

The Strategy Paper on Roma People 2016-2021

1. INTRODUCTION

The wider context of the EU Framework and progress assessments of the National Roma Integration Strategies

2012: First Steps

The EU Framework for National Roma Integration strategies up to 2020 marked a clearest declaration of serious intent to date from the European Commission that Roma inclusion required a coordinated Europe-wide effort. Key points:

- The EU Framework for National Roma Integration strategies up to 2020, adopted in April 2011 brought about a change in the approach to Roma inclusion: for the first time a comprehensive and evidence-based framework clearly linked to the Europe 2020 strategy was developed.
- EU Heads of State and Government endorsed the EU Framework, and for the first time, Member States began to coordinate their efforts to close the gap between Roma and non-Roma in access to education, employment, healthcare and housing.
- The Commission put in place an annual reporting mechanism to the European Parliament and the Council to assess progress made until 2020. It established the National Roma Contact Points' network covering all 28 Member State, and the Commission's own internal Roma Task Force, which brings together senior representatives from across the Commission and the European Union Agency for Fundamental Rights (FRA) to ensure coherence and consistency.

2013: Council Recommendation on effective Roma integration measures

The EU Framework was reinforced by a Council Recommendation on effective Roma integration measures in 2013. It reinforced the EU Framework with a non-binding legal instrument in order to make it easier for Member States to turn their commitments into reality. The Recommendation extended the Framework to additional areas and called on Member States to communicate annually to the Commission measures taken in line with the Recommendation and progress achieved in implementing the strategies. It specifically covered:

- *specific targeted action*, building on best practices, to strengthen Roma integration in full respect of the principle of subsidiarity and without duplicating existing EU legislation. This is the case for education, employment, health and housing;
- *horizontal issues* that are essential for putting into practice Roma integration policies and for securing their sustainability. These particularly include the fight against discrimination and stereotyping; the protection of children and women; the adoption of a social investment approach; the collection of information on the situation of Roma to monitor the impact of policies; the translation of national commitments into local action; the support of the work of bodies that promote equal

treatment of Roma; the reinforcement of the resources and capacities of the National Roma Contact Points and the development of transnational cooperation;

- general principles of securing the *transparent and appropriate allocation of funds* to Roma inclusion (not only EU but also national and local funds). Overall recommendations on EU funding were based on the experience of the current programming period and on the proposed Regulation on common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund.

European Commission's assessments of progress 2012-2016

At the launch of the Commission's first assessment of the National Roma Integration Strategies (NRIS) in May 2012, Commissioner Reding declared that the European Commission and Parliament had succeeded in putting Roma integration high, not only on the EU's political agenda—"but also on Member States' national agendas"; that all 27 states lived up to their word and delivered national strategies; and that "this shows the strong political will to tackle the challenges of Roma integration."

But Commissioner Reding was characteristically forthright in detailing the deficits:

"For the strategies to exist not just on paper and to produce tangible benefits for the 10–12 million Roma living in Europe we now need concrete measures, explicit targets, earmarked funding and sound monitoring and evaluation. As we know, the devil is in the detail. And it is precisely this level of detail that is lacking in most of the strategies."

The strategies submitted were deemed to be a "first step towards making a real difference in the lives of the Roma population." While the national strategies varied in terms of quality, scope and ambition, the European Commission clearly stated that: "Much more needs to be done when it comes to securing sufficient funds for Roma inclusion, putting monitoring mechanisms in place or fighting discrimination and segregation in the key priority areas."

The Commission stressed that the National Roma Integration Strategies of enlargement countries should also reflect the comprehensive approach required by the EU Framework. This is clearly highlighted in the Commission Enlargement Strategy and Main Challenges 2011-2012. In addition to focusing on the four key areas of the EU Framework, and committing to taking concrete steps, the Commission stated that countries in the Western Balkans and Turkey need to pay particular attention to facilitating access to personal documents and registration with the local authorities.

