue their studies, i.e. in gymnasiums (higher-education institutes). From the parental perspective, non-Roma parents prefer not to have their children placed in the same classroom as Roma. This is not only due to discrimination against Roma but also to the fact that non-Roma parents are aware that in Roma classrooms, the quality of education is significantly lower. The RCS thinks that these problems are connected, but the relevant research was not done, and this problem remains undetected and not targeted by the NRSF.

### 2.3. Employment

The area of the employment of Roma is described in the new NRSF as one of the areas where improvements have been made, especially in some regional areas in Croatia. In the previous RCMR ('Roma Civil Monitoring Report'), those improvements were explained as a result of the lack of workforce in the labour market caused by the emigration of the population from Croatia. The main problem regarding the employment of Roma was and still is a low level of education connected to poverty, social distance, and segregation.<sup>25</sup> We also need to underline that most Roma who experience discrimination experience it in the area of employment.<sup>26</sup> Under employment, we find three main measures defined by the new NRSF:

- Reducing the employment gap between Roma and non-Roma
- Reducing the gender gap in employment
- Reducing the gap between the Roma NEET population and the NEET population within the general youth population

The data presented in the new NRSF show that 41% of Roma of working age have never been employed. For Roma women, the percentage is highest at 58%; for Roma men, the

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<sup>25</sup> Inclusion of Roma in Croatian Society – Education and Employment, Dunja Potočnik, Darja Maslić Seršić, Nenad Karajić, page 20 available at: <https://pravamanjina.gov.hr/UserDocsImages//arhiva//Ukljucivanje%20Roma%20u%20hrvatsko%20drustvo-obrazovanje%20i%20zaposljavanje.pdf>

<sup>26</sup> Inclusion of Roma in Croatia Society – Identities, social distance and experience of discrimination; Nikola Rašić, Danijela Lucić, Branka Galić, Nenad Karajić, page 153, available at: <https://ukljucivanje-roma.com/assets/other/Ukljucivanje%20Roma%20u%20hrvatsko%20drustvo-identitet,%20socijalna%20distanca%20i%20iskustvo%20diskriminacije.pdf>



percentage is 25%.<sup>27</sup> When we compare the activities of the previous NRIS and the new NRSF, we can see that the measures are almost the same. The bigger difference we can see is in the activity of the implementation of the project JUPI ZA which targets young Roma from the NEET group. We identify no activity for measure two, which addresses the gender difference in (un)employment.

## 2.4. Healthcare

Healthcare is the least attended area when it comes to Roma inclusion policies, and this trend is also reflected in the NRSF and AP-NRSF. The research shows that the life expectancy of Roma in Croatia is up to 20 years less than the average life expectancy in Croatia.<sup>28</sup> Segregated data for Roma in this area is not collected. During the focus groups, we intended to identify the reason for these challenges. There are sporadic examples, such as that some Roma do not have health insurance and face discrimination in healthcare, etc. Most recent research, however, shows that poverty, segregation (living conditions), and education are causing these problems.<sup>29</sup> There are several other factors that are connected to the problematic health conditions of Roma communities. For instance, improper housing conditions, lack of access to basic utilities, lack of garbage transportation from settlements, unsatisfactory nutrition habits resulting from poverty, and a lack of education about health and its importance. Only one activity (preparation for the systematic tracking of Roma health) is foreseen in the area of health by AP-NRSF and which is carried out by the NRCP with EU Funds JUP ZDRAV. In these two years, predictions were that the latter would just prepare this project and partner with COPH (the Croatian Office for Public Health). Through this project, they will research the fight against discrimination in the area of health and raise awareness of the Roma community regarding prevention. The RCM coalition considers that only one activity for addressing Roma healthcare will not be adequate and that the new AP-NRSF needs to include intersectoral cooperation with additional activities. These should be preceded by research to gather information about the needs and situation in this area.

## 2.5. Housing, essential services, and environmental justice

In the area of housing, the three most important problems are poor infrastructure, access to utilities and segregation. The NRSF highlights that around 30% of houses inhabited by Roma are not safe to live in. They are primarily located in Roma settlements, where most houses are built illegally. Roma families often do not have enough space to live as houses are too small for big families. The difference from region to region is enormous. For example, in northern Croatia, more than 38% of Roma settlements do not have access to piped water, while in other regions, access to water is not a problem at all.<sup>30</sup> In some settlements, garbage transportation, lack of infrastructure, and local amenities are a

<sup>27</sup> Data available at (from page 121):

<https://pravamanjina.gov.hr/UserDocsImages/dokumenti/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%A1tvo%20-%20istra%C5%BEivanje%20baznih%20podataka.pdf>

<sup>28</sup> Inclusion of Roma in Croatian Society – Health protection and Social Care; Goran Milas and Irena Martinović Klarić, page 42-43, available at:

<https://pravamanjina.gov.hr/UserDocsImages/arhiva/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%A1tvo%20-%20zdravstvena%20za%C5%A1tita%20i%20socijalna%20skrb.pdf>

<sup>29</sup> Inclusion of Roma in Croatian Society – Health protection and Social Care; Goran Milas and Irena Martinović Klarić, available at:

