



10 September 2007

**WRITTEN COMMENTS OF THE EUROPEAN ROMA RIGHTS CENTRE
CONCERNING UKRAINE**

**FOR CONSIDERATION BY
THE UNITED NATIONS COMMITTEE ON ECONOMIC, SOCIAL AND CULTURAL
RIGHTS
AT ITS 39TH SESSION**

1. OVERVIEW

1.1 The European Roma Rights Centre (ERRC)¹ respectfully submits written comments concerning Ukraine for consideration by the United Nations Committee for Economic, Social and Cultural Rights (hereafter the “Committee”) at its 39th Session to be held 5-23 November in Geneva. This report is submitted as additional information for the Committee in its review of Ukraine’s Initial Report (hereafter “State Report”), submitted under Articles 16 and 17 of the Covenant in June 2006.

1.2 During the period 2004-2006, the ERRC has been involved in a comprehensive project, undertaken with the support of the European Commission’s European Initiative for Democracy and Human Rights (EIDHR). The project engaged all aspects of ERRC work, including documentation and research, training of various stakeholders including local Romani activists and non-governmental organisations, as well as Ukrainian judges and prosecutors; legal action to challenge systematic discrimination and other forms of human rights abuse, and domestic and international advocacy work on a number of issues, including Roma rights policy and anti-discrimination law. The project included a number of domestic NGO partners, most notably the Uzhgorod-based organisation Romani Yag, an ERRC partner since 1996. The project built on previous ERRC work in Ukraine – much of it also in partnership with Romani Yag – undertaken since 1996. Materials gathered in the course of the project have provided a substantial basis for a

¹ The European Roma Rights Centre (ERRC) is an international public interest law organisation engaging in a range of activities aimed at combating anti-Romani racism and human rights abuse of Roma. The approach of the ERRC involves, in particular, strategic litigation, international advocacy, research and policy development and training of Romani activists. The ERRC is a cooperating member of the International Helsinki Federation for Human Rights and has consultative status with the Council of Europe, as well as the Economic and Social Council of the United Nations.

report on the present situation of Roma in Ukraine, published by the ERRC in December 2006², as well as for the present submission.

1.3 Article 24 of the Ukrainian Constitution states that citizens have equal constitutional rights and freedoms and are equal before the law. Claims of superiority or the imposition of restrictions based on race, ethnicity, skin colour, political, religious and other beliefs, gender, social status, wealth, place of residence, language, or other characteristics are unlawful. However, despite Ukraine's commitments under international treaties, such as the ICESCR, as well as Constitutional and other legal provisions guaranteeing equality, Roma in Ukraine live on the margins of society, often in extreme poverty, and face significant barriers in accessing key economic and social rights, such as employment, social welfare, housing, health care and education.

1.4 Roma in Ukraine are extremely vulnerable to infringements of fundamental human rights. In recent years, the ERRC has become aware of a number of serious instances of violent human rights abuse. In these cases, without exception, justice has not been done or seen to be done. In addition, systematic abuses, such as widespread racial discrimination in a number of sectoral fields and the exclusion of Roma from personal and other documents, remain entirely unaddressed by government action to date.

1.5 The few mentions of measures to address the situation of Roma in the State Report, despite abundant indications that Roma comprise the most vulnerable group in Ukraine, is indicative of the lack of interest and dearth of sufficient will on the part of the Ukrainian authorities to address the problems of Roma at a level adequate to need.

1.6 In recent years, however, some government officials have taken a greater interest in the issue. In September 2003, the Cabinet approved a three-year national project entitled the "Program for the Social and Cultural Renewal of the Roma Population of Ukraine", which was focused largely on preserving the ethnic identity of Roma and facilitating their integration into Ukrainian society. Furthermore, the Parliament's Committee on Human Rights, National Minorities and Interethnic Relations, chaired by Mr. Hennadiy Udoenko, a former foreign minister, held its first official hearing on the situation of the Roma in Ukraine on April 12, 2005. At the local level, however, the situation has shown little, if any, recent improvement.

1.7 Current Ukrainian laws are not sufficient to adequately protect against or punish discrimination. At present, there is no effective, comprehensive anti-discrimination law in Ukraine to make the ban of discrimination effective. Furthermore, even in areas where some legal provisions and mechanisms do exist, government authorities and the judicial system continue to be unable to utilize them to bring about meaningful change for Roma in Ukraine. The absence of any comprehensive anti-discrimination law in Ukraine makes it virtually impossible for victims of discrimination in Ukraine to use legal means to secure justice where instances of racial discrimination have taken place.

