

**Monitoring and evaluation
of the National Roma Integration Strategies**
(focus on Bulgaria and Romania)



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- © Deyan Kolev – editor, 2013
deyan_kolev@yahoo.com
Amalipe Center, center_amalipe@yahoo.com
- © ACTAPTA – 2013
astarta_publ@mail.bg

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Center for Interethnic Dialogue and Tolerance
“Amalipe”

Monitoring and evaluation of the National Roma Integration Strategies *(focus on Bulgaria and Romania)*

Deyan Kolev, editor



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Hearing on Monitoring and Evaluation of National Roma Integration Strategies – active dialogue for robust monitoring system

On April 5, 2011 the European Commission announced Communication “EU Framework for National Roma Integration Strategies”. Within it the Commission required all EU member states to submit National Roma Integration Strategy until December 31, 2011. Later, the draft of new European Social Fund (ESF) Regulations proposed by European Commission on October 6, 2011 stated the existence of NRIS as ex-ante conditionality for every EU state for participating in ESF absorption. Following this requirements all Member States (except Malta) submitted their documents until the end of March 2012.

Through the EU Framework for NRIS the Communication requires “**robust monitoring mechanism** with clear benchmarks which will ensure that tangible results are measured, that money directed to Roma integration has reached its final beneficiaries”. In addition, it states that “The Commission will **report annually to the European Parliament and to the Council** on progress on the integration of the Roma population in Member States and on the achievement of the goals.”

Besides this, the Communication does not set clear M&E mechanisms. It only mentions active and important role of Fundamental Rights Agency (“The Fundamental Rights Agency, working together with other relevant bodies...will collect data on the situation of Roma with respect to access to employment, education, healthcare and housing”) and imposes to the member states and other stakeholders in-depth monitoring.

The first look at the National Roma Integration Strategies submitted showed that Monitoring and Evaluation parts are very weak and undeveloped. For example, in Bulgarian Strategy M&E takes only half a page and

leaves everything within the frames of the so-called “administrative monitoring”. Although Roma NGOs insisted to include benchmarks for community monitoring, shadow reporting and others, the only result was that a sentence allowing other forms of M&E was incorporated in the document.

Having all these in regard three national Roma organizations (Center for Interethnic Dialogue and Tolerance AMALIPE – Bulgaria, Romani CRISS – Romania and National Roma Centrum – Macedonia) initiated public event – hearing for discussing the main principles and concrete forms of the robust NRIS monitoring and evaluation (NRIS M&E). They were joint by the EU level Roma organization (namely, the European Roma Information Office in Brussels) and by the European Economic and Social Committee as the highest forum for presenting the social partners and civil society in EU. The initiative was financially supported by Open Society Foundations – New York.

The purpose of the hearing (called “**Monitoring and Evaluation of the National Roma Integration Strategies**”) was to bring together Roma civil society activists, experts, political figures from the European Commission and 2 countries with significant Roma population, namely Bulgaria and Romania in order to discuss the NRIS submitted and the necessary M&E mechanisms. The hearing intended to propose mechanisms for robust M&E that includes:

- forms of community monitoring at grass-root level;
- system of shadow reporting done by NGOs and other civil society stakeholders;
- mechanisms for communicating the results from community-based M&E and NGO M&E with national institutions and especially with the national contact points responsible for implementing and evaluating the National Roma Integration Strategies;

From the very beginning the initiative was supported by the Roma Coordination Unit within DG Justice of the European Commission and by the Fundamental Rights Agency that actively co-organized the forum and took part in it. This made the discussion useful and converted the event into effi-

cient example of the dialogue between Roma civil society, the European Commission and the member states.

To set a good starting point for the discussion, Center Amalipe commissioned two position papers:

- “Monitoring and Evaluation chapters in the National Roma Integration Strategies: the challenges ahead”: it was prepared by Jose-Manuel Fresno and provided short overview and analysis of the Strategies submitted with respect to its chapter dedicated to M&E;
- “Towards Mainstreaming of Good Practices for Monitoring of Roma Integration Policies”: it was prepared by Dimitar Dimitrov and Mariana Milosheva and analyzed successful examples of M&E on projects or initiatives for Roma integration.

The Hearing “**Monitoring and Evaluation National Roma Integration Strategies**” took place on June 26, 2012 in Brussels. It brought together more than 80 people: representatives of European Commission (DG Justice, DG EMPL and DG REGIO), Fundamental Rights Agency, members of European Parliament, National governments of Bulgaria and Romania, National and European Roma organizations, OSF, UNICEF and other stakeholders.

The time of talking is over, now is time for action, said Lina Papamichalopoulou, Head of the Non-discrimination policies and Roma coordination Unit, DG Justice, European Commission in her opening speech. The role of civil society in preparing and assessing the National Roma Integration Strategies has been massive. Following the assessment of the strategies submitted, we published Communication from May 21 and a staff working document. They identified not only strengths but also weaknesses in the strategies: M&E is among them. Mrs Papamichalopoulou outlined that now there is strong political commitment of the heads of member states as well as of the different DGs in the Commission to work for implementing the NRISs. Now we all are at one and the same side and it is time to act, concluded the Head of Roma Coordination Unit.

The participants were also welcomed by Akos Topolánszky from EESC who expressed the strong support of this highest level structure for representation of social partners and civil society to the process of implementing the NRIS. Alina Covaci from Roma Health Project of OSF explained the reason to support the Hearing: civil society should contribute to the NRIS M&E through shadow reporting, budget monitoring, community monitoring and other forms.

Deyan Kolev from AMALIPE stated that the purpose of the hearing is very practical: it has to stress the attention on M&E and particularly of Health issues in the NRIS and to propose concrete suggestions for improvement. M&E chapters are the weakest ones in the NRIS submitted. They envisage only “administrative monitoring” which proved its very limited effectiveness during the previous years. That is why it is of crucial importance to set M&E framework at local, national and European levels that guarantee civil society participation and Roma participation in the process. Kolev also stressed that it is a remarkable fact that the Hearing is organized by 3 national Roma organizations (AMALIPE, NRC, Romani CRISS), European Roma Information Office and EESC and that all key stakeholders take place in it.

Ivan Ivanov, Director of ERIO concluded that submitting NRIS is a good first step but many other following steps should be undertaken. They should be done together with Roma community and civil society organizations.

During the first panel of the Hearing Jose-Manuel Fresno presented the main findings from the report “M&E in the National Roma Integration Strategies: the Challenges Ahead” prepared for the hearing. The aim of the report is to facilitate the debate on how to make substantial progress in the monitoring and evaluation (M&E) during their process of implementation at local, European and national level, said Fresno. The report focuses on the importance of M&E and its role in the policy process. It presents a comparative analysis of the Strategies regarding the sections dedicated to M&E, as well as other related references and makes proposals on how to support M&E in the implementation of the NRIS. The main report findings show that M&E foreseen in the different NRIS present a variety of methods and pro-

cesses: while some Member states do not make or make little references to which mechanisms will be followed for the monitoring of their respective strategies, how these will be evaluated or where does the ownership of this process relies on, other are more explicit in this area. Several Member states recognise the need for a strong monitoring system and some are striving to put in place or at least are planning to develop such a system. Despite of this, in general terms there is little alignment between objectives, indicators, systems of monitoring and evaluation process; for instance, some strategies include M&E mechanisms that seem to be rather unrealistic for their implementation

Akos Topolànszky presented interesting findings from “To retrieve the lost credibility of Roma policies – on the margin of an EESC study”. He outlined that the survey shows Roma organizations were not effectively engaged in preparing the Strategies and serious steps should be done to engage them in implementing and monitoring the Strategies implementation.

Damian Draghici from the government of Romania and Georgi Krashev from the National Council for Cooperation on Ethnic and Integration Issues, Bulgaria shared their visions about the future steps for implementing the NRIS’. Both of them outlined that Roma organizations played important role in preparing the documents and they will be engaged in M&E. The mechanisms for this are still not set so it is the right time to propose how Roma participation to be guaranteed.

Ideas in this direction were raised by Kalman Mizsei, Director of MtM Program of OSF. He also stressed the importance of using EU funds for Roma integration.

Examples of monitoring mechanisms and approaches that could be used for Roma integration were discussed during the second panel, moderated by Lina Papamichalopoulou. Ioannis Dimitrakopoulos presented the Fundamental Rights Agency’s past and future work on monitoring the implementation of national Roma strategies. Andrey Ivanov from UNDP raised methodological questions and provided interesting examples within its presentation “Deconstructing M&E: who should be doing what and how?”. Pia

Lindholm explained about DG Justice practice for anti-discrimination monitoring mechanisms and engaging independent experts in evaluating the anti-discrimination policy at national and European levels.

Dimitar Dimitrov presented the second report commissioned by AMA-LIPE for the needs of the hearing, namely “Good practices for M&E of Roma integration initiatives”. The report proves that effective monitoring requires good political will, engagement and practical support from governments and institutions. But it cannot be confined only in administrative type of monitoring of performance done by the institutions themselves. Involvement of independent experts and Roma NGOs provides for increasing the data gathered directly from communities and practical knowledge of what actually works well or not in the different issue area of policy implementation. There are three types of monitoring and evaluation approaches that are necessary for complementing the administrative monitoring envisaged by the NRIS: independent expert monitoring, civil society watch and community monitoring at grass-root level.

Teodora Krumova presented the experience of Center Amalipe for organizing community monitoring for Health care services delivered at grass-root level in 7 Roma communities. Borjan Pavlovski from ESEM – Macedonia shared examples for budget monitoring of the health care in Roma community.

The presentations raised numerous questions and comments. For example, Martin Kovats, advisor on Roma issues of Commissioner Andor shared that NRIS M&E is not technical but political issue. Engaging civil society and Roma in this process is also political issues and should be done: otherwise the efficiency of the NRIS would be minimal.

During the concluding session Deyan Kolev presented a set of suggestions for establishing robust M&E of the NRIS. The suggestions covered 3 fields: methodological, administrative and financial framework. They addressed European institutions and Member states institutions.

Philippe Hatt, head of Unit for Bulgaria and Romania at DG EMPL stressed that the role of civil society is undisputable. The Commission is per-

manently facilitating the engagement of all stakeholders in the process of Roma integration and this will be done also for ensuring NRIS M&E.

After the hearing different other organizations and stakeholders submitted feedback on the recommendations. They were summarized by Deyan Kolev and Valeriu Nicolae.

The present book contains:

- The Concept paper Monitoring and Evaluation chapters in the National Roma Integration Strategies: the challenges ahead, prepared by Jose-Manuel Fresno;
- The Concept paper Towards Mainstreaming of Good Practices for Monitoring of Roma Integration Policies, prepared by Dimitar Dimitrov and Mariana Milosheva;
- The Recommendations for robust NRIS M&E, summarized by Deyan Kolev and Valeriu Nicolae.

The authors perceive the texts not as “final word” but rather as starting point for discussion. Since the implementation of the National Roma Integration Strategies is mutual task of broad set of stakeholders, the NRIS M&E should also involve institutions, civil society and the Roma communities. Their views about the principles and mechanisms of the future M&E are important and the Hearing on June 26th has started active dialogue on them. The participation of all these stakeholders in the entire process of NRIS implementation is as important since only the joint efforts of institutions, civil society and communities could bring a difference in the life of Roma.

Monitoring and Evaluation in the National Roma Integration Strategies: the challenges ahead

By José Manuel Fresno with the support of Alia Chahin

List of abbreviations

CERD	Committee on the elimination of racial discrimination
CoE	Council of Europe
CSOs	Civil Society Organisations
EC	European Commission
EU	European Union
FRA	Fundamental Rights Agency of the European Union
M&E	Monitoring and evaluation
NCPs	National Contact Point
NRP	National Reform Programme
NGOs	Non-Governmental Organisations
NRIS	National Roma Integration Strategies
OMC	Open method of coordination
SF	Structural Funds
UN	United Nations
UNDP	United Nations Development Fund
WB	World Bank

1. Rationale

National Roma Integration Strategies (NRIS) have been presented to the European Commission (EC) by the Member states at the end of 2011 and beginning of 2012.¹ The aim of this paper is to facilitate the debate on how to make substantial progress in the monitoring and evaluation (M&E) during their process of implementation.

