

SYNOPSIS REPORT OF THE OPEN CONSULTATION ON THE MIDTERM EVALUATION OF THE EU FRAMEWORK FOR NATIONAL ROMA INTEGRATION STRATEGIES (NRIS) UP TO 2020'

1. Introduction

This annex presents an overview of all activity conducted with stakeholders as part of the 'Midterm evaluation of the EU framework for national Roma integration strategies (NRIS) up to 2020'. The general objectives of the stakeholder consultations, as outlined in the consultation strategy prepared for the evaluation, were to collect stakeholders' views on:

- results achieved and challenges faced during the 5 years of implementation of the EU framework in the key areas of education, employment, healthcare and housing as well as on discrimination;
- the alignment, relevance and effectiveness of European and national policy, legal and funding instruments.

The specific objectives of the stakeholder consultations were to obtain targeted feedback on:

- the use and results of the EU framework;
- the use, impact and alignment of European policy, legal and funding instruments put in place in support of Roma integration;
- the impact on Roma of the implementation of the NRISs and of mainstream policies.

The consultation strategy specified that stakeholder views should be ensured by facilitating targeted stakeholder consultations, and through an open public consultation (OPC). The stakeholder consultations that were ultimately pursued as part of the evaluation covered both of these activities. The final types of stakeholder consultation that took place are as follows:

- an OPC, which featured a set of questions for a range of stakeholder groups;
- targeted stakeholder consultations, which took the form of interviews with a variety of stakeholder groups from across Member States and enlargement countries;
- an online survey specifically targeted at NGOs; the survey enabled the views of NGOs involved in Roma integration across Member States to be incorporated, as their insight might not have been adequately captured through the other consultation methods planned;
- a workshop, which brought together a wide variety of expert stakeholders to address different dimensions of the preliminary findings of the external evaluation study.

The following table summarises the range of stakeholders consulted as part of the evaluation, in line with the consultation strategy.

Table 10: Stakeholder type and data collection method

Stakeholder type	Data collection method
National Roma contact points	OPC Targeted stakeholder consultations Workshop
Stakeholders representing national, local, regional and municipal authorities, and other public or mixed entities such as social services, housing, health, education service providers	OPC Targeted stakeholder consultations
Representatives of non-governmental and civil society organisations (EU umbrella organisations and organisations active in Member States on national/ regional/ local levels)	OPC Targeted stakeholder consultations Workshop NGO survey
Representatives of international organisations and institutions active in the area of Roma integration in EU countries and/or enlargement countries	OPC Targeted stakeholder consultations Workshop
Representatives of research and academic institutions	OPC Targeted stakeholder consultations Workshop
European-level experts with a stated interest in Roma integration issues	Targeted stakeholder consultations Workshop
EU and non-EU citizens, including members of Roma communities	OPC
Representatives of organisations representing churches and religious communities	OPC
Representatives of business and professional associations	OPC

2. Overview of consultation activities

While all the stakeholder types included in Table 10 were approached, representatives of organisations representing business and professional associations did not respond to the

OPC. The other stakeholder groups were effectively reached through the data collection methods outlined above¹.

2.1. Open public consultation

The OPC carried out by the Commission aimed to compile the opinions of these stakeholders on the achievement and challenges of the EU framework between 2011 and 2016, in order to identify specific areas which would need prioritising during the remaining implementation period. Additionally, the OPC took stock of the various European and national policies, and legal and funding instruments which had so far been mobilised for Roma integration. The OPC questionnaire² consisted of 16 questions³ that covered:

- introductory questions on the background of the respondent;
- general questions on social exclusion and discrimination and expectations for future priority areas at the European and national level. This set of questions did not require specific knowledge of European or national instruments used to further Roma inclusion;
- specific questions on: (i) European and national efforts at Roma inclusion; (ii) relevant policy developments; (iii) achievements and challenges pertaining to the EU framework and NRISs; and (iv) specific measures taken across the four main policy areas of education, employment, health and housing.

The online OPC ran between 19 July and 25 October 2017 on the website of the European Commission. A total of 240 responses were received to the survey⁴. 165 of these came from organisations, while 75 were from individual citizens. Of those 165 organisations, 106 indicated that they represented a NGO or think tank, 44 represented public administration, and 15 answered on behalf of other organisations (such as equality bodies). Of the 240 respondents, 202 specified their ethnicity: 91 identified themselves as Roma and 111 as non-Roma.

Additionally, 28 position papers were received as part of the OPC. The majority of these were from NGOs, although UN agencies, universities and the World Health Organization also provided submissions. Some of the submissions were tailored responses to the OPC, while others were research or advocacy papers going back as far as 2010.

