



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



**EU Roma**

European Network on  
Roma Inclusion under ESI Funds

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

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

The new programming period 2021-2027 reinforces the importance of using European Cohesion Policy Funds to address challenges related with Roma equality and inclusion, thus it encourages Member States not only to programme specific measures but also to improve their effectiveness. It is essential to fully align the next European Cohesion Policy Funds' programming with the challenges and priorities established in the ["EU Roma strategic framework for equality, inclusion and participation 2020-2030"](#), including the ["European Commission Communication"](#) and the ["Council Recommendation"](#).

**Therefore, the purpose of this document is to offer guidance to EU, national & regional departments responsible for programming European Cohesion Policy Funds, especially ESF+ and ERDF. This document provides recommendations on how to set adequate basis in the programming documents, mainly the Partnership Agreement and the European Cohesion Policy**

**Funds programmes to ensure that measures implemented in the future have a real impact and contribute to reducing Roma exclusion and discrimination effectively.** It encourages Member States to go a step further by introducing improvements that were not implemented in the period 2014-2020, thus learning from what has worked well and what has not worked so well.

# A quick overview of the contents



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

- Roma exclusion and discrimination are unfortunately a persisting reality thus it remains an important challenge in EU Member States
- Member States have the responsibility of ensuring that Roma have equal access to rights and are not discriminated against in line with EU regulations
- During the 2014-2020 period, the use of European Structural and Investment Funds to address challenges related with Roma exclusion and discrimination has progressed but there is still scope for improvement in many Member States in line with EU policies
- The 2021-2027 programming period offers the opportunity to progress on what has not been achieved during the 2014-2020 period. EURoma proposes to move forward towards a more effective programming that makes a real difference for Roma
- The socio-economic integration of marginalised communities, such as Roma people, has been included as a Specific Objective (j) of the ESF+ to support Member States to address this challenge
- The ERDF Specific Objective 4(iii) aims at promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups through integrated actions, including housing and social services

## Who is this guidance & Checklist useful for?



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

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



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



A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the National/Regional Roma Strategic Framework and the European Semester CSRs and Country Reports



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

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



More ambitious measures that allow Member States (at national and regional level) to plan and implement long-term and large-scale programmes



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



Increase the programming of integrated measures aligned with the objectives of the National/Regional Roma Strategic Framework and the challenges of the European Semester CSRs and Country Reports

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



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



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




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



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



What will be the contribution of  European Cohesion Policy Funds 2021-2027 in my country (at national and regional level) to achieve Roma equality and inclusion?



**The Partnership Agreement**

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



- How can the PA contribute to better align its objectives with EU regulations and recommendations and its National Roma Strategic Framework?
- How can the PA contribute to increase the use of complementarity between ESF+ and ERDF for targeted measures to promote social inclusion, equal opportunities and non-discrimination of Roma?

### **ESF+ Programmes**



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

measures to promote social inclusion, equal opportunities and non-discrimination of Roma?

### ERDF Programmes

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

### Other key recommendations

- How can departments responsible of European Cohesion Policy Funds 2021-2027 contribute to programme more ambitious measures for Roma equality and inclusion?
- How can departments responsible of European Cohesion Policy Funds promote that more regional programmes foresee measures under ESF+ Specific Objective (j) on Roma equality and inclusion in line with the National/Regional Roma Strategic Framework's objectives?
- How can national and regional departments responsible of European Cohesion Policy Funds increase the involvement of the NRCP and CSOs working to achieve Roma equality, inclusion and participation in the programming (and entire management

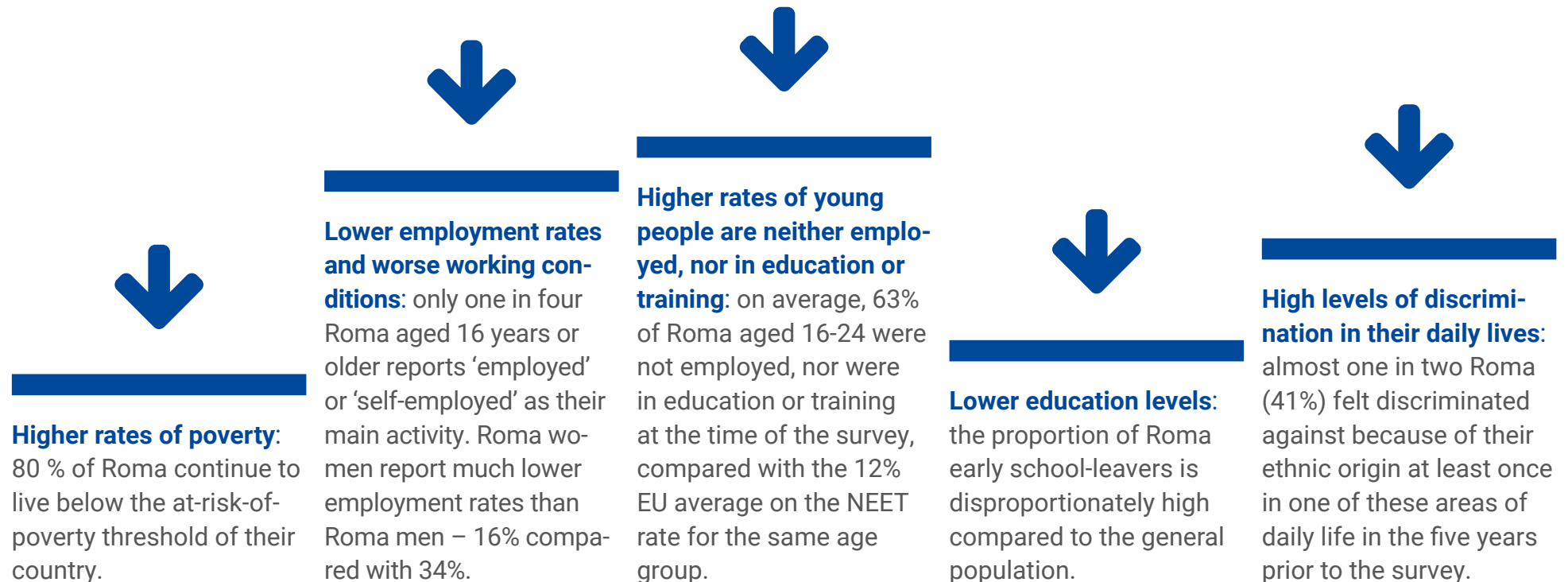
cycle) of these funds through adequate and quality participatory processes??



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

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

The “[Second European Union Minorities and Discrimination Survey Roma](#)” published by the European Union Agency for Fundamental Rights (FRA) in 2016 shows persisting inequalities that need to be tackled:





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



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

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

In this context, the European Commission adopted the the “[EU Roma strategic framework for equality, inclusion and par-](#)

[ticipation 2020-2030](#)”, including the [European Commission Communication](#) and the [Council Recommendation](#), which recognises that Roma face anti-gypsyism, discrimination and socio-economic exclusion in their daily lives. Overall, since 2011, progress has been limited, thus Europe has to address more effectively these inequalities to ensure that Roma can make full use of their potential to contribute to the economy, social protection systems and society at large.