2016: Effective Roma integration measures in the Member States¹

This Communication is the most recent detailed assessment of the current state of play with regards to progress in implementing the EU Framework. It also reviews Roma

¹ http://ec.europa.eu/justice/discrimination/files/roma-report-2016_en.pdf

integration measures put in place under the Council Recommendation. Combating racism and discrimination is now a top priority. Key points are as follows:

Fighting discrimination and anti-Gypsyism

In 2015, the Commission stepped up action to fight discrimination, segregation and anti-Gypsyism, including hate speech and hate crime. As guardian of the Treaties, the Commission has a role to guarantee the Racial Equality Directive is properly transposed and enforced. Following action taken against the Czech Republic in 2014, the Commission launched a second infringement case on the discrimination of Roma children in education against Slovakia in 2015, and a third against Hungary in 2016.

The Commission now has power to oversee the application of the Council Framework Decision on racism and xenophobia in Member States and has stepped up efforts to ensure effective action on the ground against hate speech and hate crime. It entered into discussion with IT companies, Member States and civil society to ensure the fast removal of illegal hate speech online and to promote the development of counter-narratives.

State of play on Roma integration in Member States

In addition to the economic and financial crisis, the refugee crisis posed an unprecedented challenge for Member States. Public authorities are under pressure to address the needs of newly arrived refugees, besides their own vulnerable Roma citizens and the EU or third country nationals of Roma origin living in their territory. Despite the challenges that the integration of these communities present, Member States should not prioritise one over the other. A balanced approach, reconciling all integration needs with mutually supportive and coordinated actions, is required.

Horizontal measures

Discrimination continues to be widespread across the EU and is present in all societies, and in all key areas. This is confirmed by the findings of the recent Eurobarometer survey and feedback from civil society.

Despite some efforts, no real improvements can be seen on the ground. Therefore a more systematic approach is needed and Member States are urged to demonstrate greater political will to combat discrimination. Anti-Gypsyism as a specific form of racism, closely related to deeply rooted stereotypes and stigmatisation of Roma, is on the rise. It is related to increased radicalisation and extremism in the EU.

It is crucial that public authorities distance themselves from racist and xenophobic discourse that targets Roma and effectively criminalise anti-Roma rhetoric, hate speech and hate crime. It is important to realise that a reluctance to act also contributes to the acceptance of intolerance in societies.

Education

Education continues to receive the most attention by Member States in their integration measures. The majority of Member States reported measures relevant to early childhood

education and care, early school leaving, inclusive education and individualised support. A pro-inclusive legal environment, which has been reinforced in several Member States, needs to be accompanied by effective implementation measures. Proper monitoring, sustainable funding and relevant teacher education must be secured to achieve tangible results.

Employment

Roma participation in the labour market remains very weak. Member States gave priority to mainstream measures for the unemployed, training, and subsidised jobs for the long-term unemployed. Despite all these measures, Roma still remain the most under-represented group in the labour market. Low levels of education and skills and widespread discrimination are factors explaining poor employment outcomes. While activation and public work may improve employment statistics, they failed to provide a bridge to the open labour market; on the contrary they had a lock-in effect, keeping participants in exploitative low-quality, low-income jobs that are insufficient to break out of poverty.

Health

Tackling the health inequalities endured by Roma remains an ongoing challenge, in particular in the most deprived areas. For some Roma, access to health is limited because of a lack of registration and health insurance coverage. Further efforts are needed to reach out to these vulnerable people. There is a need for awareness-raising activities targeting both healthcare professionals and Roma should in all Member States.

Housing

The most important housing challenges — namely fighting segregation and preventing forced evictions — were insufficiently addressed. Both areas should be important for further joined-up, robust action, to be potentially financed from EU funds. Use of European Structural and Investment Funds (ESI Funds) leading to (further) segregation of facilities should be avoided.

Enlargement

An important effort is being made under the Instrument for Pre-Accession Assistance (IPA II) to support Roma integration programmes at national and regional levels. However, the situation of most Roma communities remains a matter of concern. Adopting legislative or policy documents is not enough. Adequate budgetary means should be allocated at national level to implement integration measures, with special attention given to local implementation.

Roma communities need to be fully involved in planning, implementation and monitoring. The Roma Decade ensured that Roma integration became part of the political agenda. The post-Decade phase should concentrate on achieving measurable results on the ground, clearly reducing the gap between Roma and non-Roma, and with special attention to priority areas (education, employment, health, housing and civil documentation) as well as in the cross-cutting fields related to gender and anti-Gypsyism. Roma integration

policies must be reinforced in response to the current refugee crisis; a significant portion of returnees to the Western Balkans, designated now as safe countries of origin, are Roma.