In order to take this discussion one step further, this report:

1. Focuses on the importance of M&E and its role in the policy process; it also describes the guidelines given by the European Commission and by the Council with regards to this aspect.

2. Presents a comparative analysis of the Strategies submitted by EU Member states to European Commission regarding the sections dedicated to M&E, as well as other related references to this process by putting special attention on:

- To what extent the current situation of Roma is described in each country and which sources of information and available data are included in the NRIS.
- The quality and the degree in which the objectives and targets have been detailed and specified by the NRIS.
- Which type of indicators will be used to monitor and evaluate the NRIS.
- What methods have been foreseen and how M&E feeds into the planning process.
- The ownership of this process: what body is in charge of the M&E and what are its responsibilities.
- How has the M&E process been defined and what will be the degree of involvement of the different actors, including Civil Society Organisations (CSOs) and Roma themselves.
- The cases of Bulgaria and Romania and their respective action plans.

3. Makes proposals on how to support M&E in the implementation of the NRIS. These suggestions take into account actions in different directions

¹ All NRIS are available at: http://ec.europa.eu/justice/discrimination/roma/national-strategies/index_en.htm

that could concern key bodies and stakeholders' participation in the process. For instance, recommendations are addressed to European Institutions, and also to other bodies operating from the national to the local level and have to be considered according to Roma living conditions and circumstances in each country. Special attention is paid to the role of the CSOs and the Roma representatives.

The Council conclusions on Roma integration from May 2011 *An EU Framework for National Roma Integration Strategies (NRIS) up to 2020*² has called Member states to improve the social and economic situation of Roma by pursuing a mainstreaming approach in the fields of education, employment, housing and healthcare, and to set or continue working towards their goals in these fields in accordance with the Member States' policies, with a view to closing the gaps between marginalised Roma communities and the general population. To this end, the Commission asked Member States to update or develop their NRIS or integrated sets of policy measures within their broader social inclusion policies in order to improve the situation of Roma and **to appropriately monitor and evaluate the impact of the Roma inclusion strategies** or integrated sets of measures. The European Council from June endorsed the Presidency's report on Roma inclusion and called for the rapid implementation of the Council Conclusions.³

In its Communication *An EU framework for National Roma Integration Strategies up to 2020*⁴, the Commission highlights the importance of bearing in mind several approaches when developing their NRIS: to set achiev-

² Council of the European Union, "An EU Framework for National Roma Integration Strategies up to 2020 – Council Conclusions", 24/05/2011:

<http://register.consilium.europa.eu/pdf/en/11/st10/st10658.en11.pdf>

³ Council of the European Union, "Conclusions", 24/06/2011:

<http://register.consilium.europa.eu/pdf/en/11/st00/st00023.en11.pdf>

⁴ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Com(2011) 173 final "An EU Framework for National Roma Integration Strategies up to 2020", 05/04/2011: http://ec.europa.eu/justice/policies/discrimination/docs/com_2011_173_en.pdf

able national goals for Roma integration; to identify, where relevant, disadvantaged micro-regions or segregated neighbourhoods; to allocate sufficient funding from national budgets; **to include strong monitoring methods to evaluate the impact of Roma integration actions and a review mechanism for the adaptation of the strategy**; to design, implement and monitor their strategies in close cooperation and continuous dialogue with Roma civil society, regional and local authorities; to appoint a national contact point (NCP) for the NRIS.

Due to the current difficulties to access accurate detailed and complete data on the situation of the Roma as well as on the actions foreseen at national level to tackle Roma exclusion and discrimination and the measurement of its progress, the Commission emphasized the need to foresee a **robust monitoring mechanism** with benchmarks that would ensure that: tangible results are measured; funds dedicated to Roma integration would reach its final beneficiaries; there is progress towards the achievement of the EU Roma integration goals; national Roma integration strategies have been implemented.

In order to contribute to this robust monitoring mechanism the Commission planned to:

- Report annually to the European Parliament and to the Council on progress made on the integration of the Roma population in Member States and on the achievement of the goals.
- Support systems of measuring progress by: building on the Roma household survey pilot project carried out by the United Nations Development Programme (UNDP) in cooperation particularly with the World Bank (WB) and the Fundamental Rights Agency (FRA); requesting the Fundamental Rights Agency to expand this survey on Roma to all Member States and to run it regularly to measure progress on the ground; engaging with other relevant bodies as the European Foundation for the Improvement of Living and Working Conditions; drawing data collection from specific research funded by Socio-economic Sciences and Humanities Programme of the 7th Framework Programme.

- Take into account ongoing work within the Open Method of Coordination in the field of social policies and other Member States contributions based on their own monitoring systems of Roma integration, enhancing transparency and accountability.
- Make use of the National Reform Programmes (NRP) together with the monitoring and peer review process of the Europe 2020 strategy as an additional source of information for assessing progress and giving guidance to Member States.
- Facilitate methods of gathering useful data at the long term by fostering the cooperation between national statistical offices and Eurostat so as to be able to identify methods to map the EU's least developed micro-regions, where the most marginalised groups live and in particular Roma, as a first step.
- In addition, the Commission emphasizes the role of the Fundamental Rights Agency that should work with Member States to develop monitoring methods, which can provide a comparative analysis of the situation of Roma across Europe.

All these efforts that will be made at the European level need to go hand in hand with the correspondent actions of M&E at the respective national levels. In fact, at present, it is difficult to obtain accurate, detailed and complete data on the situation of Roma in most of the Member States and to identify concrete measures put in place to promote their socio-economic integration. In addition, the lack of appropriate indicators and reliable data make it almost impossible to assess whether such measures have produced the expected results.

It is expected from NRIS to describe their domestic monitoring methods and mechanisms to evaluate the impact of NRIS as well as to establish responsibilities in this respect. It is also expected from them to present appropriate mechanisms to ensure that strategies remain flexible and adaptable to the changing circumstances. The establishment of clear indicators, including outcomes and impact indicators, as well as the identification of data sources are crucial to enable proper monitoring of progress.

The recent Commission's assessment of the National Roma Integration Strategies acknowledges that despite the fact that Member States are making efforts to develop a comprehensive approach towards Roma integration, much more needs to be done at national level.⁵ The Commission asks Member States to take stronger efforts to live up to their responsibilities, by adopting more concrete measures, explicit targets for measurable deliverables, clearly earmarked funding at national level and a sound national monitoring and evaluation system.

While several Member states recognise the need for a strong monitoring system and some are striving to put it in place or are planning to develop such a system, substantial political efforts are needed to meet the expectations set out in the EU Framework and to ensure appropriate reporting on Roma socio-economic inclusion in the framework of the Europe 2020 process.

The Commission stresses that Member states should develop or make use of existing robust monitoring systems by setting a baseline, appropriate indicators and measurable targets in collaboration, where possible, with the National Statistical Offices; it is also recommended to ensure that each programme makes provision for the assessment of its relevance, effectiveness, efficiency and impacts.

It is important to highlight that although the report analyses the M&E systems and focuses on the challenges ahead, this is done with the aim of analysing how to improve this process so that Roma integration policies are better understood by the public, bearing in mind that having the best M&E systems does not necessarily make a difference in terms of delivery and impact. However, if planned from a very early stage and for a long-term perspective, it can help societies (both professionals and the general public) come to terms with the existence of their large Roma minority – to the benefit of all.

⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on “National Roma Integration Strategies: a first step in the implementation of the EU Framework”, COMM(2012) 226 final, 21/05/2012:

http://ec.europa.eu/justice/discrimination/files/com2012_226_en.pdf

2. Comparative analysis of the monitoring and evaluation in the NRIS

This chapter gives an overview on how M&E is foreseen in the NRIS. In general terms, the references to the monitoring and evaluation are very weak. In fact, it is rare to find a comprehensive section focused on monitoring and/or evaluation; many countries do not give clear details nor explain how the implementation of the NRIS will be carried out, an aspect that weakens their capacity to be accountable.

M&E need to be understood as part of the policy cycle in coherence and together with the planning and implementing process. For those countries referring to M&E, these two parts of the process are not always presented as differentiated or described as complementary part of the strategies' cycle. In fact, issues related to monitoring (who will be responsible for the follow-up of the strategy and whether these foresee the participation or involvement of national, regional or local level; what will be the institutional mechanisms or what will be the role of the different ministries and of the National contact point) must be interconnected with the evaluation (clear identification of objectives, goals and targets, how results will be measured, type of indicators, sources of information, frequency of the evaluation, systems of gathering information, etc).

From the analysis of the NRIS, there are a variety of approaches and positions according to countries:⁶

- Several countries include in detail what the monitoring will entail and the method that will be used but very few of them describe with precision how the evaluation will be carried out or based upon. For instance Finland, Poland and Slovenia indicate how the NRIS will be monitored and Finland, Hungary, Poland, Portugal, Slovakia, Slovenia and Spain describe the reporting system; some of these countries also

⁶Malta did not adopt a National Roma Integration Strategy, as there is no significant Roma population in its territory.

indicate what department has the ownership of this process (Poland, Portugal, Slovakia, Slovenia and Spain).

- Only some countries, those that have included specific and quantifiable objectives together with a set of indicators, emphasise the complementarity between the M&E. Similarly, few of them have coherent guidelines on how both are part of the strategy cycle and how they feed into the policy process, that is, how they are taken into consideration to update and adapt their strategy to new needs and priorities.
- Concerning the inclusion of objectives and indicators, different options have been identified:
 - Some countries have included in their NRIS generic or broad objectives (“increase the participation and autonomy of Roma population in society” or “enhancing the participation in education of Roma children and youth on all levels” or “promotion of public tolerance with regard to Roma”) combined with activity-based indicators (“number of cultural actions and school competitions in special skills” or “number of completed projects” or “number of didactic material developed”).
 - Some countries have based their NRIS on impact objectives (“increase the proportion of Roma girls and boys that have attended pre-school prior to their compulsory schooling < 6 years by 91% in 2015 and by 95% by 2020” or “60,000 increase in the number of employees of Roma Ethnicity”) combined with impact indicators (“percentage of Roma pupils that are enrolled in primary education and who attended Pre-school education prior to compulsory education” or “employment level of active people of Roma ethnicity”).
 - Some countries have made generic references to the importance of both the monitoring and the evaluation and acknowledge the need to identify objectives and indicators but mention that this will need to be specified and further developed.

- Finally certain countries have not approved specific NRIS as, according to their national policies, these should be part of the broader integration strategies and must not be differentiated either because they consider this to be discriminatory in comparison to the rest of the population (France, Luxembourg), either because the country has very little Roma population (Cyprus, Estonia). In those cases and with the exception of Estonia, no *ah hoc* M&E method is foreseen other than those included in their respective national integration strategies, which are not specified in the documents presented to the European Commission.

2.1. Description of the current situation: available data and sources of information

The availability of data and updated information on the current situation of the Roma is a key starting point for identifying goals and targets on the long-term and also for measuring the progress in the future. Depending on what data is available and how frequent it is collected, different techniques and mechanisms can be put into place to obtain more valuable and effective measurement of the real progress in the living and economic conditions of Roma. Many Member states have referred in their NRIS to the difficulties to collect data or to the lack of available information.

Most countries, with the exception of France, Luxembourg and Malta, have included in their NRIS a section or a chapter that describes the current situation of Roma. In some countries there is a section with information describing the situation of the Roma in the country and their main problems based on specific researches; this is the case of Bulgaria, the Czech Republic, Hungary, Latvia, Lithuania, Romania, Slovakia and Spain. In other countries, information is provided mainly based on qualitative data and reports; this is the case of Austria, Belgium, Cyprus, Denmark, Estonia, Finland, Germany, Greece, Italy, Ireland, Netherlands, Poland, Portugal, Slovenia, Sweden and UK (Wales).

