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The role of the civil society consultations in the post-2020 EU Roma Framework

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Abstract:

In 2011, the European Union presented the EU Framework for National Roma Integration Strategies up to 2020, the first large-scale EU Roma policy to tackle the integration issues of the most marginalized and vulnerable minority in Europe – the Roma minority. The EU aimed to support its Member States in developing, planning, and implementing strategies for the integration of Roma and to tackle their socio-economic exclusion under the common framework. However, even though adopting this framework was a breakthrough in the efforts of Roma integration in Europe (the EU and civil society have long emphasized the need for better Roma inclusion), it could not achieve significant progress in 10 years, which made the EU realize that more work was necessary, and therefore, the EU ended up creating a new framework, which targets are different from the first one. By examining the adoption of the new EU Roma Strategic Framework on equality, inclusion and participation, the current paper analyses why and how the new EU Roma framework is different from the previous one, what the reasons behind these changes are, and specifically, whether these changes were the result of the consultation process, the European Union established with the concerned civil society. Therefore, it aims to emphasize the role civil society had in bringing about the changes in the new EU Roma framework.

Semi-structured interviews with six representatives of Roma organizations and the Commission were conducted to examine the changes in the new EU Roma framework and the extent to which the Commission considered the civil society consultations. Also, this study takes a bottom-up approach to public policy implementation and Europeanization theory to emphasize the participation of prominent players in influencing EU Roma inclusion policies.

Key Words:

EU, EU Roma Framework, Roma strategy, civil society, antigypsyism, intersectionality, equality, Roma inclusion, Roma integration, participation, empowerment, bottom-up approach

Acronyms and Abbreviations:

CEU – Central European University

CoE – Council of Europe

CoR - European Committee of the Regions

CSOs – Civil Society Organizations

DG - Directorate-General

EC - European Council

EC - European Commission

ECEC - Early childhood education and care

ECRI - European Commission against Racism and Intolerance

EU - European Union

EP - European Parliament

ERGO Network - European Roma Grassroots Organisations Network

ERPC - European Roma Policy Coalition

ERRC – European Roma Rights Centre

FRA – European Union Fundamental Rights Agency

MEPs – Members of the European Parliament

NEET - Not in education, employment or training

NGOs – Non-Governmental Organisations

NRIS - National Roma Integration Strategies

NRCP – National Roma Contact Points

ODIHR - OSCE Office for Democratic Institutions and Human Rights

OECD – Organisation for Economic Co-operation and Development

OHCHR - Office of the United Nations High Commissioner for Human Rights

OSCE - Organization for Security and Co-operation in Europe

OSF – Open Society Foundations

RED - Racial Equality Directive

REF – Roma Education Fund

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Chapter 1: Introduction

Introduction

„...dealing with the past means knowing what happened. [...] We also need to know about the past so that we can renew our resolve and commitment that never again will such violations take place. We need to know about the past in order to establish a culture of respect for human rights. It is only by accounting for the past that we can become accountable for the future“¹

The Roma constitutes the largest ethnic minority in Europe. Despite being the largest ethnic minority in Europe, the Roma are also amongst its most marginalized groups, as many of Europe's estimated 10-12 million Roma live in deplorable socio-economic conditions and continue to face prejudice, intolerance, discrimination, and social exclusion on a daily basis (EC, 2011b, p.2). The EU has seen the need for the social and economic integration of Roma – Europe's largest minority (about 12 million); thus, it has promoted it by creating the EU Framework for National Roma Integration Strategies going up to 2020 (briefly called - EU Framework for NRIS or EU Roma Framework – the first Framework for Roma integration) on April 5, 2011. This first framework strived for the Roma inclusion into EU member states' socio-economic lives so that the Roma would be treated as other EU citizens who have full access to and exercise their human rights (EC, 2011b, p.3).

This initiative from the EU was considered the first serious initiative related to the Roma minority. The EU suggested that the member states develop national Roma integration strategies (NRIS) and set realistic national targets for Roma integration and adapt already existing ones to meet EU Roma integration goals: fighting discrimination, eradicating poverty, and enhancing Roma people's access to mainstream, high-quality, inclusive education, healthcare, housing, and employment (EC, 2018a, p.6). The EU Framework was designed to

¹ Truth and Reconciliation Commission of South Africa Report (1998), Volume 1, Chapter 1, p.7, verse 28. The report was presented to President Nelson Mandela on 29 October.
<https://www.justice.gov.za/trc/report/finalreport/Volume%201.pdf>

offer a new solution for resolving the Roma people's deep social and economic isolation in Europe. To support Member States' efforts, the framework provided a European structure to improve the lives of Roma people (EC, 2011a, p.2).

As a result, this structure sought to supplement and strengthen the EU's equality legislation and policies by addressing the specific needs of Roma in four key areas: jobs, education, housing, and healthcare, at national, regional, and local levels, as well as through consultation with and participation of Roma. For each of the four particular objectives (goals) for Roma integration outlined above, the first EU framework adopted a non-binding approach and provided a list of steps that Member States should do to advance. Thus, the framework constituted a political commitment from the EU Member States but was not a binding legislative document² (EC, 2011a, p.4).

The framework laid down a timeframe for the member states to implement these strategies between 2011 and 2020. However, by 2020, the EU had realized that nine years was not enough to achieve all of the Roma strategy goals; thus, it prolonged the framework and adopted the 2020-2030 EU Roma Strategic Framework for equality, inclusion and participation in October 2020 (EC, 2020a). Therefore, this established a second phase of the EU Roma framework, which now focuses on seven key areas. What makes this present dissertation an original research project is that there has not been full comparison of the first and second frameworks to date, even though the assessments of the first framework by the EU and civil society organisations are available and the second framework objectives are known. Moreover, it is unknown how (to what extent) the EU considered the advice from the Roma civil society when formulating the second Roma strategy and how they responded to their criticism.

So, my main **research questions** are:

² Even though the first framework is not binding document, it builds upon already existing legal protection in the EU, specifically: the Lisbon Treaty, the Racial Equality Directive and the Directive on the right to move and reside freely (EC, 2011a, p.4).

- Did the Roma NGOs and civil society push the EU to make changes in their Roma framework? If so, how?
- To what extent did the EU respond to the criticism from the Roma civil society and organizations, who suggested making changes in the post-2020 strategy?

Therefore, my research aims to shed light on the differences between the two strategies and show how the EU considered the criticism of the Roma civil society about adopting the new Roma strategy. The extent the EU responded to the external criticism will show how determined they were to adopt a better Roma integration strategy. To do so, firstly, I need to show – that the second strategy is different from the first one; another thing – that the EU just did not think itself of the necessity to make changes, that it was caused by the consultations with the civil society and last thing I am going to show what and how the EU considered suggestions from the consultation process with the Roma and pro-Roma civil society.

1.1 A brief overview of the first EU Roma Framework

Before looking at the development process between the two EU Roma frameworks (or strategies) and discussing the civil society engagement into shaping EU Roma framework, it is necessary to provide an overview of these frameworks – what their objectives are, accordingly, and what those frameworks aim to achieve.

First of all, we need to look at the adoption of the first framework. In 2011, after making several proposals for the Member States to promote the Roma's social and economic integration, the EU finally put Roma integration higher on the political agenda by creating the Framework for National Roma Integration Strategies going up to 2020 (the first EU Roma Framework). With this framework, the EU sought to make a notable difference in Roma people's lives. Thus, with this EU Framework, the European Commission encouraged Member States to establish a more comprehensive approach to Roma integration strategy and support the following objectives based on the size of their Roma population (EC, 2011b).

Due to enormous disparities existing between Roma people and the majority of the rest of the population in terms of education, health, employment, and access to quality housing and necessary amenities (EC, 2011a, p.5), the EU Framework for National Roma Integration Strategies up to 2020 set up EU Roma integration goals in those four crucial areas: access to education, employment, healthcare and housing, identified within the Decade of Roma Inclusion³. In particular, these goals are:

1. *Access to education: Ensure that all Roma children complete, as a minimum, primary school education.*
2. *Cut the employment gap between Roma and the rest of the population.*
3. *Reduce the gap in health status between the Roma and the rest of the population.*
4. *Close the gap between the share of Roma with access to housing and public utilities (such as water, electricity, and gas) and that of the rest of the population* (EC, 2011b; EC, 2018a, p.6).

Firstly, it is noteworthy that there are significant gaps between the general population and Roma in terms of employment, education, education and housing situations and healthcare (EC, 2011b). Regarding the goal in education, the Commission has also asked the Member States to ensure that Roma children are not subject to discrimination or segregation in the education field ((as many Roma children are sent to segregated schools by some EU member states (EC, 2011b, p.5)). Furthermore, except for ensuring primary school completion, member states are also requested to widen access for Romani children to quality early childhood education and care (ECEC) and reduce the number of early school leavers from secondary education as well as encourage those children to participate in secondary and tertiary education (EC, 2011b, p.6).

³ EU Framework for National Roma Integration Strategies up to 2020. COM (2011) 173 final. (EC, 2011b). <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0173&from=en>

There are significant gaps in the employment field as well. According to the World Bank and the European Agency for Fundamental Rights (FRA), Roma employment rates are much behind those of the non-Roma majority (particularly for women) (FRA, 2014; World bank, 2012), not to mention the fact that many Roma believe they are severely discriminated against in the workplace (EC, 2011b). The European Commission has recommended that the Member States provide complete, non-discriminatory access to self-employment resources, the job market, and means for vocational training for Roma people. According to the Commission, hiring qualified Roma civil servants in the public sector needs to receive the proper priority. Additionally, the EU side has recommended that Roma individuals receive personalized services and mediation. That could encourage more Roma to enter the labor force and boost the employment rate (EC, 2011b, p.6).

Regarding healthcare, the Commission urges Member States to ensure that Roma people (particularly children and women) have access to quality healthcare and social services as well as preventive care at a similar level as to the rest of the population (EC, 2011b, p.7).

As for housing policy, many Roma still live in inadequate housing with poor access to services, such as water, gas, and electricity, which negatively affects their health and overall social integration⁴. Therefore, Member States are requested to promote nondiscriminatory access to housing, including social housing for Roma people. Furthermore, the Commission also emphasizes the need to address the particular needs of non-sedentary Roma⁵ - the Roma, who are not settled in one place (for instance, Member States need to provide access to adequate halting sites for non-sedentary Roma) (EC, 2011b, p.7).

⁴ They typically result from segregated housing districts, further separating Roma people from the rest of society (EC, 2011a, p.5).

⁵ <https://www.amnesty.org/en/latest/campaigns/2015/04/roma-in-europe-11-things-you-always-wanted-to-know-but-were-afraid-to-ask/>

Aside from the specific instructions offered under each of the four components of the planned strategic support, the European Commission has identified some approaches the Member States should bear in mind. Those approaches are:

- ❖ Identifying economically underprivileged areas, where communities are most in need.
- ❖ Allocation of sufficient funding from national budgets.
- ❖ Promoting robust monitoring methods.
- ❖ Close dialogue and collaboration with local and regional authorities, and Roma civil society in the implementation and monitoring process.
- ❖ Ensuring that each and every Roma are registered with the appropriate authorities.
- ❖ Combating racism and prejudice, including different forms of discrimination against Roma.
- ❖ Increasing public awareness of the common benefits of Roma integration.
- ❖ Appointing national contact points for the national Roma integration strategy to coordinate the development and implementation of the strategy (EC, 2011b, p. 8; Popova, 2019, p.24).

For instance, close cooperation and constant dialogue with local and regional authorities are important according to the Commission, because firstly, we need to consider that Roma inclusion or exclusion occurs precisely at the local level, this is the place where diverse populations interact and where they can regularly develop mutual trust, and because of this, regional and local governments are in a unique position to provide input and valuable insights based on their experiences because they are actively involved in providing services to Roma people (EC, 2011b, p.8). This input can help in the adaptation of strategies to the needs of the Roma people. How? The regional and local authorities should:

- Put national strategies into practice - the action plans of the national strategies are translated into local policies; local and regional authorities develop projects that receive EU funding.

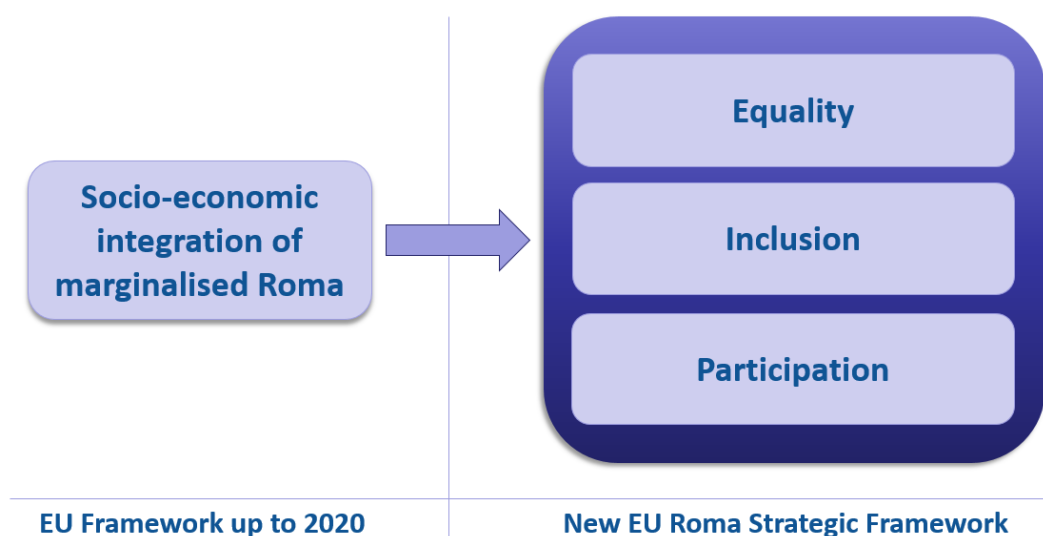
- Monitor the progress of national strategies - provide information to the European Commission on the evolution of the situation of Roma people on the ground.

Therefore, the close participation of local and regional governments at every stage of the process is critical to its ultimate success, noted by the European Commission (EC, 2011b, p.8). Furthermore, national strategies must be linked to Member States' overall social inclusion policies for Roma inclusion to be mainstreamed and not treated as a distinct policy measure (EC, 2011b, p.7).

1.2 A brief overview of the second EU Roma Framework

According to the European Union, while the first EU Roma Framework focused mainly on the **socio-economic integration** of Roma, a reinforced EU Roma strategic framework, issued on 7 October 2020, set out a comprehensive three-pillar approach for the next ten years. This approach includes the **socio-economic inclusion** of marginalized Roma, promoting equality with all other members of society, and participation in political, social, economic, and cultural life (EC, 2021a).

Towards a comprehensive three-pillar approach



6

Through a combination of mainstream and tailored policies, the new strategic framework sets seven objectives and related targets to be achieved by 2030, with a focus on combating antigypsyism (discrimination against Roma) and discrimination and fostering Roma full participation and inclusion (FRA, 2021, p.139). In particular, it has three horizontal and four sectoral policy objectives.

Horizontal objectives:

1. *Fight and prevent antigypsyism and discrimination.*
2. *Reduce poverty and social exclusion.*
3. *Promote participation through empowerment, cooperation, and trust.*

Sectoral policy objectives:

4. *Increase effective equal access to quality inclusive mainstream education.*

⁶ The table is taken from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-equality-inclusion-and-participation-eu_en#:~:text=The%20EU%20Roma%20strategic%20framework%20gives%20a%20stronger%20focus%20to,as%20those%20living%20with%20disabilities (EC, 2021a).