<https://pravamanjina.gov.hr/UserDocsImages/arhiva/Uklju%C4%8Divanje%20Roma%20u%20hrvatsko%20dru%C5%A1tvo%20-%20zdravstvena%20za%C5%A1tita%20i%20socijalna%20skrb.pdf>

<sup>30</sup> NRSF, page 30, available at: <https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Nacionalni%20plan%20za%20uklju%C4%8Divanje%20Roma%202021-2027.pdf><sup>31</sup> Inclusion of Roma in Croatia Society – Identities, social distance and experience of discrimination; Nikola Rašić, Danijela Lucić, Branka Galić, Nenad Karajić, available at: <https://ukljucivanje-roma.com/assets/other/Ukljucivanje%20Roma%20u%20hrvatsko%20društvo-identitet,%20socijalna%20odistanca%20i%20iskustvo%20diskriminacije.pdf>

problem. The standard of living measured in terms of household equipment shows that many Roma live in poverty. The NRSF recognises all of these aspects, but from our perspective, it does not solve the biggest problem: segregation. Many of the challenges listed above would be resolved if Roma lived in an integrated environment with quality services and developed infrastructure. The issue of infrastructure, access to water supply, and local amenities would all be resolved, but this is a long-term process that is not on the government's agenda. The AP-NRSF recommends four measures in this area, and only two of them are ongoing. The first one is providing financial help for Roma and the second household equipment. Both of these measures are focused on combating poverty. However, the distribution of funds does not take into consideration differences in social status among Roma families, so all families receive this aid regardless of their actual level of poverty. Regarding the practice, we witnessed that help for equipping households was received by wealthy Roma. This kind of distribution can create resentment and even increase discrimination towards Roma as many non-Roma observe this kind of practice and see it as evidence that Roma are supported in extra ways and have greater rights in Croatia than poor non-Roma.

Many Roma settlements have undergone a process of legalisation, including the construction of community centres and playgrounds. While these activities are well received among Roma, many would rather live in a mixed settlement than a well-built, segregated one. However, the government and Roma politicians privilege policies that keep Roma in settlements and provide them with a better environment within those settlements rather than aiming for desegregation. In our opinion, segregation has not been addressed by the ruling party because it is conducive to politicians exacting votes from Roma communities in exchange for the provisioning of different goods and services. Therefore, there is little motivation for those in power to address segregation. Roma should have better housing conditions, a better environment, and a social context but implementing these measures without a plan for desegregation conflicts with the goals of Roma inclusion.

## 2.6. Social protection

Social protection for Roma is the same as for the non-Roma; the law applies to everybody in the same way. The problem can be found in the education of Roma as, in some cases, they have trouble understanding the processes for obtaining entitlement to financial support. Social workers sometimes do not want or do not have the time to explain what social benefits users can get, but such matters are often resolved through a variety of informal arrangements that vary from locality to locality.<sup>31</sup> Social workers are obliged to attend seminars organised by the Ombudswomen's Office as part of regular activity aimed at combating discrimination.

The NRSF does not have any provisions regarding social protection, but within the area of housing, there are measures aimed at improving the living conditions of Roma. For example, NRCP provides additional money for Roma under specific conditions, as well as the opportunity to obtain household appliances, equipment, and furniture. In this sense, Roma in a weak financial situation have more opportunities to access support than poor non-Roma.

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<sup>31</sup> Inclusion of Roma in Croatia Society – Identities, social distance and experience of discrimination; Nikola Rašić, Danijela Lucić, Branka Galić, Nenad Karajić, available at: <https://ukljucivanje-roma.com/assets/other/Ukljucivanje%20Roma%20u%20hrvatsko%20društvo-identitet,%20socijalna%20distanca%20i%20iskustvo%20diskriminacije.pdf>

## 2.7. Social services

Social services are not explicitly covered by the NRSF. However, social workers are often very involved in the lives of Roma families. Social workers see the main problem as that their labour is not well distributed, as responsibility is divided by geographical area, which means that one social worker who covers an area with a Roma settlement has too many clients.<sup>32</sup> Therefore, social workers cannot allocate enough time to each family. Internal regulation needs to be changed to resolve this situation. The relationship between Roma and social workers varies from case to case. There is no space for any generalisations about the behaviour and work of social workers responsible for Roma families. Various scenarios could be presented regarding the relationship between social workers and Roma families; however, those are all individual cases. Addressing the whole area of social services and social protection is in the interest of Roma, but at the same time, all the challenges recognised in this area are subject to mainstream legislation. Therefore, we can see that work in this area is ongoing, but outside of the NRSF. In many cases, Roma are participating in this process and social workers are participating in different workshops, training events, and other processes focussed on Roma.