The majority of countries refer to the fact that there is very little or no available data or studies with information on the current living conditions or situation of Roma; many available researches and studies are obsolete as they do not present a global picture of the country nor a detailed territorial description. Opinions and trends on the need of future researches and systems of data collection differ:

- Some countries argue that their governments do not compile data on Roma due to the fact that their respective country laws do not allow collecting information based on personal ethnic identity. In those cases, countries state that they do not intend to carry out further studies (France, Germany, Luxembourg, Netherlands). In the case of Denmark, the Strategy refers to international reports as sources of regular information.
- Other countries, that do not have specific data, have planned, as part of their NRIS, to carry out specific studies research or statistics: some have generic references to further surveys or studies that will need to be done (Austria, Belgium, Finland, Greece and partially Ireland); in others, the development of future surveys and studies are key objectives in the implementation of the NRIS (Czech Republic, Estonia, Hungary, Italy, Latvia, Lithuania, Portugal, Slovakia, Slovenia, Spain and Sweden).

The quality of the information provided depends on several factors: up-to-date data, specificity or representativeness. For instance, in some cases, available researches are recent but in other they have been carried out several years ago. With regard to its specificity, some research or studies are thematic and coincide with the four priority areas (education, employment, healthcare and housing), but others are broader studies with some thematic references. As per its representativeness, few countries provide information based on census or official statistics; many studies or research are based on samples or geographical reports covering one country area or on study cases.

While drafting their respective NRIS, Member states have made use of complementary sources of available information:

- Official national statistics, specific studies or research.

- *Ad hoc* information gathered specifically to draft the NRIS (mainly interviews or consultations to experts, working groups, public authorities).
- Research or information provided by international institutions such as the World Bank, UNDP, Council of Europe, CERD, etc.)
- Studies, research or reports carried out by the NGOs or other institutions.

Some countries, although only a few (i.e. Latvia, Spain) have set their objectives and goals according to the analysis of information and figures available in the four main fields of action (housing, employment, education and health). In those cases, NRIS have committed to evaluate the results according to future studies that will provide updated information on these areas.

Table

Data collection sources per country

<i>Country</i>	<i>Description of situation of Roma</i>		<i>Sources of available data</i>	<i>Commitment to further studies</i>
	<i>No specific research</i>	<i>Specific research</i>		
Austria	X		There is a description of the situation although information on Roma as ethnic background is not collected. It gives a rough estimate of the number of Roma based on a study on “every day language” in Austria. It commits to carry out further surveys particularly in the key areas of education, employment, healthcare and housing.	X

Belgium	X		The Strategy has a section on “Roma in Belgium” which includes an estimation of what are the main problems faced by Roma in the country although no reference to the source of the data is made except from the number of Roma living in Belgium based on figures collected by the Council of Europe and a study carried out on migrants from central and oriental Europe. The Strategy foresees a series of mechanisms to collected data on vulnerable groups (Roma included) and a series of studies.	X
Bulgaria		X	The Strategy has a section describing the situation of Roma with data extracted from the National Statistical Institute from the population and housing census of 2011.	
Cyprus	X		The Strategy has a section on “history of Roma in Cyprus and current situation” that gives approximate figures on the number of Roma population living in the country and general references to their living conditions.	
Czech Republic		X	The Strategy does not have a specific section on the situation of Roma but includes a description of the main problems faced by this population under each thematic section (education, employment, etc.) including reference to available data. Where no data is available it includes references to the need of undertake such analysis. ⁷	X

⁷Data extracted from: World Bank “Opportunities to Improve Roma Employment” 2008 / Research conducted by the Ministry of Education in conjunction with the Education Information Institute in the first half of 2009 / National Report from the international Sastipen – Roma Population and Health research, Office of the Czech Government 2008 / Sociolinguistic research into the position of Romani in the Czech Republic, Charles, University Faculty of Arts, 2008 / “Indebtedness”: An evaluation

Denmark	X		The Strategy includes a section on “Description of the current situation for Roma” in the country with data extracted from the Council of Europe, information provided by municipality of Elsinore and NGOs. However, no official statistical data on Roma is available, as the ethnic origin of persons is not registered in Denmark and due to the fact that Roma community in Denmark is considered to be relatively small and concentrated, ethnic data should not be registered centrally.	
Estonia	X		The Strategy refers to available data on Roma in Estonia although it highlights the fact that the information is not always complete. ⁸ A survey of sub-cultures, where Roma are one of the target groups, will be conducted in Estonia in 2012-2013 with assistance from the European Fund for the Integration of Third-country Nationals. The results of the survey will map the needs of the target group and describe how Roma cope in the society.	X

of the anti-debt programmes of the Agency for Social Integration in Roma Localities”, Agency for Social Integration, 2009.

⁸Data extracted from: Report edited by ENAR-Europe 2009/2010 “Racism and Discrimination in Estonia” when giving figures of unemployment of Roma / Research project on the real number of Roma students and the problems and difficulties Roma pupils face in educational system carried out by the Ministry of Education and Research in 2010 / “Women in Estonian Roma Communities. Research Report.” Estonian Institute of Humanities of Tallinn University, Civil Society Research and Development Centre, 2007.

Finland	X		<p>The Strategy has a section on “The need for a comprehensive National Policy on Roma” describing the priority areas based on a series of hearing held with Roma population. However, official statistics on Roma are not available.</p> <p>The Strategy states that it will be necessary to carry out special surveys that should be repeated regularly, every four or five years, for example.</p>	X
France			No reference is made to the description of the situation of Roma in the country.	
Germany	X		The Strategy has section in which it refers to national and foreign Roma although it highlights the legal difficulties of collecting data on ethnic minorities.	
Greece	X		<p>The Strategy dedicates a section on the situation of the Roma based on a report carried out in 2008 as a consultation process with local councils as well as a SWOT analysis.</p> <p>In order to have access to updated information, an internet application has been developed by the General Secretariat for Management of Community and Other Resources to ensure that the interventions in the National Strategy for Roma 2012 – 2020 are as effectively targeted as possible. This application covers all local authorities in which Roma communities are located. This database will have information on settlement, housing and property status, technical infrastructures, group characteristics and details of living conditions, social infrastructures, employment conditions, level of education, state of health, etc.</p>	X

Hungary		X	<p>The Strategy dedicates a chapter on the “Analysis of the current situation”, a SWOT analysis and an annex dedicated to the situation analysis with a chapter dedicated to Roma together with a reference to the need for targeted, large-sample studies and sociological research for tracking purposes.</p> <p>It includes a list of all statistical studies, which could include relevant information.⁹</p> <p>It also has a separate chapter on the collection of data in the future, including ethnically disaggregated data.</p>	X
Ireland	X		<p>The Strategy refers to the lack of concrete information on Roma in Ireland although in each field of action it refers to certain studies and data collected by local authorities.¹⁰ In the health area, the document foresees to develop a new Key Performance Indicator (KPI) in the area of Traveller health. This will be the only national metric that will be in place to measure Traveller’s inclusion in the health sector.</p>	X

⁹ Labour force survey (Central Statistical Office) / National EU-SILC survey (Central Statistical Office) / Turning points in the Life-course (Central Statistical Office – Demography Research Institute) / European population health survey (Central Statistical Office) / Hungarian Household Monitor Survey (Tárki) / Tárki –Education Career Research Social Renewal Operational Programme, major project 5.4.1, research pillar – / Roma research (National Institute of Family and Social Policy) / National Competence Survey / PISA survey (Educational Authority).

¹⁰ “Survey of Traveller Education Provision in Irish Schools”, 2006 / All Ireland Traveller Health Study, 2010.

Italy	X		Some data is included in the Strategy with regard to the current situation of Roma in Italy from the Council of Europe, the Ministry of Labour (number of Roma living in Italy) and a description of the principal socio-demographic characteristics of Roma in Italy as well as some statistical figures on education but very little on employment, housing, health and education. It foresees the creation of a Research Centre against ethnic and racial discrimination at UNAR that would carry out the periodic detection of cases of xenophobia and racism nation-wide and the relating analysis in the respective regional territories through a set of relevant indicators and benchmarks.	X
Latvia		X	The Strategy has a section on “Description of the situation” with data extracted from specific research. ¹¹	
Lithuania		X	The Strategy includes data and figures on the current situation of Roma in education, employment, social skills of Roma and tolerance of society towards Roma, from various sources. ¹²	X

¹¹ Central Statistical Bureau of Latvia, 2011: this office collects information on Roma and their status in society / Roma are registered in the Office for Citizenship and Migration Affairs. There is information on their housing conditions and education needs / Latvia RAXEN National Focal Point, Thematic Study. Housing conditions of Roma and Travellers, March 2009 / Impact of the State programme “Gypsies (Roma) in Latvia” 2007–2009 on the Gypsy (Roma) Community in Latvia / Baltic Institute of Social Sciences, 2008 / Data collected by the Ministry of Education and Science of the Republic of Latvia / Roma rights to education: implementing the situation in Latvia Riga: Centre for Education Initiatives, 2011 / European Commission against racism and intolerance. Third report on Latvia, 2007 / The situation of Roma in Latvia. Riga: Latvian Human Rights and Ethnic Studies Centre, 2003.

¹² Institute for Ethnic Studies at the Lithuanian Social Research Centre / Ministry of Education.

Luxembourg			No reference is made to the description of the situation of Roma in the country	
Netherlands	X		The Strategy includes a section on “Roma in the Netherlands” with a brief description of the current situation based on data extracted from the Netherlands Institute for Social Research, the Council of Europe and information received by the National Roma Platform.	
Poland	X		The Strategy includes a section on identification of problems that describes the situation of the Roma. Also an annex includes a description of the situation of Roma in Poland as well as another annex with a table on the number of estimated Roma in Poland per region. Since the Strategy’s time frame is 2004-2013, the data refers to an analysis carried out in 2003.	
Portugal	X		The Strategy refers to the general situation of Roma although as it is relatively in-complete, one of the objectives of the Strategy is to carry out a national cross-cutting survey to ascertain the socio-economic situation of Roma communities by 2014. In 2011, a survey was carried out among municipalities with a view to obtaining data on local Roma communities, both in terms of the number of families and their housing, education, health and employment circumstances. It was found that many municipal councils had difficulty in accessing data in good time, making it impossible, without a closer study carried out over a longer period, to ascertain the real dimension of the situation.”	X

Romania		X	The Strategy includes a section on relevant general information as well as “defining the problem” in which it extracts data on the situation of Roma in the country according to specific research. ¹³	
Slovakia		X	The Strategy includes information extracted from several studies. ¹⁴ The Ministry of Labour, Social Affairs and Family is working on a new survey Statistical Monitoring of Living Conditions of Selected Target Groups that will include a sample on Roma and that will be available in 2015.	X
Slovenia	X		Some references to the situation of Roma in Slovenia have been included in the Strategy under each field, although there is a lack of official information in most cases. In the area of housing, the document includes data extracted from a report “Territorial Issues of Roma Settlements in Slovenia, prepared in autumn 2007” based on questionnaires sent by the Ministry of Public Administration to all municipalities and administrative units with Roma communities in 2006 on Roma settlements and housing. The Strategy foresees the elaboration of a new study on the status of Roma settlements in Slovenia.	X

¹³ National census of 2002 / “The Roma Community Social Map”, a study carried out by the Romanian government and the World Bank in 2005 / “Roma inclusion barometer” published by the Open Society Foundation in 2006 and 2007 / The Report “Risks and Social Inequities in Romania”, elaborated by the Presidential Commission for the Social and Demographic Risks’ Analysis (PCSDRA) in 2009.

¹⁴ Survey of living conditions of Roma households in 2005 and later in 2010 carried out by the United Nations Development Fund and the World Bank / Study “Regional survey of marginalized Roma” (2011), UNDP and World Bank / EU-SILC survey (Statistics on Income and Living Conditions).

Spain		X	The design of the Spanish NRIS was based on several studies that will be repeated in 2015 and 2020. ¹⁵ The strategy also mentions a study that will be carried out in the education field and that will provide data for diachronic analysis, as well as the comparison of indicators of the State System and indicators of the Ministry of Education.	X
Sweden	X		For privacy reasons and because there is no scientifically reliable method of determining ethnic affiliation, no statistics based on ethnicity are collected although there is a small section with reference to certain recent but no specific studies. ¹⁶ The aim is to provide a better picture than the existing one and authorities need to find reliable methods that are acceptable from a privacy standpoint. To ensure that the methods respect the individual's right to personal privacy, these tasks will be defined in consultation with the Data Inspection Board.	X
UK (Wales)	X		The Strategy includes a section on "current context" with data on the situation of Roma in the country with reference to specific studies. ¹⁷	

¹⁵ The socio-demographic study carried out by the Centre for Sociological Research (CSR) in 2007, which will be repeated / The Spanish National Health Survey for Roma, which is also expected to be repeated, and its comparative study with the Spanish National Health Survey for the general population / The employment study carried out on two occasions on indicators compared with the Active Population Survey (APS), which is due to be repeated / The Roma Housing Map in Spain, which provides comparable data on results from previous maps, is due to be repeated.