1.8 This report does not constitute a comprehensive assessment of all issues facing Roma in Ukraine. It does, however, describe some key areas of concern for Roma related to the rights enshrined in the ICESCR. The ERRC hopes that this report will assist the Committee in arriving at a more complete assessment of Convention matters and provide suggestions as to possible recommendations to the Ukrainian Government by the Committee.

² ERRC, 2006, Proceedings Discontinued: The Inertia of Roma Rights Change in Ukraine. Budapest. Available online at: http://www.errc.org/Archivum_index.php

2. INTRODUCTION

2.1 A 1989 census of the (former) Soviet Union recorded 47,917 Roma living in Ukraine, out of a total population of approximately 52,000,000. Roma thus constituted roughly 0.09% of the total population of Ukraine in 1989.³ In 2001, the State Statistics Committee carried out Ukraine's first census since the Communist period, and found that in 12 years the Romani population had stayed roughly stable at 47,587, out of a total population of Ukraine of approximately 47,000,000.⁴ This would place Roma at 0.10% of the total population. A number of studies, however, suggest that the actual number may in fact be much higher.⁵

2.3 Many Roma in Ukraine currently live without any personal documents, including an unidentified number of immigrants from the period of the former Soviet Union. The latter are, effectively, stateless, and lack recognition before the law. Various forms of abuse in this area include arbitrary confiscation of Roma residence permits by local officials, and refusal of authorities to issue residence permits to Roma under various pretexts.

2.4 The lack of personal documents is closely connected to the inability of Roma to find employment, access health services, and to their vulnerability to illness and disease since they require them to receive vaccinations and other preventive health measures. A lack of one or more personal documents may also hinder a Romani child from enrolling in school.

2.5 Furthermore, not only does a lack of documentation prevent Roma from accessing social services, but also their inability to benefit from those services prevents them from acquiring personal documents. The generally low level of education of many Roma make it difficult for them to fully understand how to navigate complex bureaucratic requirements needed to register property or secure individual identity documents. Moreover, the administrative processing fees are simply unaffordable for people living in conditions of extreme poverty. Racially discriminatory treatment, though, constitutes the most insurmountable obstacle. There are no government programs in place to assist an impoverished, uneducated and highly stigmatized population with obtaining the documentation they need.

2.6 A major segment of Romani communities of Ukraine lives in conditions of extreme poverty with little if no access to basic social services. A poverty assessment carried out by the World Bank in 2005 found that the general rate of poverty in Ukraine has been decreasing since 2001 due to economic growth in the country,⁶ yet Roma appear not to have benefited from such prosperity given information from the field. Although ethnic-specific data is deficient or lacking entirely, there are widespread indications that very large segments of Ukrainian Roma live in poverty, if not extreme poverty. A 2003 survey by the Ukrainian Institute for Social Studies found that almost 60% of their

³ State Statistics Committee of Ukraine, All-Ukrainian Population Census 1989: http://www.ukrcensus.gov.ua/g/d5_other.gif.

⁴ State Statistics Committee of Ukraine, All-Ukrainian Population Census 2001: http://www.ukrcensus.gov.ua/eng/results/nationality_population/nationality_1/s5/.

⁵ Quoted in Ukrainian Institute for Social Studies, "Analysis of Real Problems", p.7.

⁶ The World Bank, *Ukraine: Poverty Assessment – Poverty and Inequality in a Growing Economy*, (Washington: 2005), p.viii.

Romani respondents “could hardly make ends meet, lacking money even for basic items.”⁷ The majority of Roma in Ukraine live at or below the poverty line, with small percentages living at “medium” levels, i.e. having enough money to pay for all immediate needs.⁸ Unlike others in Ukraine who also suffer from poverty, Roma are forced to bear the additional burdens of extreme prejudice and racial discrimination which deny them fundamental human rights as well as access to already scarce social and economic resources and opportunities.

2.7 Despite numerous international instruments to which Ukraine is a party,⁹ as well as anti-discrimination clauses in its Constitution, Ukrainian legislation affords little, if any, meaningful protection from discrimination, particularly on the basis of race or ethnicity.