## 2.8. Child protection

Child protection is also not specially covered by NRSF. In this area, we also have problems with access to information when it comes to children; data on nationality is protected, along with all other data, and we do not have segregated data related to children in state care or adoption about any of these cases officially, but the number of Roma children in the social care system is based on assessment. The report 'Roma Inclusion in Croatian Society – women, young and children',<sup>33</sup> contains data on where Roma children are taken after they are removed from their families or how many Roma are familiar with cases when children were taken away from their families. Data on the latter are not official, and our research showed that a significant number of Roma are in foster care with Roma foster care families, which is not the position of the publication mentioned above. Based on information gathered in different workshops with social workers by the RCM Coordinator, Roma children seem to be overrepresented in institutional care. According to state policy, children cannot be taken away from their families for economic reasons. In other words, families in poverty are protected from losing their children exclusively because of their economic situation. On the other hand, young Roma realise how various circumstances can influence the lifepath and health situation of children.<sup>34</sup> Some young Roma claimed that in some cases it is justified that children are taken to state institutions.<sup>35</sup> However, choosing between a toxic environment and state care is a big dilemma since state care is very problematic. Roma from the settlements often fight for children not to be removed from their families. In the last RCM report, we also wrote about the Roma children who are adopted by non-Roma parents and their challenges, but this is not part of the NRSF. In relation to the topic of protecting children from domestic violence or child marriage, this area is not well-researched, and we face a lack of information. Even the Roma from the civil sector do not work on this theme very often, as many of these things are connected with Roma behaviour and are part of Roma traditions. The only thing that we can see is

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<sup>32</sup> Information gathered by the coordinator of RCM through different workshops which were attended by social workers.

The coordinator of this report has also gathered information from previous meetings with social workers at different workshops, and the statements have also been confirmed by the members of RCS who were interviewed.

<sup>33</sup> Available at: <https://www.bib.irb.hr/1096460>

<sup>34</sup> Data collected in focus group with young Roma and through interviews.

<sup>35</sup> Data collected in focus group with young Roma and through interviews.

that a large number of Roma families are fostering children, and this number is continuously rising.

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

Regarding this section, the RCM coalition shares a rather positive opinion. One Roma MP and Kali Sara have managed to promote historically important dates for the Roma such as April 8, August 02, and November 05. The initiative of promoting and remembering these dates is supported by the local, regional, and national governments. A Roma memorial centre has been built in Uštica, and the Roma cemetery has been improved aesthetically. Kali Sara opened the first Roma library and opened a Roma radio. All of these activities are part of OMP and were financed by the government through different channels. Even the smaller organisations had some breakthroughs in this sector; for example, RRC is the main actor when it comes to Roma dances and very often participates in main events in Croatia and outside the borders of Croatia. There are still specific challenges in terms of financing these activities.

RYO CRO has made quite a significant contribution in this sector as they have won different competitions with their RoUm program. All financial inputs to this program are won through mainstream public tenders, and they won the National Geographic prize 'Yellow Frame' in the category of reducing inequality. However, the problem in this area is the lack of channels for financing the development of art and culture. A Roma curriculum for national schools has been developed, but few Roma have made use of it or requested this curriculum be taught to their children. As far as we know, only one school has implemented a Roma curriculum. The mainstream curriculum should include more topics related to Roma in Croatia, as many are not aware of the influence of Roma within Croatian society.

The NRSF and AP-NRSF address the promotion of Roma arts, culture, and history in line with the measures of the horizontal objective of combating anti-Roma racism and discrimination. Some NRSF activities aim to raise awareness of Roma culture, language, and history, including remembrance of the Roma victims of the Holocaust and reconciliation procedures, including the provision of appropriate teacher training and the development of an appropriate school curriculum. Such awareness is key to reducing prejudice and anti-Romani sentiment, which are important causes of discrimination. The AP-NRSF focuses on supplying the financial means for Roma-only associations and Roma cultural and artistic societies. The funds can be used for theatre, the procurement of costumes, and the repair or purchase of instruments, among other things. This fund is managed by the NRCP, and the financial capacity of the fund is 60,000 HRK (approximately 8,000 EUR), which is little considering that this activity aims at reducing discrimination.

Another set of activities that target Roma culture and history can be found under the horizontal goal of encouraging Roma participation through strengthening, cooperation, and empowering Roma in public institutions:

- Funding programs dedicated to original Roma culture, language, traditional customs and artistic creativity and collecting and publishing Roma historical, literary and cultural materials (in languages used by Roma in the Republic of Croatia and in the Croatian language) and the program for creating positive believes for the realisation of the cultural autonomy of national minorities. This is financially supported by Council for National Minorities.

### 3. EXPECTED EFFECTIVENESS

#### 3.1. Coherence with related domestic and European policies

The 'Operational Minority Program' (OMP) overlaps with the NRSF. During the creation of the NRSF, the intention was to copy all activities from this document to the NRSF. The OMP document is pivotal since it obliges the government to develop and implement the NRSF and improve the Committee's work of monitoring the implementation of the NRSF. The OMP also contains various measures and targets based on which the NRSF was developed.

The NRSF is very well built and run by the professional team under the RCP. It is in line with all domestic and European policies and strategies. Through our desk research, we could not identify anything that conflicts with other policies.

All domestic barriers that prevented investment into improving Roma settlements have been resolved. For example, the ownership of land has moved from state to region so that contributions from the local or regional government could be made. However, government-led investments into Roma settlements focus on segregated areas that keep Roma isolated from the mainstream. While improving the living conditions of Roma people should prevail as a priority, we could not identify any provisions on the European level that would prevent governments from investing in segregated Roma settlements only.