2.2 Targeted stakeholder consultations

¹ It cannot be ascertained whether representatives of organisations representing churches and religious communities were reached, as the identity categories of the OPC were: non-governmental organisation, public, administration, business, employer organisation, trade union, association, academia/research/think tank and other.

² The online consultation form was published on the EU survey page:
<https://ec.europa.eu/eusurvey/runner/EvaluationEUFrameworkforNRIS>.

³ All questions were optional except those on self-identification.

⁴ The results of the consultation are published on the European Commission website and are available here:
https://ec.europa.eu/info/consultations/public-consultation-evaluation-eu-framework-national-roma-integration-strategies-2020_en.

Interviews with a range of relevant stakeholders across Member States and enlargement countries were carried out. Interview consultations that were undertaken were categorised into three groups:

- 138 interviews with stakeholders (NRCs, officials in employment, housing, education and health ministries, NGOs, equality bodies, regional authorities, experts) across 11 Member States selected for country analysis studies⁵;
- 53 interviews with stakeholders (NRCs, officials in employment, housing, education and health ministries, NGOs) across 16 Member States not selected for country analysis studies⁶;
- 10 interviews with stakeholders in three enlargement countries (Serbia, the Former Yugoslav Republic of Macedonia, and Bosnia and Herzegovina).

The final number of stakeholders interviewed was less than the number originally intended, as it was not always possible to arrange an interview with all stakeholders⁷. The main reasons for this included: (i) some of those contacted were unable to take part in the interview, but also unable to suggest another possible contact to replace them; (ii) some ceased responding; and (iii) others did not reply to the initial invitation to interview. In addition to the above interviews, eight interviews were conducted with experts operating at the European or international levels⁸.

2.3. NGO survey

A targeted online survey was opened on 16 January 2018 and ran until 23 February, with the aim of giving NGOs an additional opportunity to provide comments. This was considered important as not in all countries were NGOs part of the targeted stakeholder consultation described below. The survey drew 65 full responses. Respondents to the survey represented 19 Member States, with the largest share of respondents representing Greece, Slovenia and Sweden (each Member State individually accounting for 13 % of all respondents). A substantial proportion of organisations (47 %) reported that they operate at the national level, while 16 % of respondents represented a regional-level organisation, 17 % a community- or local-level organisation, while represented 14 % an international organisation.

The survey questions comprised 24 multiple choice questions, organised in accordance with the different evaluation criteria explored in the study: relevance, coherence, effectiveness, equity, coordination, efficiency, sustainability and EU added value. They consisted of statements for which the respondents had to state whether they agreed/disagreed/neither agreed nor disagreed/had no opinion/did not know.

2.4. Workshop

⁵ AT, BG, CZ, ES, EL, FR, FI, IT, HU, SK and RO.

⁶ BE, CY, DE, DK, EE, IE, HR, LV, LT, LU, NL, PL, PT, SE, SI and UK.

⁷ It was intended that 64 telephone interviews would be conducted with stakeholders in the 16 Member States not covered by a country analysis study and in enlargement countries, while up to 20 interviews would be conducted in each of the 11 Member States covered by the country analysis studies.

⁸ It was intended that 10 European- or international-level stakeholders would be interviewed; despite repeated efforts, it was only possible to interview eight.

A workshop was organised on European Commission premises in Brussels on 15 March 2018. The workshop brought together 88 stakeholders who discussed the preliminary findings of the evaluation. The workshop gave participants the opportunity to respond specifically to the findings on the effectiveness, EU added value, relevance and coherence of the EU framework. Participants at the workshop represented a wide range of stakeholders. Present were 29 national Roma contact points (from across EU Member States and enlargement countries), 28 representatives of NGO or civil society organisations, 14 representatives of the European Commission, 4 representatives of international organisations, 2 representatives of the European Parliament, 1 representative of the Fundamental Rights Agency, 1 representative of Equinet and 9 members of the ICF/Milieu evaluation team.

3. Methodology

3.1 Open public consultation

The survey data was downloaded by the Commission in excel format and processed using the following excel functions: tables, bar charts, filters and cross tabulations. The analytical work involved the breaking down of the results by:

- respondent type (citizens vs organisations);
- organisation type (public administrations, NGOs/think tanks, other);
- Roma vs non-Roma background (i.e. respondents identifying as Roma vs respondents identifying as non-Roma);
- the following country clusters: EU-15, EU-13, enlargement countries.

A separate analysis of the survey results was done for the five countries with relatively sizeable Roma communities: Bulgaria, the Czech Republic, Hungary, Romania and Slovakia. The results were broken down based on the above characteristics to identify any differences in perception or opinion among certain respondent categories or in certain (groups of) countries. A report analysing the results of the OPC was submitted by the external contractor to the Commission as a separate deliverable.