5. Increase effective equal access to quality and sustainable employment.

6. Improve Roma health and effective equal access to quality healthcare and social services.

7. Increase equal access to adequate desegregated housing and essential services (EC, 2020b; FRA, 2020a, p.4-5).

In detail, the new framework intends to halve the number of discriminated Roma while doubling the number of people who report such incidents. It also strives to cut the gap in life expectancy between Roma and the other population by at least a half, as Roma has a 10-year lower life expectancy than the rest of the population. The new framework also aims at fighting with anti-Roma sentiments, reducing the poverty gap by 50% between Romani communities and the average population, providing at least 95% of Roma with access to tap water, halving the number of Roma children attending segregated primary schools, ensuring that by 2030, the majority of Roma youth will have completed at least upper secondary school and that by 2030 at least 60% of Roma will be employed, as well as cutting the gender employment gap by at least half (EC, 2020b). It is noteworthy that, like the previous framework, the new strategy is not a legislative document of the EU; it also represents a non-binding, soft mechanism (EURoma Network, 2021).

Chapter 2: Theoretical Background

2.1 EU public policy learning

In order to better understand what the EU Roma strategies are exactly about, one must first examine EU public policy, its making and implementation. To do so, we must discuss public policy and approaches in relation to it. In this section, public policy approaches (bottom-up approach & stages model) and Europeanization theory will be introduced and elaborated upon, to be justified in their relevance to the topic of EU Roma integration strategies and why these approaches are the most appropriate to be used in the analysis. Understanding the EU public

policy targeting Roma minority inclusion is useful in many regards because we can see both positive and negative results (or shortcomings) of a public policy (in this case, integration strategy) and try to analyze more deeply the activities of the EU, incentives and intentions behind those actions, the goals of the EU Roma strategies, and involvement of all stakeholders in the policy-making process.

I will rely on the public policy literature to frame my dissertation in this study. As the Roma strategy represents one of the results of EU public policy, that is why we need to examine public policy theories. First of all, careful examination of the EU Roma policies, particularly the EU Roma frameworks, shows that several actors and players are involved in coordinating and implementing the Roma-targeted activities to achieve the expected outcomes of the EU Roma strategy. For instance, we could call the EU as the primary policy designer, and the Member States are the service-providers (Popova, 2019). In general, public policymaking is a complex process; therefore, EU policymaking is not an exception. Given the development process of the Romani policies at European level, the stages model seems more useful to be used for the analysis, as this model suggests that the policy process is a sequence of procedures that start with the identification of an issue, evolves as it is addressed, and culminates in the creation of a new agenda (Popova, 2019, p.27). Different authors identify different numbers of steps in policymaking, but the simplified five-stages model of Howlett and Ramesh could be useful for an easier understanding of public policy circles. According to the model of Howlett and Ramesh (2003), the policy cycle has five phases i.e., agenda setting, policy formulation, policy adaptation/decision making, implementation, and evaluation (Zeb-un-Nisa, Mustafa, Yaseen, Arslan, Imran, 2021, p.1313). And in the case of EU Roma frameworks, we can clearly see all of these stages: the EU has identified the Roma integration and inclusion issue, then made a framework, setting objectives, goals, and targets for solving the issue, and asked the national governments to implement the policy. Discussing all stages of the EU policy making here may not be useful, as my thesis does not aim to analyze the whole policymaking process regarding EU Roma framework, thus, instead, I will focus on the last stages – mainly

implementation. The implementation of the first EU Roma strategy as well as the evaluation of that strategy afterwards led the EU to adopt the new, improved version of the Roma strategy. Therefore, the implementation phase is very crucial. A bottom-up policy implementation approach could be helpful to better understand that implementation phase.

2.2 Bottom-up policy implementation

I would like to use a bottom-up approach to policy implementation to explain the EU public policy. First of all, studying implementation is necessary to comprehend “the missing link” between the articulation of a government's aim and the world of action and consequences, as noted by Mark T. Imperial (Imperial, 2021). Two common concepts are distinguished in the policy implementation and change literature: top-down and bottom-up approaches. The most interesting for us is the bottom-up approach, because according to the bottom-up or so-called adaptive perspective, the effective implementation allows policies to be altered based on how they interact with local institutional settings. For bottom-uppers, context is important, and they view implementation as the result of negotiating rather than explicit control by higher-level decision makers (Imperial, 2021). For us, exactly this interaction with the local society is important, which we can clearly see on the example of the consultations between the EU and Roma organisations and other civil society. The EU organized meetings with the representatives of Roma civil society to learn and understand what needs to be improved in the integration strategy. Based on these consultations, the EU made some changes in the second strategy; thus, we have negotiations and opportunities for civil society to raise their voice. Even though the EU is a high-level decision maker, they still have not made the whole strategy without communication with the rest of the concerned society.

According to the Bottom-up theorists, the policy is made at the local level (Matland 1995, p.146). The bottom-up approach, developed by Hanf, Hjern and Porter (1978), identifies the networks of players engaged in the provision of services in one or more local areas and queries them regarding their goals, plans, actions, and contacts.

And then, it uses the connections to create a networking strategy to identify the local, regional, and national actors involved in the planning, financing, and implementation of relevant programs by both governmental and non-governmental organizations (Matland 1995, p.155; Cerna, 2013, p.18). Again, this side of the theory can be applied to the implementation phase of the strategy; for effectively implementing the EU Roma strategies at national level, the EU firstly had to get opinions from the civil society and Roma organizations about integration strategy. Whether the EU really considers what civil society is asking for or not, is another issue, but the most important thing here is that there is some degree of communication between the decision-makers and the beneficiaries of the EU Roma strategy.

The bottom-up approach offers some advantages. According to Richard E. Matland, one benefit from that approach is that bottom-up approach analysts seriously consider the need to understand the goals and activities of a strategy in the implementation process. In other words, to fully understand the implementation process of a public policy, we need to examine the goals, targets and actors of that strategy (Matland, 1995, p.149. Cerna, 2013, p.18). This point of view resonates with the behavior of the EU – starting a consultation process with the civil society might be seen as the motivation to better understand their own policy and its goals. Another positive thing for bottom-uppers is that according to that approach, strategies are adaptable to local issues, so the context can be taken into consideration (Cerna, 2013, p.19). The bottom-up approach to policy implementation alone can not give us the complete picture of EU public policymaking; therefore, I consider discussing another theoretical side, the same approach applied to the well-discussed Europeanization theory.

2.3 Europeanization theory and bottom-up approach

Europeanization theory could be applied to EU policies. This theory could be useful to look at the EU Roma policies, for instance, the involvement of various civil societies into EU public policymaking process (defining the key goals and objectives of the EU Roma strategy). But before discussing the implication of this theory to our research topic, it is necessary to decide

which definition of Europeanization will be used here. From various definitions, I choose the comprehensive definition provided by Hirschhausen and Patel, who view Europeanization as a range of political, social, economic, and cultural processes that encourage (or modify) a sustained strengthening of intra-European connections and similarities through actors of emulation, exchange, and entanglement and that have been observed and referred to as "European" over time (Hirschhausen & Patel, 2020, p.2). This definition is chosen, because it shows the complexity of different processes and clearly emphasizes the role of the diverse European actors in the Europeanization process. Jacquot and Woll's (2003) definition of Europeanization would also be useful, as it simplifies all the definitions; According to them, interactions between individuals and institutions at the national and EU levels lead to Europeanization (Jacquot & Woll, 2003; Bandov & Kolman, 2018).

First of all, we should have in mind one important side of Europeanization theory: the idea, that the cooperation and transparency of the main political players, as well as extremely active advocacy networks and civil society organizations, is crucial. Secondly, we should consider that there are two approaches to the Europeanization: top-down and bottom-up approaches. However, according to Claudio M. Radaelli, there is one more approach in addition to the mentioned ones: EU integration approach (Radaelli, 2004). For us, bottom-up approach to Europeanization is interesting, as this approach is focused on various non-state actors, including civil society and advocacy networks noted by Katharina Crepaz. According to Crepaz, diverse interest groups could boost the representation of minorities through the bottom-up approach by raising awareness and networking (Crepaz, 2016). In order to achieve this, the Europeanization process may strengthen the legitimacy of input related to the inclusion of stakeholders (but this is constrained in the top-down approach regarding minority inclusion policy). In this broad sense, the Europeanization process can affect the minority groups' abilities to participate in, and lobby across all stages of the policymaking process (Crepaz, 2016, p.42). We could try to argue that because Roma civil society, as non-state actors, engaged in consultation meetings with the EU and other stakeholders, they could share their

experience with them and make more connections and networks; therefore, they could influence the future EU Roma policies.

All in all, Roma inclusion issues and EU public policymaking, particularly, EU Roma frameworks, need more comprehensive approaches; we can not apply just one theory to this topic because the topic is complex – just examining the high engagement of prominent political actors and advocacy networks in EU public policymaking process (which can be linked to Europeanization theory) might need different angles of approaches.

Chapter 3: Research methodology and data collection

The following chapter overviews the methodology and data collection process. The instruments and methods applied in the research are discussed in the first section of the chapter. The second section includes the information about the interviewees and the sampling process – how these interviewees were chosen. The third section overviews the data collection process, how the interviews were conducted. This section is followed by the section which describes how the data was analyzed. Lastly, the final part of the chapter presents which research limitations emerged in the research process that affected the whole research, especially the data collection process.

3.1 Measuring Instruments

The primary tools for this research were desk research and interview analysis (secured only online and email interviews, face-to-face interviews were not possible due to the Covid-19 pandemic). Interviewing EU policymakers (from the European Commission) and international organisations working on Roma inclusion issues was necessary to get informed views, seeking more in-depth and detailed responses on the different aspects of the EU Roma Frameworks: adoption of the second EU Roma Framework, main differences between the two frameworks,

reasons behind those differences and the influence of the civil society consultations on developing the second Roma framework.

The desk research methods involved data collection through the internet and online databases (for instance, JSTOR, where I got access to civil society research reports and journal articles on my topic, such as Open Society Foundations reports), and reports available on the EU websites – mainly the European Commission’s webpage was used to have access to not only the main working documents (the first and second EU Roma frameworks), but also other EU strategies. The reports from the civil society organisations were obtained from their official websites (mainly ERRC, ERGO, Eurodiaconia, and OHCHR websites provided me with helpful information). The information obtained from these websites was analyzed and compared to each other, the language of each document and strategy was checked.

Semi-structured questions were designed for the interview schedules. According to H. Russel Bernard, semi-structured interviews are conducted when there will not be a chance for a second interview, which means questions are guided by an interview guide (Bernard, 2006, p.212). Also, the benefit of this semi-structured interview is that it allows the researcher to explain questions to her (his) interviewees if needed or skip the questions when they are already answered. During the two online interviews I conducted, I had to explain some of my questions to the respondents due to the complexity of my questions. Moreover, during one interview, I guessed that I already had the answer to the following question; thus, I did not fully ask that question to the participant; I made it shorter and asked a different angle of it to the interviewee. I have also had opportunities to ask additional questions to interviewees at the end of conversations. Thus, semi-structured interviews offered me helpful flexibility.

Most of the questions were formulated through the literature review and the material learning process in general. This process revealed what questions were not answered regarding the comparison of the two EU Roma frameworks or what areas needed more clarity. In particular, the civil society organizations’ reports were beneficial as they clearly discussed the differences

between the first and second EU Roma frameworks and the advancing Romani policies by the Commission in general. In addition, checking the language in the EU Roma frameworks and their textual analysis has helped me identify possible questions.

3.2 Interviewees and sampling process

The research process led me to have two phases of the interview process: the first one in July 2021 and the second one next year, June-July 2022. For the first interview phase, two groups of respondents were approached to take part in this study: experts from the EU institutions (European Commission and European Parliament) and experts from civil society, who have already worked or working on the EU Roma Frameworks. In total, 39 individuals were contacted for the first interview phase, of whom only four people volunteered to participate in my research project. For the second interview phase, 15 people were contacted, out of which two agreed to be interviewed. The response distribution was as follows: one representative from the European Commission – working in the cabinet of the Commissioner for Equality (cabinet expert, responsible for Roma coordination); The rest of the participants represented civil society organizations : one representative from the European Roma Rights Centre (ERRC) – Advocacy & Communications Manager; One representative from the European Roma Grassroots Organisations Network (ERGO) (I had two interviews: in 2021 and 2022), one local Romani representative from Romania, working on Roma inclusion issues and a policy analyst from Phiren Amenca International Network. As it is known to me from my interviewees one was a Romanian Roma; another person was a Romanian. I also had British and Bulgarian Roma participants, and thus, three of my interviewees had Romani ethnicity. The interviewees ranged in age from 20-60 years; three were women and three others – were men.

Four of these six interviews were conducted online, with an average duration of 1 hour and 8 minutes and a median length of 57.5 minutes. 3 hours and 50 minutes of audio were transcribed in total.

List of Interviewees

Name/Pseudonym	Sex	Ethnicity	Organization /Occupation	Interview Place	Date of the Interview
Silvan Agius	Male	Non-Roma	Commission	Google Meet	20 th July, 2021
Romani representative	Female	Roma	Local activist from Romania	Email	20 th July, 2021
Jonathan Lee	Male	Roma	ERRC	Email	22nd July, 2021
ERGO representative	Female	Non-Roma	ERGO Network	Zoom	22nd July, 2021
Atanas Stoyanov	Male	Roma	Phiren Amenca Int. Network	Facebook Messenger	27 th June, 2022
ERGO representative	Female	Non-Roma	ERGO Network	Zoom	6 th July, 2022

Interviewees were identified mainly through the desk research process. In particular, the European Parliament resolutions and motions on national Roma integration strategies were helpful, as some of them contained the names of the MEPs who voted for adopting these resolutions. Accordingly, interviewing these MEPs seemed reasonable, as they would have some information regarding EU Roma strategy and Roma inclusion. My main supervisor also offered one name of a potential interviewee (working in the Parliament on Roma inclusion issues). Other interviewees were identified from the official speeches of the European Commissioners regarding Roma inclusion issues. The target participants should have been politicians and political experts, firstly from the European Commission and Parliament, who understand the EU Roma frameworks well and have worked on adopting these documents.

That is why I looked at the official EU documents to choose the participants from the EU institutions. Contacting these interviewees was easy as their emails were available on the official websites of the European Commission and Parliament.

To identify the experts from the civil society, firstly, I chose the most recognized civil society organisations advocating Roma issues (such as ERRC, ERGO, OSF) which I got familiar with from their reports on the EU Roma frameworks. Their experts were easily identifiable as these organisations' websites provided information about the team members who worked in the direction of EU Roma frameworks, Roma inclusion, and coordination of Roma projects. Also, one interviewee was secured through personal contact, which resulted from attending the Roma youth seminar 2022 in Strasbourg, on 6-8 April 2022, where I got to know the Roma organizations and their representatives, such as Phiren Amenca, ERIAC and ERGO Network.

3.3 Data Collection

After contacting the participants through email and getting their informed consent to take part in my research, I sent them the participant information sheet (Appendix 1) to read, which thoroughly explained the research objectives, how the interview was conducted, and what the interviewee's rights were. The interviewees were also sent a consent form for audio recording and anonymous use of information (Appendix 1), and they were asked to read and sign it. The participants of the online interviews were audio-recorded for transcription and later analysis. The interviewees were given the option of being quoted anonymously or by name in the subsequent study. At the end of the interview, three of them decided to be anonymized. The rest decided their names to be disclosed, mentioning that not everything they said is necessarily the position of the organisations they represent. Participants also had an opportunity to request a transcript of the interview or part of the thesis analysis where their views were expressed. Only one interviewee asked to check the interpretation of her ideas at the end of the interview. Another participant expressed his concern that I could interpret his ideas freely unless I needed to use quotes from what he said. In this case, I would need to get

his confirmation firstly. Therefore, the interviewees had enough opportunities and flexibility to express their concerns or questions to me.