The objectives of the 'National Plan for Roma Inclusion 2021 – 2027' contribute to the achievement of two developmental directions of the 'National Development Strategy of the Republic of Croatia' until 2030: 1. Sustainable economy and society; 2. Strengthening resilience to crises. Since the implementation period, most of the national strategic planning documents whose objectives are directly and/or indirectly related to the objectives of the 'National Plan for Roma Inclusion' expired in 2020, and attention was given to its harmonisation with the 'Operational Programs of National Minorities for 2021-2024' and the 'National Anti-Discrimination Plan for 2017-2022'. Harmonisation with the objectives of documents under preparation, such as the 'National Plan for the Protection and Promotion of Human Rights and Anti-Discrimination for the 2021-2027 period' or the 'National Plan for Combating Poverty and Social Exclusion for the 2021 to 2027 period' or the 'National Plan for Gender Equality for the 2021 to 2027 period' was based on the relevant EU documents and relies on the assumption that the national documents will largely be in line with the 'EU Anti-Racism Action Plan 2020-2025', the 'EU Gender Equality Strategy 2020-2025', and certainly the 'European Pillar of Social Rights'.

#### 3.2. Responsibility for NRSF coordination and monitoring

The coordination of the NRSF and the AP-NRSF is done by the NRCP. The NRCP sends the reports to the Commission. The NRCP gathers all the information from the ministries and institutions as well as maintains contact with the civil sector to target problems with implementation. In many cases, the NRCP is included in resolving such problems, but it does not have power over the ministries and institutions, which frequently have different interests and agendas from that of Roma inclusion. In order to address this lack of intersectoral cooperation between the NRCP and ministries and governmental institutions, the NRCP created an online tool with which all interested stakeholders can be involved with the goal of sharing information and reports. However, some ministries and governmental institutions did not upload their respective parts on a regular basis. The tool was created a few years ago but was not used. The NRCP said that they are expecting this tool to be used from next year.

The lack of intersectoral cooperation is a problem, and one of the goals of the Commission in relation to monitoring the implementation of the NRSF is ensuring the cooperation and sharing of information between stakeholders. The same Commission has the task of monitoring the implementation. If the tool for monitoring the implementation is used

properly, together with the Commission, this would be enough for monitoring. Coordination is a challenge which lies with the NRCP, and we do not see a solution to this. We are of the opinion that the Commission will not be enough, especially if the decision-makers from institutions and ministries are not present in the Commission. Roma members of the Commission are deeply connected with or members of Kali Sara, which we cannot see as a nongovernmental organisation.

### 3.3. Quality of the plan

The NRSF and AP-NRSF were adopted during the Covid crisis in an online format, thus not in the best circumstances. However, the quality of the NRSF is very good. The NRSF recognises most problems. The form and the context are in line with European and domestic recommendations and legislation. All activities that were undertaken prior to the creation of the documents were taken into consideration and impact the quality of the documents. The data were taken from the Research of Baseline data. The NRSF not only underlines the problems but also provides data that represent starting points. We, the authors of this report, as well as several interviewees, consider that the goals are very ambitiously defined. Deadlines are clearly seen throughout the NRSF and AP-NRSF. When it comes to the AP-NRSF, we note that many measures do not have associated activities. The NRCP sees the reason for this in the timeline of the creation of the document: all of the ministries and government institutions had finalised their budgets for 2022. Whether or not this will be the same with the action plan for the next period remains to be seen. The AP-NRSF provides information on funding for each activity. Many in Roma civil society think that this new NRSF will not change anything on the local level and that it is not so important. But we need to be aware that RCS is weak and that only a few individuals understand the processes, and that one of them did read the NRSF and AP-NRSF.

### 3.4. Funding

Every activity is associated with funding in the AP-NRSF. The main problem is that when it was created, the ministry's budget was already finalised, and funding could not be ensured. The current budget of the NRSF is larger than the budget for the previous national strategy. However, it does not have its own budget; rather, the allocated funds are derived from various sources as follows. One of the innovations is that this NRSF contains EU funds from ESF in the area of employment and health and two horizontal areas, antidiscrimination and poverty. From the previous RCM reports, it is known that the Ministry of Education and the Croatian employment office have a special budget for Roma, and this practice will remain the same. Some funding is ensured based on the Croatian Operative Program for national minorities 2021-2024<sup>36</sup> and the budget from the OMP. The budget of the NRCP comes from domestic and European funds.

### 3.5. Monitoring and evaluation

The NRCP will report to the Coordination Body for the Strategic Planning and Development Management System of the Republic of Croatia on the implementation on an annual basis and through the 'Report on the Implementation of Operational Documents of the NRSF' ('Action Plan for the Implementation of the National Plan for Roma Inclusion 2021-2022'; 'Action Plan for the Implementation of the National Plan for Roma Inclusion 2023-2025'; 'Action Plan for the Implementation of the National Plan for Roma Inclusion 2026-2027').

In 2021, an internal ex-ante evaluation was conducted (by officials functionally independent of the officials who participated in the development of the NRSF). The process

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<sup>36</sup> Operative program for national minority 2021-2021 available at:  
<https://pravamanjina.gov.hr/UserDocsImages/dokumenti/Operativni%20programi%20nacionalnih%20manjina%20za%20razdoblje%202021.-2024..pdf>

was focused on a single document, the 'Third Draft Proposal of the National Plan for Roma Inclusion 2021 – 2027', which was the subject of evaluation

In 2024, the Office plans to replicate the baseline data study. In doing so, the original survey questionnaire for the baseline data study will be minimally adjusted in order to ensure maximum possible comparability with studies that will be used to assess the effectiveness of the new 'EU Equality Framework', to be drawn up by the European Union Agency for Fundamental Rights to assess the effectiveness of the new 'EU Framework for Roma Equality, Inclusion and Participation'.