Conclusions and way forward

The legal, policy and funding instruments at European level have been put in place. Member States have set up coordination structures, introduced targeted and mainstream measures in response to the Council Recommendation, and they have allocated funding.

However, efforts could not prevent further deterioration of the living conditions of Roma and widespread hostility of majority societies. Serious bottlenecks have been identified in fighting anti-Roma discrimination, especially residential and educational segregation and prevention of forced evictions. Member States should ensure a political recommitment to Roma integration so that legal, policy and financial instruments in place are fully used to bring tangible results on the ground. Local implementation is of the utmost importance.

Priorities

The Commission called on Member States to address the following urgent priorities:

- Enforce anti-discrimination and anti-racism and xenophobia legislation and safeguards at national and local levels by: monitoring, fighting, reporting and sanctioning anti-Roma discrimination in all policy areas; criminalising public incitement to violence or hatred including on the grounds of ethnic origin; addressing trafficking in human beings with gender specific and child sensitive measures; targeting majority society and key stakeholders with awareness raising and anti-discrimination campaigns to promote understanding of the economic imperative and mutual benefits of Roma inclusion.
- Prevent evictions on the grounds of ethnic origin by ensuring that any evictions take place in full respect of fundamental rights, providing adequate alternative housing to evicted families to avoid homelessness and aggravating exclusion, and by exploring the opportunities under ESI Funds' investments to improve the housing situation of Roma.
- Eliminate segregation in education and housing in line with Commission guidance through legislation, inclusive policy reform, teacher education, dissemination of inclusive methods and explicit desegregation measures combined with targeted support to tackle all barriers to access, using opportunities under ESI Funds to the full.
- Put in place safeguards and targeted measures to ensure that mainstream interventions effectively reach out to Roma, especially in employment and health.
- Further develop data collection, monitoring and reporting methodologies to meet expectations of accountability for the use of public funds and ensure that the impact of targeted and mainstream measures on Roma is assessed and that it leads to policy learning and review.

- Make full use of National Roma Platforms to ensure inclusive involvement of all stakeholders in implementation, monitoring, reporting and policy review, to promote exchange, evaluation and transfer of good practices, to build partnerships and to further mobilise Roma communities, local authorities, civil society and the private sector.

2. THE NATIONAL STRATEGY PAPER ON THE SOCIAL INCLUSION FOR ROMA PEOPLE 2016-2021 (ANKARA, APRIL 2016)

The National Strategy Paper on the Social Inclusion for Roma People 2016-2021, and the Action Plan are to be welcomed as a significant step forward to promote social inclusion, “overcome the obstacles (Roma face) in terms of access to education, health, employment and housing”, improve their living conditions and close the gap between Roma and non-Roma citizens.

The **10 Common Basic Principles on Roma** Inclusion serve a tool for both policy-makers and practitioners devising inclusion strategies, managing programmes, and projects. On 8 June 2009 the Council of Ministers in charge of Social Affairs annexed the Principles to their conclusions and invited Member States and the Commission to take them into account. The vademecum provides a practical check-list on how to implement each of the Principles:

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

More than eight years later, the Common Basic Principles still stand as the most effective ‘at a glance guide’ as to whether a Roma inclusion strategy is well-conceived at the outset; and later on, whether the implementation of the strategy is making a concrete difference to people’s lives.

The National Strategy Paper and Action Plan adhere in many ways to the spirit of the Common Basic Principles, and the approaches adopted are similar to many of the National Roma Integration Strategies (NRIS) across Europe. It is an important document in that it acknowledges that, despite the fact that the Constitution of the Republic of Turkey guarantees the right to access public services and social security, in practice “Roma people face some obstacles in terms of access to education, health, employment and housing.” The document includes the contributions of relevant public institutions and civil society organisations and its declared purpose is to improve the “socio-economic status of Roma people both in short and long term.”