3. DISCUSSION

3.1 Articles 6 and 7 of the Covenant

3.1.1 With regard to Articles 6 and 7 of the Covenant, the ERRC is seriously concerned with the extraordinarily high unemployment level amongst Roma in Ukraine. The Roma Congress of Ukraine estimates that about 90% of Roma in Ukraine have no regular employment. Ukrainian Roma frequently cannot find work due to the both the difficult economic situation, as well as due to outright racial discrimination.

3.1.2 According to information provided by the ERRC and partners, the majority of employed Roma work as unskilled labourers. Most often, Roma perform seasonal forms of work as agricultural and construction labourers or scrap material collectors, and more rarely are they employed in a few low-skilled service sectors such as hairdressing or market trading. The high rate of illiteracy within the Romani community prevents many from knowing where or how to access information regarding employment opportunities. However, low levels of education often mask the core issue of racial discrimination in the labour market.¹⁰

3.1.3 Field research by the ERRC and partners indicates that racial discrimination is among the most serious factors that burden Roma on the labour market. Where qualifications are equal, many potential employers reject Romani applicants if there is a choice of hiring a non-Romani person, and thus far authorities in Ukraine have not taken effective measures to combat racial discrimination in the field of employment.

⁷ Ukrainian Institute for Social Studies, International Renaissance Foundation, “Analysis of Real Problems and needs of Roma People in Ukraine,” (Kyiv: October 2003). p.11

⁸ *Ibid.*, p. 12. According to experts interviewed by the researchers in the study, the number of Roma with “medium” levels of income were higher in urban areas, such as Uzhgorod (20-30%) or Odessa (25%), than in the rural areas, while in other regions, such as Chernigiv and Nihin, that amount was only between 5-10%.

⁹ In addition to the International Covenant on Economic, Social and Cultural Rights, Ukraine is a party to the International Covenant on Civil and Political Rights (ratified on 12 November 1973), the Convention for the Elimination of All Forms of Racial Discrimination (ratified on 7 March 1969), the Convention on the Rights of the Child (ratified on 28 August 1991), the Convention on Elimination of All Forms of Discrimination Against Women (reservation subsequently withdrawn – 12 March 1981), the European Convention on Human Rights and Fundamental Freedoms (ratified on 11 September 1997) and the Revised European Social Charter (ratified on 21 December 2006).

¹⁰ European Commission Against Racism and Intolerance, Second Report on Ukraine, CRI (2002) 23, §59.

3.1.4 The lack of a valid residence permit has also deprived many Roma in Ukraine from the possibility of employment in their hometown or anywhere else for that matter. Until the relevant Labour Code provision was abolished in 1997, prospective employers were required to check residence permits before hiring an individual. The labour code was amended the same year to the effect that employers are now prohibited from requesting residence permits as a condition of employment, but previous effects of this strict legal regime do not appear yet to have been overcome as far as Roma are concerned.

3.1.5 Roma are for the most part excluded from access to credit and/or bank loans, with the exception of informal support provided by loan-sharks. For those who do manage to gather enough capital to start small businesses, such as kiosks in marketplaces, their ability to earn a living from them and be successfully self-employed is tempered by discrimination experienced on a daily basis from the general public. It is not uncommon for directors of marketplaces to expel all Romani merchants, as happened in 2005 in Dniprodzerzhynsk, Dnipropetrovsk region, in response to a media story of a Romani man in the city having raped a non-Romani woman.¹¹

3.1.6 The ERRC notes with concern that the prospects of Romani women to secure gainful employment are even worse. Irrespective of the barrier of racial discrimination, they are also discriminated against by employers based on their gender. Human Rights Watch in 2005 reported that gender discrimination in the Ukrainian workforce, in both the public and private sectors, is widespread, with most women forced into lower-paying jobs if any at all. Fully 80% of Ukraine's unemployed population is female.¹²

3.1.7 The ERRC is aware of no occasion on which the government of Ukraine has acknowledged that Roma face racial discrimination in employment. Both the Constitution and the Labour Code contain provisions that guarantee the equal rights of citizens to labour.¹³ These protections have been to date ineffective in challenging the exclusion of Roma from the mainstream labour market and/or employment in the regular economy.