The interview data and contextual analysis of the EU Roma frameworks were supplemented and compared to secondary data from the latest and most relevant reports available about the EU Roma frameworks. Usually, this data is available through various sources: EU institutions' reports and documents and academic and NGO publications and materials, such as ERRC, ERGO, FRA, CoR, OSF, UN, OSCE, Eurodiaconia reports, that incorporate both these official data and the authors' research.

This thesis is divided into several sections. The first part overviews both the EU Roma frameworks, reveals their targets and aims and overviews the development background between the first and second EU Roma frameworks. The second part, theoretical background discusses relevant literature to public policy and its approaches; Third part shows which methodology was used in the research and how the data was analyzed. The fourth and fifth parts, which are the main parts- provide the analysis of the comparison of the two frameworks and the civil society consultation role in all of these. Finally, the last part of the thesis offers final conclusions and recommendations.

3.4 Data Analysis

The audio recordings of each interview were used to create word-for-word transcripts. The interviews were transcribed initially into a Word document and the information revealed by the respondents were analyzed directly, according to the context.

3.5 Research Limitations

There are several constraints that this work has inadvertently encountered just like with any other research topic. First of all, I could not do any field research to learn about the situation of the Roma in the Member States in the policy areas mentioned above and better understand the two EU Roma frameworks or meet the EU and civil society representatives in person to

learn the issue better. Therefore, I mainly rely on indirect sources of information in my thesis. Secondly, I could not recruit many respondents for several reasons: there were time and availability restraints - there were two series of interviews, in 2021 and 2022. I was not able to recruit enough number of the interviewees in 2021 as I got the ethical approval for conducting interviews quite late (on 2nd of July 2021). Accordingly, until July 2, I could not send any emails to the potential interviewees. Firstly, I just emailed the European Commission and European parliament representatives. However, most of them even did not reply to my emails. Afterwards, I realized that contacting and getting answers from other organization representatives could have been more productive, so I also sent emails to them later. It turned out that I reached all these people at the wrong time, as most of them were on holiday already or going to or preparing for the end of the semester. This explains why most of them did not even reply to my emails or participate in my research. If not gone on holiday, some respondents wished to be interviewed by me.

As a result, I could only secure four interviews. Because of time restraints from both sides (as the deadline for submitting my thesis was coming closer and the participants were going to go on vacations soon) I had to interview 2 respondents via email (I sent my questions to them and then they sent the answers back). Thus, I had two email and only two online interviews. The number of interviews I conducted was not enough to answer my research questions from every single angle. Still, even these four interviewees gave me insightful thoughts and ideas and helped me to explore my research topic better. First of all, most of them confirmed the idea in the existing literature that the adoption of the new framework is linked to the lessons the EU learned in the Roma integration process. With their information, they also led me to discover the research angle that is not addressed openly yet in the existing literature, meaning that the changes between the two phases of the EU Roma frameworks are not just caused by the EU's realization of its failure, also the pressure from the civil society; For instance, that the Commission did not adopt intersectional approach or did not include different education targets in the new framework just by accident, that these changes were dictated during the

civil society consultations. These interviews led me to discover the latter part more deeply, so I decided to recruit more respondents to get information about that particular research angle. For the second phase of interviews, I had to extend the ethical approval deadline so that I would be able to recruit more interviewees. This time, my focus was on the representatives from the Roma organizations, as the practice last year showed me that contacting EU Commission or Parliament members is less fruitful as they do not usually reply to me. Therefore, I had to change the direction of the interviews a bit. Nevertheless, interviewing Roma civil society could still help me to create new knowledge.

Chapter 4: Discussion/analysis

4.1 Comparison of the two framework objectives

In this section, I will compare the language and terminology used in both frameworks and compare all objectives in them to show the changes. Based on the two framework documents, we can identify a few differences, which I will shed light on. The international organisations have assessed both frameworks and have given us interesting evaluations as we have already discovered. Their analysis, and the viewpoints of my interviewees, will be helpful for the comparison of the EU Roma frameworks.

First of all, international society, such as ERGO, ERRC, CoR and Eurodiaconia welcomes several positive developments included in the new EU Roma Strategic Framework, which were missing in the first framework (ERGO, 2020; ERRC, 2020; CoR, 2021; Eurodiaconia, 2021). For instance, the first difference could be seen in the title of the new framework as Eurodiaconia notices (Eurodiaconia, 2021). While the first framework was named an EU Framework for National Roma Integration Strategies up to 2020, the new framework has a slightly different title - A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. Office of the High Commissioner for Human Rights (OHCHR) and

Eurodiaconia welcome the change in the title. As OHCHR states, the change in title from “Framework for Roma Integration” to “Framework for Equality, Inclusion and Participation” is important (not just symbolically), as it signals that the responsibility for Roma integration is no longer lies only with Roma, but the responsibility now clearly lies with States, who need to remove the challenges and hurdles that prevent the inclusion and participation of the Roma (OHCHR, 2020; Eurodiaconia, 2021, p.6). The change in the title also shows a shift from Roma integration to the inclusion of Roma. As one of my interview participants, Silvan Agius from the European Commission noted, that change from integration to inclusion, equality and participation indicates a bigger shift in the framework. As he mentions, integration is more related to the migrants’ reality (people who do not know the EU well), while Roma are not foreigners in Europe as they have been here for several centuries and will be here too in the future. Thus, the EU needed to secure Roma inclusion in society so that Roma could function properly, not because it was the EU’s choice but because it was a necessity (Agius, 2021).

Another variation is mentioning the antigypsyism (anti-Roma racism) in the new framework. While the EU Framework for NRIS states the fact that many Roma in Europe face intolerance, discrimination, prejudice and social exclusion in their daily lives (EC, 2011, p.2), the EU Roma strategic framework for equality, inclusion and participation adds that they also continue to face antigypsyism. According to the European Council, antigypsyism is a prevalent form of racism, which is the root cause of exclusion and discrimination toward Roma (EC, 2021b, p.4) or in other words, this is the violent manifestation of a historically and geographically perpetual racism towards Roma, that has lasted for centuries with no signs of abating, according to the Commission (EC, 2020c, Pp.29-30). Moreover, the Council of Europe’s Commission against Racism and Intolerance (ECRI) calls antigypsyism a form of dehumanization and institutional racism, which is manifested in hate speech, violence, exploitation, stigmatization, and the most flagrant form of discrimination (Lajčáková, Hojsík, & Karoly, 2020; EC, 2018c, p.3). In fact, antigypsyism as a term is not mentioned in the first framework at all, while in the new framework, it is mentioned at least 16 times. Thus, as the

European Roma Grassroots Organisations Network (ERGO) notes, the new framework clearly refers to antigypsyism (ERGO, 2020), which is considered as the major shift from the previous framework to the second one, noted by one of the ERGO representatives (ERGO rep, 2021⁷). It will not be surprising that we have clear addressing of antigypsyism in the new EU Roma framework if we consider one thing here. As already mentioned, the EU consulted civil society representatives, National Roma Contact Points and other stakeholders to have a full picture of what to improve in the post-2020 Roma framework. Based on these consultations and meetings, as the participants requested and suggested an ambitious post-2020 strategy, with a focus on antigypsyism as a particular goal and a horizontal priority, as well as practical and real antidiscrimination concerns, the EU mainly considered their views and suggestions (EC, 2020c, p.53). Also, as one of my interviewees, Silvan Agius mentioned, addressing antigypsyism explicitly in the new framework just comes from the fact, that the EU learned some things from the previous framework and they are still in the learning process, as EU exists in a dynamic world, they need to constantly explore how to make things better – that's how the EU ended up from general addressing of antigypsyism to explicit and clear addressing of antigypsyism with clear targets in the new framework (Agius, 2021). Interestingly, in my interview, the ERGO representative stated an original idea: when the civil society offered the EU to include the target - fight against antigypsyism and discrimination, the EU was initially against it (ERGO rep, 2021). Now, as there is already that objective in the new framework, we can guess that civil society's ongoing consultation with the EU bore fruit.

Besides, the new framework emphasizes that discrimination based on race or ethnic origin still exists and still represents a significant issue as outlined in the EU anti-racism action plan 2020-2025 (EC, 2020b, p.1; EC, 2020d, p.1). This is one step ahead of recognizing the antigypsyism or anti-Roma racism phenomenon.⁸ Moreover, as the Office of the High

⁷ Online Interview with ERGO representative on 22 July 2021.

⁸ Since 2005, the European Parliament has been using the term antigypsyism in its reports and resolutions. Other organizations are sometimes using other terms, such as anti-Roma racism, romaphobia and antiziganism, to refer to the same phenomenon (EC, 2021b, p.3). In 2016, the Council acknowledged the need to fight all forms of racism

Commissioner for Human Rights states, the new framework not only clearly refers to antigypsyism, but also for the first time, acknowledges that the situation of the Roma cannot change without tackling antigypsyism and prejudice among the general population (OHCHR, 2020; Eurodiaconia, 2021, p.8). In the first framework, the European Union could not acknowledge that fact, making us think that the EU failed to address antigypsyism in the first framework.

However, as the ERGO representative mentioned during the interview with me, even though the term antigypsyism was not mentioned in the previous framework and now is mentioned in the new one, this phenomenon had been the subject of discussions by the Council before. According to her, we should not discuss EU Roma Frameworks in isolation because it is part of more extensive policy processes, as many organizations address the antigypsyism phenomenon and their reports speak about antigypsyism (ERGO rep, 2021). Moreover, as she adds, the EU acknowledged the definitions and terminology of antigypsyism articulated by ECRI and Alliance Against Antigypsyism. Moreover, discussion about antigypsyism took place in other organisations, EU bodies (for instance, in FRA, EP) and at a national level too; therefore, there has been some significant work both in the EU (at every level) and outside of the EU before the antigypsyism phenomenon was finally clearly addressed in the new strategic framework (ERGO rep, 2021). What is more interesting here is that this interviewee revealed another new viewpoint – the merit of the civil society is not only making the EU put the fight against antigypsyism in the new framework; what the civil society did was pushing the EU to address antigypsyism as a phenomenon, not as a term (ERGO rep, 2021). Silvan Agius shared another original idea that clearly addressing antigypsyism phenomenon is the result of the learning process by the Commission, so the first framework evolved in terms of language and orientation throughout the last ten years, because the EU kept exploring and constant

against Roma, because the EU finds antigypsyism as the primary source of exclusion and discrimination toward Roma Council Recommendation. 21 March 2021. (2021/C 93/01)

[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021H0319\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021H0319(01)&from=EN)

evaluating what could have been done better (Agius, 2021). So far, no reports and articles have mentioned the development of terminology in the European Union as a factor influencing the approaches toward anti-Roma racism.

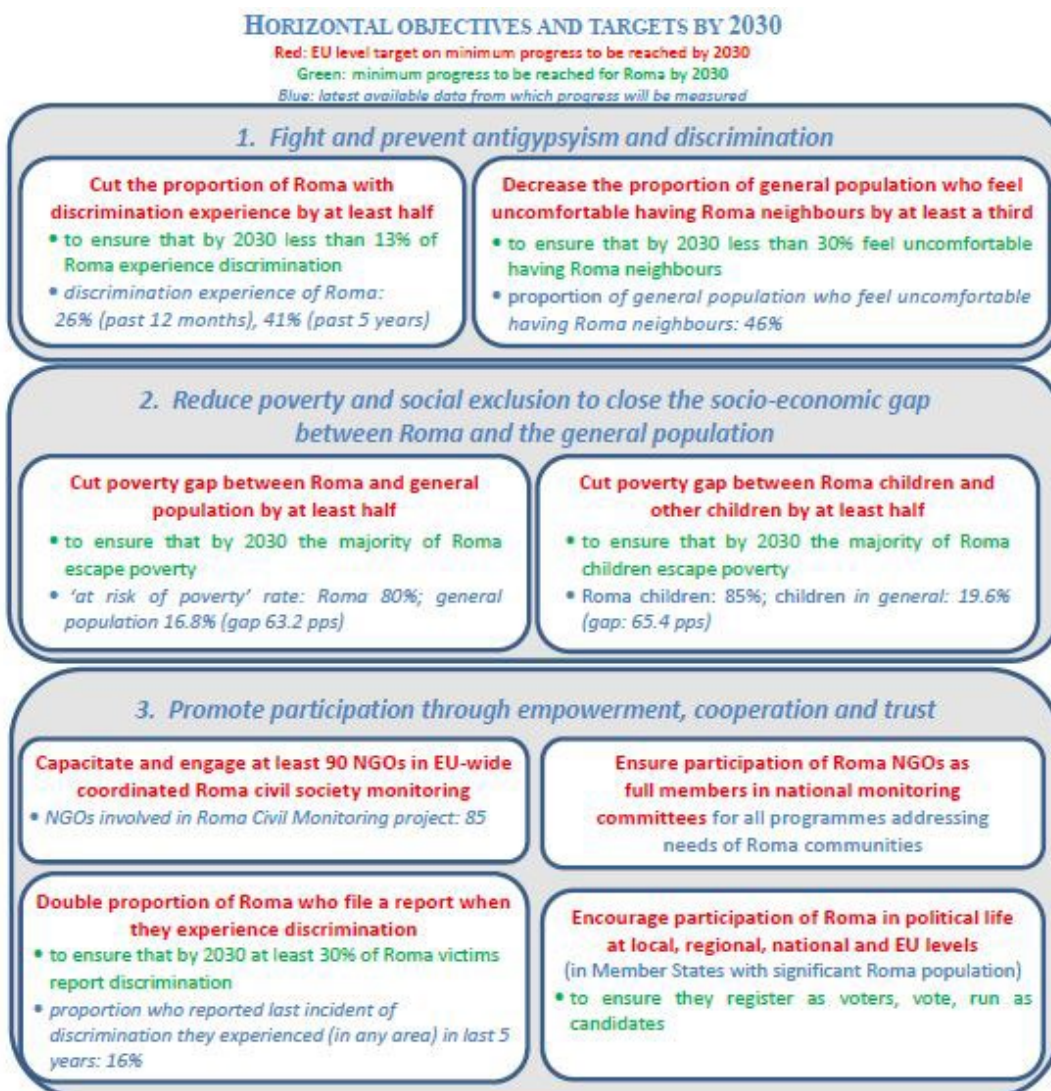
According to the ERGO representative, another difference between the two EU Roma frameworks is that for the first time, the new framework offers targets under each main objective, as there were no targets before. As the ERGO representative mentions, now, each priority area has targets, which is a positive thing, because these targets can be the baseline for Member States to implement the new Roma strategic framework (ERGO rep, 2021). Besides, one more thing to reveal from the interviews and textual analysis is that the new framework acknowledges the current pandemic's impact on Roma communities (ERGO rep, 2021). As we can read in the text of the EU Roma Strategic Framework, the necessity of stepping up action to fight discrimination and anti-Roma sentiments under the new framework has become even more important, because the COVID-19 pandemic has worsened the situation of already excluded and marginalised Roma communities (EC, 2020b, p.2; Eurocities, 2020). That has influenced the context of the new framework, because according to the Commission, new EU Roma framework also provides recommendations on how to better handle new issues, taking into account the disproportionate toll that crises like the COVID-19 outbreak have on Roma, guaranteeing digital inclusion, and ensuring environmental justice (EC, 2020b, p. 10). Besides, another new thing, according to Silvan Agius, is that now there are some clear benchmarks to be met by which the implementation of the strategic framework can be measured. Those benchmarks were not in the first framework (Agius, 2021).