¹⁶ "Roma Rights", Delegation for Roma Issues, 2010 / "Hate crimes 2010", National Council for Crime Prevention / "The many faces of intolerance", the Living History Forum, 2010.

¹⁷ An informal desk based exercise carried out in January 2009 with local authorities to establish best estimates of Gypsies and Travellers in their areas / 2011 Census

Source: own elaboration based on the English version of NRIS available at the European Commission website section of the Directorate General of Justice, Fundamental Rights and Citizenship, May 2012

2.2. Setting the objectives for monitoring and evaluating

This section analyses whether NRIS have established objectives and if it is the case what type and how they will be monitored and evaluated. The Commission's Communication emphasises that Member states should include in their NRIS achievable national goals for Roma integration to bridge the gap with the general population. Roma integration goals should concentrate in the area of access to education (ensure that all Roma children complete at least primary education), access to employment (cut the employment gap between Roma and the rest of the population), access to healthcare (reduce the gap in health status between the Roma and the rest of the population) and access to housing and essential services (close the gap between the share of Roma with access to housing and the public utilities such as water electricity and gas in comparison to the rest of the population).

The lack of available and updated data in these four key areas have hindered the establishment of tangible quantitative indicators by Member states; in fact, it is crucial that objectives are established according to a specific starting point, that is, to the situation in 2011 in coherence to the economic resources that will be allocated. While few countries propose progres-

which add a new ethnicity question / "A Review of Service Provision for Gypsy Travellers", 2003 / "Review of the Literature on the Health Beliefs, Health Status, and Use of Services in the Gypsy Traveller Population, and of Appropriate HealthCare Interventions", 2005 Welsh Government Report / "The Education of Gypsy Traveller Learners, a survey of provision to schools and local authorities to meet the needs of Gypsy Traveller learners", 2006 ESTYN / Education of Gypsy Traveller Children in Wales. National Research for Educational, Jones, G. Powell, R. Reakes, S. 2006 / "A review of service provision for Gypsy Travellers", 2003, The Equality of Opportunity Committee / The Health Status of Gypsies and Travellers in England Sheffield University, 2004, Van Cleemput, P et al.

sive and gradual targets according to the current situations and identify quantitative objectives in the four priority areas, other refer to the same objectives set for the rest of the population, something that seems unrealistic to reach due to the existing gaps and the lack of available specific resources; in many cases, objectives are reduced to a general declarations aiming to improve Roma socio-economic situation.

The analysis of all countries shows that NRIS have different methods to describe and present their objectives:

- Some countries (Bulgaria, Finland, Italy, Lithuania, Romania, Slovakia) include a section within the strategy or an annexed action plan that describes in further detail the objectives set out in the NRIS; for instance Slovakia foresees the approval of an action plan that will describe in further detail concrete objectives desegregated by areas; the Czech Republic, Hungary, Austria include in an annexed document a list of tasks to other Ministries with concrete objectives.
- Some countries (Austria, Latvia, Portugal, Spain, Sweden) include quantitative objectives setting targets in percentages (i.e. percentage of Roma people unemployed) or impact objectives (i.e. reduction of poverty rates). In the case of Sweden for example, most goals are set in comparison to the average population with the aim that in 20 years time, the Roma have the same opportunities as the non-Roma, although it is difficult to know how realistic these objectives are as there is no data or information on the current starting point.
- Other countries (Slovenia, United Kingdom, Poland, Austria, Belgium and to some extent Italy) combine generic outcomes objectives such as “the improvement of the situation of Roma” or “a better integration and social inclusion of Roma population” or “reduce unemployment or drop-out at schools” or “improve political participation of Roma communities”, with input objectives such as “carry out a study” or “promote raising awareness campaigns”.
- Some countries (Denmark, Ireland, Germany, Austria) include in the strategy a list of objectives that have been set out in their respective

mainstreaming national policies (housing, education, employment, housing).

- Some countries (Denmark, France, Luxembourg, Netherlands) refer to their integration and social inclusion strategies and plans in terms of objectives for the general population (for the entire population) but do not include specific ones for Roma population.

Table

Country comparative table on objectives and action plans in NRIS

<i>Country</i>	<i>Objectives</i>					<i>Action Plan</i>	
	<i>Impact or quantitative objectives</i>	<i>Generic objectives</i>	<i>Activity-based input and outcomes objectives</i>	<i>Reference to objectives included in mainstreaming policies</i>	<i>Reference to objectives included in integration/social inclusion policies</i>	<i>Include action plan in the strategy (within the text or annexed)</i>	<i>Foresee the approval of an action plan for implementation</i>
Austria		X	X	X	X		
Belgium		X	X	X	X	X	
Bulgaria		X	X	X		X	X
Cyprus					X		
Czech Republic		X	X	X		X	
Denmark		X			X		
Estonia		X	X	X	X		
Finland	X	X	X			X	
France				X	X		
Germany				X	X		
Greece		X	X			X	X
Hungary	X	X	X	X	X	X	X
Ireland					X		
Italy		X	X				X
Latvia	X			X	X	X	

Lithuania		X	X			X	
Luxembourg				X	X		
Malta					X		
Netherlands				X	X		
Poland		X	X				
Portugal	X					X	
Romania	X	X	X			X	
Slovakia	X	X	X				
Slovenia		X	X				
Spain	X						X
Sweden	X						X
UK (Wales)		X	X			X	

Source: own elaboration based on the English version of NRIS available at the European Commission website section of the Directorate General of Justice, Fundamental Rights and Citizenship, May 2012

2.3. Indicators that will be used to monitor and evaluate the results

The identification of clear indicators related to the objectives set in the NRIS is essential to monitor and evaluate the results at the medium and long-term. Indicators need to be aligned with the expected objectives and defined according to them. As it has been described in the previous chapter, many countries did not identify clear or specific objectives hence the difficulty to propose clear and measurable indicators. For instance, not all the countries that have included objectives have concreted them into indicators. For those that have done so, the analysis shows different approaches and type of indicators.

In general terms, most countries setting a list of indicators have included quantitative results whilst there are a few cases that have included qualitative indicators. With regards to the quantitative indicators, it is important to mention that depending on the type of objectives set out they vary: when countries have set impact or quantitative objectives, indicators generally measure these results in terms of percentages (% of unemployment; % of Roma children in education; etc.) where as countries that have set activity or generic

objectives, indicators are based in inputs or outputs and measure the implementation of activities (number of awareness-raising activities; number of participants; etc.).

Concerning the sources of verification, except for some of the countries that have presented annexes of indicators with this information, there is little reference to the way the information will be collected, the frequency of measurement, etc., which makes it difficult when assessing the quality of the information. In some cases, countries propose to involve in the gathering of information and data collection official bodies responsible for research or statistics, despite the fact that it is not clear how this work will be carried out.

Among the different options and positions related to indicators we can find:

- Countries that make no reference to indicators: Austria, Belgium, Cyprus, Denmark, Estonia, France, Ireland, Luxembourg, Malta, Netherlands and UK (Wales).
- Countries that do not identify indicators but have the purpose to develop future studies or foresee the development of indicators in the future: Czech Republic, Austria and Italy (in the case of this country, the strategy refers to the FRA and other future studies).
- Countries that identify indicators in various ways:
 - Some name the indicators but do not quantify them, such as Greece.
 - Some identify qualitative and quantitative indicators. For instance, Finland will do so through the National Institute for Health and Welfare; in the case of Slovenia each measure includes qualitative or quantitative indicators but they do not refer to the impact sought, as there are no concrete figures of the current situation to compare with.
 - Some such as Poland have set input and output indicators (number of activities, families involved...). In the case of Portugal indicators are given with each planned measured.
 - Other countries are more precise and specific in term of indicators. For instance: Hungary indicates what are the goals, the primary indicator, indicator breakdown, source of indicator, secondary indicator and source of secondary indicator; in the case of Latvia a table of concrete indicators is

included in the Strategy with concrete figures on the current situation as well as mid-term and long-term objectives; in Romania there is a list of indicators (mainly quantitative) and expected results as well as a table annexed to the Strategy; in Slovakia, there are impact indicators planned for monitoring implementation with reference to a benchmark which includes the reference to the specific study that gives the concrete figure, mainly from UNDP sources (however, benchmarks are not always included, most probably because there is no previous study that has measured that concrete aspect); in Spain, the strategy includes impact indicators, which will be used when analyzing a selection of statistical and sociological studies that will be carried out in the following years; in Bulgaria, the action plan presents objectives, task, activities, responsible institution, timeframe, funds, source and indicators.

– The case of Sweden is worth highlighting as it sets as indicators the average living conditions of non-Roma.

Table

Country comparative table on indicators in NRIS

<i>Country</i>	<i>Indicators</i>			
	<i>Quantitative and/or impact indicators based on further surveys/studies</i>	<i>Activity-based indicators from reports of authorities responsible of implementation</i>	<i>Foresee the development of set of indicators</i>	<i>No reference to indicators</i>
Austria				X
Belgium				X
Bulgaria		X		
Cyprus				X
Czech Republic			X	
Denmark				X
Estonia				X
Finland	X	X	X	

France				X
Germany				X
Greece	X	X		
Hungary	X		X	
Ireland				X
Italy			X	
Latvia	X			
Lithuania		X		
Luxembourg				X
Malta				X
Netherlands				X
Poland				X
Portugal	X			
Romania	X	X		
Slovakia	X		X	
Slovenia		X		
Spain	X			
Sweden	X			
UK (Wales)				X

Source: own elaboration based on the English version of NRIS available at the European Commission website section of the Directorate General of Justice, Fundamental Rights and Citizenship, May 2012

2.4. Methods of monitoring and evaluation

Monitoring and evaluation are different and complementary parts of the policy cycle that need to go hand in hand. Most NRIS do not necessarily have a specific section on monitoring and on evaluation. This chapter analyses four aspects: the methods that will be followed for M&E; the time frame foreseen; how the M&E process interact with and influence the policy process; finally, the resources allocated to monitoring and evaluation.

Methods for monitoring and evaluation

According to the country analysis, the results show that there are different approaches and methods:

- Few countries foresee at the same time complementary methods. In those cases, they combine the elaboration of review reports, external assessment, periodic studies or statistics, meetings of inter-ministerial committees or committees of stakeholders, etc. (Austria, Bulgaria, Finland, Latvia, Portugal, Slovakia, Slovenia, Hungary, Spain, Sweden). In Finland, a combination of methods of monitoring and evaluation will be followed, for instance M&E is divided in two areas: firstly the monitoring of the execution of the implementation; secondly, the evaluation of the realisation of the objectives set in the Policy. In order to do so the strategy has included the elaboration of a first situation assessment of the implementation, an international assessment of the implementation and a separate cross-administrative monitoring group. It is worth highlighting the case of Portugal that foresees an external assessment that will establish its own benchmarks for analysis and evaluation so as to give the evaluation process an independent point of view.

- Other countries have not foreseen a specific method, as this will be done through the evaluation carried out in mainstreaming policies (Denmark, Ireland).

- Other countries have combined a specific evaluation and monitoring together with the evaluation of mainstreaming policies. In the case of Estonia, it combines the evaluation of its national integration policy 2008–2013 together with a survey of sub-cultures; this survey will include Roma as one of the target groups and will be conducted in 2012–2013, although it does not foresee a follow-up in the future.

- Other countries will do the monitoring and evaluation through specific committees that will meet regularly. Often, these committees are inter-ministerial and include representatives from key stakeholders: academic experts, civil society organisations, Roma representatives, etc. (Austria, Hungary, Lithuania, Poland, and Romania).