3.2 Article 11 of the Covenant

3.2.1 Article 11 of the Covenant requires that State parties "recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing and to the continuous improvement of living conditions." The ERRC is concerned that the Ukrainian Government has not taken all necessary steps to achieve adequate housing for Ukrainian Roma.

3.2.2 Roma in Ukraine face serious obstacles in the exercise of the right to adequate housing. Many live in substandard conditions in settlements or ghettos that are often segregated from mainstream society with little access to public transportation or public utilities such as electricity or waste removal. Public services or improvements such as road repairs or garbage disposal are thoroughly absent.

¹¹ ERRC interview with Ms Lydia Cibulienka, 28 July 2006, Novotomoskovsk, Dnipropetrovsk region.

¹² Human Rights Watch, p.144. <http://hrw.org/english/docs/2005/01/13/ukrain9884.htm>.

¹³ The Labour Code of Ukraine, Article 2-1 states that: "Ukraine shall secure the equality of the labour rights of all citizens, regardless of their descent, social and material status, race, ethnicity, sex, tongue, political views, faith, character or nature of occupation, place of residence or other circumstances." Article 43 of the Constitution guarantees the equal right to labour.

3.2.3 Very large numbers of Roma in Ukraine live in worse conditions than members of other groups or of the mainstream society. In 2006, the ERRC undertook comprehensive monitoring of the situation of human rights of Roma national minority in Zaporizhie, Kirovograd, Ternopil, and Kherson regions of Ukraine, as well as in the Autonomous Republic of Crimea.¹⁴ According to the survey, Romani households frequently have no running or potable water in the house, with family members drawing water from a neighbouring street. Houses are often heated by coal or wood fires, and lack central (gas) heating or central heating is not working properly. Many families live in houses with some windows missing. Over 50% of Roma interviewed in Kherson region and the Autonomous Republic of Crimea in August 2006 do not have a permanent place of residence and are not registered anywhere.

3.2.4 The substandard conditions of Romani settlements increase the likelihood of public health and other risks. In fact, the ERRC encountered a case where a pregnant Romani woman from the settlement died because of complications during childbirth because there was no telephone in the settlement with which to call an ambulance.

3.2.5 The Committee has stated that legal security of tenure is a fundamental component of the right to adequate housing. However, many Roma in Ukraine have testified to ERRC partners that local authorities continuously refuse to provide eligible Romani families with the proper documentation or permission for them to legalize their current homes or build improvements. Local authorities are frequently either personally moved to refuse to register and legalize property possessed by Roma or are pressured by non-Romani residents to do so.

3.2.6 The ERRC knows of no occasions on which direct discrimination in the field of housing have been the subject of any form of redress or punishment by any Ukrainian authority. The Ukrainian government has no programs that address the uniquely problematic housing concerns of Roma that arise directly from their stigmatization by non-Romani Ukrainians. Some Romani NGOs have recently begun trying to organize committees to cooperate with local authorities to study and document living conditions of Romani communities throughout Ukraine. The ERRC knows of no examples of slum settlement upgrade in Ukraine.

3.3 Article 12 of the Covenant

3.3.1 The ERRC is concerned that the Ukrainian government has not taken all necessary steps to achieve the full realization of “the right of everyone to the enjoyment of the highest attainable standard of physical and mental health” where Roma are concerned. Roma in Ukraine are in practice subject to discrimination when seeking to exercise this right, and in practice the health status of Roma in Ukraine is markedly worse than that of any other segment of the Ukrainian population. For example, in many settlements in the Transcarpathian oblast, the number of TB-affected people exceeds Ukraine’s average by tens of times.¹⁵

3.3.2 Many of the healthcare concerns of Roma in Ukraine are directly linked to the extreme poverty in which the majority live. A recent study on current problems facing Roma in Ukraine interviewed public health officials across the country and learned that the general health level

¹⁴ The survey at issue took place in the period July-September 2006, and was carried out by the Ukraine-based organisation Legiteam as implementing partner.

¹⁵ International Renaissance Foundation, Roma Program Strategy, 2007-2009: <http://www.irf.kiev.ua/en/programs/cs/roma/strategy/>.

of Roma residents in high-density “compact living” communities was poor, mostly a result of widespread poverty, inadequate nutrition, poor hygiene and substandard housing.