There is a well-developed timeline related to the evaluation cycles, as presented below. In 2025, a mid-term evaluation at EU level is planned. In 2027, an external evaluation of the 'National Plan for Roma Inclusion' and the accompanying implementation documents is scheduled in order to assess the impact of the implementing measures on the defined areas of intervention. In 2028, an ex-post evaluation is planned.

In addition to the above, the Office for Human Rights and Rights of National Minorities is obliged to submit a report on the implementation of the EU Framework to the European Commission in 2023, 2025, 2027 and 2029, and it is planned that the implementation of the EU Framework will be monitored by civil society organisations in 2022 and 2026, 2028 and 2030.

A committee for monitoring the implementation of NRSF and AP-NRSF has been formed under the RCP.

As mentioned above, the OMP document is pivotal since it obliges the government to develop and implement NRSF and improve the work of the Committee in relation to monitoring the implementation of the NRSF. This also contains various measures and targets based on which the NRSF was developed. For the activity of monitoring and evaluation, 2,000,000 HRK, which is approximately 250,000 EUR, has been allocated.

The RCM coalition has the opinion that the activities foreseen for this sector are excellent; the only concern is that more Roma NGOs should be included in the monitoring and evaluation part, and their quality participation shall be ensured. The NRSF and AP-NRSF are well-aligned in terms of the measurement of impact and monitoring of implementation through indicators, baseline data and outcomes. The NRSF provides information on specific horizontal goals (which we consider overall goals):

- The fight against anti-Roma racism and discrimination
- Reducing poverty and the social exclusion of Roma in order to reduce the socioeconomic gap between the Roma and the majority population
- Encouraging the participation of Roma through empowerment, cooperation and building the trust of Roma in public institutions

The NRSF also provides information about specific goals in the areas of education, employment, housing, and health. Each of the specific goals has outcome indicators, which are well-correlated with the specific goals (results-based management can be seen, which is much better than activity-based management from the perspective of the RCM coalition). The strength of the NRSF is seen in the provision of baseline data for each outcome indicator, which can then be compared to target values by the end of the NRSF in 2027. Some indicators have targeted values to be achieved only by the year 2030 and not 2027, which might be problematic as this could be used as an excuse for not achieving some defined targets by the end of the NRSF. NRSF is also providing information about the measures of each specific goal named in the NRSF. These are again well-correlated with the specific goals and properly measured by outcome indicators. The NRSF provides information on various activities which could be undertaken in order to achieve the measures. The AP-NRSF continues in a good direction and provides information about the activities which are going to be implemented under each measure. The AP-NRSF provides detailed data about each activity: the leaders of the implementation of each activity and partners or potential partners for implementation, the available funding for each activity,

and implementation and effectiveness indicators according to the year of implementation. Those indicators are activity-based indicators which are reasonable as they measure the implementation and effectiveness of activities. Not all activities prescribed by the NRSF are in the AP-NRSF, and not all the measures are covered by activities. This can be justified by the fact that action plans only cover a one or two-year period, and not all the measures should be covered by Action Plans as these are short-term documents. But as we have mentioned in other sections, political will and access to funding will ultimately affect the increase in the number of activities and specific Roma-targeted activities in action plans for the next period. Another problem is that with some measures, only the mainstream approach activities are prescribed by the AP-NRSF, and those activities alone are not likely to help achieve the targets defined by the NRSF.

### 3.6. Assessment of the expected effectiveness and sustainability

The RCM coalition believes the document is well-written and much higher quality than the previous NRIS. The biggest improvement is that it contains clear goals and that it is based on data. However, it is unlikely that the goals will be achieved. Also, there is a lack of active participation of stakeholders who are not from the area of education. Another challenge is the lack of intersectoral cooperation and real political will, which is one of the biggest obstacles to achieving the defined goals. Accordingly, it is not likely that this document will lead to a major breakthrough in Roma inclusion. This is also due to the failure to develop a plan for the desegregation of Roma settlements that influences many other areas. It is concerning that the suggested activities would not bring us to the goals defined in the NRSF in the area of discrimination against Roma. Except for the area of education and housing, this NRSF is more focussed on mainstreaming Roma problems while more targeted activities should be defined, and financing for them should be ensured, as in the case of education. In the process of monitoring and evaluation, more members of the NRCP should be involved who do not have a political background and are not connected with Kali Sara. The NRCP has invested time and will in producing the NRSF, and the document seems to be good, while its implementation will be very challenging, which questions whether the defined goals can be achieved.