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



It ensures access to human rights



It reinforces European values



It prevents an important loss of human capital



It reduces welfare dependence



It contributes to increase labour supply and tax revenues

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



Treaty of the European Union



Charter of Fundamental Rights



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



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



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



### Treaty of the European Union (article 2)

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



### Charter of Fundamental Rights (article 21)

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



### Directive 2000/43 (article 2)

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



### EU Roma Strategic Framework for equality, inclusion and participation

A renewed commitment to Roma equality, inclusion and participation at both European and national level with seven objectives at the EU level for the period 2020-2030.



### European Semester

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

## 2030 Agenda For Sustainable Development and the Sustainable Development Goals

The 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs), adopted by the United Nations (UN) in September 2015, have given a new impetus to global efforts for achieving sustainable development. The EU, in coordination with its Member States, is committed to support the implementation of the 2030 Agenda and to strive towards a sustainable future for all. The EU's answer to the 2030 Agenda is outlined in the European Commission Communication "[Next steps for a sustainable European future - European action for sustainability](#)" (2016) and more recently in its Staff Working Document "[Delivering on the UN's Sustainable Development Goals – A comprehensive approach](#)" (2020). In this sense, the European Union is linking the SDGs with the European Semester.

## The 10 Common Basic Principles on Roma Inclusion

[Link to the document](#)

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

The EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030 calls for more coherence between EU policy support, legal and funding instruments mobilised and aligned towards Roma equality and inclusion thus European Cohesion Policy Funds should be mobilised for Roma equality, inclusion and participation.

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

Education → → → →

Employment → → →

Housing → → → →

Healthcare → → → →

Preventing → → → →  
antigypsyism  
& discrimination

Reducing poverty →  
& exclusion

Participation → → →

EU  
Funds

ESF+  
2021-2027

ERDF  
2021-2027

Next  
Generation  
EU

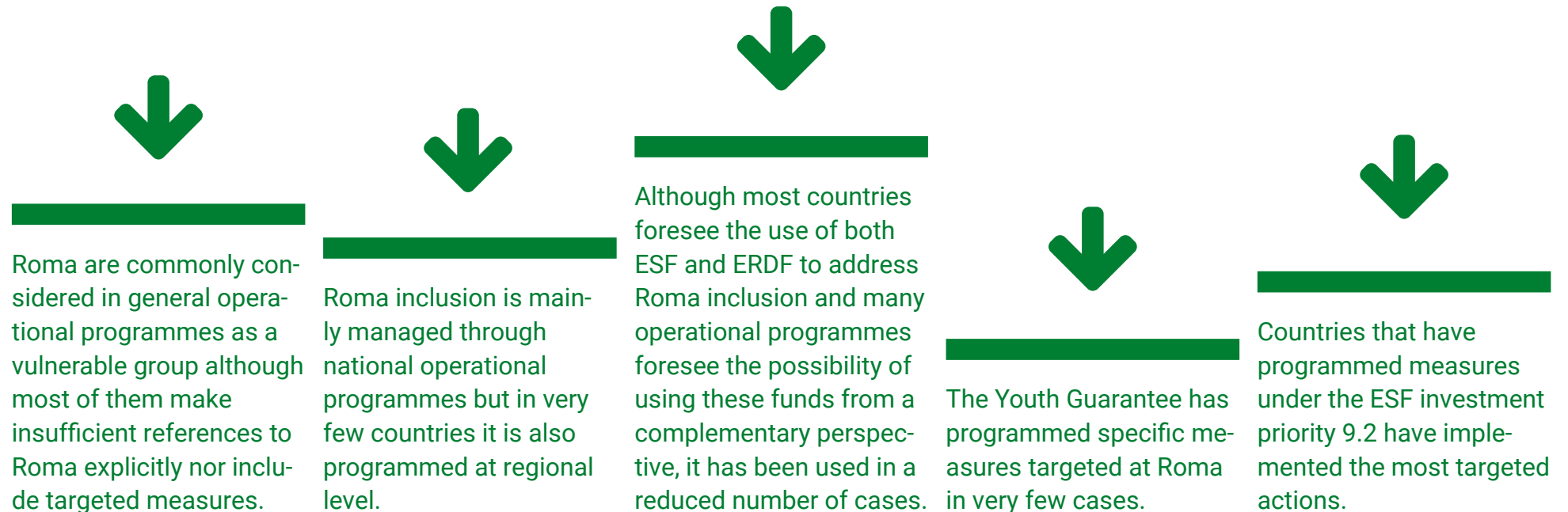
## During the 2014-2020 period, the use of European Structural and Investment Funds to address challenges related with Roma exclusion and discrimination has progressed but there is still scope for improvement in many Member States in line with EU policies

Several documents and reports prepared by [EURoma Network](#)<sup>1</sup> show that European Structural and Investment Funds (ESI Funds)/European Cohesion Policy Funds have an important capacity and potential to contribute to social inclusion, equal opportunities and non-discrimination of

Roma thus during the period 2014-2020 the EU and many Member States have encouraged the management units of these funds to programme and implement measures to this end.

EURoma has observed the following trends:

<sup>1</sup> [EURoma Network publications and key documents.](#)





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Although operational programmes incorporate actions addressing the four key fields identified in the “2011 EU Framework for National Roma Integration Strategies up to 2020” and the 2013 “Council Recommendation on effective Roma integration measures in the Member States”, interventions mainly focus on employment and education. In fact, measures are not always in line with the objectives of the National/Regional Roma Integration Strategies.



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



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



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Lack of administrative capacity by beneficiaries to apply and manage European Cohesion Policy Funds/ESI Funds.