3.3.3 Only 50% of the Romani respondents of the same nationwide study said that they had sufficient daily meals, 31% reported that they did not have enough food several times a month and 15% said they had no food at least one day a week. In some locations, the figures vary. In Uzhgorod, for example, according to one estimate, around 70% of the Romani population experiences regular malnutrition.¹⁶

3.3.4 Many Roma in Ukraine also run serious risks of intestinal infections from unclean water. According to the study by the Ukrainian Institute for Social Studies, only 32% of its respondents said that they had water connections to their homes, and nearly 20% used surface water for cooking and drinking.¹⁷

3.3.5 The ERRC is concerned with the fact that all Romani respondents during a July 2006 ERRC field mission in the Dnipropetrovsk region stated that they had bad experiences with health care institutions. Thirty percent of persons interviewed said that they did not receive qualified medical assistance, including free choice of a doctor and health care institution. This, in particular, according to the respondents, manifested itself in the form of “improper and disrespectful attitudes on the part of doctors”, “medical staff extorting bribes”, “refusals to provide medication for free” and “low proficiency of the doctors”. Because of their low wages, public officials in the health care sector often resort to substandard treatment, or simply refuse to treat those who are unable to pay.¹⁸

3.3.6 Because of the poor economic situation of Roma in Ukraine, as well as discriminatory practices in the field of housing, most Roma settlements are situated away from hospitals and medical institutions, which significantly impedes access of Romani people to health services. ERRC research revealed that in 2004 a Romani woman in Uzhgorod was refused treatment by a doctor after her newborn child became ill with a fever. The mother, living in a largely Romani neighbourhood with no telephone connection, made contact with the doctor through a friend, asking him to visit her home and examine the baby as the baby was too sick to travel. The doctor in question is reported to have told her friend, “I won’t go there. Tell [the mother] she can come when her child is dead.” Two weeks later, the baby died.

3.4 Article 13 of the Covenant

3.4.1 The ERRC is concerned with the significant disparities between the situation of the majority of children and the situation of Romani children in the Ukrainian educational system. The ERRC notes in this report that the state has failed to provide educational services to Romani children, or to undertake measures to ensure that Romani children realise the right to education on an equal footing with other children in Ukraine.

3.4.2 A country-wide survey conducted by the Ukrainian Institute for Social Studies found that 68% of its respondents either could not read and write, or could do so with difficulties, and 59% could either not count at all, or only with difficulty. Twenty-five percent of the respondents could not write at all, 34% never attended school, 49% had some primary education, 10% claimed some

¹⁶ Quoted in Ukrainian Institute for Social Studies, p. 13.

¹⁷ Ukrainian Institute for Social Studies, p. 13.

¹⁸ Lekhan, Valeria et al. Health Care Systems in Transition: Ukraine 2004, (Copenhagen: World Health Regional Office for Europe, 2004), p. 101.

incomplete secondary school, 6% had a high school or professional trade certificate, and only 2% ever attended an institute of higher education at one time in their lives.¹⁹

3.4.3 The low level of educational attainment greatly impacts all other areas of life. As a result of the low levels of education held by a great number of Roma in Ukraine, many Roma who do succeed in accessing employment are engaged in only the least paid and unskilled forms of employment, usually in the form of hard physical labour.

3.4.4 The ERRC is concerned that Romani children in Ukraine are often wrongly categorized as having learning disabilities or, what is more, being mentally disabled. This is due to the fact that Romani children who do not attend pre-school find themselves wholly unprepared when they apply to attend primary school. Lacking the basic skills they should have learned in preschool, and often not functionally conversant in either Russian or Ukrainian, they are unable to pass the entrance test, nor do they understand what is expected of them, and they are often immediately segregated from the regular stream of children.

3.4.5 Due to the grave economic situation of Roma in Ukraine, some impoverished Romani families are often eager for their children to attend the special schools for the mentally disabled because by doing so their children are guaranteed one hot meal a day and sometimes free clothing. However, the curricula at these schools are entirely unsuited to the mental aptitude of many Romani children attending who have no learning impairment. These children are completely unchallenged in their education and from an early age learn not to expect much from it. Graduation from a special school for the mentally disabled effectively guarantees Romani children a life of exclusion and marginalisation.

3.4.6 In addition to the placement of Romani children in segregated and inappropriately unchallenging learning environments, another even more widespread phenomenon is the general absence of Romani students altogether from mainstream schools. This is partially a result of the segregation of Romani children, but also caused by the lack of concern and capacity by school administrators to resolve the problem of non-attendance.