This set of benchmarks allows a clearer picture and evaluation of progress; thus, we need to consider and overview each objective and its targets in detail (four objectives from the first framework and seven objectives from the second one) as the major differences can be identified from the comparison of the objectives of each framework. As already mentioned, while the first framework only set four main integration goals, the EU Roma strategic

framework for equality, inclusion and participation set seven mutually reinforcing specific objectives.

These include three horizontal objectives in the areas of equality, inclusion and participation. The rest are sectoral objectives in education, employment, housing, and health (EC, 2020b, p.3; EC, 2020c, p.25).

Those seven objectives are:



EU Roma Strategic Framework for equality, inclusion and participation (EC, 2020b, p.4).

SECTORAL OBJECTIVES



(EC, 2020b,

p.5).

First of all, the commitment in the new EU Roma Strategic Framework to include these horizontal objectives such as the fight against poverty, antigypsyism and genuine Roma participation is a welcome step forward, because by adopting these objectives, the new framework acknowledged that without addressing the structural racism against Roma, real change will not happen. That is important, especially now, because as a result of the pandemic, the urgent need to step up efforts to combat antigypsyism and promote Roma equality and inclusion has become even more important (Eurodiaconia, 2021, p.8). It is noteworthy, that

this pandemic really shaped how the Commission developed its new Roma framework as the pandemic experience emphasized the need for three-dimensional focus and coordination. The first is to combat discrimination, prejudice, and antigypsyism; the second is to reduce socio-economic inequalities; and the third is to promote genuine participation of Roma (EC, 2020c, p.43). The EU cooperated with the civil society, national Roma contact points, and FRA to consider the crisis' impact on marginalised Roma communities and developed indicators and measures that emerged from the lessons learnt from the COVID-19 pandemic (EC, 2020c, p.43). Therefore, the pandemic lessons and consultation with the stakeholders influenced the objectives of fighting against poverty, antigypsyism, and genuine Roma participation.

4.1.1 Horizontal Objectives

1. First objective - Equality: Fight and prevent antigypsyism and discrimination

- ❖ Cut the proportion of Roma with discrimination experience by at least half, e.i to ensure that by 2030 less than 13% of Roma experience discrimination.
- ❖ Decrease the proportion of general population who feel uncomfortable having Roma neighbors by at least a third (EC, 2020b, p.4).

As already stated, in the first framework, antigypsyism was not mentioned at all, nor there was a clear objective, aiming at fighting antigypsyism and discrimination (it was a general goal of the NRIS, but it was not formulated as one of the four core integration goals). Now not only is there a clear objective related to fighting antigypsyism in the new framework but also there is a specific plan given – how exactly the EU wants to achieve this goal – by decreasing the number of discriminated Roma by half and decreasing by a third the proportion of general population who feel uncomfortable having Roma neighbors. However, as ERGO points out, those targets on antigypsyism are non-ambitious, also, they are too few and inadequate to make a significant difference (ERGO, 2020). According to ERGO, the horizontal objective on antigypsyism fails to sufficiently convey the need to develop preventive measures and counter-narratives to increase public knowledge of Roma history, culture, recognition and

reconciliation (ERGO, 2020, p.7). Furthermore, ERGO thinks that the goal regarding antigypsyism and discrimination: achieving that less than 13% of Roma feel discriminated – does not seem realistic; while the EU has mentioned in the new framework that in the past 12 months 26% of the Roma has experienced discrimination, ERGO states, that this number can be up to 3 times higher than the baseline of 26% used. Furthermore, targets aim to reduce the perception of discrimination instead of reducing de facto discrimination. Lastly, ERGO states that reporting of discrimination should be listed under antigypsyism instead of participation, as it should be considered a matter of access to justice (ERGO, 2020). Therefore, even though inclusion of the explicit goal regarding antigypsyism was an improvement and change in the EU Roma frameworks, this objective does not represent a perfect and well-defined goal yet.

2. Second objective – Inclusion: Reduce poverty and social exclusion to close the socio-economic gap between Roma and the general population

- ❖ Cut poverty gap between Roma and general population by at least half.
- ❖ Cut poverty gap between Roma children and other children by at least half.

ERGO welcomes the fact that the EU introduces the fight against Roma poverty as a specific objective with associated indicators in the new framework. However, according to the ERGO, despite the fact that the guidelines are generally excellent, they leave it up to governments to determine what should be included in their own frameworks (ERGO, 2020, p.4). What is interesting here is that, now the EU has two focuses - reducing poverty level not only just between Roma and general population, but also between the Romani children and other children – now the needs of a specific group of Roma are acknowledged. It is noteworthy, that the EU adopted this objective based on the consultations with national Roma contact points and civil society organisations, because these representatives called for concrete anti-poverty interventions and the EU considered this suggestion (EC, 2020c, p.53).

3. Third objective – Participation: Promote participation through empowerment, cooperation and trust, the EU aims:

- ❖ Capacitate and engage at least 90 NGOs in EU-wide coordinated Roma civil society monitoring.
- ❖ Ensure participation of Roma NGOs as full members in national monitoring committees.
- ❖ Double proportion of Roma who file a report when they experience discrimination - to ensure that by 2030 at least 30% of Roma victims report discrimination.
- ❖ Encourage participation of Roma in political life at local, regional, national and EU levels - to ensure they register as voters, vote, run as candidates (EC, 2020b, p.4).

Now, the EU Roma strategic framework for equality, inclusion and participation brings out above mentioned goals and objectives and sets specific plans for achieving them – building trust and cooperation between the Roma and the rest of the population can be achieved if there are more NGOs (including Roma NGOs) fully involved in national monitoring committees and Roma civil society monitoring and if there is Romani people's involvement in political life. It is also interesting, that this objective involved another target – double proportion of Roma (increase twice the share of the Roma from the whole Romani population), reporting their discrimination cases. In the first framework, this approach is missing (there was not this target). As the ERGO representative recalled during my interview with her, a lot of reports (for instance, civil society reports) had spoken about the failure to report crimes committed against Roma, so the Commission introduced this as a target, because they wanted to increase the confidence of Roma to report. As the ERGO representative points out, the level of crime against Roma is so pervasive and prominent and the level of reporting is so small, that there is proportional gap between those two, and this is why the EU decided to increase the reporting of such crimes by incorporating it into the new framework (ERGO rep, 2021). The Commission representative Agius also stated a similar idea that by adopting this objective the Commission wanted to make the Roma community become more independent so that they

can defend their rights (Agius, 2021). However, the ERRRC representative Jonathan Lee points out, even though it is good that the EU wants to get more data regarding human rights abuses against Roma, just getting more data and reports of discrimination will not do much if the competent authorities (law enforcement and other local authorities) do not act accordingly (they frequently fail to investigate the discrimination acts and hate crimes effectively). Therefore, according to Lee, the real problem is not lack of data, but institutional racism in public authorities and in order to build trust, an adequate response to discrimination acts from national authorities is required, not just simply having more data (Lee, 2021). That issue (having more data is not a solution) seems unaddressed in the official reports. Therefore, overall, it is positive that unlike the first framework, there is now a clear objective in the new framework, aiming to build trust and increase Roma's participation, without which inclusion of Roma cannot be fully achieved.

4.1.2 Sectoral Objectives

4. *Comparing the objectives regarding education (access to education & increase effective equal access to quality inclusive mainstream education)*

When we compare the objectives related to education in the previous and new EU Roma frameworks, we will see that the new framework has three main directions in the education sector – focus on early childhood education and care (ECEC), finishing secondary education and elimination of segregation of Roma pupils.

Objective regarding education in the first framework	Objective regarding education in the second framework
Access to education: Ensure that all Roma children complete at least primary school.	Increase effective equal access to quality inclusive mainstream education:

<ul style="list-style-type: none"> ➤ Member States should, as a minimum, ensure primary school completion. ➤ They should also widen access to quality early childhood education and care and reduce the number of early school leavers from secondary education pursuant to the Europe 2020 strategy. ➤ Roma youngsters should be strongly encouraged to participate also in secondary and tertiary education. 	<ul style="list-style-type: none"> ➤ Cut gap in participation in early childhood education and care by at least half. ➤ Reduce gap in upper secondary completion by at least one third. ➤ Work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools.
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When we look at the similar objective of the first framework - *Access to education: Ensure that all Roma children complete at least primary school*, we will see a difference, because back to 2011, when the Commission set this goal, they focused on achieving the completion of the primary school for Romani children. After nine years, we can see that the EU focus is now shifted from primary education to early and upper secondary education. Of course, even in the first framework, this first objective also aimed at improving access to quality early childhood education and care, as well as minimizing the number of early secondary school dropouts and encouraging Roma students to pursue secondary and tertiary education (EC, 2011b, p.5), but still, the focus was on primary education. As a Romani Romanian expert stated at interview with me, the focus for instance on the early childhood education and care might be coming from the fact, that ECEC serves a critical role in meeting the educational needs of children, as

⁹ Based on the first and second EU Roma framework texts, I compiled this table: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0173&from=en> (EC, 2011b, p.6) & https://ec.europa.eu/info/sites/default/files/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf (EC, 2020b, p.5).

well as laying the groundwork for a more prepared educational system in the school stages (Romani expert, 2021). Thus, ECEC is very important in children's academic development and that is why the EU could have now identified this need and included this target.

Regarding primary education, ERGO notes, that there is no target for primary education now in the new framework, while it was in the initial one (ERGO, 2020, p.7). Moreover, ERGO finds education targets too low: the proposed target of 70% in preschool education and reducing the gap in upper secondary completion by a third is too low, according to the ERGO. As the ERGO representative tries to explain this change, not focusing on primary school completion in the new Roma framework is caused by the fact, that some progress has been achieved in this field already – many Romani children now finish primary school, and they drop out of school afterwards when they study in secondary schools (because secondary education is not mandatory). So, completion of primary school for Romani children is not so problematic now as it was before. Another point, the ERGO representative mentions here is that EU adopted these new targets according to the sustainable development goals (SDGs)/UN goals¹⁰, so the EU targets under the education sector are in line with SDGs by UN (ERGO rep, 2021; Agius, 2021). For instance, the fourth sustainable development goal is about achieving quality education - ensure inclusive and equitable quality education and promote lifelong learning opportunities for all, which main targets are by 2030 providing all girls and boys with complete, free, equitable and quality primary and secondary education as well as providing quality early childhood development, care and pre-primary education (UN SDGs). So, these targets are absolutely matching with the education targets in the EU Roma Strategic Framework and therefore, adopting these specific targets under the education objective by the EU is not surprising and goes along with the international society's interests and development or as Silvan Agius noted, the developments and changes in international organisations and

¹⁰ The Sustainable Development Goals (SDGs) are 17 interlinked global goals, that provide a shared blueprint to achieve peace and prosperity for people and the planet, and more sustainable future for all. The SDGs were adopted in 2015 by the United Nations and are intended to be achieved by the year 2030.

<https://sdgs.un.org/goals>

member states have influenced the above mentioned issue (such as the adoption of the SDGs, new policy positions by civil society, United Nations, the Council of Europe, and developments in the Member States) (Agius, 2021). That is something the EU or other organisations' reports have not openly revealed yet.

When it comes to other targets under the education objective, for instance, putting one more target under education objective – eliminating segregation in education sector by cutting at least in half in general is considered positively, as the new objective made it clear that eliminating segregation is a serious focus for the EU now (ERGO, 2020). But, on the other hand, allowing at least 50% segregation by the EU in primary education is an EU law violation, as segregation is regarded as racial discrimination by the Committee on the Elimination of Racial Discrimination (ERGO, 2020, p.6). That is why ERGO and ERRRC recommend that Member States and Enlargement countries acknowledge that segregation is illegal and that they should have zero tolerance against segregation in education (ERGO, 2020, p.20; ERRRC, 2020). ERRRC points out that the European Commission's suggestion that national governments only need to reach 'half-way' to desegregation by 2030 is a slap in the face of European law. ERRRC rejects any assertion that segregation is somehow inevitable because they think that racial segregation is not unavoidable, and 'country-specific challenges' can not be used as an excuse to deny Romani children their fundamental rights. That is why 2030 targets for Romani children in all aspects of their lives must be as ambitious as those for any other child in the European Union, noted by the ERRRC (ERRRC, 2020). Moreover, as the advocacy & Communications manager at the ERRRC, Jonathan Lee stated in the interview, segregation can not be discussed in terms of percentage reduction. The target of 50% less segregation by 2030 is not only unambitious, but also incompatible with the EU's rule of law, and insulting to the thousands and thousands of Romani children who will be denied a proper education over the next 10 years (Lee, 2021). As he expresses the view, the current European Commission seems to have very little commitment to implementing meaningful policies which would have a measurable impact on discrimination prevention. There is a lot of discussion, but there is not

much action. Much of their response to antigypsyism (and other forms of racism) in Europe appears to be a holding strategy (Lee, 2021). The commission representative, Silvan Agius's response to this matter is that the EU did not set more ambitious commitment regarding the segregation in education sector, because this is very difficult. Allowing 50% segregation does not mean that the EU does not want to have less segregation in education. Mr Agius mentions that segregation is banned and not welcomed, but there is a difference between banned segregation and having responses to it, as it is not always easy to have a response to segregation in education. It depends on where Roma people reside and how they mix and engage with society (Agius, 2021).

Therefore, overall, the objectives of the second framework in the education sector seem less ambitious than in the first. The ERGO representative tries to link it with the EU's failure in the first framework. She thinks that the EU acknowledged the fact that they failed in the first framework so drastically, that now they want to avoid such failures and achieve progress, so they had to set the objectives which would be feasible and achievable (ERGO rep, 2021). However, the Commission representative Agius does not think that the new framework is less ambitious in the education sector. He noted that the new EU Roma framework goes beyond the previous one. If the first framework brought the desired result in the education sector (and it did partially as we know) then it should have provided the EU with a foundation for higher-level, more advanced level (Agius, 2021). Thus, shifting the benchmark from primary to higher education is not surprising and it shows that EU has moved further in this direction. Based on all of this discussion we can conclude, that changes in the objectives of education sector might be seen differently by representatives of different organisations but one thing is clear: the EU has developed its approaches in the education sector by providing more specific and explicit targets (for instance, adding elimination of segregation in schools as a target) and despite the fact that these targets still need developing or they seem less ambitious, they are expected to achieve the expected result, because they seem more realistic.

5. *Comparing the objective regarding employment (access to employment & increase effective equal access to quality and sustainable employment)*

If we compare the objective regarding employment from the first framework and new framework, we can see the difference clearly as according to the first framework, *access to employment: Cut the employment gap between Roma and the rest of the population* – with this objective EU set a headline target of 75% of the population aged 20-64 to be employed (when the employment rate in the EU usually amounts to 68.8%) (EC, 2011b, p.6), while now the EU plans to cut the employment gap by half to achieve 60% of employment among Roma.