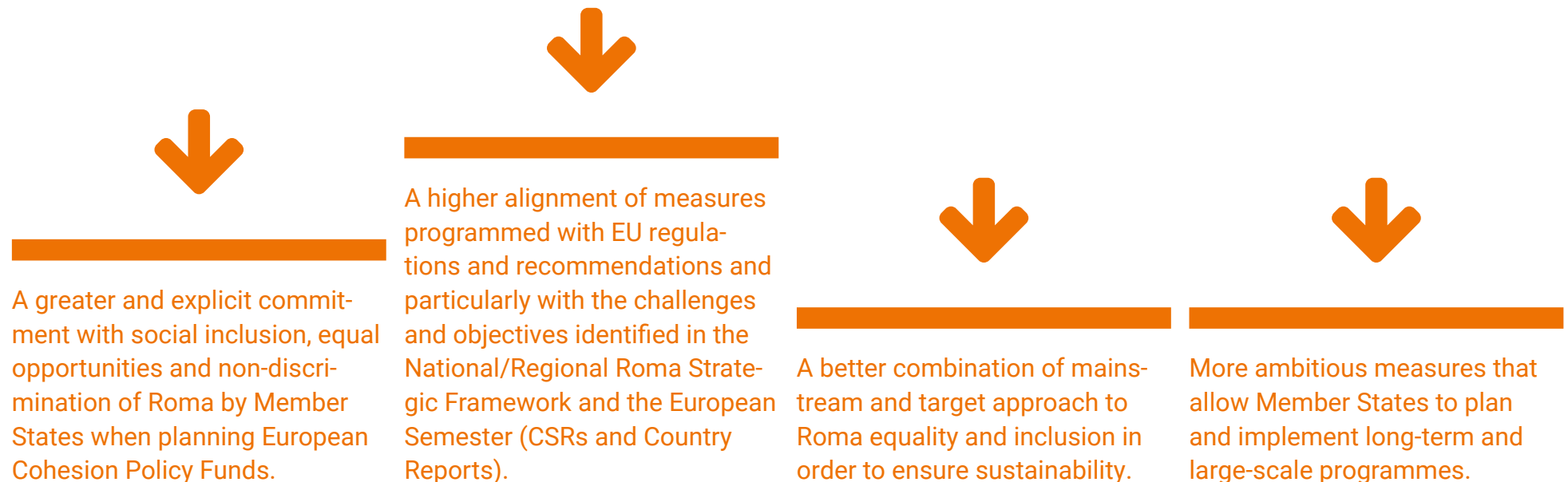


## The 2021-2027 programming period offers the opportunity to progress on what has not been achieved during the 2014-2020 period. EURoma proposes to move forward towards a more effective programming that makes a real difference for Roma

Member States have now the opportunity to better use the future European Cohesion Policy Funds in addressing challenges related with Roma exclusion and discrimination at national and regional level to make real progress towards the goals set

in their National/Regional Roma Strategic Framework for equality, inclusion and participation (hereinafter referred to as National/Regional Roma Strategic Framework) in line with EU regulations and recommendations.

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





More regional programmes that foresee measures under the ESF+ Specific Objective (j) on Roma equality and inclusion in line with the National/Regional Roma Strategic Framework's objectives and adapted to the challenges of each territory.



An increased programming of integrated measures aligned with the National/Regional Roma Strategic Framework's objectives as well as the challenges of the European Semester CSRs and Country Reports.



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



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



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



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



It is of utmost importance for Member States (administrations at national and regional level) to set coherent and consistent basis in the programming documents to ensure that future interventions aimed at promoting social inclusion, equal opportunities and non-discrimination of Roma funded by the European Cohesion Policy Funds 2021-2027 are effective and efficient.

This document includes, in the following sections, practical recommendations that national and regional administrations can follow to achieve this goal.

Greater and **explicit commitment**

Higher **alignment of funds and policies**

Combination of **mainstream and target approach**

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

More **regional programming**

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

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

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

Higher involvement of **NRCPs & Roma CSOs working for Roma equality, inclusion and participation**



Strengthening of the **administrative capacity** of stakeholders for managing European Cohesion Policy Funds for Roma equality and inclusion

## The socio-economic integration of marginalised communities, such as Roma people, has been included as a Specific Objective (j) of the ESF+ to support Member States to address this challenge

The “[Regulation laying down the common provisions](#)” establishes a series of enabling conditions, among them, a National Roma inclusion strategic policy framework linked with the Policy Objective 4 *A more social and inclusive Europe implementing the European Pillar of Social Rights* and the ESF+ Specific Objective established in article 4: (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people.*

### Fulfilment criteria of the enabling condition on the National Roma inclusion strategic policy framework

A National Roma inclusion strategic policy framework is in place that includes:

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

In addition, the “[ESF+ Regulation](#)” highlights that this fund should contribute to address social challenges faced by the EU, in particular those related to social exclusion of marginalised groups including Roma.



### Whereas (18)

The ESF+ should support the efforts of Member States to contribute to the eradication of poverty with a view to breaking the cycle of disadvantage across generations and promote social inclusion by ensuring equal opportunities for all, reducing barriers, tackling discrimination and addressing health inequalities. Such support implies mobilising a range of policies targeting the most disadvantaged people regardless of their sex, sexual orientation, age, religion or belief, racial or ethnic origin, in particular marginalised communities such as **Roma people**, people with disabilities or chronic diseases, homeless people, children and elderly people.

## The ERDF Specific Objective 4(iii) aims at promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups through integrated actions, including housing and social services

According to article 3.1. of the “[Regulation on the ERDF and on the Cohesion Fund](#)”, Member States have the possibility of programming the following interventions:



### Article 3 Specific Objectives for the ERDF and the Cohesion Fund

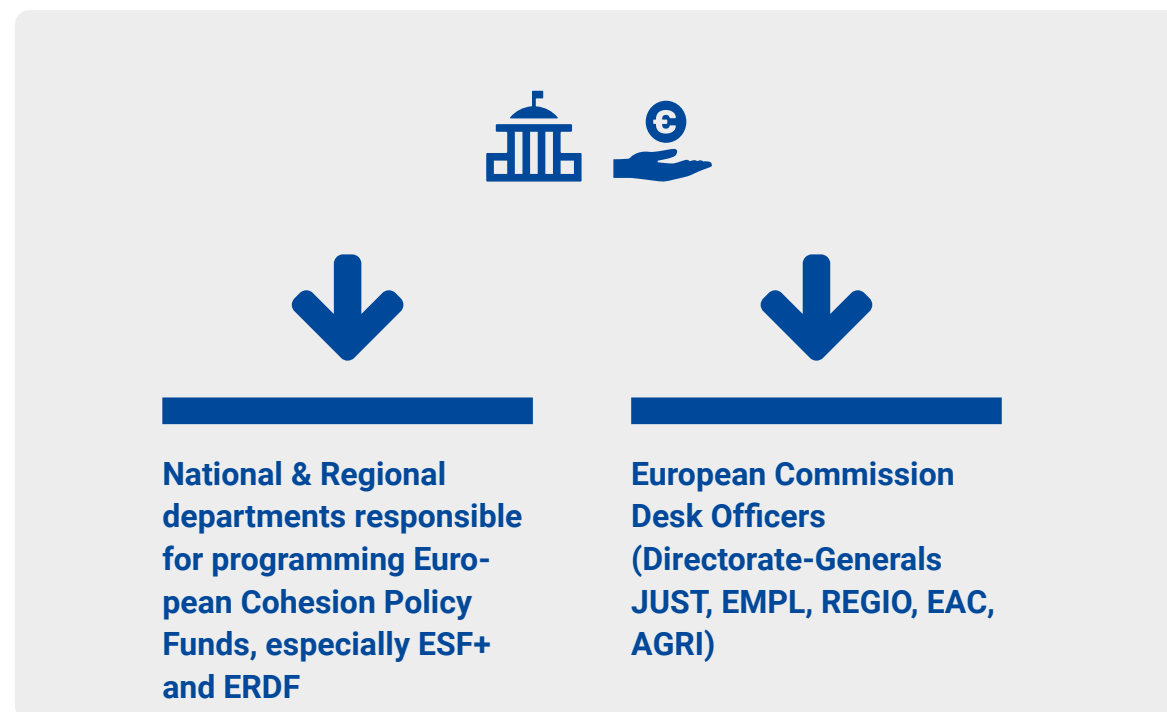
Specific Objective 4(iii) *Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including people with special needs, through integrated actions, including housing and social services.*

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

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

# Who is this guidance & Checklist useful for?

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



Thus, this guidance and Checklist is mainly addressed to:

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

- National Roma Contact Points and regional departments in charge of policies targeting Roma population
- Equality Bodies
- National and regional departments in charge of relevant sectoral policies

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

The programming period 2021-2027 offers Member States the opportunity to better use European Cohesion Policy Funds to address challenges related with Roma exclusion and discrimination at national/regional level.