## 4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

### 4.1. Reflecting diversity among Roma

The NRSF recognises young Roma, the NEET group and women, but the AP-NRSF does not have special activities for women in some areas. The NRCP stated that this would be changed in the AP-NRSF for the next period. The problem derives from the fact that when the AP-NRSF was approved, the budget from the ministries and governmental institutions had been finalised. As mentioned above, the latter are, among others, the main sources of the budget of the NRSF. Another group which is also recognised by the NRSF is Roma children, but in this case, the AP-NRSF does not target Roma children separately. It seems that Roma children are targeted in different areas, but they are not explicitly mentioned as beneficiaries. For example, free-of-charge kindergarten is one initiative intended to improve the situation of children and their parents, but Roma children are not mentioned as beneficiaries. For other groups, the situation is different; for instance, Roma women are explicitly mentioned as a target group in the area of health. The NRSF does not specifically say that indicators and targets should be identified by gender, but in practice, data is collected according to gender in the area of education and employment, for example. Baseline data for the NRSF were also collected on gender, age, residence, and so on.

### 4.2. Combining mainstream and targeted approaches

The NRSF includes both targeted and mainstream approaches. The RCM coalition, the Ombudswomen's Office, and the RCS in Croatia instead consider the targeted approach for Roma inclusion to be more effective due to the political, policy, and institutional environment. The NRSF should provide additional activities which specifically target Roma, such as in the area of education. The NRSF is mainstreaming the challenges of Roma in many areas by specifying activities which typically address all people in Croatia.

Relying only on a mainstreaming approach to Roma inclusion in general policies and interventions, without dedicated Roma-targeted interventions, is problematic; we consider the former to be inefficient. The latter does not consider the fact that Roma are often in a disadvantaged situation and, in reality, cannot benefit from mainstream measures. With the mainstream approach, the Roma lag behind the majority. The RCM coalition shares the opinion that the best outcomes of Roma inclusion are in the area of education since this is being addressed by a Roma-targeted approach. For example, the Croatian employment office had special activities for Roma. However, in some cases during the implementation of the NRIS, Roma programs were changed to mainstream programs, while there was and still remains a separate additional budget for Roma. The NRSF applies a mainstream and targeted approach, while it is problematic that in some areas only the mainstream approach prevails. For example, research conducted by the Ombudswoman's Office showed that the vast majority of non-Roma people believe that Roma live on social benefits as they do not want to work. However, the fact is that most Roma face difficulty finding jobs. The mainstreaming approach is that Roma are included in employment measures, but without considering the specific challenges Roma face, such as a lack of education, discrimination, poor living conditions, etc.

### 4.3. Usage of instruments introduced by the Council Recommendation

The NRSF is generally in alignment with the European Council recommendations. The RCM coalition would underline the problem of residential segregation, which is not addressed by the AP-NRSF and is just recognised by the NRSF. Having this fact in mind, we do not see how all Roma children can have the same access to quality education. The residential segregation of Roma is the main reason for segregation in education. The problem is that segregation in education contributes to the poor quality of education in most segregated

classrooms. There are some other minor aspects of the Council recommendations which are not taken into consideration by the NRSF.

The RCM coalition would like to underline one specific issue connected to the Council Recommendation (no. 15) concerning the specific needs or vulnerabilities of certain groups. The NRSF in the 'National Plan for Roma inclusion for the period 2021-2027' mentions LGBTQ+ persons only twice in relation to activities which will be undertaken according to measures in the field of Roma health and the horizontal objective of combating anti-Roma racism and discrimination. However, in the Action Plan (2021-2022) for the implementation of the National Plan, no activities focus on this group. The NRSF does not have any measures for Roma who have not declared they are Roma.

In connection with the Council Recommendation (no. 16), Croatia does not recognise any subgroups; it only recognises Roma in general as a national minority. The Constitution of Croatia recognises Croatia as the land of Croats and twenty-two national minorities. Based on the Constitutional Act on Minorities, rights are given to all minorities regarding language, alphabet, political participation, etc. The title of the NRSF includes "Roma", but in reality, only Roma national minority members are targeted by this policy document. To be part of the Roma national minority and benefit from any Roma-targeted measure, a person must have Croatian citizenship and have declared themselves Roma. If the person is declared to be Egyptian, Ashkali, Bojas, Rudar etc., or is a self-declared Roma but does not have Croatian citizenship, they will not be able to benefit from any measure in the NRSF. People who have lived in Croatia for a long time and who say that they are Roma but do not have Croatian citizenship will not be able to benefit from any measures targeting Roma as they are not considered a part of the Roma national minority. Also, they cannot officially declare themselves Roma as they are not Croatian citizens. Another group who are facing this problem is Roma who have lost their identity; for example, members of Roma groups living around the cities of Delnice and Glina. They do not declare themselves Roma, although society considers them to be. For example, schools in these cities cannot provide any programs for Roma as the latter are not officially members of the Roma national minority. For any call that targets the Roma, the application requires a Croatian identification card or Croatian certificate proving that the applicant is a Croatian citizen and confirmation from the voter list that one is a self-declared Roma. Alternatively, Roma identification can be proven with a birth certificate, where it needs to be written that the holder is Roma (this information is obtained at birth and is provided by parents to officials). The RCM coalition understands the need for Roma to be declared Roma as they are provided with specific rights and have a chance for political participation, but this is not in line with the recommendations of the Council of Europe.