3.2 Targeted stakeholder consultations

Stakeholders were selected depending on the type of organisation or institution that they represented, following provisional sampling agreed at inception report level. For each country covered, it was imperative to consult with a representative of the national Roma contact point⁹. Other categories of stakeholders interviewed included equality bodies, representatives of government entities at national or regional level (dealing with health, employment, education, housing and trafficking), and also NGOs. For each of the 11 country analysis studies, local country correspondents carried out an initial stakeholder analysis to also identify local government representatives responsible for the four policy areas. The full list of stakeholders to be consulted per country was agreed with the ISSG.

⁹ Contacts provided by the Commission.

All responses from the targeted consultations were processed using NVivo qualitative data analysis computer software¹⁰. The interview guidelines that were used to support the individual consultations had a specific structure, which grouped certain questions together in correspondence with the evaluation criteria being assessed. This meant that as a whole, the interview responses could be effectively analysed per evaluation criteria, using NVivo software to isolate those responses relevant to the evaluation criteria.

3.3 NGO survey

A list of 135 national NGOs from across the EU was developed and the survey was sent on 15 January to these NGOs. National Roma contact points were also invited to distribute the survey further. The NGO survey was comprised of a series of multiple choice questions. The data received showed how many people responded to each question and the percentage share of respondents that answered a certain question. The content of the response fed into each evaluation criterion.

3.4. Workshop

The workshop presented the preliminary evaluation findings and enabled participants to provide feedback in particular to the specific evaluation criteria questions on effectiveness, EU added value, relevance and coherence. This feedback was given through an open discussion, facilitated by members of the evaluation team. Similarly, participants were invited to share recommendations openly at the workshop or to send them in writing later.

4. Results of stakeholder consultations per activity and how they fed into the evaluation

The results of the consultation activities were used according to the evaluation framework agreed at inception report level. For each of the evaluation questions, the evaluation framework clarified which of the consultation activities would be relevant for data collection.

4.1 Open public consultation (OPC)

A full summary of results stemming from the OPC was published on EUROPA¹¹. Findings include:

- An overwhelming majority of the respondents (between 86 and 95 % depending on the thematic area) agreed that targeted public interventions are needed in the fields of discrimination, employment, education, housing and healthcare¹².
- For a majority of the respondents (almost 60 %), the EU has a major role to play in supporting national, regional and local authorities because alone they cannot effectively improve the situation of Roma¹³.

¹⁰ <https://en.wikipedia.org/wiki/NVivo>.

¹¹ OPC results available here: https://ec.europa.eu/info/consultations/public-consultation-evaluation-eu-framework-national-roma-integration-strategies-2020_en.

¹² EU added value.

¹³ EU added value.

- Respondents consistently stated that both EU institutions and national authorities should work together to develop measures to improve Roma inclusion. They see a stronger role for the EU than for national authorities in: (i) monitoring and enforcing European non-discrimination and anti-racism legislation; and (ii) making access to funding conditional on developing and implementing ambitious Roma policies¹⁴.
- National authorities are expected to play a bigger role in measures such as: (i) community building between Roma and non-Roma; (ii) non-discrimination; (iii) training for public officials on how to achieve Roma inclusion; (iv) making Roma history and culture part of school curricula; and (v) providing policy guidance to authorities¹⁵.
- Key challenges identified by the respondents include: (i) the insufficient incorporation of Roma inclusion into other policies and instruments at both European and national level; (ii) rising discrimination and antigypsyism, especially at European level; and (iii) insufficient funding allocated to Roma inclusion at the national level¹⁶.
- With regard to suggested priorities at European and national level, respondents confirmed that successful Roma inclusion strategies need to be comprehensive. Access to education came out as a clear priority (67 % at European level and 76 % at national level), while access to employment, healthcare and housing, fighting discrimination and addressing antigypsyism were also selected as a priority by at least one third of respondents at both European and national levels¹⁷.

4.2. Targeted stakeholder consultations

Targeted stakeholder consultations consisted of 201¹⁸ interviews as explained above. The replies to the interviews were so numerous and varied, and covered such a wide geographical scope, that summarising their results as a whole for the purpose of this report is not realistic. However, the outcomes of these targeted stakeholder interviews are fully reflected in the external evaluation study¹⁹ and this SWD, using the following referencing of sources:

Table 11: Referencing of sources

Type of source	Referencing code
Interviews	Member State code, followed by a number indicating the particular interview being referenced. The full interview code list is available in a separate document. E.g. UK1 EU-level interviews are abbreviated as EU-1, EU-2, etc. Enlargement country interviews are coded as

¹⁴ Coordination; EU added value.

¹⁵ Coordination.

¹⁶ Effectiveness.

¹⁷ Relevance.