**Therefore, we encourage departments at national and regional level to use all their potential to reach the goals set in their National/Regional Roma Strategic Framework in line with EU, national and regional legislation.**

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

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

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

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

Countries should particularly commit to include the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people related with Roma equality and inclusion when planning Policy objective 4 A more social and inclusive Europe implementing the European Pillar of Social Rights* to ensure ESF+ and ERDF Management Units have an adequate framework to implement, monitor and evaluate measures in this area.

## Recommendations

## Benefits

1.

### **Adoption of a National Roma Strategic Framework in line with the enabling conditions**

Ensure that Member States adopt a National Roma Strategic Framework in line with the EU Roma Strategic Framework for equality, inclusion and participation and that it fulfils the criteria set for the specific ESF+ enabling conditions.

It ensures the compliance with European Cohesion Policy Funds 2021-2027 Regulations thus allowing the adoption of the Partnership Agreement.

2.

**Explicit reference to National/Regional Roma Strategic Framework's objectives as one of the priorities within the Policy Objective 4 *A more social and inclusive Europe implementing the European Pillar of Social Rights* both in the Partnership Agreement and the European Cohesion Policy Funds programmes, especially in ESF+ and ERDF programmes.**

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

3.

**Select the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people to programme measures linked with the National/Regional Roma Strategic Framework.***

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

It facilitates the programming of targeted measures connected with the objectives of the National/Regional Roma Strategic Framework designating a specific budget with its corresponding performance framework thus establishing specific outputs, results indicators and milestones to be achieved by 2024 and targets to be achieved by 2029.



It allows selecting key intervention fields related with Roma equality and inclusion as defined in [Annex I](#) of the Regulation laying down the common provisions:

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

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

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

it contributes to improve the data collection, monitoring and evaluation on the contribution of European Cohesion Policy Funds to Roma equality and inclusion.

It allows to better promote integrated and innovative actions to foster Roma equality and inclusion thus encouraging policy experimentation and innovation to develop more effective and efficient Roma equality and inclusion public policies. It must be noted that this type of measures benefits from a higher EU co-funding rate (up to 95% according to article 14 of the ESF+ Regulation).

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

## A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the National/Regional Roma Strategic Framework and the European Semester CSRs and Country Reports

According to the “[Regulation laying down the common provisions](#)”, European Cohesion Policy Funds shall support the Policy Objectives set out in article 4. Countries should include in the Partnership Agreement the selected Policy Objectives. Member States that include Policy Objective 4 *A more social and inclusive Europe implementing the European Pillar of Social Rights* should explicitly refer to the challenges related to Roma exclusion and discrimination. This is especially important for countries that have specific references to the Roma in their European Semester 2019 Country Reports (Annex D) and/or in their Country-Specific Recommenda-

tions to ensure more coherence between EU policy support, legal and funding instruments mobilised and aligned towards Roma equality and inclusion.

Member States should note that according to article 19 of the Regulation laying down the common provisions, European Cohesion Policy Funds should support the implementation of relevant Council Recommendations and support the implementation of Country-Specific Recommendations thus the European Commission could request a Member State to review and propose amendments to European Cohesion Policy Funds planning documents to ensure this.

### Article 19 Measures linking effectiveness of Funds to sound economic governance

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

Such a request may be made for the following purposes:

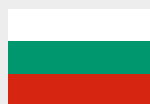
- (a) to support the implementation of a relevant country-specific recommendation adopted in accordance with Article 121(2) TFEU and of a relevant Council recommendation adopted in accordance with Article 148(4) TFEU, addressed to the Member State concerned;
- (b) to support the implementation of relevant Council Recommendations addressed to the Member State concerned and adopted in accordance with Article 7(2) or 8(2) of Regulation (EU) No 1176/2011 of the European Parliament and of the Council (41) provided that these amendments are deemed necessary to help correct the macroeconomic imbalances.

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



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

Bulgaria



Czech Republic



Greece



Hungary



Romania



Slovakia



Spain



## Recommendations

## Benefits

# 4.

### Identification of challenges

Include a reference to the challenges related with Roma equality, inclusion and fight against discrimination in the programming documents (Partnership Agreement and programmes) making an explicit reference to CSRs and Country Reports, when applicable, and to the challenges identified by the European Commission in the “[Report on the implementation of national Roma integration strategies - 2019](#)”.

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

# 5.

### Consistent needs analysis

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

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

## 6.

## Prioritising key priorities aligned with National/Regional Roma Strategic Framework

Agreeing key priorities with the NRCP to establish what will be the contribution of European Cohesion Policy Funds to the objectives of the National/Regional Roma Strategic Framework and the challenges identified in the CSRs and Country Reports to ensure that measures programmed especially under the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people* contribute to the selected priorities.

It ensures European Cohesion Policy Funds will contribute to achieving National/Regional Roma Strategic Framework's results and impact, as well as guaranteeing a more coordinated intervention at national, regional and local level.

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

According to the new “[EU Roma strategic framework for equality, inclusion and participation 2020-2030](#)”, including the [European Commission Communication](#) and the [Council Recommendation](#), all National Roma Strategic Frameworks should have common features, among them the combination of mainstreaming and explicit, but not exclusive Roma targeting. National Roma

Strategic Frameworks should combine mainstreaming and explicit but not exclusive targeting, ensuring that mainstream services are inclusive and providing additional targeted support to promote effective equal access for Roma to rights and services. They should serve as planning instruments for using national and European Cohesion Policy Funds 2021-2027 for Roma-targeted action

and inclusive mainstream reform. Experience and best practice<sup>2</sup> show that opting for a complementary approach that combines targeted measures linked with mainstreaming Roma inclusion and equality with thematic public policies is the most effective investment. In fact, the absence of these two complementary approaches has the risk

of limiting the effectiveness of social and Roma policies; moreover, it may result in an unintended situation causing further exclusion.<sup>3</sup>

<sup>2</sup> Joint Research Centre, 2019, [A meta-evaluation of interventions for Roma inclusion](#)

<sup>3</sup> EURoma+ Network, 2013, [How to mainstream Roma inclusion in general programmes, projects and interventions](#)

*Embedding targeted interventions in mainstream policy and legal frameworks to ensure that they remain temporary and promote effective equal access of Roma to mainstream services, instead of creating permanent parallel structures is one of the success factors for planning, implementation and monitoring Roma inclusion interventions identified by the European Commission “[Report on the implementation of national Roma integration strategies - 2019](#)”.*

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

## Principle no. 2: Explicit but not exclusive targeting

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

A combined approach of target and mainstream measures in the programming of European Cohesion Policy Funds 2021-2027 could result in:



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

## Principle no. 4: Aiming for the mainstream

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



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

## Programming targeted measures

under the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people* or within other ESF+

objectives as long as they are **linked with the National/Regional Roma Strategic Framework**. Additionally, it is worth highlighting that targeted

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

to transitional processes that leads to guaranteeing the access to mainstream services.