The strategic objectives and goals as set out in the priority areas of education, employment, housing, health and social services and assistance are congruent with the objectives of the EU Framework and the stress on comprehensive approaches to social integration, dialogue and awareness raising, and multi-stakeholder collaboration is laudable. This is evident in the strategic goal in housing, which highlights both the complexity and scale of the challenges: “Putting beneficiaries’ concerns under the microscope and enacting executive and legislative regulations to deliver side services ... which range from the beneficiaries’ financial situations and their conditions for making ends meet, to their children’s educational situation, public transportation problems and other potential problems.”

Fundamental Implementation Principles

The ‘Fundamental Implementation Principles’ are congruent with the 10 Common Basic Principles. They include the following:

Policy-making and implementation based on data: There is the need for decisions on political priorities, strategic policy-making and implementation, as well as monitoring and evaluation to be based on regular gathering of reliable data rather than “hypotheses and prejudices.”

A regional political approach with a definite goal that does not lead to social exclusion: Combating disadvantage by addressing all people living in excluded neighbourhoods is fully in line with the second Common Basic Principle: Inclusion policy initiatives adopt an approach of explicit but not exclusive targeting, which provides for focusing on Roma as a target group but not to the exclusion of other people who share similar socio-economic circumstances. This approach does not separate Roma-focused interventions from mainstream policy initiatives. In addition, where relevant, consideration is given to the likely impact of mainstream policies and decisions on the social inclusion of Roma people.

Anti-discrimination: While mention of anti-discrimination is somewhat qualified – “location-based and cultural prejudices against Roma people who *could* face discrimination ...” – the call for the elimination of discrimination in accessing public services is nonetheless welcomed.

The alignment with the Common Basic Principles is evident in the Implementation Principles which include an integrated holistic policy approach which promotes transparency and accountability, and engenders collaboration across institutions; involvement of civil society and Roma communities; involvement of regional and local authorities, public participation and policy mainstreaming; promoting intercultural dialogue to counter majority prejudices and establish respect for human rights and difference; prioritizing the most disadvantaged groups: women, children, youth, and people with disabilities.

Also in line with the European Commission’s recommendations, there is mention of the need for monitoring and evaluation. The plan to establish a Monitoring and Evaluation Board (in the First Phase of the Action Plan), one half comprised of Ministries, public institutions and agencies; the other half drawing from civil society organisations,

academics and professional organisations; a board that meets regularly to review past progress and future activities, is an excellent model.

The principles contain references to community participation and consultation in decision-making to ensure that interventions address local needs, involvement of civil society organizations in deliberation decision-making and implementation of inclusion policies. As founding principles on participation these are entirely laudable; putting them into practice is more of a challenge involving a time-consuming, complex and invariably uneven set of processes. The experiences, successes and failures in other accession countries and EU Member States may prove instructive. On this and many other issues, the declared intent to take the experiences of EU, international and non-governmental organisations “into account in a maximum capacity” is also welcome, learning is of course a two-way process and international organizations can benefit from Turkey’s experience as the strategy moves to the stage of implementation.

The European Commission has urged enlargement countries to pay particular attention to the issue of ID papers, other official documentation and registration with the local authorities. It is to be welcomed that the issue of identity cards is identified as a fundamental implementation principle from the outset and that Item 4 on the Action Plan states that beginning 21 December 2016 “It will be ensured that all Roma people will have an identity card” and that Roma people will be informed about the registration process for newly-born children. As a policy objective with a clearly quantifiable relation between outputs and outcomes, it will be interesting to measure progress one year on.

The strategy foresees two main interventions: broadening access to public services, and improving delivery to ensure quality service provision. Policy interventions made on the basis of a ‘territorial approach’, targeting localities with large Roma concentrations, and providing services to all regardless of a citizen’s ethnicity aligns with Common Basic Principle No. 3 for Roma Inclusion: explicit but not exclusive targeting, which provides for focusing on Roma as a target group, but not to the exclusion of others who share the same socio-economic circumstances; and does not separate Roma focused interventions from mainstream policy initiatives.

AREAS OF CONCERN

Education

The problems identified are common to most countries: low access, high absenteeism and early school leaving. The main cause for Roma children not being able to “benefit from the education opportunities sufficiently” is identified as the socio-economic challenges faced by their parents, “who consider their children’s educational process as a relatively long and ambiguous investment”.