Objective regarding employment in the first framework	Objective regarding employment in the second framework
<p>Access to employment: Cut the employment gap between Roma and the rest of the population.</p> <ul style="list-style-type: none"> ➤ The Europe 2020 strategy set a headline target of 75% of the population aged 20-64 to be employed. ➤ Member States should grant Roma people full access in a nondiscriminatory way to vocational training, to the job market and to self-employment tools and initiatives. 	<p>Increase effective equal access to quality and sustainable employment.</p> <ul style="list-style-type: none"> ➤ Cut employment gap by at least half - to ensure that by 2030 at least 60% of Roma are in paid work. ➤ Cut gender employment gap for Roma by at least half - to ensure that by 2030 at least 45% of Roma women are in paid work. ➤ Cut gap in NEET rate by at least half (youth not in

<p>Access to micro-credit should be encouraged.</p> <ul style="list-style-type: none"> ➤ In the public sector, due attention should be given to employment of qualified Roma civil servants. ➤ Public Employment Services can reach out to the Roma by providing personalised services and mediation. 	<p>education, employment, or training)</p>
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There is another change as well – finally recognizing not only the employment gap, but also the gender employment gap – in the first framework objectives, this important thing was missing. There is a significant gap between Roma men and Roma women employment (women: 29%, men: 56% - gender employment gap – 27pps¹¹, compared to 11.7 pps gap in the general population) (EC, 2020b, p.5). That is why now the Commission focuses on reducing this gap. Besides, we can notice from this new objective that not only cutting the gender employment gap has become more important, but also cutting gap between the Roma youth and the other youth, who are not studying, working or are in training. However, in the new framework, emphasis on providing Roma with vocational training, self-employment tools, initiatives, and personalized services and mediation is not emphasized as in the first framework (EC, 2011b, p.6).

ERGO finds some inconsistency in this new objective - even though ERGO finds positive that now EU aims at achieving at least 60% in employment from a baseline of 43%, the target for women in employment should be equal to that of men (ERGO, 2020, p.7). Another missing point (from both frameworks) is that there is no target for youth employment, as ERGO points

¹¹ However, when it comes to informal employment, more Roma women are involved in this than Roma men (thus, informal employment is far more widespread among Roma women, whereas it is mostly seen among non-Roma men) (Cukrowska & Kóćzé, 2013, p.36).

out [p.7]. Therefore, from the above discussion, we can conclude, that what makes the two EU Roma frameworks different in terms of the objective regarding employment, is that the first framework shift moved from a general employment objective without specific targets to a clearer employment objective with three well-defined targets and intersectional approach.

6. *Comparing the objective regarding healthcare (access to healthcare & improve Roma health and increase effective equal access to quality healthcare and social)*

The objective regarding healthcare in the new framework is quite different from other objectives, as it offers only one approach/one target – cutting the life expectancy gap and improving health care for Roma.

objective regarding healthcare in the first framework	objective regarding healthcare in the first framework
Access to healthcare: Reduce the gap in health status between the Roma and the rest of the population.	Improve Roma health and increase effective equal access to quality healthcare and social <ul style="list-style-type: none"> ➤ Cut life expectancy gap by at least half - to ensure that by 2030 Roma women and men live 5 years longer.

In the first framework, a similar objective is formulated like this: *Access to healthcare: Reduce the gap in health status between the Roma and the rest of the population.* In this case, the Commission also encourages member states to ensure that the Roma, like the rest of the population, have access to quality healthcare, particularly for children and women, as well as preventive care and social services at the same level and under the same conditions (EC, 2011b,

p.7). Thus, in fact, the objectives regarding healthcare are similar to each other in the two frameworks, because they have the same aim. The only difference is that cutting the life expectancy gap is not explicitly mentioned in the first framework, even though this first framework text shows the difference in life expectancy between the Roma and the rest of the population and reveals, how serious issue this is. Cutting life expectancy as a target was included only in the second framework, which is considered positively by the ERGO, however, ERGO finds this insufficient, as there are no targets on access to health in general (thus, there should be more targets in healthcare sector, according to ERGO) (ERGO, 2020, P.7).

As already mentioned, cutting life expectancy gap by half is the only target under healthcare objective, but it is formulated so clearly and in a simple way, that the EU and Member States now exactly know what to focus on when trying to improve healthcare for the Roma people. Before, the similar objective in the first framework was unspecified, which usually leads us think that without defining the problem clearly and adopting clear measures, the fight with discrimination in healthcare can be difficult.

7. Comparing the objective regarding housing (access to housing and essential services & *increase effective equal access to adequate desegregated housing and essential services*)

A little difference can be observed from the title of the new objective – in the title, it is emphasized that Roma people should have equal access to desegregated housing. Desegregation was clear from the initial framework as well, but it was not formulated in the housing objective.

Objective regarding housing in the first framework	Objective regarding housing in the second framework
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Access to housing and essential services: close the gap between the share of Roma with access to housing and to public utilities and that of the rest of the population.	<p>Increase effective equal access to adequate desegregated housing and essential services</p> <ul style="list-style-type: none"> ➤ Reduce gap in housing deprivation by at least one third - to ensure that by 2030 the majority of Roma do not face housing deprivation. ➤ Cut gap in overcrowding by at least half - to ensure that by 2030 the majority of Roma no longer live in overcrowded households. ➤ Ensure that at least 95% of Roma have access to tap water.
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Another difference is related to cutting gap in overcrowding. As we can see, before, this was not set as a way of achieving effective housing. There is one more interesting fact from the first framework too. It mentions that particular needs of nonsedentary Roma should also be considered (such as providing access to suitable halting sites for them) (EC, 2011b, p.7), while this is not clarified in the new framework and its housing objective.

Interestingly, none of the EU Roma Frameworks has set the target of fighting with forced evictions under the objective regarding housing. Even though housing objective in the new framework has now three clear targets, there is no target about fighting with forced evictions (which is an obstacle for Romani people to have proper housing). As the ERGO representative thinks, the reason for this is that the European Commission does not see this under their

competence, as this responsibility lies usually with Member States and the EU can not intervene in their national affairs (neither the EU wants to intervene) (ERGO rep, 2021). Thus, even though the housing objective in the new framework is more developed and clearer than in the previous framework, it still misses some important elements, such as fighting with forced evictions, but adoption of this target seems problematic yet as it requires cooperation and readiness from the Member States. The ERRC representative Jonathan Lee also expresses his viewpoint regarding the non-inclusion of fighting forced evictions. He thinks that the Commission did not consider including this target under the objective of housing because the EU considers it as in regard to landowners' rights. For instance, he gives an example, when impoverished Romani communities erect shacks on land that does not belong to them and the municipality comes and evicts them illegally, landowners' rights clash with the human rights of socially disadvantaged individuals (those, who are technically committing a crime), thus, the EU can not interfere much. Besides, another reason he mentions for non-inclusion of this target is the fact that the EU Racial Equality Directive (RED) does not include forced evictions in its scope – implying that if forced evictions were included in the new policy, there would be no enforcement mechanism to go along with them (Lee, 2021). So, again, the case is the EU's matching with other organisations' missions and targets. As we have already discussed before, many of the EU approaches are in line with other EU strategies and/or other international organisations' goals, meaning that it should not be surprising if the EU did not include some specific targets in its framework (because these goals were not adopted by other organisations yet). I will discuss later how other EU strategies tie with the goals of the EU Roma strategic framework.

Apart from the objectives, the new framework sends out recommendations for the Member States, such as proposing that all national Roma strategic frameworks have some common features: a stronger focus on equality (EC, 2020b, p.6). EU Roma strategic framework for equality, inclusion and participation also emphasizes that the fight against discrimination and antigypsyism should be a key goal and cross-cutting priority in each policy sector,

complementing the inclusion approach/strategy (EC, 2020b, p.7). Once again, the new framework also proposes that Roma participation should be promoted through empowerment, cooperation, and trust (building cooperation and trust between stakeholders and between Roma and non-Roma communities), so that Roma will have a sense of belonging as full members of society [p.7]. Another important added value from the new framework is that it points out how important reflecting diversity¹² and the needs of diverse groups of Roma are. The framework defines intersectional discrimination for the first time and proposes an intersectional approach to tackle discrimination, as noted by the ERGO (ERGO, 2020, p.4). For example, there was a lack of an intersectional approach in the previous framework. It has become clear that generally considering Roma needs is not enough, as different groups of Roma require different approaches and solutions to their problems (EC, 2020b, p.7). The ERGO representative states that it is not surprising that there is now clear intersectional approach in the new framework, because this is a natural process, given that this issue has been already discussed many times before the adoption of the new framework, so there is a big academic input regarding intersectional approach, for instance, EU Anti-racism Action Plan mentions intersectional approach (ERGO rep, 2021). As Silvan Agius adds, we should look at the EU Roma Strategic Framework and its intersectional approach as a part of a bigger framework of what the EU is calling union of equality, meaning that there are several other important strategies and policies such as gender equality strategy (2020-2025), the LGBTIQ equality strategy (2020-2025) and disability rights strategy (2021-2030), which adopt intersectional approach. This shows that the EU has included intersectionality in all their approaches, including EU Roma Strategic Framework (Agius, 2021). From this discussion, we can conclude that we should not look at the second EU Roma framework in isolation and that adopting intersectional approach regarding Roma inclusion is just one of the natural results of the

¹² Diversity in terms of age, gender, sexual orientation, mobility, and other personal characteristics (EC, 2020b, p.7).

development of the broader equality framework deployed in the EU and that the EU is now structuring the Roma according to that broader EU initiative on equality.

Another factor we might also take into consideration when trying to analyze why the EU has adopted different approaches in the new Roma strategic framework is its experience and knowledge obtained in this Roma inclusion processes. According to the ERGO representative, the Commission has got a lot of expertise, knowledge, and experience during all of these years since 2011, thus, based on their policy experience they now know what works better and what works less (ERGO rep, 2021). Silvan Agius shared similar viewpoint as well. He stated that the first EU Roma Framework learnt much from the first one, that is why they now know what works and what does not. Also, unlike the first framework, the second framework focuses on how much progress is expected in a realistic view (Agius, 2021). To sum up, all of these ideas mentioned above are useful to explain the EU's shift and setting different and, in some cases, less ambitious objectives and targets. But in order to have more complete picture – to put all of these reasons in one system or in other words, link these reasons to bigger inspirational source, we should discuss how the European union made civil society and Roma organizations participate in shaping the future EU Roma framework.

Chapter 5: EU Consultations with Civil Society

5.1 The origin of the first consultations

We have already seen the changes between the two frameworks, but now to see more clearly where these changes came from mainly (what and who was the inspiration), we need to consider the consultation meetings between the European Union and civil society. Of course, we should not underestimate the role of other stakeholders, but this section will try to unpack the deserved merit of civil society in adopting the post-2020 EU Roma framework. Here, I will

mainly rely on the information given by my respondents – the representatives of the Roma organizations, who have been personally involved in those consultation meetings.

Firstly, it is notable what processes and events the European Union went through until they started the official consultations with the Roma civil society regarding the Roma policies and, especially the EU Roma Framework. Everything started much earlier than the adoption of the first EU Roma framework. Before the adoption of the framework, there were two EU Roma summits – the first in September 2008 in Brussels and the other in April 2010 in Cordoba (Rostas, 2020)¹³. Nearly 400 people, including high-ranking national officials, Roma leaders, and human rights campaigners, attended the first summit in 2008 to debate the best ways to make Roma integration policies and initiatives more effective (Popova, 2019, p.23). And ahead of these EU Roma summits, the so-called Roma Platform was established (the European Platform for Roma Inclusion - EPRI), which is a mechanism, bringing together EU officials, national experts, international organizations, and Roma civil society representatives. According to the European Commission, this platform aims to encourage collaboration and the sharing of knowledge about effective Roma inclusion (EC, n.d). This Roma Platform, in 2009, during the Czech Presidency of the EU, adopted the ten Common Basic Principles on Roma Inclusion¹⁴ in Prague as a guidance document for the formulating of Roma policies and projects (Rostas, 2020; OHCHR, 2014; Popova, 2019). On June 8, 2009, these principles were added to the conclusions of the Council of Ministers responsible for Social Affairs and the Commission was urged to take them into consideration. This signaled the beginning of the EU's discussions on Roma issues (OHCHR, 2014).

Another important thing was setting up the network of National Roma Contact Points (NRCP) in 2012, serving the role of facilitating dialogue among and between the Member States, as

¹³ European Roma Summit in Brussels - 16 September 2008 & European Roma Summit in Córdoba - 8 and 9 April 2010. After the adoption of the first EU Roma framework, there was another Roma Summit in Brussels, on the 4th of April 2014. https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/european-roma-platform-roma-summits_en

¹⁴ See the list of these principles here on page 6 <https://www.coe.int/t/congress/Sessions/Alliance/EC-roma.pdf>

well as with the EU. The NRCP meets twice annually, but civil society organizations are concerned about the lack of transparency (Rostas, 2020, p.193; OSF, 2017). We should also consider, that since the 1990ies, Roma rights groups have raised their voice about the discrimination against the Roma in Europe, which resulted in informal gatherings. Finally, this led to the formation of the EU Roma Policy Coalition (ERPC) in 2008, a network of eight national and international NGOs working on Roma-related issues (Rostas, 2020). These organizations were: Amnesty International, European Network Against Racism, European Roma Information Office, European Roma Rights Centre, European Roma Grassroots Organisation, Open Society Institute, Minority Rights Group International and Spolu International Foundation. ERPC advocated for the adoption of an EU Framework Strategy on Roma Inclusion (OSF, 2008). Moreover, ERPC pushed the EU to include a strong antigypsyism component in the EU Roma Framework, with other priorities such as non-discrimination, gender equality, access to justice, prevention of anti-Roma crimes and ethnic profiling. They also emphasized the participation of Roma and civil society in Roma policies (Rostas, 2020). Though, ERPC was not the only network, which alone called for serious consideration of antigypsyism in the framework. As the representative of the ERGO Network revealed in the interview with me, ERGO Network with ERPC, EU Fundamental Rights Agency (FRA) and the Alliance against Antigypsyism pushed altogether that the EU would look at it this issue more seriously and recognise antigypsyism as a form structural and institutional racism. As she mentioned, strong emphasis on antigypsyism was the basis of their advocacy work, because they thought and think, that antigypsyism is a root cause of Roma situation and the EU failed to recognize this fact. However, the civil society work bore the fruit, because now there is a reference to antigypsyism as a form of institutional discrimination or racism in the post-2020 EU Roma framework¹⁵ (ERGO Rep, 2022; EC, 2020b). Moreover, most of the EU Member States (who have adopted the EU Roma frameworks) acknowledge the term now, when they

¹⁵ First horizontal objective in the post-2020 EU Roma framework – “Fight and prevent antigypsyism and discrimination” (EC, 2020b, p.4). Also, see the page 1, footnote 4 in the same document.

did not even acknowledge it in the past. However, this has not been an easy and short process. According to her, ERGO has advocated in this direction with other civil societies since 2008 – much earlier than the adoption of the 2011 EU Roma framework (ERGO rep, 2022). Therefore, serious addressing of the antigypsyism issue from the European Union side took more than 10 years and exactly the fight regarding addressing antigypsyism paved a way to the adoption of the very first political document about the Roma people inside the European Union.

Fundamental Rights Agency also reveals more details about the consultation process before the adoption of the post-2020 EU Roma framework. The FRA claims that after publishing the Commission staff working document¹⁶ and the report on the implementation of national Roma integration strategies¹⁷ in September 2019, the EU recognized the need for a more organized approach to monitoring progress in Roma integration (FRA, 2020a, p.7). This led the Commission to invite the Commission and Parliament members, NRCs, civil society and international organization representatives on the workshop to discuss the potential priorities of the post-2020 EU Roma actions (FRA, 2020a). Therefore, we can see the first official involvement of main stakeholders in the developing of the post-2020 EU Roma framework from 2019.