### Specific Objectives where Member States are encouraged to programme targeted measures

#### ESF+

Article 4 of the [ESF+ Regulation](#)

#### Policy Objective 4

✓ (a) Improving access to employment (including through self-employment and social economy) and activation measures for all jobseekers, in particular young people (especially through the Youth Guarantee), for long-term unemployed and disadvantaged groups on the labour market, and for inactive people

✓ (b) Modernising labour market institutions and services to assess and anticipate skills needs and ensure timely and tailor-made assistance

✓ (c) Promoting a gender-balanced labour market participation, equal working conditions, and a better work-life balance

✓ (d) Promoting the adaptation of workers, enterprises and entrepreneurs to change, active and healthy ageing and a healthy and well-adapted working environment

✓ (e) Improving the quality, inclusiveness, effectiveness and labour market relevance of education and training systems

✓ (f) Promoting equal access to and completion of quality and inclusive education and training, in particular for disadvantaged groups

✓ (g) Promoting lifelong learning

✓ (h) Fostering active inclusion and improving employability, in particular for disadvantaged groups

✓ (i) Promoting socio-economic integration of third-country nationals, including migrants

✓ (j) **Promoting the socio-economic integration of marginalised communities, such as Roma people**

✓ (k) Enhancing equal and timely access to quality, sustainable and affordable services

✓ (l) Promoting social integration of people at risk of poverty or social exclusion, including the most deprived persons and children

✓ (m) Addressing material deprivation

## ERDF

Article 3 of the [ERDF Regulation](#)

### Policy Objective 1

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

### Policy Objective 2

- ✓ (i) Promoting energy efficiency and reducing greenhouse gas emissions

### Policy Objective 4

- ✓ (i) Enhancing the effectiveness and inclusiveness of labour markets and access to quality employment through developing social infrastructure and promoting social economy

- ✓ (ii) Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training

- ✓ (iii) Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including people with special needs, through integrated actions, including housing and social services

- ✓ (iv) Promoting the socio-economic integration of third country nationals, including migrants through integrated actions, including housing and social services

- ✓ (v) Ensuring equal access to health care and fostering resilience of health systems, including primary care, and promoting the transition from institutional to family-based and community-based care

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

### Policy Objective 5

- ✓ (i) Fostering the integrated and inclusive social, economic and environmental development, culture, natural heritage, sustainable tourism and security in urban areas

- ✓ (ii) Fostering the integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security in areas other than urban areas

## Recommended targeted actions that can be programmed with ESF+

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



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

Member States can programme the following actions under the ERDF Specific Objective 4(iii) *Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including people with special needs, through integrated actions, including housing and social services:*

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

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

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

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

## Ensuring that measures programmed under other Specific Objectives are inclusive by

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

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

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

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

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

## Recommendations

### Programming of targeted measures

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

## Benefits

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

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

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

134 | Measures to improve access to employment

136 | Specific support for youth employment and socio-economic integration of young people

139 | Measures to modernise and strengthen labour market institutions and services to assess and anticipate skills needs and to ensure timely and tailor-made assistance

145 | Support for the development of digital skills

## 8.

**Explicit mention to Roma in mainstream measures**

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

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

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

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

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

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

## 9.

**Selection of a specific indicator**

Ensure that ESF+/ERDF Units select an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism in line with the guidance included in the ESF+ Annex on indicators. Values of the indicators shall be determined based on informed estimates provided by the beneficiary.

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

## More ambitious measures that allow Member States (at national and regional level) to plan and implement long-term and large-scale programmes

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

Experience shows these are **frequent reasons for project failure**:<sup>4</sup>

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

<sup>4</sup> EURoma, 2013, *Tackling Roma Needs in the 2014-2020 Structural Funds Programming Period*. Guide to improve the planning process

Although some of these reasons have been addressed during the period 2014-2020, most of these trends remain a challenge thus the programming period 2021-2027 should be seen as an opportunity to encourage Member States to be more ambitious in the way measures are programmed to increase effectiveness and efficiency to ensure that the investment of European Cohesion Policy Funds 2021-2027 has a higher social and economic return.

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

## Recommendations

## Benefits

# 10.

### Long-term measures

Programme measures with a long-term timeframe so that actions are planned from a pluriannual perspective in line with the multiannual framework period avoiding as much as possible the implementation of measures with an annual or shorter timeframe. Overcoming Roma exclusion and discrimination requires long-term commitments and a comprehensive approach. Structural changes need time and real impact may not be seen for at least a generation.<sup>5</sup>

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

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

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

<sup>5</sup> European Commission, 2018, [Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020](#)

## More regional programmes that foresee measures under the Specific Objective on Roma equality and inclusion in line with the National/Regional Roma Strategic Framework's objectives and adapted to the challenges of each territory

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

The evaluations carried out by the European Commission in the last-

few years demonstrate the importance of encouraging also regional and local actors to implement measures that promote social inclusion, equal opportunities and non-discrimination of Roma. In fact, the conclusions from the European Commission's ["Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020"](#) highlights that

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

## Recommendations

# 11.

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

Encourage the selection of the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people* in regional ESF+ programmes aligned with National/Regional Roma Strategic Framework.

## Benefits

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

## 12.

**Explicit reference to Roma in mainstream regional measures**

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

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

## Increase the programming of the integrated measures aligned with the objectives of National/Regional Roma Strategic Framework and the challenges of the European Semester CSRs and Country Reports

European Commission's "*Report on the implementation of national Roma integration strategies - 2019*" highlights that *Intersectional, cross-sectoral, integrated approaches to tackle multiple discrimination and multi-dimensional exclusion* is one of the key success factors for planning, implementation and monitoring Roma inclusion interventions.

In fact, the European Commission's mid-term review<sup>6</sup> also reminds Member States that:

<sup>6</sup> European Commission, 2017, *Midterm review of the EU framework for national Roma integration strategies*

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

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

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

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





## 13.

## Recommendations

### Integrated measures

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

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

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

## Benefits

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

## 14.

### Connection of integrated measures with mainstream policies

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

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

with the corresponding mainstream policy at national, regional or local level to ensure the alignment with the objectives of the National/Regional Roma Strategic Framework.

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

The mid-term review carried out by the EC and published in 2018<sup>7</sup> found that the EU framework had limited capacity to deal with diversity among Roma. The gender dimension was found to be weak, with only some NRIS taking into account the specific vulnerabilities of women. A child-sensitive approach would have required more comprehensive strategies tackling

*children's needs simultaneously in education, health and housing policies, and in child protection. Fighting trafficking in human beings with child sensitivity and addressing the gender dimension is still a need. Multiple and intersectional discrimination is rarely addressed.*

Thus, the European Commission is insisting on the importance of

reinforcing the gender dimension taking into account the specific vulnerabilities of women as well as strengthening the child-sensitive approach through more comprehensive strategies tackling children's needs simultaneously in education, health and housing policies as well as in child protection.