3.4.7 On 23 August 2006, an ERRC staff member attempted to enrol one Romani child in five different primary schools in Donetsk. One after the other, each of the five refused, either outright, or on the basis of claims that classes were full. In the case of the latter, non-Romani families were observed successfully enrolling their children of the same age in the same schools afterwards.

3.4.8 The ERRC is greatly concerned with the fact that the vast majority of Romani children in Ukraine is either not attending school at all or is being denied access to mainstream schooling. The outcome of both is the same. An entire generation of Romani children is growing up and preparing for adulthood in a way that will leave them with extremely limited opportunities to have a future that will be free from poverty, social marginalisation and suffering.

4. EXECUTIVE SUMMARY

1. A large number of Romani people in Ukraine do not have access to employment as a result of low educational attainment levels as well as direct and indirect discrimination on the part of employers.

¹⁹ Ukrainian Institute for Social Studies, p. 47

2. When seeking employment, Romani women suffer from double discrimination, which is based on their ethnicity, as well as their gender.
3. As a result of substandard housing and poverty, the living conditions of Roma in Ukraine are extremely inadequate.
4. Due to the inadequate housing conditions and poverty, Romani people's health situation is significantly worse than that of the general population of Ukraine.
5. Romani people in Ukraine face serious obstacles accessing health care services as a result of lack of personal documents and health insurance.
6. Romani people often face inhuman and degrading treatment by doctors and other hospital personnel on the basis of ethnicity. In some cases, that results in denial of health care treatment.
7. Romani people face a number of barriers in accessing education as reflected in significantly higher illiteracy rates among Romani people compared to non-Romani people.
8. Lack of personal documents needed in order to enrol in school are fundamental barriers to Romani children's access to education.
9. Romani children are often wrongly placed in special schools for the mentally handicapped on the basis of inadequate categorising by medical commissions. The lack of economic possibilities also force Romani families to send their children to special schools as these schools result in less expenses. In some regular schools Romani children are segregated along ethnic lines into Roma only classes.
10. Romani children are often target of inhuman and degrading treatment in the form of verbal and physical abuse based on ethnicity by other classmates and teachers. These practices are rarely punished by teachers and other school officials, even when reported by Romani parents.
11. Policies and strategies adopted thus far by the Ukrainian Government to improve the socio-economic position of Roma have so far proved insufficient and often lack a minority perspective that takes into account the particular situation and needs of Roma people.

5. RECOMMENDATIONS

5.1 The ERRC urges the Committee to recommend to the Ukrainian government to undertake the following measures to redress the worrying situation of Roma in Ukraine:

1. Without delay, adopt comprehensive anti-discrimination law securing protection against discrimination – in particular racial discrimination – in all areas relevant for realizing the rights secured in the Covenant;

2. Develop and implement programmes to assisting Roma in obtaining personal and other documents to ensure that all Roma are in possession of those documents required to realize fundamental civil, political, social, economic and cultural rights;
3. Abolish the practice of race-based segregation of Romani children in education, including special remedial classes for mentally disabled and other separate, substandard educational arrangements;
4. Implement a comprehensive school desegregation plan, such that all Romani children may fully realize the right to education, and integrate all Romani students into mainstream classes. Design pre-school programmes for Romani children to learn the primary language of schooling and attain a level of preparation ensuring an equal start in the first class of primary school. Develop and implement catch-up or adult education programmes aimed at remedying the legacies of substandard education and non-schooling of Roma;
5. Adopt and implement measures, including but not necessarily limited to anti-racism training, codes of conduct and job performance reviews for the prevention of discriminatory and degrading treatment of Roma by public officials, including teachers and other educational official, doctors, medical personnel, civil servants and law enforcement officials;
6. Provide security of tenure for residents of Romani communities and settlements, and protect the inhabitants from forced and arbitrary evictions, as well as segregationist local practices;
7. Provide free legal aid to members of vulnerable groups, including Roma;
8. Systematically collect and make available data disaggregated by ethnicity in areas of relevance to the ICESCR, including statistical data comparing the situation of Roma with non-Roma in areas such as education, employment, housing, health care, access to social services and access to justice;
9. At all levels, speak out against racial discrimination against Roma and others, and make clear that racism will not be tolerated.