



To the kind attention of:

Mayor of Rome, Gianni Alemanno
Deputy Mayor of Rome, Sveva Belviso
Municipal Councillor for Heritage and Housing Policies, Lucia Funari

Dear Mayor, dear Deputy Mayor and dear Councillor,

We are writing with regard to the situation of hundreds of Romani families currently residing in the formal camps (officially known as “villaggi attrezzati”, equipped villages) of the Municipality of Rome. As you may be aware, our organizations¹ have been fighting against the discrimination of Roma in their access to adequate housing for a long time, and have urged the competent authorities to remove the obstacles which *de facto* discriminate Romani families in their access to social housing. We believe that this is essential to overcoming the segregation of Roma in camps. Furthermore, it constitutes a legal obligation binding on Italy under Council Directive 2000/43/EC of 29 June 2000, which implements the principle of equal treatment irrespective of racial or ethnic origin; the International Convention on the Elimination of All Forms of Racial Discrimination; and the International Covenant of Economic, Social and Cultural Rights.

Our organizations welcomed the announcement on 31 December 2012 of the *Public notice for the assignment on lease of social housing located within the territory of the Municipality of Rome and nearby areas, according to Regional Law n. 12 of 6 August 1999* (Bando Generale di Concorso per l’assegnazione in locazione di alloggi di edilizia residenziale pubblica ubicati nel territorio di Roma Capitale e zone limitrofe, ai sensi della Legge Regionale 6 agosto 1999, n. 12). The Public Notice gives priority in the assignment of social housing units which will become available to those families

¹ Amnesty International is a global movement of more than 3 million supporters, members and activists in over 150 countries and territories who campaign to end grave abuses of human rights. Our vision is for every person to enjoy all the rights enshrined in the Universal Declaration of Human Rights and other international human rights standards. We are independent of any government, political ideology, economic interest or religion, and are funded mainly by our membership and public donations; Associazione 21 luglio is an independent organization which promotes and protects the rights of the child, with a particular focus on Roma children living in Italy. The mission of the organization is to safeguard Roma children, to fight any form of discrimination, to promote campaigns and appeals, with the aim to put an end to the human rights’ violations affecting Roma children. See also www.21luglio.org. The European Roma Rights Centre (ERRC) is an international public interest law organisation working to combat anti-Romani racism and human rights abuse of Roma through strategic litigation, research and policy development, advocacy and human rights education. See also www.errc.org. The Open Society Justice Initiative is an operational programme of the Open Society Foundations, which uses law to protect and empower people around the world. Through litigation, advocacy, research, and technical assistance, the Justice Initiative promotes human rights and builds legal capacity for open societies. Its efforts focus on accountability for international crimes, racial discrimination and statelessness, criminal justice reform, abuses related to national security and counterterrorism, freedom of information and expression, and natural resource corruption. Since 2010, Open Society Justice Initiative is registered in the Registry of Associations and Entities that carry out activities to combat discrimination, kept by UNAR – Office for the promotion of equal treatment and the removal of discriminations based on race or ethnic origin – and set up at the Presidency of the Council of Ministers – Ministry for Equal Opportunities.



who find themselves in situations of gravest vulnerability, that is who are in “greatly disadvantaged housing conditions”. Besides listing the essential requirements to submit an application, regarding citizenship, income and so on, the Public Notice describes the conditions of priority for the assignment of points, adopted by the Municipal Council with Decision n. 302 of 25 October 2012.² Among these conditions, the highest score is assigned to applicants meeting the criteria described under Category A1, that is “families living in greatly disadvantaged housing conditions, verified by the competent authority, who have been living for at least one continuous year on the date of their application in centres, public dormitories or any other appropriate structures, temporarily provided by organs, institutions, and recognized and authorized charitable organizations dedicated to public assistance”.

The analysis of this text suggests that the living conditions of Romani families residing in the eight authorized camps of the Municipality of Rome match those described under Category A1.

However, the news that, on the basis of the new Public Notice, some of these families were submitting their applications for the assignment of a social housing unit or were about to do so, seeking the attribution of the points in Category A1, prompted in the last few weeks a series of public statements by representatives of local institutions. These have repeatedly denied that Romani families who reside in the authorized camps of the Municipality of Rome can obtain the assignment of Category A1 points, albeit without providing any clear justification or legal basis for their statements.