<sup>7</sup> European Commission, 2018, [Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020](#)

15.

## Recommendations

### Priority groups and early interventions

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

## Benefits

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

16.

### Connection of integrated measures with mainstream measures

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

- Roma equality among men and women.
- Women empowerment, antigypsyism awareness and prevention and participation in social and political life.
- Fight against poverty and exclusion of families with a special focus on child poverty.

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

- Participation of children and young people in social and political life.
- Specific vulnerable situation of EU mobile Roma with particular focus on children.

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

The “[Regulation laying down the common provisions](#)” for 2021-2027 continues to foster the combined use of European Cohesion Policy Funds to improve complementarities and simplify implementation under the Investment for jobs and growth goal thus the Partnership Agreement. European Cohesion Policy Funds programmes should specify if the option of combination of funds will be used for each of the selected policy objectives, taking

into account that article 25 foresees that *the ERDF and the ESF+ may finance, in a complementary manner and subject to a limit of 15% of support from those Funds for each priority of a programme, all or part of an operation for which the costs are eligible for support from the other Fund on the basis of eligibility rules applied to that Fund, provided that such costs are necessary for the implementation.*

In the period 2014-2020, the Regulation introduced

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

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

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

grammes, including the Recovery and Resilience Facility (RRF), the European Instrument for Temporary Support to Mitigate Unemployment Risks in an Emergency (SURE), the European Agricultural Fund for Rural Development (EAFRD), the Asylum, Migration, and Integration Fund (AMIF) and InvestEU, in order to support social inclusion in an integrated manner.

## 17.

## Recommendations

### Complementarity of funds

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

## Benefits

It allows to programme, implement and evaluate more effective and efficient long-term and integrated interventions aligned with National/Regional Roma Strategic Framework's objectives and CSRs or Country Report challenges.

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

According to article 8 of the "[Regulation laying down the common provisions](#)", European Cohesion Policy Funds 2021-2027 programming units should ensure that relevant actors are involved in the entire managing cycle. In this case, it is vital to involve NRCs and CSOs working for Roma equality, inclusion and participation, especially when programming ESF+ programmes.

In fact, according to article 3 (c) (ii) and article 4 (c) (iii) of the "[Commission Delegated Regulation \(EU\) No 240/2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#)", Member States shall identify the relevant partners to involve in the Partnership Agreement and operational programmes. *This includes other organisations or groups that are significantly affected or likely to*

*be significantly affected by the implementation of the ESI Funds, in particular groups considered to be at risk of discrimination and social exclusion.*

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

Finally, the “**European Commission’s Communication on the EU Roma strategic framework for equality, inclusion and participation**” establishes that *the role of the NRCP should be strengthened, so that it can be involved (by EU fund managing authorities) in the coordination of cross-governmental discussions on the distribution of EU funds for Roma, and in systematic monitoring of their use (e.g. through monitoring committees, Roma inclusion impact screenings)*. The “**Council Recommendation on Roma equality, inclusion and participation**” also reinforces the importance of involving Equality Bodies in these management cycle of European Cohesion Policy Funds: *Member States should ensure that equality bodies are closely involved in and can contribute effectively to designing, implementing, monitoring and reviewing*

*national Roma strategic frameworks for equality, inclusion and participation and relevant Union funds programmes, including involving equality bodies in structures set up to oversee the implementation, monitoring and review of national Roma strategic frameworks, and in committees for monitoring relevant Union funds.*



## Article 8 Partnership and multi-level governance (Regulation laying down the common provisions)

**1.** For the Partnership Agreement and each programme, each Member State shall organise and implement a comprehensive partnership in accordance with its institutional and legal framework and taking into account the specificities of the Funds. That partnership shall include at least the following partners:

- (a)** regional, local, urban and other public authorities;
- (b)** economic and social partners;
- (c)** relevant bodies representing civil society, such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination;
- (d)** research organisations and universities, where appropriate.

**2.** The partnership established under paragraph 1 of this Article shall operate in accordance with the multi-level governance principle and a bottom-up approach. The Member State shall involve partners referred to in paragraph 1 in the preparation of the Partnership Agreement and throughout the preparation, implementation and evaluation of programmes, including through participation in monitoring committees in accordance with Article 39.

In that context, Member States shall, where relevant, allocate an appropriate percentage of the resources coming from the Funds for the administrative capacity building of social partners and civil society organisations.

## 18.

**Recommendations****Involvement of the NRCPs and the regional bodies in charge of Roma policies as well as of the Equality Bodies**

Involve the NRCPs and the regional bodies in charge of Roma policies as well as the Equality Bodies in the drafting process of the Partnership Agreement and European Cohesion Policy Funds programmes 2021-2027.

**Benefits**

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

## 19.

**Involvement of CSOs working working to achieve Roma equality, inclusion and participation**

Involve CSOs working to achieve Roma equality, inclusion and participation in the drafting process of the Partnership Agreement and European Cohesion Policy Funds programmes 2021-2027 to ensure it considers their opinion.

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

## 20.

**Adequate involvement of actors**

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

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

It identifies the key stakeholders, fosters Roma participation and empowerment and complies with articles 7 and 9 of the European Code of Conduct on Partnership in the framework of the European Structural and Investment Funds.

- It gives transparent information on the process and the information that is being shared and consulted and gives the opportunity to send feedback with sufficient time to respond.
- It encourages and support the participation of a variety of Roma representatives, especially women and young people.

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

According to Article 9(2), an appropriate amount of ESF+ resources under shared management must be allocated in each programme for the capacity building of social partners and civil society

organisations. Therefore, support for the capacity building of civil society organisations, including those working for Roma equality, inclusion and participation, remains a priority. The Code of

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



### Article 9 Partnership (ESF+)

[...]

2. Member States shall allocate an appropriate amount of their resources of the ESF+ strand under shared management in each programme to capacity building of the social partners and civil society organisations, including in the form of training, networking measures, and strengthening of the social dialogue, and to activities jointly undertaken by the social partners.

Where capacity building of the social partners and civil society organisations is identified by a relevant country-specific recommendation [...], the Member State concerned shall allocate an appropriate amount of at least 0,25 % of its resources of the ESF+ strand under shared management for that purpose.



## 21.

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

## Recommendations

### Capacity building of actors






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

## Benefits

It identifies the key stakeholders, fosters Roma participation and empowerment and complies with article 17 of the European Code of Conduct on partnership in the framework of the European Structural and Investment Funds.