5.2 The selection criteria for the organizations and the regularity of the meetings

We mentioned who was the frontrunner in the consultation process with the EU and how all of this started. However, it is interesting to pay attention to one detail, which usually stays behind the attention of the public – how the Commission chose the civil society organizations,

¹⁶ European Commission Staff Working document. Brussels, 5.9.2019 SWD (2019) 320 final.
https://ec.europa.eu/info/sites/default/files/cswd_roma_inclusion_measures_reported_under_the_eu_framework_for_nris_pt1_en.pdf

¹⁷ Report on the implementation of national Roma integration strategies – 2019. Brussels, 5.9.2019 COM (2019) 406 final.
https://ec.europa.eu/info/sites/default/files/swd2019-320-final_report_on_the_implementation_of_national_roma_integration_strategies_en.pdf

by which criterion and how regularly the consultation meetings took place. What I would like to show with this is that – the number of meetings and Roma organizations involved in the process may define the final result (how much input from the meetings will be put in the new framework will depend on if there were many meetings and also, if every civil society representative had opportunities to raise their voice).

To start with, the consultation meetings have been entirely voluntary (as the adoption of the strategy by Member States). Therefore, nobody is paid for this job, as Atanas Stoyanov said to me (Stoyanov, 2022). Regarding the selection criterion, as Mr. Stoyanov reveals, the Commission recently has introduced new rules for the Roma and pro-Roma organizations, that would like to participate in the consultation process with the Commission. The known selection criterion is being a registered organization, existing for several years, having enough human and financial capacity, etc. Though this selection criterion was not introduced just out of the blue. As he said, this has something to do with legally removing some people or organizations from participation, as their participation may not always be beneficial for the process (Stoyanov, 2022).

Regarding the regularity of the meetings, he confirms that there was regularity, the civil society organizations would meet with the EU institutions at least four times per year, however, as he recalled, these meetings were not very well planned in advance, as the organizations were usually informed about them in the last minute. Therefore, Roma organizations could not have meaningful participation in these chaotic consultation meetings (Stoyanov, 2022). The ERGO representative has said, that there was no particular schedule for the consultation process, but the meetings have been quite frequent, and they have been inclusive. For instance, during the 2020 year, they had meetings quarterly, but after the adoption of the post-2020 framework, those meetings have become even more often, for example, as she recalled, they would meet almost every month (ERGO rep, 2022). In terms of the selection process, according to her, there was a loose selection criterion, because the

Commission accepted any organization for the consultations, which was registered as NGO, working on Roma issues and existing for minimum for three years. Nothing more important was required, therefore, as she thinks, every organization had an opportunity to participate in this process, it was just dependent on their will (ERGO rep, 2022). All in all, if we compare the ideas of these two civil society representatives, their discussion is a bit contradictory – if there are many consultation meetings between the Commission and Roma organizations, this might show the seriousness of the topic (integration and inclusion of the Roma minority), however if the Roma organization representatives are not informed about these meetings on time, they cannot prepare normally for the meetings, thus, they can not contribute enough to the discussions. It is interesting to see what the European Commission has published on their official website regarding the selection criterion. Just after the adoption of the second EU Roma strategy, the Commission published on their website the call for the Roma and pro-Roma civil society organisations (CSOs) to be involved in the consultation process. The Commission emphasized that the selection would be based on working topic, expertise, outreach capacity, size, and type of an organization. Besides, an organization must: be legally registered in the EU, have demonstrated expertise in policy, research, advocacy work related to Roma equality, inclusion, and participation for at least three years; good working knowledge of English (EC, 2021b¹⁸). These criteria are quite understandable given the sensitivity of the topic, however, if an organization is not registered in the EU or has less than 3 years of expertise, then it would not have an opportunity to take part in that consultation process, which can affect overall the quality of the consultations – maybe exactly that young Roma or pro-Roma organization has valuable input to share with the Commission.

5.3 The structure and coordination of the consultations

According to the ERGO representative, the consultation process between civil society and the European Union was and is a complex mechanism, as it includes at least two layers of

¹⁸ https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/consultation-process_en

consultations. First, it is notable, that inside the Commission, the primary consultation coordinator is the DG JUST, so DIRECTORATE GENERAL Justice and Consumers, which has established permanent consultation platform with civil society (ERGO rep, 2022, Stoyanov, 2022). Specifically, from this DG JUST, Non-discrimination and Roma coordination Unit (JUST.D.1)¹⁹ is responsible for this process. DG JUST not only organizes meetings with CSOs, but it also possesses the authority to oversee the other DGs' activities on Roma (OSF, 2017). Therefore, according to the ERGO representative, consultations also occur between the Commission's different DGs. With their discussion, the DGs ensure an intersectional and mainstream approach to the strategy (ERGO rep, 2022).

Regarding the consultation process between the Commission and Roma organisations, the ERGO representative revealed, that the ERGO Network has coordinator role in this consultation process, So the ERGO Network would open the broader consultations with other civil society (ERGO rep, 2022). According to her, this can be explained by the fact, that ERGO Network is Brussels based organization, funded by the Commission itself, also members-based organization – having members across the EU countries and outside of the EU (Western Balkans, Turkey, Ukraine, etc.), so ERGO is responsible to coordinate input from others. Therefore, it was natural that the Commission asked ERGO to lead the consultations. Except for the ERGO Network, there are other coordinating bodies, involved in the consultations. For instance, these are the EU Roma Policy Coalition and Fundamental Rights Agency (FRA), which has coordinated EU Roma (FRA) Working Party. The Commission established the FRA Working Party as a tool to provide indicators on Roma that would adhere to the EU Roma framework. Moreover, as the ERGO representative reveals, it is a closed mechanism, attended by only governments, National Roma Contact Points and FRA (ERGO rep, 2022). Fundamental Rights Agency website gives us more complimentary information – the EU Roma Working Party also brings statistical offices from Member States and the Commission, and they share

¹⁹ https://op.europa.eu/en/web/who-is-who/organization/-/organization/JUST/COM_CRF_231300

good practices, methodologies and develop the indicators for Roma inclusion (FRA, 2020b). Thus, ERGO has organized consultation meetings with ERPC, FRA and civil society and presented all of the input within the FRA Working Party (ERGO rep, 2022). So, if we imagine, this consultation structure may look like this:

1st Layer of consultations:	2nd Layer of consultations:	3rd Layer of consultations:
<p>DG JUST</p> <p>↓</p> <p>ERGO</p> <p>↓ ↓</p> <p>ERPC FRA</p> <p>↓</p> <p>FRA Working Party</p>	<p>FRA Working Party</p> <p>↓</p> <p>❖ Commission</p> <p>❖ National Roma Contact Points</p> <p>❖ Statistical Offices</p> <p>❖ FRA</p>	<p>ERGO</p> <p>↓</p> <p>Roma and Pro-Roma organizations</p>

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When I asked the Roma organization representatives about the number of Roma and pro-Roma organizations involved in the consultations, they told me that there was no exact number, however as they knew, numerous Roma organizations participated in this process, as European Roma civil society is huge in numbers (Stoyanov, 2022). The ERGO representative shared that ERGO Network had consultations with 60 organisations in the past years (ERGO rep, 2022). Through the Phiren Amenca representative I could get access to the list of those organisations involved in the consultations. Their number is between 40 and 50. Among these organizations there are the most famous Roma, pro-Roma and international organizations and their bodies, such as: Eurodiaconia, Phiren Amenca Network, ERGO Network, ERRC, Amalipe, ERIAC, Carpathian Foundation, Open Society Foundations, European Roma Travellers Forum, Central Council German Sinti and Roma, UN (UNHCR, OHCHR, UNICEF),

²⁰ I compiled this table based on information, revealed by the ERGO Network representative with me (in 2022).

WHO, OSCE (ODIHR), FRA, Council of Europe, EQUINET, CEU. Therefore, the consultations do not really have lack of diversity in terms of organizations and their expertise.

5.4 Contribution from CSOs, mainly ERGO Network and Phiren Amenca

Based on my interviews, I got information about the involvement of the two leading Roma organizations in the discussions with the EU – ERGO Network and Phiren Amenca²¹. According to policy analyst, Atanas Stoyanov, the contribution to the discussion from Phiren Amenca is related to Roma youth policies. As the Roma organization, usually advocating for the rights of young Roma, Phiren Amenca has always advised the Commission to address young Roma people in their policies; they were constantly pushing for young Roma to be part of the EU Roma framework, as young Roma were not mentioned at all in the 2011 framework. Before the adoption of the post-2020 Roma framework, Phiren Amenca suggested how the EU Roma strategy should have addressed young Roma (Stoyanov, 2022). Interestingly, during that period, this organization has examined the respectful situation in the EU Member States with significant Roma populations - Hungary, Czech Republic, Slovakia, and Romania and compared how young Roma were positioned in those national documents in the comparison to the EU documents. Based on this, Phiren Amenca has concluded some important recommendations for the European Commission, and they elaborated on the document, which is discussing how Roma youth should be reflected in the EU Roma strategy²². Based on this document, it becomes clear that they suggested the Commission that they target diverse Roma youth at the national and EU levels; for example, that Roma youngsters should be one of the target groups of European youth programs and projects, such as Erasmus+, the European Solidarity Corps, the EU Youth Dialogue, the European Voluntary Service, etc. (Phiren Amenca, 2019). Another point from Phiren Amenca was that young Roma should not have only the beneficiary role, but instead, they should be involved in the decision-making process in Roma structures and CSOs to be able to raise their voice and determine the laws that will

²¹ Phiren Amenca in the Romani language means – walk with us.

²² <https://phirenamenca.eu/discussion-on-the-future-of-eu-roma-youth-policies/>

affect them. Phiren Amenca also pushed not only to address young Roma generally, but also the needs of various Roma youth groups (with different gender, religious and sexual identities); They urged addressing the needs of different young Roma groups in various policies, programs, projects, and measures. Moreover, they stressed the significance of Roma youth civil society participation in the various stages of the development of EU policies aimed at Roma youth (Phiren Amenca, 2019).

All in all, the main suggestions from Phiren Amenca were about young Roma, as this is the only organization in the coalition which is working on the Roma youth issues (Stoyanov, 2022). Finally, we can see some results of the Phiren Amenca Network fight - in the horizontal objectives of the new framework – at least Roma youth is mentioned, particularly, the 4th objective – “*Increase effective equal access to quality inclusive mainstream education*” with its target – “*to ensure that by 2030 the majority of **Roma youth** complete at least upper secondary education*” and the 5th objective “*Increase effective equal access to quality and sustainable employment*” mentions a target on young Roma – “*Cut gap in NEET rate by at least half - to ensure that by 2030 less than one in three **Roma youth** is not in education, employment or training*” (EC, 2020b, p.5). Moreover, in the text of the new Roma framework, we read that the national strategic framework should set out targets and measures for specific groups (Roma children, women, **young people**, etc) to reflect the diversity among Roma (EC, 2020b, p.8). Also, it is mentioned in the framework, that the role of the national Roma Contact Points should be enhanced to guarantee national engagement and discourse empowering Roma (particularly **young people** and women) (EC, 2020b, p.9-10). Besides, the Commission is promising in the framework, that their awareness-raising activities about Roma in Member States with significant Roma communities will focus on empowering and highlighting Roma children, **young people**, and women as role models in diverse communities (EC, 2020b, p. 15). Another thing the EU says is that active involvement of Roma, “*particularly women and **youth***” will be promoted through European Roma Platform and the Commission is suggesting that “*Roma youth should be offered dedicated traineeships or junior positions in national*

structures linked to the implementation of national Roma platforms” (EC, 2020b, p.15). Therefore, Atanas Stoyanov considers all of these things (mentioning of the Roma youth in the new framework, having targets on them, recommendations for young Roma to be involved in the Roma platforms and be given traineeships) as achievements of the ongoing fight from Phiren Amenca International Network (Stoyanov, 2022). However, as Stoyanov mentioned, it seems that the EU Roma framework has not really been for young Roma, it is just generally about Roma and the Commission has never taken everything that the organization asked for, but Phiren Amenca, as an organization, of course realizes that it is not possible to consider all concerns about young Roma so far (Stoyanov, 2022).

When it comes to the second organization – ERGO Network, the ERGO representative revealed that the way ERGO contributed to the consultations was as follows: developing list of recommendations for the EU framework and national strategic frameworks on all thematic areas, that could serve as a model for civil society to do their advocacy and to do input; organizing meetings with civil society and, inside the network; making a survey about the consultation processes on national level, which was answered by 80 respondents from 27 countries (ERGO rep, 2022). According to the ERGO representative, the key message from ERGO has always been that the antigypsyism issue should have been addressed in the framework and recognized as a form of structural and institutional racism (and now there is a reference to it in the post-2020 framework). Another thing the ERGO pushed the Commission for is the need to have specific targets and indicators in the framework, which is now visible in the new framework, because the 2011 framework did not have specific targets and indicators. For example, there is now a target about segregation in education, as she mentioned (ERGO rep, 2022). The 4th objective from the new framework about increasing access to education includes the target: “*Work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools*” (EC, 2020b, p.5). The European Commission has published the contribution materials from the ERGO after 2019

consultation meetings with the civil society²³, according to which, ERGO not only asked for the recognizing antigypsyism as a specific form of racism, but to put it as a separate objective and policy area of the post-2020 framework (combating antigypsyism) with another policy area – Arts, Culture and History. The commission document also reveals that in the 2019 consultations, ERGO also called for tackling neglected or under-addressed issues, including material deprivation, poverty, house evictions, discrimination, and diversity within the Roma communities (EC, 2019c). From the new framework, we know that poverty and discrimination is addressed, but still there is no target about house evictions and diversity of all Roma groups is not fully addressed.

The recommendations and suggestions from the ERGO network were even more inclusive. ERGO representative mentioned that ERGO Network with other organizations pushed the EU for the alignment of the framework with various other mainstream EU policies, for instance, European Semester and the European Pillar of Social Rights. In addition, ERGO Network has also pushed the EU council, and DG for Employment, Social Affairs and Inclusion to strengthen monitoring of the framework implementation (ERGO rep, 2020; EC, 2019c). Additionally, ERGO Network once again brought attention to the engagement of Roma CSOs through significant consultation processes (EC, 2019c). Because ERGO and other civil society pushed the EU about all of these, therefore the new framework is an advanced form of the first framework, said the ERGO representative. If the civil society did not criticize and give suggestions to the Commission, these things would not have been considered. However, the result of this fight did not come immediately – the Commission did not decide suddenly to make some changes in the framework – this has been an effort of several years from the civil society, again more than 10 years of fight, which is direct advocacy work of ERGO and few other organizations, particularly the EU Roma Policy Coalition (ERGO rep, 2022).

²³ https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu/workshop-future-policies-roma_en#agenda-and-background-papers

Except for the contribution from the ERGO and Phiren Amenca networks, other CSOs and Roma organizations also put their input into the consultations. Most of the other CSOs (for instance, Eurodiaconia, EU Roma Network, ERIAC, ERRC) also share the same key suggestions – addressing antigypsyism at the highest level and putting concrete targets in that area; considering gender perspective, therefore promoting equality between Roma men and women; considering the diversity of the Romani people and the needs of specific groups of Roma, including mobile-Roma and youth; making targets under each policy area; quality participation of Roma NGOs in the decision-making process. In detail, for example, Eurodiaconia (European network of social and health care organisations, promoting Roma inclusion²⁴) raised the following points:

- To establish a direct connection between the European Pillar of Social Rights implementation and the future EU Roma framework, particularly, using principle 19 on housing (including protection against eviction and services for the homeless) and principle 16 on health care for Roma inclusion.
- Tackling antigypsyism more systematically – better reporting hate crimes.
- Addressing the immediate needs of mobile and migrant Roma people (EC, 2019c).

As we can see, their focus was on social justice, especially regarding housing issues and antigypsyism. Providing a target in the area of antigypsyism (reporting hate crimes) is considered by the Commission (a target from the 3rd horizontal objective), however, considering the housing issues, especially forced evictions, still lies behind the attention from the decision-makers, as well as clear targeting of mobile Roma issues.