The statement that “Roma families do not believe in the future” would need to be qualified and substantiated. As UNDP research shows, what parents to be a sufficient level of educational attainment for their children is constrained by what seems possible. The issue of agency, defined as the aspirations of an individual (or a group), matched by the resources and opportunities required to reach those aspirations, is crucial to any

understanding of choices and survival strategies of marginalized groups. Rather than attribute low aspirations to cultural proclivities, it is clear that the multiple deprivations marginalized Roma communities face in all spheres of life “lead to low aspirations that can be met through “low agency strategies” and thus additionally fuel the cycle of exclusion, replicating its patterns over generations.” As UNDP puts it, much of Roma life takes place in an “agency-hostile” context, which keeps Roma in a subordinate status, and severe poverty “lowers the level of aspiration, which makes even the limited opportunities an individual may have to a large extent hypothetical.” Thus Roma are locked into a vicious cycle of exclusion “that is reinforced by the very survival strategies that have evolved in response to severe poverty.”²

The section seems to blame inequalities and segregation on the children themselves, their parents and those who ‘complain’ about segregation. From the side of the authorities, it is stated “segregation regarding student distribution is not possible but it is observed in the past that Roma children have education in different classrooms or environments or they form isolated groups among themselves.” It is unclear how different ways of ‘having education’ or becoming isolated could happen spontaneously without direct institutional interventions.

The hypothesis that complaints about segregation have led to a perception that there is segregation, which restrains Roma children from attending schools, and causes some Roma children who continue to study to “leave education just because they think that they are exposed to social exclusion”, is not entirely comprehensible; nor is it clear what evidence there is to sustain such a line of argument.

This emphasises the importance of the first of the Fundamental Implementation Principles, which states that decisions on policy priorities, design and implementation, as well as monitoring and evaluation should be informed by in-depth research and reliable data, rather than “hypotheses and prejudices”.

Discrimination

While the strategy acknowledges the role of discrimination, and calls for a comprehensive strategy to combat it, the experience across Europe since the launch of the Framework is that most EU Member States have taken no effective action to counter anti-Gypsyism. It is not clear from the strategy document, if there is a shared understanding among all stakeholders how discrimination operates and impacts upon Romani communities, and if there is any agreement between policy-makers, politicians, educators and civil society about how best to counter it. The report *We are Here! Discriminatory Exclusion and Struggle for Rights of Roma in Turkey* argued that:

“Despite the fact that social deprivation does not affect solely Gypsy communities in Turkey, the prevalence of anti-Gypsy prejudices, manifest in the daily experiences of individuals belonging to these communities in their interactions with non-Gypsies, reveals a high degree of unequal treatment on an ethnic basis. In numerous cases from all over

² Ivanov, A., Kagin, J. (2014). Roma poverty from a human development perspective. Roma Inclusion Working Papers. Istanbul: UNDP.

the country, Gypsies in Turkey experience discrimination on the basis of their identity, over and above the experiences of other poor groups in Turkish society.”

Most experiences of discrimination were reported in the area of employment, followed by reports of discriminatory treatment of Romani children in education, then discrimination in the areas of housing and health care.

The tacit recognition that discrimination exists is a valuable first step. However, the experience across all Member States of the EU and implementation of the Roma Framework strategies since 2011 is that without ethnically disaggregated data, and an in-depth analysis of how institutional racism operates in public service provision, employment practices, among law enforcement officers and the justice system, one can only hazard estimates concerning the extent of the problem. And as a consequence, it is difficult to envisage the scale of interventions that would be required to have an impact needed to dislodge discriminatory practices, and dispel popular prejudices.

It is encouraging that the Fundamental Implementation Principles does include a clear anti-discrimination statement that ‘location based and cultural prejudices and discrimination against Roma people who could face **discrimination** in having equal access to public services, such as joining the labor market, getting education and using health and housing services **should be eliminated**.’ The Action Plan, under general policies, makes specific but very general mention of continuing awareness raising through media and training public sector staff to eliminate prejudices against Roma.