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

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

-  A greater and explicit commitment with social inclusion, equal opportunities and non-discrimination of Roma by Member States' national and regional authorities when planning European Cohesion Policy Funds 2021-2027
-  A higher alignment of measures programmed with EU regulations and recommendations and particularly with the challenges and objectives identified in the National/Regional Roma Strategic Framework as well as the European Semester CSRs and Country Reports
-  A better combination of mainstream and target approach to Roma equality and inclusion to ensure sustainability
-  More ambitious measures that allow Member States (at national and regional level) to plan and implement long-term and large-scale programmes
-  More regional programmes that foresee measures under the Specific Objective (j) on Roma equality and inclusion in line with the objectives of the National/Regional Roma Strategic Framework and adapted to the challenges of each territory



More programming of integrated measures aligned with the objectives of the National/Regional Roma Strategic Framework and the challenges identified in the European Semester CSRs and Country Reports



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



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



A higher involvement of the NRCP, Equality Bodies and CSOs working to achieve Roma equality, inclusion and participation in the programming phase (and entire management cycle) of European Cohesion Policy Funds through adequate and quality participatory processes



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

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



#### **Partnership Agreement**

Aligned with the template included in the Regulation laying down common provisions



#### **ESF+ Programmes**

Aligned with the template included in the Regulation laying down common provisions



#### **ERDF Programmes**

Aligned with the template included in the Regulation laying down common provisions



#### **Other key recommendations**

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

## What will be the contribution of European Cohesion Policy Funds 2021-2027 in my country (at national and regional level) to achieve Roma equality and inclusion?



Before you start planning and revising the Checklist in detail, we propose that you reflect on the following key questions that will help you establish your goals (based on the challenges and situation analysis included in your National/Regional Roma Strategic Frameworks).

**What will be the contribution of European Cohesion Policy Funds 2021-2027 in my country (at national and regional level) to achieve Roma equality and inclusion?**

Goal 1

Goal 2

Goal 3

**What will be the priority areas in my country?**



Education



Employment



Housing



Healthcare



Preventing antigypsyism and discrimination



Reducing poverty and exclusion



Participation

**What will be the geographical scope?**

- National Programme(s)
- Regional Programme(s)

**What approach will my country take when programming?**

- Target & mainstreaming
- Only target
- Only mainstreaming

**What timeframe will my country promote for the chosen measures?**

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

**What funds will my country use to programme measures?**

- European Social Fund Plus (ESF+)
- European Regional Development Fund (ERDF)
- Asylum, Migration and Integration Fund (AMIF)
- Recovery and Resilience Facility (RRF)
- Other

## What Specific Objective will my country choose to programme measures?

### FSE+ (Article 4 of ESF+ Regulation)

#### Policy Objective 4

- (a)  Improving access to employment (including through self-employment and social economy) and activation measures for all jobseekers, in particular young people (especially through the Youth Guarantee), for long-term unemployed and disadvantaged groups on the labour market, and for inactive people
- (b)  Modernising labour market institutions and services to assess and anticipate skills needs and ensure timely and tailor-made assistance
- (c)  Promoting a gender-balanced labour market participation, equal working conditions, and a better work-life balance
- (d)  Promoting the adaptation of workers, enterprises and entrepreneurs to change, active and healthy ageing and a healthy and well-adapted working environment
- (e)  Improving the quality, inclusiveness, effectiveness and labour market relevance of education and training systems
- (f)  Promoting equal access to and completion of quality and inclusive education and training, in particular for disadvantaged groups
- (g)  Promoting lifelong learning
- (h)  Fostering active inclusion and improving employability, in particular for disadvantaged groups
- (i)  Promoting socio-economic integration of third-country nationals, including migrants
- (j)  **Promoting the socio-economic integration of marginalised communities, such as Roma people**
- (k)  Enhancing equal and timely access to quality, sustainable and affordable services
- (l)  Promoting social integration of people at risk of poverty or social exclusion, including the most deprived persons and children
- (m)  Addressing material deprivation

## What Specific Objective will my country choose to programme measures?

### ERDF (Article 3 of ERDF Regulation)

#### Policy Objective 1

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

#### Policy Objective 2

- (i)  Promoting energy efficiency and reducing greenhouse gas emissions

#### Policy Objective 4

- (i)  Enhancing the effectiveness and inclusiveness of labour markets and access to quality employment through developing social infrastructure and promoting social economy
- (ii)  Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training
- (iii)  Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including

people with special needs, through integrated actions, including housing and social services

- (iv)  Promoting the socio-economic integration of third country nationals, including migrants through integrated actions, including housing and social services

- (v)  Ensuring equal access to health care and fostering resilience of health systems, including primary care, and promoting the transition from institutional to family-based and community-based care

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








#### Policy Objective 5

- (i)  Fostering the integrated and inclusive social, economic and environmental development, culture, natural heritage, sustainable tourism and security in urban areas
- (ii)  Fostering the integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security in areas other than urban areas

## What type of measures will my country programme?

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




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

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

- National Roma Contact Points
- Regional departments in charge of policies targeting Roma
- Equality Bodies
- CSOs working to achieve Roma equality, inclusion and participation

**What type of capacity building activities will my country organise?**



## The Partnership Agreement (PA)

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



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



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



The National Roma Strategic Framework adopted by the Member State fulfils the criteria set for the ESF+ specific enabling condition.

**How can the PA contribute to better align its objectives with EU regulations and recommendations and its National Roma Strategic Framework?**



The current EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030, the objectives of the National Roma Strategic Framework as well as the CSRs/Country Reports are referred to in *Table 1: Selection of policy objective and JTF with justification*.



The current EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030, the objectives of the National Roma Strategic Framework as well as the CSRs/Country Reports are referred to in *Section 2: Policy choices, coordination and complementarity*.

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



The PA allocates funds for ERDF and ESF+ to address key priorities and objectives defined in the National Roma Strategic Framework in the Policy Objective 4 in Section 7. *Preliminary financial allocation from each of the funds covered by the Partnership Agreement by policy objective, JTF specific objective and technical assistance, at national and where appropriate regional level.*

## ESF+ Programmes

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



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



The Specific Objective (j) **Promoting the socio-economic integration of marginalised communities, such as Roma people** is selected in *Section 2.1. Priorities other than technical assistance*, especially in countries with specific references in CSRs and Country Reports.

How can the ESF+ contribute to better align its objectives with EU regulations and recommendations and the National/Regional Roma Strategic Framework?



National or regional ESF+ programmes refer to the challenges related with Roma equality and inclusion in *Section 1. Programme strategy: main development challenges and policy responses* making an explicit reference to the CSRs and the Country Report, when applicable, and to the challenges identified by the European Commission in the [“Report on the implementation of national Roma integration strategies - 2019”](#), paying special attention to priority groups (women, children, young people and EU mobile Roma).



National or regional ESF+ programmes include a needs analysis on Roma exclusion and discrimination detailing what needs will be prioritised based on the objectives of the National/Regional Roma Strategic Framework and consistent data/source that will be updated recurrently during the programming period (e.g. European Union Minorities and Discrimination Survey (EU-MIDIS) carried out by the FRA).

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



ESF+ National programmes include targeted measures from the key recommended strategic actions under *Section 2.1. Priorities other than technical assistance*, preferably linked to the Specific Objective (j) **Promoting the socio-economic integration of marginalised communities, such as Roma people** but also linked to [other Specific Objectives](#).



ESF+ Regional programmes include targeted measures from the key recommended strategic actions under *Section 2.1. Priorities other than technical assistance*, preferably linked to the Specific Objective (j) **Promoting the socio-economic integration of marginalised communities, such as Roma people** but also linked to [other Specific Objectives](#).