EU Roma Network²⁵, brought more attention to the implementation phase rather than the future framework objectives. This organization suggested that the EU should:

²⁴ <https://www.eurodiaconia.org/who-we-are/presentation/>

²⁵ <https://www.euromanet.eu/about-us/>

- monitor the commitment from the Member States in the implementation process, especially at local level.
- Consider the different context of each member state.
- Keep recognizing the role of European structural and investment funds and make sure that these funds will contribute to the delivery of results (EC, 2019c).

The European Roma Institute for Arts and Culture (ERIAC) contributed to the discussions, mainly from a Romani culture perspective. According to the ERIAC, the new EU Roma framework should make promoting Roma art and culture a priority by creating a separate policy area of Roma arts, culture, and history (EC, 2019c). However, even though raising awareness of Roma art and culture is mentioned in the new framework, this topic is not a separate policy area (EC, 2020b).

All in all, most of the Roma and pro-Roma organizations, involved in the consultation process with the European Union shared similar ideas on what the post-2020 EU Roma framework should have looked like and they tried to raise the points exactly based on their expertise – Phiren Amenca as youth organization, making Roma youth related suggestions, ERIAC -Roma culture related points, ERGO – considering all dimensions of Roma issues, Eurodiaconia – social justice (housing) related recommendations. These diverse points are reflected in the new framework, at least partially, and some recommendations have remained as recommendations.

5.5 The European Commission – the partner or opposant?

It is also important to see how the Roma civil society evaluates the feedback and reaction from the EU to the civil society suggestions about the Roma framework. As the ERGO representative revealed, obviously the Commission did not consider all the suggestions from the civil society. The fact that the recommendation on the new framework is short (it's about 20 pages long) and the whole framework is even shorter (18 pages) shows this. However, she understands the impossibility of including all the Roma concerns into the strategic frameworks, as Atanas Stoyanov shared this idea as well. But the most crucial thing here according to her is that the

EU took up the main message from the consultation process – now the Commission is not dealing with the Roma minority only from a social perspective but also from human rights perspective - now they see Roma as specific individuals. The new framework has addressed the points about their culture and diversity (ERGO rep, 2022). For example, the need to address the diversity of this minority in the new framework is mentioned ten times (EC, 2020b). She thinks that this has something to do with growing and progressive understanding by the Commission (DG JUST) about the Roma - who Roma are, what their situation is and how to approach them, which is coming from the fact, that the EU has been working on Roma issues since the beginning of the 2000s, so for almost 20 years (ERGO rep, 2022). Moreover, as she said, after so many years of working on the Roma issues, the Commission has started a personal fight for these people, and they are aware that further construction is necessary so that the time and money already invested will not be wasted. However, a good thing now is that if the civil society needed to be very critical in the beginning, now they do not need to be so critical, because now they see that the Commission has become more partner and ally, than the opposant, for instance, in terms of the fight against antigypsyism. Interestingly, she does not think the same about the Member States in this regard. According to her, the Commission is working with the NGOs to make sure that the Member States comply with obligations and responsibilities and there is always a greater interest and commitment from the EU level than the Member States on Roma and generally as well (ERGO rep, 2022). Therefore, overall, she considers the EU side and their work as positive, because the Commission took a significant number of demands, and concerns of the civil society within the framework when there were challenges, such as how to make a strategy, which all the 27 Member States would approve and how to convince all these states to adopt it. Thus, she thinks that the Commission had to compromise a bit, they could not put everything into the framework as not all the states would agree. That is why there are minimum and additional commitments in the framework based on a country population and situation regarding the Roma. In general, she praised the ability,

wisdom, and political understanding of the Commission in finding such a language that convinced the 27 Member States to adopt the framework (ERGO rep, 2022).

Atanas Stoyanov does not have such a positive view about the Commission work. He thinks that there were more changes in the first years and now there is nothing new, it is just continuation of the Roma policies by the Commission. As he considers, it is because there is a lack of ambition and initiative from the current Commission Roma team leader. This idea was also shared by the ERRC representative, Jonathan Lee, who considers the current Commission a conservative commission, which “*does not want to upset status quo*” (Lee, 2021). However, Atanas Stoyanov sees the will from the Member States, but to make everything work out, he thinks that organizing EU Roma summits are necessary. Before covid-19, there were normal summits, but now they do not organize these summits anymore (Stoyanov, 2022). From the Commission website this is obvious what Stoyanov says – the last EU Roma Summit was held in 2014. After that there have not been any Roma Summits²⁶. As Stoyanov recalls, there were some meetings in the Commission, for instance, the last one, as called EU anti-racism summit, but it has not really been a summit, as most of the participants were people from the Commission itself (Stoyanov, 2022). Careful examination of the EU website about this anti-racism summit clearly shows the lack of participation of the highest decision-makers and Roma organizations. There were only 3 Roma organizations represented at the summit: ERGO, Phiren Amenca and ERIAC, with only one representative. From international organisations, there were only UN and WHO representatives presented. Besides, most of the summit topics were not about Romani issues. The only Roma-related topics discussed at this summit were environmental racism, which Romani people face, and reduced educational opportunities for vulnerable youth²⁷.

²⁶ https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/european-roma-platform-roma-summits_en#roma-summits

²⁷ <https://www.antiracism-eusummit2022.eu/agenda/> for participant and topic lists, see the agenda of the European Anti-Racism Summit.

It is also interesting to know what the Commission did not consider from the civil society consultations. For instance, the ERGO representative says the Commission did not address police violence and forced evictions in the new framework. These points were also raised by the European Roma Rights Centre (ERGO rep; Stoyanov, 2022). The ERGO representative explains this with the point of view, that in terms of policy violence and house evictions, the Commission does not have a negotiable position, that it is a responsibility of the Member States, and it is a complicated area to deal with at member state level. Also, it is not a long-term solution to give them alternate accommodation. Besides, even though there is one target under the objective about health (about life expectancy), it is still not enough, so the Commission has not fully addressed this need (ERGO rep, 2022).

5.6 The civil society role

The civil society representatives reveal if the changes between the two Roma frameworks resulted from ongoing consultations between the EU and civil society. Phiren Amenca and ERGO Network representatives declare the Roma and pro-Roma organizations' role in the consultation process with the EU. According to Atanas Stoyanov, the changes between the frameworks were partially because of the civil society effort and, because of the flexibility of the people working at that time in the Roma team (Stoyanov, 2022). The ERGO representative thinks, that obviously, the changes are because of the hard work of the civil society in general, but at the same time, there is also work from the EU, particularly Commission and Parliament, thus, she emphasizes the role of the two sides. She said that the Commission has made monitoring and evaluation reports, so they have a very clear overview of what the problems and challenges are at national level; There is also work from the Fundamental Rights Agency, which reports are taken very seriously by the Commission, and the work of the Member States and other intergovernmental organizations, such as UN, ECRI, Council of Europe (and its different bodies). Overall, she made it clear that civil society in coalition and partnership with other organizations and EU institutions make the Commission move forward regarding the EU

Roma policies (ERGO rep, 2022). Based on what she said, we can imagine that the partnership and cooperation between the EU and civil society look like a circle – the Parliament pushes the civil society, civil society pushes the Parliament and other institutions, thus, all these institutions and bodies are involved in this process, which is why there is a result there. She also said that it is very important to ally with EU institutions and constantly keep pushing them – make youth partnerships, send letters, and participate in every debate about Roma inclusion so that the suggestions from the civil society will be considered. Atanas Stoyanov also added, that whatever result there is now, it is never enough, and he thinks that the civil society should be even more consulted and involved in the consultation process with the EU, however, because there is a minimal number of people working in the Roma team, it is hard to have more work done, so this point should be considered (Stoyanov, 2022). To sum up, the Roma organization representatives state that the work of the civil society is undeniable, because CSOs did a good job and they have a major role in the improving of the EU Roma framework, however they have not been alone in this fight. The EU institutions also did their job (no matter how big or small), and cooperation of all these bodies, institutions and organizations has brought the result.

Chapter 6: Conclusion

The analysis and evaluation of EU Roma frameworks have shown significant changes and shifts from the first EU Roma framework to the second one; mostly, these changes are about the objectives and targets under these objectives. For instance, first of all, there is improved and precise terminology and language in the new strategy; secondly, unlike the previous framework, now the new framework has an intersectional approach (for instance, in the employment sector and regarding fighting poverty) as well as additional objectives, especially adding the objective regarding fighting antigypsyism (which shows that civil society managed to make the EU realize the need for tackling this inequality, also, the pandemic experience

convinced the EU of this and that they have finally acknowledged antigypsyism as a phenomenon, not just as a term, that this is the root cause of discrimination toward Roma). Furthermore, discrimination issue, in particular, segregation in education is more explicit in the new framework as well, which is also a positive step (however, not yet sufficient because the target about segregation in schools does not aim for more than 50% elimination of segregation). Therefore, based on the desk research and my interviews, firstly, I argue that the post-2020 EU Roma framework clearly differs from the first one and it is an improved version of the first EU Roma framework; and the reasons behind these differences should be found in the development process between the first and second EU Roma frameworks – the EU's constant monitoring of the results of the first framework implementation, evaluation and interpretation of these results and more importantly – consultation process with civil society organisations led the EU to adopt clearer and more inclusive approaches in the Roma strategic framework as Roma and pro-Roma organizations worked hard and pushed the Commission to better address the needs and concerns of the Roma people in the framework. Hence, the role of the CSOs is quite significant, especially in making the EU finally recognize antigypsyism and address it at the highest level.

Based on the interview analysis, precisely the selection criteria of the past and current CSOs involved in the consultation process, I also would like to give out some recommendations for the European Union:

- i. It would be more beneficial if each Roma and pro-Roma organization had ENOUGH opportunities to participate in the consultation process; having legal requirements may not always be a good idea.
- ii. If possible, there should not be time restraints for the civil society – they should be able to express ALL of their recommendations and suggestions freely.
- iii. Diversity of civil societies should be guaranteed, so that different CSOs with diverse expertise will be involved in the discussions.

I hope my analysis will give impetus to the EU and non-EU experts to further explore and research all of the factors affecting the adoption of the new EU Roma Strategic Framework and the way the EU communicates with the civil society and conduct complete, comprehensive research on the topic, as I could not do it due too many limitations. I suppose future research would have to include more in-depth interviews with the EU representatives from each institution and also interviews with the representatives of other Roma-advocating organisations, including local Roma NGOs. Moreover, the research period has also made it clear to me that if we want to have a successful implementation of the EU Roma policies or Roma policies of other organizations and states, this depends on cooperation between the Roma population and the rest of the society. Romani people working separately in their organizations and EU policymakers making Roma policies alone will not bear much fruit. They should be working together, so more Romani people should be involved in making Roma policies, particularly the number of Romani people working in the Roma teams of at least the Commission, Parliament, Council of Europe and OSCE should be significantly increased.

Bibliography

Amnesty International. (2015). The Roma in Europe: 11 things you always wanted to know but were afraid to ask. Retrieved June 27, 2021, from: <https://www.amnesty.org/en/latest/campaigns/2015/04/roma-in-europe-11-things-you-always-wanted-to-know-but-were-afraid-to-ask/>

Bandov, G. & N. Kolman. (2018). Research on Europeanization in Literature: From the Top-down Approach to Europeanization as a Multi-directional Process. *Cadmus Journal*. 3 (5). Pp. 134-144. Retrieved July 21, 2022 from: <http://cadmusjournal.org/files/pdfreprints/vol3issue5/Research-on-Europeanization-in-Literature-GBandov-NKolman-Cadmus-V3-I5-Reprint.pdf>

Bernard, H. R. (2006). Research Methodology in Anthropology: Qualitative and Quantitative Approaches. Lanham, MD: AltaMira Press.

Cerna, L. (2013). The Nature of Policy Change and Implementation: A Review of Different Theoretical Approaches. Organization for Economic Co-Operation and Development (OECD). Retrieved June 6, 2022, from: <https://www.oecd.org/education/ceri/The%20Nature%20of%20Policy%20Change%20and%20Implementation.pdf>

Crepaz, K. (2016). The Impact of Europeanization on Minority Communities. Berlin, Germany: Springer. Retrieved June 20, 2020 from: <https://www.springerprofessional.de/the-impact-of-europeanization-on-minority-communities/7072038>

Cukrowska, E., & Kóczé, A (2013). Interplay between gender and ethnicity: Exposing Structural Disparities of Romani women. Analysis of the UNDP/World Bank/EC regional Roma survey data. Retrieved June 20, 2021, from: <https://webcache.googleusercontent.com/search?q=cache:b5L47VVaNOsJ:https://www.und>

p.org/content/dam/rbec/docs/Exposing-structural-disparities-of-Romani-women.pdf+&cd=3&hl=en&ct=clnk&gl=hu

Dye, T. R. (2017). Understanding public policy. Fifteenth Edition. Pearson Education. Retrieved 25 May 2022, from: <https://dokumen.pub/understanding-public-policy-fifteenth-edition-9780134169972-0134169972.html>

Eurodiaconia. (2021). Eurodiaconia's assessment of the EU Roma Strategic Framework for Equality, Inclusion and Participation. Retrieved June 20, 2021, from: https://www.eurodiaconia.org/wordpress/wp-content/uploads/2021/01/Eurodiaconia-Assessment-of-EU-Roma-Strategic-Framework_FINAL.pdf

Euro Cities. (2020). The EU Roma strategic framework for equality, inclusion and participation for 2020-2030 – Policy brief. Retrieved July 22, 2021, from: https://nws.eurocities.eu/MediaShell/media/Policy_brief_on_the_EU_Roma_strategic_framework_for_equality_inclusion_and_participation_2020-2030.pdf

EURoma Network. (2021). European Recommendation on Roma equality, inclusion and participation for the next decade now approved. Retrieved June 20, 2021, from: <https://www.euromanet.eu/esi-funds-roma-policies/european-recommendation-on-roma-equality-inclusion-and-participation-for-the-next-decade-now-approved/>

European Anti-Racism Summit 2022. (n.d.). European Anti-Racism Summit 2022. Retrieved July 17, 2022, from <https://www.antiracism-eusummit2022.eu/>

European Commission. (2011a). Working together for Roma inclusion. The EU Framework explained. Retrieved April 27, 2021, from: <https://www.coe.int/t/congress/Sessions/Alliance/EC-roma.pdf>

European Commission. (2011b). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. An EU Framework for National Roma Integration Strategies up to 2020.