- Finally, some countries do not foresee specific monitoring or evaluation or make no reference to the method (Cyprus, France, Greece, Luxembourg, Netherlands, UK (Wales)). In the case of Germany, international reports, which regularly evaluate the situation of Roma, are considered sufficient for this purpose (Council of Europe Framework Convention for the

Protection of National Minorities, the European Commission against Racism and Intolerance and the Committee on the Elimination of Racial Discrimination).

Table

Country comparative table on methods and influence in the implementation in NRIS

<i>Country</i>	<i>Methods</i>						<i>Influence</i>	
	<i>Foresee periodic monitoring</i>	<i>Foresee annual assessment/evaluation reports</i>	<i>Foresee multi-annual assessment/evaluation reports</i>	<i>Foresee evaluation but does not specify time-frame</i>	<i>Foresee an international assessment/evaluation report</i>	<i>Foresee an independent external assessment/evaluation report</i>	<i>Does not foresee a specific method</i>	<i>Foresee changes in Strategy taking into account monitoring/evaluation</i>
Austria	X			X				X
Belgium	X			X				X
Bulgaria			X					X
Cyprus							X	
Czech Republic				X				
Denmark							X	
Estonia							X	
Finland	X		X		X			X
France							X	
Germany							X	
Greece			X					X
Hungary	X		X					X
Ireland				X				X
Italy				X	X	X		X
Latvia	X		X	X				
Lithuania							X	
Luxembourg							X	
Malta							X	
Netherlands							X	

Poland	X						X
Portugal	X	X				X	X
Romania	X	X					X
Slovakia		X	X				X
Slovenia	X	X					X
Spain			X				X
Sweden		X					X
UK (Wales)						X	

Source: own elaboration based on the English version of NRIS available at the European Commission website section of the Directorate General of Justice, Fundamental Rights and Citizenship, May 2012

Monitoring and evaluation timeframe

Timeframe for monitoring and evaluation is not often specified and not differentiated. From the available information we can infer that generally in most countries monitoring will be done annually. Concerning the evaluation, some countries include a mid-term evaluation by 2015 and a second evaluation at the end of the strategy's period, while only a few foresee regular evaluation on an annual basis. Those NRIS that include a concrete reference are not often comparable between each other.

- In the case of Belgium, Poland and Slovenia an annual monitoring process is foreseen but no specific mention is made regarding the evaluation process.

- In the case of Hungary, the Strategy has planned a 3-year evaluation timeframe. In the case of Slovakia, it is also planned to have an annual monitoring and a report every two years. Similarly, in Sweden, it is planned to have an annual report on the budget and an initial evaluation of the management of the strategy after five years.

- In the cases of Bulgaria, Finland, Spain and Latvia, the strategy foresees two evaluation periods along the ten years that will be based on the achievement of proposed targets.

- In the case of Portugal, NRIS refers to an annual progress report to be presented to the key stakeholders for discussion and combines it with an external assessment; both reports produced will be submitted for discussion

to the Consultative Group for the Integration of Roma Communities comprising representatives of the various ministries, civil society organisations and representatives of Roma communities, which will be required to issue an opinion on the documents produced.

How the monitoring and evaluation feeds into the policy process

In general terms, NRIS that foresee specific monitoring and evaluation mechanisms do not describe how these are part of the implementation process. Only a few countries (Austria, Bulgaria, Belgium, Finland, Hungary, Poland, Portugal, Slovakia, Slovenia, Spain and Sweden) include references to regular assessment or evaluation reports that could potentially be taken into consideration at a certain point in time to revise, amend or adapt the objectives and activities foreseen in their respective strategy so as to adapt to new challenges or realities. Some examples:

- Austria: different parts of the Plan may be modified/updated if needed and depending on the analysis of the first period of implementation of the Action Plan.

- Belgium: the working group created to monitor and evaluate the strategy will be responsible of adapting and reorienting the content of the strategy if necessary.

- Bulgaria: the Strategy shall be implemented at the operational level in two periods: one through the Action Plan for the implementation of the Strategy (until 2014 this is the updated National Action Plan under the international initiative Decade of Roma Inclusion 2005–2015). The Action Plan is an open document which can flexibly reflect any changes needed, while observing the relevant budget procedures. The second period shall cover 2014–2020. Different parts of the Plan may be modified/updated if needed and depending on the analysis of the first period of implementation of the Action Plan.

- Finland: an international assessment will be carried out to support the progress review and possible modification of the policy.

- Hungary: the revision of the strategy will be carried out every three years by the committee evaluating the National Strategy.

- Poland: The Programme's participants have the responsibility to prepare annual financial report that also shows the results of the activities that have been carried out. The modification of methods and means used in executing the goals is possible based upon the analysis of the information gathered during the monitoring of the activities as well as annual evaluation.

- Portugal: targets and expected results were established, which may be adjusted during the course of implementing of the Strategy in accordance with any constraints observed.

- Slovakia: once every two years an evaluation will be done and, if necessary, an update of the plan of activities and of policy measures defined in the Strategy.

- Slovenia: Implementation of the National Programme of Measures for Roma will be systematically monitored; each year an assessment of measures will be carried out and, if necessary, modifications and amendments to the document will be proposed.

- Spain: coinciding with the creation of future three-year plans and pursuant to the evaluation made of these, the Strategy's targets will be updated accordingly, and the measures proposed currently will be revised in order to adapt them to the needs and priorities detected.

- Sweden: an initial evaluation of the management of the twenty-year strategy should be carried out after five years by the Swedish Agency for Public Management, as a basis for possible adjustments to the management approach.

Funding allocated to monitoring and evaluation

In terms of funding for monitoring and evaluation, NRIS do not make a reference to the funds that will be allocated to this task; the only exception is the Finnish strategy that includes a reference to the fact that funds are to be made available for evaluation and monitoring. In fact, the experience shows that a certain amount of resources are required for this purpose though they have not been explicitly budgeted. We can infer that some Member states will

dedicate enough resources to this end but it is also possible that as no specific mention has been made regarding this, when extraordinary resources are needed for this task, they might not be available which will hinder the M&E by not making economically viable the forecasted process.

2.5. Department responsible of the monitoring and evaluation

Responsibilities on the monitoring and evaluation of the NRIS relies, in general terms, in the governmental department responsible of the design and endorsement of the strategy; in fact, in most cases, the governmental department responsible of the strategy is at the same time the governmental department responsible of the M&E and also hosts the NCP. It is usually attached to ministries of social affairs, social policies or social inclusion/integration; in some cases there are specific departments responsible for Roma affairs within the Ministry of Culture, Human Rights or other Ministries.

In very few cases, the governmental responsibility depends of a high ranked department. In the case of Finland, the department assigned depends of the Prime Minister's Office whilst in Hungary it depends directly of the State Secretariat for Social Inclusion. In Bulgaria, "the implementation of the Strategy shall be coordinated, consulted and endorsed by the Deputy Prime-Minister, Chairperson of NCCEII and National Coordinator of the International initiative Decade of Roma Inclusion 2005–2015".

The involvement of the regional and the local level in the monitoring and evaluation process is scarce except in some cases. In Italy, it is foreseen that regional and local authorities will take part in the monitoring and evaluation of the project in collaboration with UNAR. In Latvia, responsibility lies under the Ministry of Culture in collaboration of a Consultative Board integrated by representatives of state bodies, local authorities, educational establishments, civil society and Roma representatives. In Slovakia, the office of the Plenipotentiary will collaborate with key actors such as municipalities. In Spain, the National Contact Point will monitor the strategy in collaboration with national, regional and local authorities. In Sweden, it is foreseen to involve the local level in line with the responsibilities they already have.

There are a few cases where nothing is specified with regards to what department will be the contact point although one could assume that the body endorsing the strategy is the department responsible of the strategy and the NCP (Austria, Czech Republic, UK (Wales)). In the case of Sweden it is unclear what governmental department will be responsible of the M&E.

In some cases NRIS have appointed commissions or will establish platforms, forums, or committees as the governmental structure responsible of the strategy (Slovenia) or as a relevant actor that will have a key role in the implementation, monitoring and evaluation (Finland, Italy, Latvia, Lithuania, Portugal). Some countries have chosen a composition integrated exclusively by inter-ministerial departments (Belgium, Lithuania) and other are integrated by representatives from national, regional, local authorities as well as social agents, academic experts, Roma civil society organisations and Roma representatives (Austria, Belgium, Finland, Italy, Portugal).

Some countries specify that the responsibility of the implementation of the strategy relies on each governmental department responsible of each field of action in coordination with the governmental department responsible of the strategy (Bulgaria, Finland). In others, the responsibility of the strategy's implementation relies on each governmental department responsible of each field of action with no explicit reference on how this will be coordinated (Ireland). In the case of Sweden responsibilities are under the department responsible of each field and also at the municipality level.

Table

**Country comparative table on responsibilities and participation
of Civil Society Organisations (CSOs) & Roma representatives**

<i>Country</i>	<i>Responsibility</i>						
	<i>Relies in the national contact point</i>	<i>Relies only in one department</i>	<i>Relies in one department in collaboration with other departments/stakeholders (informally or committees)</i>	<i>Relies in a committee/ commission of key stakeholders</i>	<i>Is done in mainstreaming policies or integration policies</i>	<i>The strategy does not clarify this</i>	<i>Foresee participation of CSOs and Roma representatives</i>
Austria			X				X
Belgium	X		X				X
Bulgaria	X		X				X
Cyprus						X	
Czech Republic					X		
Denmark					X		
Estonia					X		
Finland			X				X
France					X		
Germany					X		X
Greece	X		X				X
Hungary			X				X
Ireland					X		X
Italy	X		X				X
Latvia	X		X				X
Lithuania			X				
Luxembourg					X		
Malta					X		
Netherlands					X		
Poland		X			X		X
Portugal	X		X				X
Romania	X	X			X		X
Slovakia	X		X				X
Slovenia				X			X

Spain	X		X			X
Sweden					X	X
UK (Wales)					X	

Source: own elaboration based on the English version of NRIS available at the European Commission website section of the Directorate General of Justice, Fundamental Rights and Citizenship, May 2012

2.6. Participation of stakeholders, CSOs and Roma representatives

The active involvement of stakeholders in Roma policies is a prerequisite for these to be successful. In fact, this participation should not only be focused in the implementation of the measures, but in all the cycle of the policy process, including planning, monitoring and evaluation. It is expected from policy makers and public institutions to support the participation of different actors in the process of monitoring and evaluation. Therefore CSOs specialised on Roma issues and Roma organizations and representatives can provide substantial added value in this process.

While looking at NRIS we observe that, to a different extent, 15 member states foresee the participation of stakeholders in the monitoring and evaluation process. Among the bodies to be involved there are frequent references to the role of academic and university experts, to CSOs working with Roma, Roma NGOs and Roma leaders. Truth is that in many cases this participation is based on voluntary decisions rather than in formal structures of civil dialogue.

From the analysis made, we observe different options:

- Some countries have included the collaboration of key stakeholders but do not specify the instrument or mechanism that will be used or if this will be an informal and one-off participation (Czech Republic, Greece, Poland, Romania, Slovakia). Some countries do not specify the instrument or mechanism through which this will be done (Bulgaria, Germany, Greece, Hungary, Poland, Romania). Germany insists on the great importance of the involvement of civil society, including sports associations in the planning and implementation of integration measures. In Romania, the strategy men-

tions the importance of reinforcing Roma CSOs and their role in the monitoring of the Strategy as one of its objectives. Portugal proposes to seek the participation of CSOs and various administrative levels (despite there is not identified clear mechanism).

- In some cases, ad hoc systems and mechanisms for stakeholders' participation have or will be established. For instance, Austria foresees the creation of a discussion platform involving representatives from public authorities and civil society associations, as well as academic experts and research scientists. Belgium will create a working group for the participation of stakeholders, including local CSOs. In Slovenia, representatives of self-governing local communities in which representatives of the Roma community are elected to the city and/or municipal council will be part of the Commission for the Protection of the Roma Ethnic Community.

- In other cases, existing consultative bodies will be engaged in the monitoring and implementation process. For instance, in Finland, Roma organisations are part of the steering and monitoring group for the implementation of the National Policy and of the Regional Advisory boards. In Spain, participation will be carried out through the Roma State Council.