On 18 January 2013, in a document addressed to the Socio-Educational, Cultural and Sport Organizational Units of the territorial structures of the Municipality of Rome (U.O.S.E.C.S. delle strutture territoriali di Roma Capitale)³ containing ‘Clarifications on the requirements of the Public Notice for the assignment of social housing,’ the Director of the Operational Unit for the Housing Support Interventions of the Department of Housing Policies of the Municipality of Rome (‘Dirigente dell’U.O Interventi di Sostegno Abitativo del Dipartimento Politiche Abitative di Roma Capitale’), Lucietta Iorio, affirmed that “nomad camps cannot be included under Category A1 because they must be considered permanent structures”. This statement was reaffirmed on 7 February 2013 by the Municipal Councillor for Heritage and Housing Policies (Assessore alle Politiche del Patrimonio e della Casa di Roma Capitale), Lucia Funari, who stated in a note to the media: “With regard to concerns raised about priority conditions for the assignment of social housing contained in the Public Notice, I would like to reassure all Councillors that, as it has been clarified in the document sent to all borough councils on 18 January by the Department for Housing Policies, nomad camps are not included in Category A1, as in order to obtain the 18 points provided by it, applicants must be hosted in temporary shelters, that is structures meant to accommodate homeless people or people with no fixed abode”.

² Roma Capitale, Giunta Capitolina, Session of 25 Octobre 2012, Deliberation n. 302: *Approvazione condizioni di priorità per l'attribuzione dei punteggi per l'indizione del bando pubblico generale per l'assegnazione in locazione di alloggi in Edilizia Residenziale Pubblica* (Prot. N. 17124/12).

³ U.O.S.E.C.S. stands for socio-educational, cultural and recreational organizational unit.

This clarification, also in light of declarations contextually made by several representatives of local institutions, seems to have the discriminatory aim of preventing members of Romani communities from obtaining the attribution of Category A1 points, and thus of denying them a concrete chance to be assigned a social housing unit.

Furthermore, the affirmation in the 18 January circular that “nomad camps” have to be considered as “permanent structures” appears ambiguous. In fact, the circular does not clarify whether the character of “permanence” is attributed to the camp as a whole, as a public structure, such as a public dormitory, or rather to the nature of the allocation of the housing units within the camp. In the first case, the permanent or non-permanent nature of the camp appears irrelevant for the purpose of assigning the points of Category A1, given that in Category A1 the temporariness cannot but be referred to the assignment of housing units. In the second case, i.e. if the 18 January circular is meant to say that the allocation of a housing unit within a camp is “permanent”, that is assigned in a permanent way to the families who reside there, the circular would be inconsistent with several other official documents, where it is clearly stated that the allocation of housing units in authorized camps is temporary, including:

- The regulation on temporary stay in authorised camps for nomad communities in the Municipality of Rome of 15 January 2010 (Disciplinare sulle modalità di permanenza temporanea nei Villaggi Attrezzati per le comunità nomadi del Comune di *Roma*), which “establishes, for the nomad communities in the Municipality of Rome, the terms of temporary stay in authorised camps.”⁴
- The agreement between the Municipality of Rome and the Association ‘Isola Verde Onlus’ for the management of Camping River, an authorised camp in Rome, of 13 November 2009, prot. N. 65664 (Convenzione stipulata tra il Comune di Roma e l’Associazione Isola verde Onlus per la gestione del villaggio della solidarietà Camping River), where it is stated: “Guests should always be reminded that their stay in the camp is temporary: accommodation is only provided in order to prevent emergency situations, and guests must use this time to look for another permanent and autonomous accommodation, in accordance with the rules governing residence in Italy. For this reason, it is established that reception and stay at the centre are allowed only for a minimum period of six months to a maximum of twelve months, and may be extended only due to a guest’s particular circumstances if agreed by the manager of the centre.”⁵
- The 2012 agreement signed by the Municipality of Rome for the management of reception services in the authorised camp of La Barbuta in Rome (Convenzione stipulata dal Comune di Roma - Dipartimento V Direzione per la gestione del servizio di accoglienza del Campo attrezzato Barbuta), whose Article 1 states:

⁴ See Comune di Roma, Disciplinare sulle modalità di permanenza temporanea nei Villaggi Attrezzati per le Comunità nomadi del Comune di Roma, 15 January 2010: “stabilisce, per le comunità nomadi presenti nel Comune di Roma, le modalità di permanenza temporanea nei Villaggi Attrezzati”.