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



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



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



National or Regional ESF+ programmes, whether opting for targeted or mainstream measures, introduce in section *Section 2.1.1.1.2. Indicators* an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism.



National or Regional ESF+ programmes refer to Roma among the main target group in *Section 2.1.1.2. Specific objective addressing material deprivation.*



National or Regional ESF+ programmes, whether opting for targeted or mainstream measures, select interventions related with Roma equality and inclusion in *Section 2.1.1.1.2. Indicators:*

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

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

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

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



National or Regional ESF+ programmes mention explicitly long-term and large-scale actions within the type of actions listed under *Section 2.1.1.1.1. Interventions of the Funds.*



National or Regional ESF+ programmes prioritise at least one long-term and large-scale operation of strategic importance on Roma equality and inclusion under *Section 2.1.1.1.1. Interventions of the Funds* linked to mainstream policies or mainstream measures foreseen in [other Specific Objectives](#).

**How can the ESF+ increase the programming of integrated measures aligned with the National/Regional Roma Strategic Framework's objectives and the CSRs/ Country Reports' challenges?**



National or Regional ESF+ programmes foresee among the type of actions under *Section 2.1.1.1.1. Interventions of the Funds* the following type of interventions, especially aimed at Roma living in extreme poverty:

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

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

These integrated interventions should have the possibility of being funded by ESF+ or ERDF and be connected with mainstream policies at national, regional or local level

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



The ESF+ that programmes the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people* foresees the use of ERDF under *Section 2.1 Priorities other than technical assistance*.



## ERDF Programmes

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



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

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



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with Policy Objective 4 in *Section 2.1. Priorities other than technical assistance* in particular to priorities related with (in line with National/Regional Roma Strategic Framework's objectives):

- (ii) Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training
- (iii) Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including people with special needs, through integrated actions, including housing and social services
- (iv) Promoting the socio-economic integration of third country nationals, including migrants through integrated actions, including housing and social services



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with Policy Objective 1 in *Section 2.1. Priorities other than technical assistance* in particular to priorities related with (in line with National/Regional Roma Strategic Framework's objectives):

- (iv) Developing skills for smart specialisation, industrial transition and entrepreneurship
- (v) Enhancing digital connectivity



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with Policy Objective 2 in *Section 2.1. Priorities other than technical assistance* in particular to priorities related with (in line with National/Regional Roma Strategic Framework's objectives):

- (i) Promoting energy efficiency and reducing greenhouse gas emissions



National or Regional ERDF programmes make explicit reference to challenges related with Roma equality and inclusion when defining priorities related with Policy Objective 5 in *Section 2.1. Priorities other than technical assistance* in particular to priorities related with (in line with National/Regional Roma Strategic Framework's objectives):

- (ii) Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training
- (iii) Promoting the socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups, including people with special needs, through integrated actions, including housing and social services

→ (iv) Promoting the socio-economic integration of third country nationals, including migrants through integrated actions, including housing and social services



National or Regional ERDF programmes refer to Roma among the main target group in *Section 2.1.1.2. Specific objective addressing material deprivation.*



National or Regional ERDF programmes make explicit reference to the challenges related with Roma equality and inclusion in the operations of strategic importance selected under *Section 2.1.1.1.1 Interventions of the Funds.*



National or Regional ERDF programmes, whether opting for targeted or mainstream measures, introduce in *Section 2.1.1.1.2. Indicators* an output indicator related with Roma beneficiaries and establish an adequate reporting mechanism.



National or Regional ERDF programmes, whether opting for targeted or mainstream measures, select interventions related with Roma equality and inclusion in *Section 2.1.1.1.2. Indicators:*

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

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

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

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



National or Regional ERDF programmes that select Policy Objective 4 foresee the use of ERDF under *Section 2.1. Priorities other than technical assistance* and include actions that make an explicit reference Roma equality and inclusion challenges identified in the National/Regional Roma Strategic Framework, the CSRs/Country Reports under *Section 2.1. Priorities other than technical assistance*.

## Other key recommendations

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



Agreeing key priorities with the NRCP to establish what will be the contribution of European Cohesion Policy Funds to the objectives of the National/Regional Roma Strategic Framework and the challenges of the CSRs/Country Reports to ensure that measures programmed especially under the Specific Objective (j) *Promoting the socio-economic integration of marginalised communities, such as Roma people* contribute to the selected priorities.



Fostering and encouraging that long-term and large-scale measures are programmed within ESF+ or ERDF in the type of actions that are included in *2.1.1.1.1 Interventions of the Funds*.



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



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



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

**How can departments responsible of European Cohesion Policy Funds promote that more regional programmes foresee measures under ESF+ Specific Objective (j) on Roma equality and inclusion in line with the National/Regional Roma Strategic Framework's objectives?**



Provide specific guidance and support to European Cohesion Policy Funds regional programming units on the importance of selecting this objective and the priorities of the National/Regional Roma Strategic Framework.

Sharing this document with them would be recommendable.



**How can national and regional departments responsible of European Cohesion Policy Funds increase the involvement of the NRCP and CSOs working to achieve Roma equality, inclusion and participation in the programming (and entire management cycle) of these funds through adequate and quality participatory processes?**



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



CSOs working to achieve Roma equality, inclusion and participation are involved in the drafting of the Partnership Agreement and are included in the list of actors consulted to ensure their involvement throughout the entire management cycle of European Cohesion Policy Funds.



NRCP is involved in the drafting of the European Cohesion Policy Funds programmes, in particular ESF+ programmes.



CSOs working to achieve Roma equality, inclusion and participation are involved in the drafting of the European Cohesion Policy Funds programmes, in particular ESF+ programmes.



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



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



### Final beneficiaries

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



### Data collection and evaluation

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



### Implementing instruments

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



### Role of NRCP

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

# Acronyms

AMIF	Asylum, Migration and Integration Fund
CSOs	Civil Society Organisations
CSRs	Country Specific Recommendations
DG AGRI	Directorate-General Agriculture and Rural Development
DG EAC	Directorate-General Education, Youth, Sport and Culture
DG EMPL	Directorate-General Employment, Social Affairs and Inclusion
DG JUST	Directorate-General Justice and Consumers
DG REGIO	Directorate-General Regional and Urban Policy
EAFRD	European Agricultural Fund for Rural Development
EC	European Commission
EB	Equality Body
ESF	European Social Fund
ESF+	European Social Fund Plus
ESI Funds	European Structural and Investment Funds
ERDF	European Regional Development Fund
EU	European Union
EU-MIDIS	European Union Minorities and Discrimination Survey
FRA	European Union Agency for Fundamental Rights
NEET	Not in Employment, Education or Training
NRCP	National Roma Contact Point
NRIS	National Roma Inclusion Strategy
PA	Partnership Agreement
RRF	Recovery and Resilience Facility
SDGs	Sustainable Development Goals
SURE	European Instrument for Temporary Support to Mitigate Unemployment Risks in an Emergency
UN	United Nations



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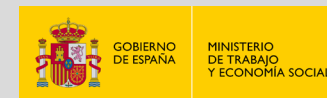
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