¹⁸ Comprising 138 stakeholder consultations across 11 Member States covered by a country analysis study; 53 stakeholder consultations across 16 Member States not covered by a country analysis study; and 10 stakeholder consultations with stakeholders from enlargement countries.

¹⁹ Link to external evaluation study once published.

	WB1, WB2, etc.
Open public consultation	OPC
Country analysis studies	CS-[country code] – e.g. CS-SK for the SK Country Analysis Study
Survey of NGOs	NGO survey
Stakeholder workshop	Workshop

4.4. NGO survey

The results of the NGO survey are published in the external evaluation study²⁰. Key findings include:

- With regard to contributions made by NRISs to effective changes on the ground, survey participants considered that the NRIS of their respective Member State had contributed to some extent to reducing discrimination against Roma (40 %), reducing hate speech against Roma (50 %), reducing hate crimes against Roma (53 %) and improving the enforcement of anti-discrimination legislation (44 %) during 2011-2017²¹.
- Nearly half of the respondents considered that the Roma's access to employment has not changed since 2011. 43 % of the respondents felt that Roma children's access to and integration into education systems has improved since 2011, while 20 % believed this has worsened over the years²².
- Around half of the NGOs (53.8 %) are involved in mechanisms for coordination, implementation or monitoring of the NRIS. However, most of them support the opinion that the existing mechanisms for coordination and implementation of the NRIS do not allow for effective cooperation and/or consultation with all key stakeholders²³.
- Asked whether both EU and national funding per Member State was sufficient and proportionate to meet the needs of Roma across the four policy areas, over half of all respondents thought that this was not the case. 63 % of respondents did not think that EU or national funding for Roma inclusion reaches the Roma beneficiaries it was intended for, and did not think that it provides them with long-term benefits²⁴. 60 % of NGO respondents believe that EU funding has provided added value in terms of addressing the national funding gap²⁵.

4.5. Workshop

Consultation with workshop participants focused on the evaluation criteria of relevance, coherence, effectiveness and EU added value.

With regard to **relevance**, the participants agreed that the original objectives of the EU framework remained relevant today but that the ambition in some areas should be increased. Given the deep-rooted nature of discrimination against Roma, several

²⁰ Add footnote once published.

²¹ Effectiveness.

²² idem.

²³ Coordination.

²⁴ Effectiveness.

²⁵ EU added value.

participants noted that explaining and addressing institutionalised racism was of great importance, as was generally increasing the focus on antigypsyism.

For the **coherence** criterion, several workshop participants highlighted the need for better policy mainstreaming. On budget allocation and funding for Roma inclusion, it was recommended that specific Roma indicators be identified and developed to effectively implement NRISs. Participants noted problems due to the NRCPs feeling isolated within their governments and that the lack of financial capacity can prevent the effective implementation of NRISs.

On **effectiveness**, several participants noted the important role played by the Commission in prioritising Roma issues and in particular by adopting the EU framework in 2011. Other participants highlighted how the availability of EU funding for Roma inclusion helped Member States commit to the cause. The rise of populism and far-right political parties was also cited by participants as a worrying aspect that would affect the objectives for Roma inclusion.

With regard to **EU added value**, following a question asked through an online tool (SLIDO), 97 % of the participants agreed that the EU had provided added value for Roma inclusion in the Member States. NGO participants added that none of the Member States would be where they were without the EU framework. On the other hand, several participants stated that while certain tools are in place, a clear connection between EU funding and the indicators in the NRIS should be made and monitored.

5. Overall results from the consultations

Across the results of all the consultations, a number of common messages can be identified. In particular, there was a broad consensus that since 2011:

- The EU framework has been necessary to help realise positive changes related to Roma inclusion across the policy areas of education, employment, health and housing at national level.
- Without the framework and EU direction and support, it is unlikely that Member States would be able to effectively improve the situation of the Roma.

More specifically, multiple stakeholders raised the aspects set out below.

- Improving access to education must remain an absolute priority for all actors involved in the implementation of NRIS.
- Roma inclusion has become a higher priority on the EU policy agenda.
- Mainstreaming of Roma inclusion in policies remains to be effectively implemented in particular at national levels.
- Political commitment at national level to policies that ensure Roma inclusion must be increased.
- Measures at national level to tackle antigypsyism were insufficient.
- National funds are often deemed insufficient to implement Roma inclusion measures.

The results of the stakeholder consultations generally demonstrate a range of common aspects and shared areas of concern. While there were differences in the opinions of the multiple stakeholders consulted, these differences are normal given the backgrounds of

the interviewees, for example when discussing the functioning and influence of the NRCPs with NGOs vs with NRCPs themselves; or when discussing mainstreaming at national level with ministries vs NGO experts. Such differences were reflected in the analysis and do not challenge the above overall results of the consultations.