## CONCLUSIONS AND RECOMMENDATIONS

The NRSF is a good quality document that is mainly aligned with domestic and EU policies, laws and recommendations. In the development process, the main stakeholders were invited to participate, however, not all invited stakeholders participated actively. The NRSF is based on baseline data, and the goals are defined clearly but ambitiously. In some areas, the goals only rely on the mainstream approach, and there is a possibility that the goals will not be achieved by 2027. The NRSF recognises residential segregation, while there are no activities which tackle the problem. In some other areas (for example, employment focusing on Roma women), the situation is the same, while in other cases, the reason is the time when the AP-NRSF and NRSF were created. At that time, the budgets from ministries and governmental institutions had been finalised. The funding dedicated to the NRSF is larger than for the previous national strategy as it includes domestic as well as EU funds. The area of education is covered best, and the biggest improvement is expected in this particular area. In the last few years, investments in Roma settlements have been made, and as a result, some developments can be foreseen. There is a lack of intersectoral cooperation between different policy fields. The RCM coalition shares the opinion that some activities in one area will contribute to achievements in other fields as well, but this phenomenon is not recognised by the NRSF.

### *Recommendations to national authorities*

1. Roma-targeted activities should be implemented in each area; at least one, but preferably more activities should be introduced into the AP for the next period.
2. Address the mainstream/targeted approach dilemma
3. The government needs to tackle the residential segregation of Roma, which is not addressed by the AP-NRSF.
4. The NRSF should address the needs of Roma children in the social protection system and in foster families and the needs of families who have adopted Roma children, especially non-Roma families.
5. The MSE should conduct research on the educational outcomes of Roma children who have attended segregated education compared to those of children who attended non-segregated education in order to obtain data on the quality of education in a segregated education environment.
6. To ensure the same attention is paid to Roma as non-Roma families in social care, the distribution of work among social workers should be based on the number of beneficiaries and not on geographical area. The reason for this is that social workers who cover Roma settlements have more beneficiaries than those who do not, which is why the quality of the assistance that is provided is not the same.

### *Recommendations to European institutions*

7. European institutions need to open channels of communication and use pre-existing tools to make the Croatian Government deal with residential segregation and segregation in education.
8. European institutions need to check and understand the difference between Roma as an umbrella term for a variety of ethnic identities and those officially recognised as the Roma national minority in Croatia and decide whether the target group of the NRSF and AP-NRSF (the Roma national minority) needs to be more inclusive.
9. Closer follow-up of the monitoring and evaluation of the implementation of the NRSF

### ***Recommendations to the civil society***

10. Civil society needs to be more active and open channels with the NRCP regarding their needs, such as specific forms of education.
11. Civil society and Kali Sara need to start a negotiation process with the government to define the position of Kali Sara as this organisation is not the same as other associations and should not be considered part of the NGO sector.

### ***Recommendations to other stakeholders***

12. Ministries and governmental institutions need to make more effort and plan more Roma-targeted activities (this comment is not addressed to the MSE) to ensure that the goals defined in the NRSF in areas of health, social protection, employment, etc., will be achieved.
13. Local and regional governments need to make local/regional action plans for the implementation of the NRSF, but prior to drawing up these action plans, they need to focus on the specific challenges of Roma in their localities and regions and action plans should be created (as with the AP-NRSF) based on data, clearly defined goals, and secured funding.

## REFERENCES

### List of interviews

- Interview with a representative of Međimurje County – online – 18.07.2022, the representative was participating in a working group for developing NRSF and AP-NRSF in front of Union of Croatia Counties
- MSE – questionnaire, answers received by e-mail.
- Ombudswomen Office interview – online – 15.07.2022, two representatives
- CMS interview – online – 15.07.2022, one representative
- NRCP interview – online – 19.07.2022, two representatives of RCP (additional questions and answers were sent/received by e-mail).

### Focus groups:

- In person, Međimurje County, Orehovica, 20.04.2022 six young Roma, in the same day another focus group was held with Roma children 8 of them participated in Municipality Mala Subotica.
- In person – Zagreb, 27.04.2022, Roma activists and young Roma 6 participants
- On line 15.07.2022, 3 associations – Bolja Budućnost (City of Rijeka), Romski resursni centar (Municipality Darda), Romorčić (Rijeka) and two Roma activists from Međimurje

### Interviews with representatives of other Roma associations:

- Bolja budućnost – Roma Woman Association (Zagreb)
- Interviews held with Members of Council of Roma National Minorities and Roma activists:
- Member of Council of Roma national minority – City of Vodnjan
- Members of Council of Roma National Minority - City of Slavonski Brod and Brodsko Posavska County
- Members of Councils of Roma National Minority – City of Zagreb
- One Roma activist from Međimurje County
- Perspektiva (City of Zagreb)
- Romski San (City Zagreb)
- Romsko Srce (Municipality Jagodnjak)

*Please have in mind that some interviewed members of RCS are also part of Roma Councils and mainstream Councils, and that with key persons from RCS we had open channels of communication so some people are contacted more than one time by phone or in person.*

### **Key policy documents and reports**

Action Plan for implementation NRSF for period 2021-2022 (AP-NRSF); 2021;  
<https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Akcijски%20plan%20za%20provedbu%20NPUR-a%20za%202021.%20i%202022..pdf>

European Framework for Roma equality, inclusion and participation; October, 2020;  
[https://eur-lex.europa.eu/resource.html?uri=cellar:9a007e7e-08ad-11eb-a511-01aa75ed71a1.0021.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:9a007e7e-08ad-11eb-a511-01aa75ed71a1.0021.02/DOC_1&format=PDF)