⁵ See Convenzione stipulata tra il Comune di Roma e l’Associazione Isola verde Onlus per la gestione del villaggio della solidarietà Camping River (Prot, n. 65664), 13 November 2009: “Agli ospiti dovrà essere sempre ricordato che la permanenza al campo assume il carattere della provvisorietà: si tratta di un’accoglienza limitata ad evitare situazioni di emergenza e gli stessi devono utilizzare questo periodo per ricercare una sistemazione definitiva ed autonoma nel rispetto delle norme che disciplinano il soggiorno in Italia. A tal fine il periodo di accoglienza e permanenza nel centro è fissato da un minimo di sei mesi ad un massimo di dodici mesi, prorogabile in presenza di particolari condizioni degli ospiti concordate con il gestore del centro”.



"Permanence in the camp is temporary. In no case are guests assigned with a stable and long-lasting accommodation, except for the time necessary to families to find autonomous housing solutions, with the support of social assistants available in the camp."⁶

Lastly, the temporary nature of accommodation of Roma in camps is well described in the National Strategy for the Inclusion of Roma, Sinti and Caminanti Communities: "Created to meet emergencies and with the objective of temporarily hosting people in transit, the housing structures of camps cannot meet the needs of families who have always lived a sedentary life, and they easily become places of degradation, violence and abuse; and in many cases the interventions of municipal authorities for the creation of "nomad camps" and the social support of the families living there, have been inconsistent, uncoordinated, led by emergencies or unsustainable in the long-run".⁷

We wish to express our regret for the adoption of the 18 January circular and deep concern for its application, which is discriminating against about 3,600 Roma and Sinti residents in the formal camps of Rome. Many of them, in fact, despite being eligible to apply for social housing on the basis of the new Public Notice and despite living in greatly disadvantaged housing conditions, may be deterred from applying thinking that they would not be assigned sufficient points to have a housing units assigned. It is also possible that families who have applied after the 18 January circular was issued have requested a lower number of points than that they would be entitled to.

The right to adequate housing is a human right, and the authorities have the obligation to ensure its fulfilment without any discrimination. The undersigned organizations recognize that in Rome inadequate housing and lack of housing are grave problems, that the social housing available is gravely inadequate to meet the needs of the city, and that there are many vulnerable families whose right to adequate housing has been violated for years. Our research and experience allow us to state also that Romani communities in Rome are among the most discriminated against in their access to adequate housing and among those who have been suffering from particularly severe housing inadequacy for many years.

The undersigned organizations call for an end to the ethnic segregation of Roma and Sinti in Rome's authorized camps, a goal that can only be achieved if the families residing in these camps are allowed to access without discrimination other forms of housing, including social housing.

⁶ See Convenzione stipulata dal Comune di Roma - Dipartimento V Direzione per la gestione del servizio di accoglienza del Campo attrezzato Barbuta, 2012, Art. 1: "La permanenza al campo assume il carattere di provvisorietà. In nessun caso viene data agli ospiti l'assegnazione di una sistemazione stabile e duratura se non per il tempo necessario a consentire ai nuclei ospitati, di ricercare soluzioni più autonome, sostenuti, in questo, dagli operatori sociali presenti nel villaggio".

⁷ See Presidenza del Consiglio dei Ministri, National Strategy for the Inclusion of Roma, Sinti and Caminanti Communities (European Commission Communication No.173/2011), 28 February 2012, per. 2.4.6, p. 85, available at http://ec.europa.eu/justice/discrimination/files/roma_italy_strategy_en.pdf. Please note the translation provided here is not the official translation.



In light of what said above and in order to avoid serious harm to Roma and Sinti interested in the allocation of social housing units, we ask that the Municipality of Rome:

- ♣ adopts all necessary measures to ensure equal access to the Public Notice of 31 December 2012 by the residents of “equipped villages”, including through an immediate amendment of the 18 January 2013 circular;
- ♣ ensures that the applications submitted by families living in "equipped villages" are correctly categorized;
- ♣ gives wide dissemination to the measures taken to ensure access to social housing, including through communications specifically targeted to the residents of the eight "equipped villages".

The undersigned thank you in advance for the measures that you may want to adopt to remedy the situation we have described. We look forward to your response.

Yours sincerely,

Amnesty International - John Dalhuisen, Director, Europe and Central Asia Programme

Associazione 21 luglio – Carlo Paolo Stasolla, Presidente

European Roma Rights Centre - Dezideriu Gergely, Executive Director

Open Society Foundations – James A. Goldston, Executive Director, Open Society Justice Initiative