- In the case of Sweden, the strategy indicates a variety of methods that could be used to involve Roma representatives: through formal consultation targeted at Roma population both at national and local level, through dialogue with Roma representatives of civil society organisations or Roma experts, by promoting Roma engagement in civil society organisations or by employing more people with Roma language skills and cultural knowledge in government bodies.

- Other countries have included Roma civil society organisations and representatives in the commissions, committees, platforms or forums that collaborate with the governmental department responsible of the implementation, monitoring and evaluation of the strategy (Austria, Finland, Italy, Latvia, Portugal, Slovenia).

- In some countries, the strategy has foreseen *ad hoc* mechanisms of Roma participation. In Italy, it is foreseen to create a "Forum of Roma and

Sinti communities” and in Latvia there will be a consultative body with the participation of all relevant stakeholders.

- Some countries do not include reference to the participation of Roma representatives or civil society organisations (Cyprus, Czech Republic, Denmark, Estonia, France, Lithuania, Luxembourg, Malta, Netherlands, UK (Wales)).

3. Monitoring and evaluation in the Bulgarian and Romanian Strategies

In this chapter we will refer to the NRIS of Bulgaria and Romania, as these are two countries of special interest where Roma represent an important percentage of the population, respectively 10.33% and 8.32%. For each country, a summary of the strategy is presented as well as an analysis of the relevant aspects of the M&E process.

3.1. Bulgaria

The NRIS in Bulgaria applies an integrated targeted approach to Roma citizens in vulnerable condition, which falls within the framework of a more general strategy for combating poverty and social exclusion and therefore does not exclude rendering support to disadvantaged persons from other ethnic groups. It is presented as a strategic document, in line with the NRP 2011–2015 (although so far the NRP does not contain any reference to Roma integration) and with the National Action Plan for the Decade of Roma Inclusion 2005–2015. The strategy is framed under the applicable legislation of UN, the CoE and the EU and is one of very few NRIS that was adopted by the national Parliament

Six priorities have been identified in the Bulgarian strategy: education, healthcare, housing conditions, employment, rule of the law and non-discrimination, culture and media; a set of goals are proposed for each priority. Concerning the implementation, there are general references to the management, the coordination with civil society structures and the participation of

the local governments; nevertheless, there is little reference to the implementation mechanisms and the management system.

The strategy includes an annex with an Action Plan that shall be implemented in two periods: the first, up to 2014 completing the National Decade for the Roma Inclusion; the second, from 2014 to 2020 to be consistent with the next EU Structural Funds programming period and their corresponding operational programmes; it is not clear how the second action plan will make use of EU funds for the next planning period since its preparation is envisaged for 2015 when the new operational programmes will have been approved and signed. For each priority objective, the Action Plan describes the tasks, activities, responsible institutions, timeframe and financing; the financing references include sources, funds and indicators.

A special Annex “Programs for implementing the NRIS” was proposed by Roma NGOs, not approved but not rejected that aims to bind the implementation of the Strategy with EU funds absorption and suggests concrete targeted programmes and calls to be announced within the operational programmes and the Rural Areas Development Programme.¹⁸

● **Data collection/gathering information**

The description of the current situation of the Roma is based on data provided by the National Statistical Institute from the population and housing census of 2011 showing that the Roma ethnos remains the third largest ethnic group in Bulgaria. According to this information there are 325.343 Roma persons, i.e. 4.9% of the Bulgarian citizens; however according to other studies and researches, including the CoE, the Roma population could duplicate this figure. The strategy presents figures about the Roma situation in education, employment, housing and healthcare conditions.

The description given in the strategy is rather partial. For instance, there is no information about the situation of Roma within regions. The data does not refer to the territorial segregation and nor it identifies some crucial prob-

¹⁸ AMALIPE, 2012: “Towards following steps necessary: Assessment of the National Strategy of Republic of Bulgaria for Roma Integration”. Available at: http://www.amalipe.com/files/publications/amalipe_statement_ec.pdf

lems in the different areas such as segregation in education or Roma children in special education. The Strategy does not propose concrete mechanisms to improve information and data collection systems in the future.

- **Objectives and indicators**

The Strategy sets a strategic goal: “creating conditions for equitable integration of the Roma and the Bulgarian citizens in a vulnerable situation, belonging to other ethnic groups, in the social and economic life by ensuring equal opportunities and equal access to rights, goods and services, by involving them in all public spheres and improving their quality of life, while observing the principles of equality and non-discrimination”. The Strategy states that it will be guided by the 10 Common Basic Principles on Roma as well as a series of horizontal aspects that will have to be taken into account in its implementation; for instance the need to include Roma inclusion in mainstreaming policies, to encourage and promote affirmative actions and to apply an integrated territorial approach. Nevertheless, it is not explained how these principles apply to the priorities and goals.

The Strategy describes for each field of action specific objectives and tasks, although these are not set as measurable objectives and do not refer to how the planned actions or activities will influence positive change or development taking into account the data included in the “Current status of the Roma Community” section.

The goals set are comprehensive and well planned although some important goals are missing, for example in the case of education where no explicit reference is made to key aspects such as widening the access to quality early childhood education and care, increasing Roma youngsters’ participation in tertiary education; in the area of housing, interventions are not framed from an integrated approach. Concerning the action plan, the measures do not always match the goals. Their financial back up is minimal and far from sufficient.

As already mentioned, the strategy includes an annex with the action plan 2012–2014 that describes in detail the tasks and activities for each objective. The table includes a column with the indicators that will serve to

evaluate the actions. The majority can be considered as quantitative output indicators (“number of supported projects”; “number of students beneficiaries of the service”; “number of organized campaigns”; etc.); however there are a few indicators that aim to measure a certain impact although no current benchmark has been set (“% of children included in the system of pre-school education” etc.).

One of the greatest weaknesses in the Bulgarian NRIS is the lack of mechanisms for collecting and disseminating disaggregated data. The only available instrument for official data collection is the National Census, which provides limited information regarding Roma integration policies. Evidently, there are number of civil society organizations that provide data on the different priorities, however these are not mentioned.

• **Methods systems/follow up mechanisms**

The Strategy has a section on “mechanisms for implementation of the integration policy” which foresees an implementation at operational level through action plans. For the first period (2012–2014), it will follow the current Action Plan for the Decade of Roma Inclusion initiative 2005–2015, updated in 2011 and shall follow its format. A second action plan will follow for the second period (2014–2020) with a specific format included in the document; a generic reference to the next Structural Funds programming period is made in this context.

This implementation method foresees the elaboration in 2015 of an administrative report that will give information on the status of the measures and activities foreseen for the first period and that “shall be coordinated, consulted and endorsed by the Deputy Prime-Minister, Chairperson of NCCEII and National Coordinator of the International initiative Decade of Roma Inclusion 2005–2015.” This report will need to give details on the measures that have been implemented, which are still in the process of implementation and which have not been implemented.

The report’s elaboration process also foresees the active involvement of key stakeholders:

- The secretariat of National Council for Cooperation on Ethnic and Integration Issues (NCCEII) will coordinate and summarize the report.
- The report shall be discussed by the Commission for Roma integration and by the ministries and agencies involved in the implementation of the action plan.
- The report shall be submitted to NCCEII for approval.
- The report shall be adopted by the Council of Ministers.

The Strategy foresees that this evaluation report could influence the future action plan as it includes a reference to the possibility of modifying or updating, if needed. In addition to this administrative report, the Strategy includes an open clause stating that this does not exclude other means of monitoring and evaluation although it does not give detailed information on what could this entail.

The “administrative monitoring” described in the strategy foresees the elaboration of annual reports by each institution engaged in the process of implementation, however it does not refer to the evaluation methodology and lacks of concrete indicators and mechanisms for collecting information related to the outcomes of the integration policies.

Since the NRIS was approved by the Bulgarian Parliament, the annual reports will be presented in the Parliament. Nevertheless, it is not clear whether this will bring changes in the monitoring procedures envisaged.

● **Actors/responsible bodies for monitoring**

The NCCEII is the governmental structure responsible of the implementation of the Strategy as well as of the monitoring and evaluation, taking into account that ministries and other competent authorities are responsible for the “updating of the operational Roma integration documents in their respective areas, for the implementation of the planned measures, the monitoring, evaluation and reporting before NCCEII”. The secretariat of NCCEII shall be the national contact point.

The Strategy specifies that it will assign specific functions, tasks and budget to departments (national, regional or local) in charge of its imple-

mentation as well as one employee that shall be appointed at each regional administration, with the basic duties to work on the integration policy. In addition, at local level, the Strategy foresees a series of actions:

- The development of annual action plans based on the Strategy with the participation of representatives of local Roma communities, ensuring that these are properly resourced.
- Delegation of activities for Roma integration at the municipal level, supported with municipal own funds.
- Setting up of appropriate advisory and coordination mechanisms with the participation of civil structures.

However, no reference is made on how actions will be monitored and evaluated or what body or institution has the ownership of this process.

The Action Plan envisages that “the coordination of ensuring resources for the implementation of NAP shall be performed by an Interdepartmental Working group for provision of resources for Roma integration, chaired by the Minister of EU Funds Management. Members of this WG shall be the respective Deputy Ministers chairing the Managing Authorities and Intermediate Bodies of OP Development of Human Resources (OPDHR), OP Regional Development (OPRD) and Rural Areas Development Programme (RADP)”; however, it is not clear whether this Working group will have responsibilities for monitoring and evaluation.

● **Role of civil society and Roma population in evaluation**

The Strategy refers to the active Roma involvement in the implementation, monitoring and evaluation of the Strategy as well as in other policy areas as a key success factor. In order to do so, it specifies that the Roma community will have to be involved in the administrative process, although it does not give any details on how this will be carried out.

In relation to the coordination with civil society organization, the Strategy calls for an improvement of their role in the key participative structures (NCCEII, Roma Integration Commission) though it does not mention what improvements should be implemented. The Strategy also encourages the creation of advisory structures and mechanisms within ministries, regional governors and local governments but does not clarify how these will be funded.

- **Funding for monitoring/evaluation**

The strategy does not include any reference to the financial resources that will be dedicated to monitoring and evaluation.

3.2. Romania

The Romanian strategy understands that social inclusion policy of the Roma minority requires a holistic approach, a process planned and a concerted action, followed by the adoption of specific strategies, programs and projects. The Strategy is framed under the social policies, focused on the concept of social inclusion, adopted by the Government: the National Anti-Poverty and Social Inclusion Promotion Plan (NAPSIPP), the Joint Social Inclusion Memorandum (JIM), the National Development Plan of Romania 2007–2013 (NDPR), the Governmental Program for 2009–2012 and the National Reform Program for 2011–2013.

The Strategy “aims at making the local and central public authorities, the Roma minority and the civil society responsible for the increase of the level of social and economic inclusion of the Romanian citizens belonging to Roma minority”. Target group are mainly those Roma people confronted with marginalization and exclusion.

The scope is “to ensure the social and economic inclusion of Romanian citizens by implementing integrated policies in the fields of education, employment, health, housing, culture and social infrastructure”. First, the Strategy makes a brief description of the Roma situation on the four priority areas and identifies some key problems in education, employment, public health, housing, culture, child protection and prevention against discrimination. Secondly, it describes each measure, the responsible institutions for its implementation as well as the deadlines although these last are less clear. There is also an indicative budget up to 2015 detailed by years.

The Strategy continues presenting objectives and direction of actions in the aforementioned areas and briefly refers to expected results and some indicators, although these are not described in all areas referred previously. The annexes include six action plans, by areas, that indicate a list of mea-

tures, responsible institutions, time limit, assessment period, budget (detailed by cost and financial resources) and remarks. Finally, another annex compiles a list of indicators mainly focused on the number of activities and outputs.