Disaggregated Data

Across many EU countries, the shortage of disaggregated data makes it extremely difficult – and sometimes impossible – to assess the progress of policies to tackle discrimination over time. It also weakens the effectiveness of public policies to increase equality and combat discrimination throughout the EU, and jeopardises the work of equality bodies, which were set up in each Member State specifically with the task of monitoring the implementation of the equality directives and assisting victims of discrimination. When one takes into account the main interventions envisaged - broadening access to public services, and improving delivery to ensure quality service provision - it is impossible to assess what financial resources are required to effect change; what scale of interventions are required; and what would be the baseline data from which to monitor and measure progress.

Roma Participation

While many of the NRIS (and this document also) make mention of Roma participation, and some efforts have been made to ensure a degree of consultation in certain member states, the reality falls way short of the rhetoric of active citizen participation. The recognition in the introduction, policy fields and strategic objectives, and implementation principles of the importance of Roma participation is welcomed. The recommendation for this and indeed most of the national strategies across Europe is for an explicit commitment to a timeline for scheduled and structured broad-based consultations with all relevant stakeholders in targeted Roma communities between now and 2020.

Funding

In the 1st Phase Action Plan, there is no mention of earmarked funding for planned interventions, no estimated costing to give a sense of the scale of anticipated actions. The plan anticipates that during 2016 and 2017 activities covered by existing funding will be determined and data will be collected during this period to “create a basis for relevant policies”, for a better design of policies starting from 2017. Without disaggregated data, it is hard to estimate what resources commitment would be adequate to effect the scale of change needed. And without costings, the strategy cannot be judged as being anything other than a draft statement of intent.

The Commission indicated last year that in the Instrument on Pre-Accession Assistance (IPA II), funding will shift from supporting policy development and institution building to actions directly making an impact on the lives of individual Roma persons, with a particular focus on education, housing and social inclusion. The possibilities to utilise EU funding for specific interventions could be explored.

3. SUMMARY REVIEW OF THE ACTION PLAN

	Key Elements	Identified Gaps
Monitoring and Evaluation	Establishing an M&E board comprised of one half relevant ministries, public institutions and agencies, and on the other half NGOs, academics and other professional bodies. Scheduled to meet twice annually to review, evaluate and adjust strategies as required for the coming year	
Research	Combining Ministries, Scientific Research Institutes, Universities and NGOs to conduct field research on Roma communities for an in-depth understanding of needs, access to services, basic rights and expectations	<i>Apart from the start date of June 21, 2017 there are no other details</i>

<p>Measures to eliminate anti-Roma prejudice</p>	<p>Ministries, local administration and NGOs will conduct awareness raising through effective use of media and public service staff training</p>	<p><i>Apart from the information that such activities will continue, there is no detail provided</i></p>
<p>To ensure that all Roma people will have an identity card</p>	<p>The Ministry of Interior together with local administrations and NGOs will inform people about registration process for new-borns, and Roma who do not have ID cards “will be detected and registered”</p>	<p><i>Apart from the information that this action will start December 2016, there is no timeframe, no targets or implementation detail provided.</i></p>
<p>Education</p>	<p>The strategy envisages that Roma students will be supported to become more engaged and better adapt to school environments; encouraged to become involved in clubs and competitions. Roma parents will be informed about educational benefits and how to avail of conditional cash transfers.</p> <p>Students who drop out will be detected and their continuation with schooling ‘will be ensured’. Parents will be informed about the importance of girls’ schooling. Extra classes will be provided in densely populated areas to compensate for the gap between primary and secondary standards.</p>	<p><i>What is missing is all the positive features identified in an earlier version of the strategy.</i></p> <p><i>No targets, no detail, no benchmarks, no costing</i></p> <p><i>No indication whether the strategy will include increasing access to early childhood education and care services.</i></p> <p><i>While gender equity is mentioned in the strategy, it is unclear how equitable outcomes will be achieved for boys and girls.</i></p> <p><i>Any comprehensive educational strategy would involve a wide range of cooperating institutions. It is unclear from the document whether this cooperation has already been solicited or confirmed by the various institutions.</i></p> <p><i>No mention of third level education. Earlier versions of the strategy included</i></p>