Retrieved April 20, 2021, from: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0173&from=en>

European Commission. (2017). Midterm review of the EU framework for national Roma integration strategies. Retrieved May 17, 2021, from: [https://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/com/2017/0458/COM_COM\(2017\)0458_EN.pdf](https://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/com/2017/0458/COM_COM(2017)0458_EN.pdf)

European Commission. (2018a). Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020. Retrieved April 15, 2021, from: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0480&from=EN>

European Commission. (2018b). Communication from the Commission to the European Parliament and the Council Empty. Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020. Retrieved May 2, 2021, from: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0785>

European Commission. (2018c). Antigypsyism: Increasing Its Recognition to Better Understand and Address Its Manifestations. Retrieved May 27, 2021, from: https://ec.europa.eu/newsroom/just/document.cfm?doc_id=55652

European Commission. (2019a). Commission Staff Working Document. Roma inclusion measures reported under the EU Framework for NRIS, Accompanying the document Communication from the Commission to the European Parliament and the Council- Report on the implementation of national Roma integration strategies – 2019. Retrieved July 19, 2022, from: https://ec.europa.eu/info/sites/default/files/cswd_roma_inclusion_measures_reported_under_the_eu_framework_for_nris_pt1_en.pdf

European Commission. (2019b). Communication from the Commission to the European Parliament and the Council - Report on the implementation of national Roma integration

strategies – 2019. Retrieved July 19, 2022 from:
https://ec.europa.eu/info/sites/default/files/swd2019-320-final_report_on_the_implementation_of_national_roma_integration_strategies_en.pdf

European Commission. (2019c). Workshop on future policies for Roma. Retrieved June 22, 2022, from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu/workshop-future-policies-roma_en#agenda-and-background-papers

European Commission. (2020a). Factsheet - A new EU Roma Strategic Framework. Retrieved April 20, 2021, from:
https://ec.europa.eu/info/sites/default/files/factsheet_a_new_eu_roma_strategic_framework_en.pdf

European Commission. (2020b). Communication from the Commission to the European Parliament and the Council. A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. Retrieved May 21, 2021, from:
https://ec.europa.eu/info/sites/default/files/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf

European Commission. (2020c). A Union of Equality: EU Roma strategic framework for equality, inclusion and participation and its accompanying proposal for a revised Council recommendation on national Roma strategic frameworks for equality, inclusion and participation. Retrieved June 18, 2021, from: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0530&from=EN>

European Commission. (2020d). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A Union of Equality: EU anti-racism action plan 2020-2025. Retrieved May 23, 2021, from:

[https://ec.europa.eu/info/sites/default/files/a union of equality eu action plan against racism 2020 -2025 en.pdf](https://ec.europa.eu/info/sites/default/files/a_union_of_equality_eu_action_plan_against_racism_2020-2025_en.pdf)

European Commission. (2021a). Roma equality, inclusion and participation in the EU. Retrieved May 22, 2021, from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-equality-inclusion-and-participation-eu_en

European Commission. (2021b). Call for expression of interest to participate in consultation processes of Roma and pro-Roma civil society organisations. Retrieved June 22, 2022 from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/consultation-process_en

European Commission (n.d). Workshop on future policies for Roma. Retrieved August 12, 2021, from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu/workshop-future-policies-roma_en

European Commission (n.d). European Roma Platform & Roma Summits. Retrieved July 21, 2022, from: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/european-roma-platform-roma-summits_en#roma-summits

European Committee of the Regions – CoR. (2021). OPINION - A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. Retrieved June 30, 2021, from: <http://edz.bib.uni-mannheim.de/edz/doku/adr/2020/cdr-2020-5625-en.pdf>

European Council. (2021b). Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation 2021/C 93/01. Retrieved May 28, 2021, from: https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=OJ:JOC_2021_093_R_0001

European Roma Grassroots Organisations Network (ERGO). (2020). Recommendations for the national strategic frameworks under the new EU Roma Strategic Framework for Equality,

Inclusion and Participation. Retrieved June 19, 2021, from: <https://ergonetwork.org/wp-content/uploads/2020/12/Guidelines-to-Member-States-NRFs-2020.pdf>

European Roma Rights Centre (ERRC). (2020). New EU Roma Framework Falls Short on Police Brutality, Justice, & Segregation. Retrieved July 3, 2021, from: <http://www.errc.org/press-releases/new-eu-roma-framework-falls-short-on-police-brutality-justice--segregation>

European Union Agency for Fundamental Rights (FRA). (2014). Roma survey – Data in focus Poverty and employment: the situation of Roma in 11 EU Member States. Retrieved April 20, 2022, from: https://fra.europa.eu/sites/default/files/fra-2014-roma-survey-employment_en.pdf

European Union Agency for Fundamental Rights (FRA). (2020a). Monitoring framework for an EU Roma Strategic Framework for Equality, Inclusion and Participation: Objectives and indicators. Retrieved May 19, 2021, from: https://fra.europa.eu/sites/default/files/fra_uploads/2020-portfolio_of_indicators_working-paper_en.pdf

European Union Agency for Fundamental Rights (FRA). (2020b). Roma Working Party - Consultations on the Roma inclusion monitoring framework. Retrieved July 15, 2022, from: <https://fra.europa.eu/en/news/2020/roma-working-party-consultations-roma-inclusion-monitoring-framework>

European Union Agency for Fundamental Rights (FRA). (2021). Fundamental Rights Report 2021. Retrieved August 7, 2021, from: <https://fra.europa.eu/en/publication/2021/fundamental-rights-report-2021>

European Union. (2016). European Committee of the Regions (CoR). Retrieved June 27, 2021, from: https://europa.eu/european-union/about-eu/institutions-bodies/european-committee-regions_en

Hirschhausen, U. & Patel, K. (2010). Europeanization in History: An Introduction. In *Europeanization in the Twentieth Century: Historical Approaches*, by M. Conway and K. K. Patel (Eds), 1–18. The Palgrave Macmillan Transnational History Series. London, United Kingdom: Palgrave Macmillan UK. Retrieved June 15, 2022, from: https://doi.org/10.1057/9780230293120_1

Imperial, M. T. (2021). Implementation Structures: The Use of Top-Down and Bottom-Up Approaches to Policy Implementation. Retrieved May 18, 2022, from: <https://oxfordre.com/politics/view/10.1093/acrefore/9780190228637.001.0001/acrefore-9780190228637-e-1750>

Jacquot, S., Woll. C. (2003). Usage of European integration: Europeanisation from a sociological perspective, *European Integration online Papers*, Vol.7. no.12. Retrieved July 20, 2022, from: https://www.researchgate.net/publication/30391285_Usage_of_European_Integration_Europeanisation_from_a_Sociological_Perspective

Lajčáková, J., Hojsík, M. & Karoly, M. (2020). Combatting Antigypsyism. Expert reports building on forward-looking aspects of the evaluation of the EU Framework for National Roma Integration Strategies. European Commission. Retrieved May 27, 2021, from: https://ec.europa.eu/info/sites/default/files/post2020_eu_roma_in_antigypsyism.pdf

Matland, R. E. (1995). Synthesizing the Implementation Literature: The Ambiguity-Conflict Model of Policy Implementation. *Journal of Public Administration Research and Theory: J-PART*, 5(2), 145–174. <http://www.jstor.org/stable/1181674>

Naydenova, V. & Matarazzo, M. (2019). Post-2020 EU Roma Strategy: The Way Forward. *Open Society Foundations*. Retrieved May 25, 2021, from: https://ec.europa.eu/info/sites/default/files/post_2020_eu_roma_strategy_-_the_way_forward.pdf

Open Society Foundations (OSF). (2008). Press Release. NGO Coalition Calls for EU Framework Strategy Against Roma Discrimination. Retrieved July 21, 2022, from: <https://www.opensocietyfoundations.org/newsroom/ngo-coalition-calls-eu-framework-strategy-against-roma-discrimination>

Open Society Foundations (OSF). (2017). Revisiting the EU Roma Framework: Assessing the European Dimension for the Post-2020 Future. Retrieved April 25, 2021, from: <https://www.opensocietyfoundations.org/publications/revisiting-eu-roma-framework-assessing-european-dimension-post-2020-future>

Phiren Amenca. (2019). Discussion on the future of EU Roma youth policies. Retrieved July 22, 2022, from: <https://phirenamenca.eu/discussion-on-the-future-of-eu-roma-youth-policies/>

Popova, Z. (2019). Understanding the EU Roma Policy. *Journal on Ethnopolitics and Minority Issues in Europe*. 18 (1). Pp.20-46.

Radaelli, C. (2004), Europeanisation: Solution or problem? *European Integration online Papers*. 8 (16). Retrieved July 15, 2022 from: <http://eiop.or.at/eiop/pdf/2004-016.pdf>

Rorke, B. (2011). Beyond Rhetoric: Roma Integration Roadmap for 2020. Priorities for an EU Framework for National Roma Integration Strategies. *The Open Society Roma Initiatives*. Retrieved April 29, 2021, from: <https://www.opensocietyfoundations.org/publications/beyond-rhetoric-roma-integration-roadmap-2020>

Rostas, I. (2020). Ethnic Identity and Policymaking: A Critical Analysis of the EU Framework for National Roma Integration Strategies. In H. van Baar & A. Kóczé (Eds.), *The Roma and Their Struggle for Identity in Contemporary Europe* (1st ed., Vol. 3, pp. 179–202). Berghahn Books. Retrieved July 12, 2022, from: <https://doi.org/10.2307/j.ctv1k3nr1x.13>

Stoyanov, A. (2020). WHAT MAKES A MEASURE RELEVANT? Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012-2020. Retrieved June 27, 2022, from: [https://www.academia.edu/50991766/WHAT MAKES A MEASURE RELEVANT Understanding the interaction between the European Commission and the National Roma Contact Points in reporting the implementation of National Roma Integration Strategies in 2012 2020](https://www.academia.edu/50991766/WHAT_MAKES_A_MEASURE_RELEVANT_Understanding_the_interaction_between_the_European_Commission_and_the_National_Roma_Contact_Points_in_reporting_the_implementation_of_National_Roma_Integration_Strategies_in_2012_2020)

United Nations. Department of Economic and Social Affairs. The 17 Goals. Retrieved July 20, 2021, from: <https://sdgs.un.org/goals>

United Nations Human Rights Office of the High Commissioner (OHCHR). (2014). Advocacy Brief on Roma Inclusion Policies. Second Draft 17 July 2014. Retrieved July 20, 2022, from: <https://europe.ohchr.org/Documents/Publications/Advocacy%20Brief%20on%20Roma%20Inclusion%20Policies%20-%20second%20draft.pdf>

United Nations Human Rights Office of the High Commissioner (OHCHR). (2020). Intervention of the Office of the High commissioner for Human Rights for the launch of the strategic EU Roma Framework for equality, Inclusion and Participation, 12 October 2020. Retrieved June 20, 2021, from: <https://europe.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=2587&LangID=E>

Truth and Reconciliation Commission of South Africa Report. Volume 1. 1998. <https://www.justice.gov.za/trc/report/finalreport/Volume%201.pdf> retrieved May 1, 2022.

World Bank. (2011). Roma Inclusion is Smart Economics - Illustrations from Bulgaria, Czech Republic, Romania and Serbia. Knowledge Brief. Europe and Central Asia. Volume 39. Retrieved June 15, 2021, from:

<https://documents1.worldbank.org/curated/en/509711468261335080/pdf/622560BRI0Roma0Box0361475B00PUBLIC0.pdf>

World Bank. (2012). Reducing Vulnerability and Promoting the Self - Employment of Roma in Eastern Europe Through Financial Inclusion. Retrieved June 15, 2021, from: <https://documents1.worldbank.org/curated/en/157071468249644850/pdf/723310WP0P127200financial0inclusion.pdf>

Zeb-un-Nisa, Mustafa, G. Yaseen, Z. Arslan, M. & Imran, M. (2021). Theoretical Approaches to Study the Public Policy: An Analysis of The Cyclic/Stages Heuristic Model. *Palarch's Journal of Archaeology of Egypt/Egyptology* 18(10), 1307-1321. Retrieved May 19, 2022, from <https://archives.palarch.nl/index.php/jae/article/view/10010>

- ✚ Email Interview with a local Roma representative from Romania – 20 July 2021.
- ✚ Online Interview with Silvan Agius - European Commission representative (expert from the cabinet of the Commissioner of Equality) – 20 July 2021.
- ✚ Online Interview with a representative from ERGO Network – 22 July 2021.
- ✚ Email Interview with Jonathan Lee, the advocacy and communications manager at European Roma Rights Centre (ERRC) – 22 July 2021.
- ✚ Online Interview with Atanas Stoyanov – Policy Analyst at Phiren Amenca – 27th June 2022.
- ✚ Online Interview with a representative from ERGO Network – 6th July 2022.

Appendices

Appendix 1



Participant Information sheet

Participant Information Sheet

Study title and Researcher Details.

Master thesis – The role of the civil society consultations in the post-2020 EU Roma Framework

Researcher: Mimoza Tielidze, MA student of *Central and Eastern European, Russian and Eurasian Studies*. 2484557T@student.gla.ac.uk

Supervisors: Sandor Gallai (sandor.gallai@uni-corvinus.hu)
& Helen Hardman (Helen.Hardman@glasgow.ac.uk)

You are being invited to take part in a research study. Before you decide to take part it is important for you to understand why the research is being done and what it will involve. Please read the following information carefully and discuss it with others if you wish. Ask the researcher if there is anything that is not clear or if you would like more information. Take some time to decide whether or not you wish to take part.

Thank you for reading this.

Do I have to take part?

You can decide whether you would like to participate in this research or not. Your participation is voluntary. I also want to emphasize that you can withdraw from the research at any time.

What is the purpose of the study and why am I being asked to participate?

I am conducting this interview because my research plans to enrich the academic discussion about the EU Roma Frameworks with valuable insights from the EU and local policy-makers, experts,

academicians. I hope I can get valuable information and opinions from you as well, which will let me deeply investigate the chosen topic and contribute to the further researches with my thesis.

What will happen to me if I take part?

The interview consists of about 15-18 questions and it will take about one hour via Zoom/Skype/Meets.

Will my taking part in this study be kept confidential?

I will make sure that your personal data is kept securely until the end of the research. Should you consent, I will keep your email for future communication. After the end of the research project, all of your personal data will be deleted (including your email address if you do not want me to keep it).

Confidentiality will be respected unless there are compelling and legitimate reasons for this to be breached. If this was the case we would inform you of any decisions that might limit your confidentiality.

What will happen to the results of the research study?

The data, collected from you, will be used for my masters dissertation, which later on (after submission) I can share with you, should you request. The data might be used for future publications as well, such as journal articles and conference papers. Data will be stored securely. The research data will be stored for 10 years, according to the University of Glasgow regulations.

Who has reviewed the study?

This project has been considered and approved by the School of Social and Political Sciences Research Ethics Committee. If you have any concerns regarding the conduct of this research project, you can contact the School of Social Sciences Ethics Officer, Dr Susan Batchelor (email: Susan.Batchelor@glasgow.ac.uk).

_____End of Participant Information Sheet_____

Appendix 2

Consent Form



University
of Glasgow

College of Social
Sciences

Consent Form

Title of Project: Master Thesis – The role of the civil society consultations in the post-2020 EU Roma Framework

Name of Researcher: Mimoza Tielidze (2484557T@student.gla.ac.uk)

Supervisors: Sandor Gallai (sandor.gallai@uni-corvinus.hu)

& Helen Hardman (Helen.Hardman@glasgow.ac.uk)

Basic consent clauses, statement format

I confirm that I have read and understood the Participant Information Sheet for the above study and have had the opportunity to ask questions ☐

I understand that my participation is voluntary and that I am free to withdraw at any time, without giving any reason ☐

Confidentiality/anonymity clauses

I consent for my name to be disclosed in attributing comments ☐

I do not agree for my name to be disclosed and instead that any comments remain unattributed to me, and that anonymity be preserved ☐

Clauses relating to data usage and storage

- ♦ The research data will be retained in secure storage for up to 10 years for possible future academic research.
- ♦ The research data may be used in future publications, both print and online.
- ♦ I understand that other authenticated researchers may use my words in publications, reports, web pages, and other research outputs, only if they agree to preserve the confidentiality of the information as requested in this form.

I consent that the researcher retains my e-mail address for any possible future correspondence ☐

I do not consent that the researcher retain my e-mail address for any possible future correspondence

☐

Refer to Privacy Notice in relation to processing of personal data.

I acknowledge the provision of a Privacy Notice in relation to this research project.

Consent on method clause

I consent to interviews being audio-recorded. ☐

I do not consent to interviews being audio-recorded. ☐

Consent to participate in the research study

I agree to take part in this research study ☐

I do not agree to take part in this research study ☐

Name of Participant Signature

Date

Name of Researcher - Mimoza Tielidze Signature

Date

..... End of consent form