- **Data collection/gathering information**

The Strategy starts with two sections (“Relevant general information” and “defining the problem”) that analyse the available data on the situation of the Roma population in the country. According to the text, there are some official statistics that reflect information on Roma (national Census of 2002) although it should be treated taking into consideration that in Romania declaring ethnic identity remains a personal option. In addition to official statistics, the document also refers to other sources of information: “The Roma Community Social Map”, a study carried out by the Romanian government and the World Bank in 2005; “Roma inclusion barometer” published by the Open Society Foundation in 2006 and 2007; the Report “Risks and Social Inequities in Romania”, elaborated by the Presidential Commission for the Social and Demographic Risks’ Analysis (PCSDRA) in 2009; the Communication “An EU framework for National Roma Integration Strategies up to 2020” (2011).

Most of the information is based in old data (2002 census, 2005 World Bank research). The document does not mention any geographical distribution and the description of the socio-economic challenges of Roma is very short.

- **Objectives and indicators**

The Strategy dedicates another section to the “scope and objectives of the government strategy”, which sets the generic objectives, the target groups as well as the nine guiding principles, very similar to the 10 European common basic principles on Roma inclusion. In further sections, the Strategy continues describing the specific objectives and associated activities or actions for each field (education, employment, health, housing and small infrastructure, culture and social infrastructure) as well as the expected results and indicators for each of these areas of action.

Although the Strategy mentions that the expected results relate to the current situation, described in the chapter “Definition of the problem”, it does not include a column with the current figure. This will most probably create confusion when monitoring and evaluating; in addition, for many of these indicators there is not information on the current situation.

There is an unspecific reference to indicators: “the types of indicators provided are primary and tertiary indicators set in compliance with the provisions of Government Decision No 488/2005 approving the national system of social inclusion indicators, published in the Official Gazette of Romania, Part I, No 492 of 10 June 2005)” and could be on proposal from the central public institutions involved in their use in order to implement their own sectorial measures.

The Strategy also includes as annexes the sectorial plans, which shows the governmental department responsible of the actions. There are also some indicators for the proposed actions, but they are not correlated with the measures of the sectorial action plans of measures.

● **Methods systems/follow up mechanisms**

The Strategy dedicates a section on “the mechanism for monitoring and assessing the government strategy”. It commits to establish a mechanism for information, communication, monitoring and assessment that shall be in close cooperation and dialogue with the civil society and Roma representatives with the aim to measure the degree of social inclusion of Roma population.

This mechanism is based on the participation of many different administrative levels and stakeholders. The monitoring and evaluation process is coordinated by the Central Department for Monitoring and Assessment (CDMA) and an inter-ministerial Joint Working Group responsible of endorsing the annual report and submitting it to the government. The Strategy also foresees that the National Agency for Roma shall collaborate with experienced evaluators who will elaborate a post-implementation study. A first assessment will be done at the end of 2013 that will analyse achievements/disfunctions caused by the implementation of the measures provided for in

the Strategy, together with clear recommendations for enhancing its effectiveness, with a view to making the second assessment stage on the basis of the subsequent sectorial plans.

It is not clear how this inter-institutional system for communication and monitoring will be established. For the time being, the monitoring mechanism is only presented as a general guideline for what is supposed to happen at the central and county level, without any specific indication. There is not information on what department will be responsible to carry out the impact study of the Strategy following each period of implementation of the measures.

- **Actors/responsible bodies for monitoring**

The Strategy describes an overview of what will be the different administrative departments involved and determines their responsibilities. Many will take part in the monitoring and evaluation process at the central, regional, county and city hall level. In principle it is foreseen an active engagement of the different levels of the public administration as well as of civil society in the monitoring process. Nevertheless, the proposed systems appear to be rather complicated to put in practice and will require high level of governance, strong commitment and leadership. For instance:

At central level, the Central Department for Monitoring and Assessment (CDMA) will coordinate the implementation, monitoring and assessment activities of the Strategy; it will be integrated by several ministries and the President of the National Agency for Roma (NAR) and headed by a State Counsellor. This department will be responsible of ensuring the coordination with the ministries as well as with other national, regional, county or local institutions. It will submit annual progress reports on the implementation of the Strategy.

There will also be an inter-ministerial working group (Joint Working Group) coordinated by the Vice-Prime Minister and headed by the NAR in collaboration with two state secretaries. This group will hold monthly meetings and each semester its chair will present a note on the activity and results of the implementation of the Strategy. This group will also be responsible of

analyzing and endorsing the annual report and submit it to the government for approval.

At ministerial level, the strategy also foresees the creation of ministerial commissions for Roma (MCRs) – or reactivated where appropriate - by orders of the competent ministers. These commissions will include representatives from the NAR and, where appropriate, representatives from non-governmental Roma organisations with relevant expertise. At the level of institutions subordinated to competent ministries, technical working groups (TWGs) shall be established. Both the MCRs and TWGs will be to monitor the measures under their specific activity sector drafting a report on a semi-annual basis.

At regional level, the regional offices of the NAR have been assigned with the following tasks: proposing or, where appropriate, extending strategic partnerships with competent public and private organisations at regional level; supporting and monitoring social actors' efforts at regional level to implement the initiatives and reference programs for Roma minority; informing, collaborating and supporting the activity of County Offices for Roma.

At county level, there will be two bodies involved: the County Offices for Roma (with 3-4 experts employed) with the role of monitoring, mediating between the national and the local level, giving support and providing assistance, elaborating the county plan and drawing the semi-annual progress report; the Joint Working Groups (JWG) composed of representatives from decentralised structures of ministries, members of Roma non-governmental organisations and delegates from communities of ethnic Roma citizens, including county/local counsellors.

At city hall level, it is foreseen to appoint local experts for Roma that depend on the county offices at technical level and to the Mayor at administrative level. To carry out their work, Roma experts will organize: Local Initiative Groups (LIGs) made up of representatives of communities of Roma ethnics where they are active; and Local Working Groups (LWGs) made up of the local expert, representatives of local public institutions, members of the Local Council (including elected Roma counsellors), members of non-gov-

ernmental organisations (including Roma organisations) and a delegate of the local Roma community from the LIG.

- **Role of civil society and Roma population in evaluation**

The Strategy includes as one key priority the involvement of Roma organisations and Roma representatives. To this end, it assigns the NAR with the task of establishing a mechanism for consultation and permanent involvement of the Roma organizations and Roma leaders in the monitoring system described in previous point. This task will require strong leading capacity as well as adequate means and support that have not been detailed.

- **Role of National Contact Points in monitoring/evaluation**

The Strategy assigns as the NCP the Central Department for Monitoring and Assessment, which will be at the same time the governmental department responsible of the M&E. It will be lead by a state councillor together with: the president of NAR, a representative of the monitoring and assessment offices from the Ministry of Administration and Interior, the Ministry of Regional Development and Tourism, the Ministry of Education, Research, Youth and Sport, the Ministry of Labour, Family and Social Protection and the Ministry of Health, as well as two representatives from the General Secretariat of the Government. Despite the fact that the NCP will have an important role as coordinator and the responsibility of M&E, the Strategy does not allocate a specific budget line to carry out this task appropriately.

- **Funding for monitoring/evaluation**

No mention is made in the Strategy to the funds that will be dedicated to monitoring or evaluation.

4. The challenges ahead

As it has been described previously, NRIS presented by the Member states are very diverse in terms of approach, quality and level of detail. This diversity depends on many reasons as for example the size of the Roma people in each country, which is related to the importance of the Roma issue in the political agenda, the experience in dealing with this subject, the level of commitment by the countries, the challenges Member States need to address, etc. While some strategies follow the orientations proposed by the EC and focus in the four priority areas identifying clear targets, many others give a general description on the current situation and are less focused. All these differences show that there is no basis for a standard approach to Roma integration policies or even M&E process across the EU. In addition, it must be said that drafting a comprehensive strategy does not necessarily guarantee an effective implementation, but it can be considered as prerequisite and helpful stage for a coherent and systematic Roma policy; for instance, there have already been some experiences of countries in the past that have adopted ambitious national Roma long-term plans with very little results.

Concerning the M&E, the analysis shows the same diversity of situation: while some Member states do not make or make little references to which mechanisms will be followed for the monitoring of their respective strategies, how these will be evaluated or where the ownership of this process relies on, other are more explicit in this area. Several Member states recognise the need for a strong monitoring system and some are striving to put in place or at least are planning to develop such a system. Despite of this, in general terms there is little alignment between objectives, indicators, systems of monitoring and evaluation process; for instance some strategies include M&E mechanisms that seem to be rather unrealistic for their implementation.

The presentation of NRIS by the Member states need to be understood as the beginning of a process or starting point that will continue during the current decade; in any case, it should not be conceive as paper work to be sent to the EC but rather as an opportunity for setting the Roma issues in the political agenda and achieving their integration while fighting current dis-

crimination and supporting their full participation in the society. Thanks to the EU framework for NRIS some countries have designed for the first time their National Roma policy or strategy and others have updated their current policies by improving the policy planning process and focusing their targets; but unfortunately in most cases, it has been a lost opportunity to frame national Roma policies into the European policy process, including EU 2020 Strategy and the NRPs, in terms of goals, joint actions and participation at European level.

When it comes to implementation, it is necessary to focus on the action plans, to identify specific measures, to develop projects and actions, to establish clear timetables and allocate appropriate funding in order to produce results. In fact, implementation will imply the development or use of “existing robust monitoring systems by setting a baseline, appropriate indicators and measurable targets in collaboration, where possible, with the National Statistical Offices and to ensure that each programme makes provision for the assessment of its relevance, effectiveness, efficiency and impacts”, according to the assessment made by the EC.¹⁹ Unfortunately implementation process and mechanisms as well as the M&E framework remains unclear for most strategies.

M&E should be at the heart of the Roma policy process in order to meet the expectations set out in the EU Framework and to ensure appropriate reporting on Roma socio-economic inclusion in the framework of the Europe 2020 process. To this end, some proposals have been included in the next sections.

4.1. Creating national conditions for proper M&E

NRIS M&E need to be seen both as a process and a method as well as a means of engaging more people in an informed way with Roma. It is very important to create conditions for qualitative change in terms of the extent to which the NRIS process leads to better ways of talking about and addressing Roma issues.

¹⁹European Commission 2011, op. cit.

Although the terms monitoring and evaluation tend to be referred as if it were only one task, they are, in fact, two distinct stages of the policy cycle, related and complementary.

Monitoring is the systematic process of collecting and analyzing information as the NRIS progress toward reaching its objectives and to guide management decisions. It is aimed at improving the efficiency and effectiveness of the strategies' organization. Monitoring NRIS should focus on processes, such as when and where activities occur, who delivers them and how many people or entities have been reached. Monitoring should be regular and continue throughout all the strategies implementation period so as to help keeping the work on track and to enable to decide whether the resources are sufficient and are being well used, whether the institutional capacity is sufficient and appropriate or whether actions are being implemented according to plan.

Evaluation is the systematic assessment of the strategies and the comparison of project impacts against the agreed strategic targets. In the NRIS, evaluation should focus on expected and achieved accomplishments, examining the results chain (inputs, activities, outputs, outcomes and impacts), processes, contextual factors and causality, in order to understand achievements or the lack of achieving them. Evaluation aims at determining the relevance, impact, effectiveness, efficiency and sustainability of interventions and the contributions of the intervention to the proposed objectives. It is expected from the evaluation to provide evidence-based information that is credible, reliable and useful. The findings, recommendations and lessons of an evaluation should be used to inform the future decision-making processes regarding the update of strategies and plans.

Efficiency, effectiveness, impact and sustainability must be at the heart of the NRIS M&E: efficiency measures how the results were achieved in terms of how much money, time, staff, equipment was dedicated to each result; effectiveness should indicate the extent to which the implementation of a programme achieved the objectives foreseen; impact shows whether or not what has been developed made a difference to the problem that was being addressed; sustainability indicates whether the solution proposed and

systems created will be able to continue in the future or whether it has solved the problem definitely.