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<https://pravamanjina.gov.hr/UserDocsImages/arhiva/Evaluacija%20Nacionalne%20strategije%20za%20ukljucivanje%20Roma%20u%20RH.pdf>

Inclusion of Roma in Croatian Society – Employment and Education; 2020;  
<https://pravamanjina.gov.hr/UserDocsImages//arhiva//Ukljucivanje%20Roma%20u%20hrvatsko%20društvo obrazovanje%20i%20zaposljavanje.pdf>

Inclusion of Roma in Croatian Society – Health Care and Social Care; 2020;  
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## ANNEX: LIST OF PROBLEMS AND CONDITIONS

### *Fighting antigypsyism and discrimination*

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

### *Education*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Lack of available and accessible pre-school education and ECEC services for Roma	minor problems	irrelevant	absent	absent



Lower quality of pre-school education and ECEC services for Roma	significant problems	irrelevant	absent	absent
High drop-out rate before completion of primary education	minor problems	understood with limitations	present but insufficient	absent
Early leaving from secondary education	significant problems	identified and analysed sufficiently	appropriate	relevant targets well defined
Secondary education/vocational training disconnected from labour market needs	irrelevant	irrelevant	present but insufficient	some targets but not relevant
Misplacement of Roma pupils into special education	significant problems	identified and analysed sufficiently	present but insufficient	absent
Education segregation of Roma pupils	critical problems	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	irrelevant	irrelevant	absent	absent
Limited access to second-chance education, adult education, and lifelong learning	significant problems	identified and analysed sufficiently	appropriate	relevant targets well defined
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	minor problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among pupils	minor problems	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their development among adults	minor problems	irrelevant	absent	absent

## Employment

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

## Healthcare

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	minor problems	identified and analysed sufficiently	absent,	absent,
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	irrelevant,	irrelevant,	absent,	absent,

Limited access to emergency care	minor problems	irrelevant	absent,	absent,
Limited access to primary care	irrelevant,	mentioned but not analysed sufficiently	absent,	absent,
Limited access to prenatal and postnatal care	irrelevant,	mentioned but not analysed sufficiently	absent,	absent,
Limited access to health-related information	minor problems,	mentioned but not analysed sufficiently	absent,	absent,
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	irrelevant,	mentioned but not analysed sufficiently,	absent,	absent,
Poor access to sexual/reproductive healthcare and family planning services	irrelevant,	mentioned but not analysed sufficiently,	absent,	absent,
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	irrelevant,	irrelevant,	absent,	absent,
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	irrelevant,	irrelevant,	absent,	absent,
Unrecognised historical injustices, such as forced sterilisation	irrelevant,	irrelevant,	absent,	absent,
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	irrelevant,	irrelevant,	absent,	absent,

### *Housing, essential services, and environmental justice*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Poor physical security of housing (ruined or slum housing)	critical problems	identified and analysed sufficiently	present but insufficient,	adequate but with room for improvement
Lack of access to drinking water	significant problems	identified and analysed sufficiently	present but insufficient	adequate but with room for improvement

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

*Social protection*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
High at-risk-of-poverty rate and material and social deprivation	critical problems	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Income support programmes fail to guarantee an acceptable level of minimum income for every household	critical problems	understood with limitations,	present but insufficient	adequate but with room for improvement,
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	irrelevant,	irrelevant,	absent,	absent,
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	irrelevant,	irrelevant,	absent,	absent,
Low flexibility of income support programmes for addressing changing conditions of the household	irrelevant,	irrelevant,	absent,	absent,
Discrimination by agencies managing income-support programmes	minor problems,	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Risk of municipalities misusing income support to buy votes	significant problems,	irrelevant,	absent,	absent,

*Social services*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Limited quality, capacity and comprehensiveness of help provided by social services	significant problems,	mentioned but not analysed sufficiently,	absent,	absent,
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	minor problems,	irrelevant,	present but insufficient,	absent,

Services providers do not actively reach out to those in need	minor problems,	irrelevant,	present but insufficient,	absent,
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	minor problems,	irrelevant,	present but insufficient,	absent,
Discrimination by social service providers	minor problems,	mentioned but not analysed sufficiently,	present but insufficient,	absent,

### *Child protection*

<b>Problems and conditions</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>
Child protection not considered in the NRSF	minor problems	mentioned but not analysed	absent,	absent,
Specific vulnerability of Romani children as victims of violence not considered	minor problems,	irrelevant,	absent,	absent,
Segregated or discriminatory child-protection services provided to Roma	irrelevant,	irrelevant,	absent,	absent,
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	irrelevant,	irrelevant,	absent,	absent,
Illegal practices of child labour	minor	irrelevant,	absent,	absent,
Large-scale and discriminatory placement of Romani children in early childhood care institutions	minor	irrelevant,	absent,	absent,
Persistence of large-scale institutions rather than family-type arrangements	irrelevant,	irrelevant,	absent,	absent,
Early marriages	significant	understood with limitations,	absent	absent
Barriers to children's registration; statelessness	irrelevant,	irrelevant,	absent,	absent,
Biased treatment of Roma youth by security and law enforcement	minor	mentioned but not analysed sufficiently,	present but insufficient,	adequate but with room for improvement,

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

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

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