		<p><i>additional support in high-school to prepare Romani students for university exams, providing 'guest courses' in the universities, additional courses to increase academic success for target group of 2000 students.</i></p>
<p>Employment</p>	<p>Employment surveys and labour market analysis will be conducted to determine the content of employment services and vocational training. Awareness raising activities will be conducted to orient Roma towards in demand occupations, training opportunities and public works programs.</p> <p>Investors will be encouraged to market craft products</p> <p>Child and family education to prevent child labour</p>	<p><i>The strategy lacks a clear sense of how to bring the levels of Romani men and women's participation in the workforce to the national average in a medium to longer time frame.</i></p> <p><i>The ambition of the current version has been reduced from equalizing participation levels in the workforce to a more modest strategic objective of facilitating access and increasing employment.</i></p> <p><i>The strategy only commits to surveys and analysis at this stage, so there is no data, no detail, no targets, no planned activities on which to make a judgment.</i></p> <p><i>While there is mention of discrimination in the document, there is no sense of how much of an impact discrimination actually has, and no sense of what national and local authorities, employers in the public and private sectors might do (in terms of clearly defined, time-</i></p>

		<i>scaled, costed and concrete activities) to combat, or at least ameliorate the situation.</i>
Housing	<p>Activities envisaged include assessment of dwellings in need of minor repairs, and selecting Roma within the scope of public work to be employed in this work.</p> <p>For flats which are uninhabitable or those affected by urban transformation programs, inhabitants needs will be assessed.</p> <p>Some projects for small detached houses with gardens for small scale farming will be activated takin into consideration needs and lifestyles.</p>	<i>Apart from the starting date of December 21, 2018, there is no indication of the scale of activities envisaged, and no detail on which to base any assessment of how the strategic objective might be achieved.</i>
Health	<p>The strategy includes the following positive elements:</p> <p>To increase the capacity of provinces where Roma people live to deliver increased health service provision as well as public health centres in regions where Roma migrate.</p> <p>Effective implementation of the vaccination calendar so that no child is left unvaccinated</p> <p>Nationwide drive to ensure that no Romani citizen is without personal ID cards needed to access public services;</p>	<p><i>In the sphere of health, the absence of disaggregated data inhibits any efforts to devise a comprehensive set of activities; to identify clear goals and time-constrained targets; and to earmark an appropriate amount of financial resources.</i></p> <p><i>Aside from a mention of gender equality, there is no clear sense of how gender mainstreaming might work in the health component of this strategy.</i></p> <p><i>In an earlier version there was mention of expanding health insurance and a target to set up 22 new</i></p>

	<p>Mobile health screening conducted by health care teams.</p> <p>Increasing health awareness, plus rights of disabled and elderly who are in need of social services plus dealing with issues such as gender equality and early marriages.</p>	<p><i>Social Services Centres in cities and districts with large Romani populations.</i></p>
<p>Social services and assistance</p>	<p>The strategic objective is to ensure that needy Roma benefit from social assistance and services. Towards this end consultancy services and family education programs will be developed. In addition information and awareness activities will be developed to educate people about the challenges of aging, disability and gender equality will be carried out by the Ministry of Family and Social Policy in cooperation with relevant agencies.</p>	<p><i>Pending the research, fact finding and needs assessments that are scheduled for the preparatory phase of the strategy implementation, there is no information on which to judge the efficacy of activities which are scheduled to start on June 21, 2017</i></p>

4. CLOSING REMARKS

The strategy's fundamental goals of the strategy are to improve the living conditions and socio-economic status of Roma people and to ensure they have access to basic public services. The strategy contains strategic objectives, goals and actions, and fundamental implementation principles that largely adhere to the guidelines of the EU Framework for National Integration Strategies up to 2020. As former European Commissioner Reding noted 'the devil is in the detail' and much of the detail in terms of actions, implementation and costing is as yet forthcoming, and envisaged to materialize in the course of research and consultation processes in 2016-2017. In this preliminary form, the strategy sends a clear signal that the Turkish government is willing and is preparing to tackle the complex and multi-faceted challenge of Roma exclusion. Common to all EU member states and accession countries, the challenge that lies ahead is to turn this political commitment into concrete action that will change the live of Romani citizens to make social inclusion a tangible reality.