Evidence-based policy requires good data, analytical skills and political support. In order to create proper conditions for M&E, Member states should, according to their current situation, make progress in several directions:

1. Improving their respective NRIS while designing national and local actions plans, as well as projects or process of implementation at the national and local level by following the recommendations of the EC; these plans and projects should focus on concrete targets. Monitoring and evaluation are best done when there has been proper planning against which to assess progress and achievements; there is a need for policy adjustment in the strategies that requires:

- A more focused and better targeted approach to the four priority areas: identifying specific targets, establishing clear priorities, better defining the expected results. In the development of the strategies within each programme, individual measures should be supplemented with output, outcome and impact indicators to enable proper monitoring of progress. In the development of strategies indicators should be identified according to the clear, achievable goals, SMART criteria (Specific, Measurable, Attainable, Realistic and Timely).
- Including the territorial approach by involving the regional and the local level and identifying specific needs and actions for those geographical areas with higher Roma concentration or physical areas including neighborhoods where Roma are segregated.
- Establishing adequate budgets and allocating economic resources according to the proposed actions by identifying the budgets lines; for instance, budgets should be connected to the actions to be developed at the local level.
- Clarifying how the proposed objectives will be achieved and specifying responsibilities and task in relation to the development of the strategies as well as clarifying the coordination process between the different policy areas.

- Mobilizing and involving domestic actors (officials, experts, Roma etc.) to produce and disseminate information that can generate the widest and highest quality of domestic public and professional debates and understanding about Roma issues (circumstances and policies).

2. Improving data collection and systems of gathering information as a prerequisite for developing and implementing effective NRIS. The need for reliable data and update information needs to be placed at the heart of the strategies. The analysis shows that collecting ethnic data remains a problem for most of the countries, especially when this is done by public authorities. Each country has to find the appropriate system according to its own reality and seek a method to be used to allow for strong comparison over time. In fact, in order to achieve this, Member states need to determine what method they will use but most of all they need to do this by involving key stakeholders in this process to achieve a wide consensus. For instance, without knowing the ‘Roma universe’ i.e the actual number of Roma in a state, it is not possible to produce a truly representative survey. It is in this area that participative and periodic M&E techniques can be beneficial to the NRIS. For this purpose, Member states should made substantial progress by:

- Proposing systematic actions and measures to obtain accurate and updated information on Roma living conditions, also at the local level. This can be done by different means and in fact each country has to find the appropriate system according to his own reality, taking into account that collecting ethnic data is better accepted by minorities if this is done by non-state organisations:
 - Through the National Statistic Research Centers, which are likely to be better accepted by public authorities.
 - By including Roma in the national statistics and surveys (i.e European Household survey, Eurobarometer on health care, EU Statistics on Income and Living Conditions (EU-SILC), etc.). As EU-SILC surveys are carried out by Member States’ statistical offices, this would not only ensure quality and national-level ownership, but also provide comparability among Member States.

- By carrying on ad hoc samples, comparing data with the national statistics.
- By using information and ad hoc researches provided by the FRA, UNDP, WB and the EC in the research “The situation of Roma in 11 EU Member States - Survey results at a glance”²⁰ and in the future forecasted FRA research.
- By using academic publications and researches that draw upon these official datasets as well as upon authors’ own research.
- By developing poverty maps in the areas where there is high Roma concentration.
- Through reports and information provided by CSOs.
- By developing national-wide systems for community monitoring at grass-root level.
- Collecting information on the developed activities in the framework of the strategies. It is important that this information is collected in a planned, organized and recurrent way as a prerequisite for proper M&E.
- Clarifying how new information will feed into the policy process.

3. Establishing appropriated systems of evaluation and clarifying how and who will develop them; for instance:

- All strategies should foresee the elaboration of at least one mid-term evaluation and a final evaluation according to the objectives proposed.
- NRIS or their respective action plans should describe how these evaluations will be carried out from the national to the local level.
- An annual report should be done by Member states on the progress made by the strategies
- The participation of the civil society and Roma communities at grass-root level in the evaluation process should be guaranteed taking into

²⁰FRA: “The situation of Roma in 11 EU Member States - Survey results at a glance”, May 2012: http://fra.europa.eu/fraWebsite/research/publications/publications_per_year/pub_roma-survey-at-a-glance_en.htm

account their contributions and provision of information by different means as for example shadow reports, qualitative opinions from Roma themselves, community monitoring practices, etc.

4.2. Framing monitoring and evaluation in the EU policy process

Roma strategies and policies need to be framed at the European and at the national level in wider EU and national policies related to education, employment, housing, health care, civic participation, antidiscrimination, etc. In fact, the aim of the EU framework for NRIS is not only to promote separate programmes projects and actions for the Roma but to include the Roma in the mainstream policies. In practical terms, this means to monitor and evaluate to what extent general policies in the different areas (education employment...) are inclusive with the Roma people. For the general policies to be inclusive they need to tackle the Roma needs according to their circumstances and to compensate their disadvantages.

Connecting NRIS with NRPs

Several Member states refer in their respective NRIS that these have been conceived and will be developed in the Framework of the EU policies mainly in the EU 2020 Strategy and NRPs as it has been required by the EC Communication. Nevertheless, very little is said in most of the cases on how these two processes, NRIS and NRPs, will interact and feed into each other. In spite of many Roma being a significant component of the Europe 2020 targets (in the fields of poverty and social exclusion, employment and also educational disadvantage), they do not feature as such in most Member States' national targets. For instance, only in very few cases, the integration of Roma is well reflected in NRPs. The recent EC communication²¹ stresses that "National Reform Programmes within the European semester will be scrutinised for coherence with National Roma Integration Strategies and, where appropriate, references to Roma integration will be made in the Country-Specific Recommendations, in order to guide the relevant Member States

²¹ EC Communication (2012), op. cit.

towards further progress”. In fact, framing Roma strategies in the EU 2020 Strategy and in the NRP, would imply to align M&E with the *European semester process* which means in practical terms:

- At the EU level:
 - That the Commission in its Annual Growth Survey (January), which sets out EU priorities for the coming year to boost growth and job creation, refer to Roma situation.
 - That when EU Heads of State and Government issues EU guidance for national policies on the basis of the Annual Growth Survey (March), the Roma needs are to be taken into account.
 - That when the Commission assesses the NRPs and provides country-specific recommendations to be endorsed by the European Council, there are specific recommendations related to Roma.
- At the national level:
 - That when Member States submit their reforms and measures to make progress towards smart, sustainable and inclusive growth (NRP), explicit references to the Roma should be made.

Improving the living condition of the Roma by focusing on the measurable objectives launched by the Europe 2020 Strategy should be at the permanent review of NRPs. M&E should focus on their progress made in issues as for example: securing equal access to education (pre-school education and compulsory education), decreasing school dropout among Roma children; improving the labour market integration of the Roma; reducing the number of Roma at risk of poverty, etc.

M&E should also look at the involvement of the Roma into some *flagship initiatives*; for instance Youth on the Move, an agenda for New Skills and Jobs, a digital Agenda for Europe and of course the European Platform Against Poverty that aims to ensure social and territorial cohesion so that the benefits of growth and jobs are widely shared and people experiencing poverty and social exclusion are enabled to live in dignity and take an active part in society.

NRIS and EU legal and policy instrument

The NRIS, policies, action plans and projects should be explicitly rights-based to ensure that Roma, as citizens or residents of the EU Member States, can fully enjoy their fundamental rights as enshrined both in EU law and in international human rights treaties binding on Member States. M&E in these strategies need to follow the respect for fundamental rights, the observance of which need to be monitored by the EC and ultimately ensured by the Court of Justice of the EU.

When following the implementation of legal instruments it is needed to monitor how they are applying to the Roma Strategies and subsequent plans. For instance, the EU Treaty and Charter of Fundamental Rights stresses that the EU is “founded on the values of respect for the human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities” (Art. 2 of the Treaty on the EU);²² on the other hand, one should take into account the EU Directives: the Racial Equality Directive 2000/43/EC²³ that prohibits both direct and indirect discrimination and gives protection against discrimination on the basis of racial or ethnic origin and the Directive 2004/38/EC on the right of EU citizens to move and reside freely within the EU that regulates the right of free movement and residence across the EU and EFTA area of all EU citizens and their family members. It is also necessary to monitor how the Framework Decision on Combating Racism and Xenophobia adopted in November 2008²⁴ is implemented so as to ensure that racist and xenophobic

²² EU (2010) Consolidated versions of the Treaty on European Union and the Treaty on the Functioning of the European Union. Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:083:0047:0200:en:PDF> Charter of Fundamental Rights of the European Union. Official Journal of the EU. C83 Volume 53. Available at: <http://www.consilium.europa.eu/treaty-of-lisbon.aspx?lang=en>. EU (2000c), op. cit.

²³ European Council (2000a) op. cit.; European Council (2000b), op. cit.

²⁴ European Council (2008) Council Framework Decision 2008/913/JHA of 28 November 2008 on combating certain forms and expressions of racism and xenophobia by means of criminal law. Available at: http://europa.eu/legislation_summaries/justice_freedom_security/combating_discrimination/l33178_en.htm

conducts are sanctioned in all Member States by effective, proportionate and dissuasive criminal penalties; also the International conventions as the Universal Declaration of Human Rights (UDHR) especially in relation to the right to a standard of living: “Everyone has the right to a standard of living (Art 25) and education (Art 26)”.

Other conventions and international human rights instruments refer to issues closely related to the Roma situation and must be at the heart of NRIS’ M&E: for instance, European Convention on Human Rights (ECHR); the International Convention on the Elimination of All Forms of Racial Discrimination; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the Convention on the Rights of the Child; the Convention on the Elimination of All Forms of Discrimination against Women; the Convention Relating to the Status of Stateless Persons (1954); the Convention on the Reduction of Statelessness (1961) and relevant ILO Conventions concerning equality, non-discrimination in employment and occupation, employment policy, social policy, freedom of association, forced labour, child labour.²⁵

As regards to the policy instruments it is crucial to monitor to what extent the Open Method of Coordination (OMC) in Social Protection & Social Inclusion²⁶ and the OMC in education²⁷ tackle and focus on Roma issues. It is also important to monitor how other EU policies contribute to the Roma inclusion: for instance the EU Agenda for the Rights of the Child,²⁸

²⁵ Please see bibliographical section of the present report to access full references.

²⁶ EU policy framework:

<http://ec.europa.eu/social/main.jsp?catId=753&langId=en>

²⁷ The Open Method of Coordination in Education and Training. Available at: http://www.ateel.org/uploads/EUpolicies/ec_open_method_of_coordination_2007.pdf

²⁸ European Commission (2011d) Communication from the Commission. An EU agenda for the rights of the child. COM (2011) 60 final. Brussels, 15 February. Available at: http://ec.europa.eu/justice/policies/children/docs/com_2011_60_en.pdf

the Health policies and programmes,²⁹ the antidiscrimination policies³⁰ and instruments in other areas such as the European Agenda for Culture.³¹

NRIS – Structural Funds (SF) and other financial instrument

In its Communication (2011)³², the Commission invited Member States “to amend their operational programmes co-financed by the Structural Funds and the European Agricultural Fund for Rural Development in order to better support Roma targeted projects, and to align them with their national Roma integration strategies”. The conclusions of the Roma Task Force as well as the EURoma report have demonstrated significant weaknesses in the use of SF aimed at Roma inclusion.³³ Inefficient managing models and coordination mechanisms and several bottlenecks render the implementation difficult. Furthermore, the level of expenditure is very low especially in countries with large Roma populations; besides, there is little accountability and available information about the results and impact that Structural Funds have on Roma. NRIS’ M&E should also concentrate on the concrete changes made in the use of the SF for the Roma inclusion.

The proposals presented by the Commission for the Budget Review as well as for the regulations of the next programming period (including SF as well as enlargement Funds for the period 2014–2020)³⁴ provide important

²⁹ European Commission (2009b) Commission Communication “Solidarity in health: Reducing Health Inequalities in the European Union”. Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2009:0567:FIN:EN:PDF>

³⁰ European Commission (1997) European Union Anti-discrimination policy: from Equal opportunities between women and men to combat racism. DG for Research. Working Document. Public Liberties Series. Available at: http://www.europarl.europa.eu/workingpapers/libe/102/default_en.htm

³¹ Description available at: http://ec.europa.eu/culture/our-policy-development/doc399_en.htm

³² European Commission (2011a) op.cit.

³³ European Commission Roma Task Force (2010) op. cit.; EURoma (2010), op. cit.

³⁴ European Commission (2011b) Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European

improvements in terms of making EU funds more accessible and efficient for Roma inclusion. The Commission proposals for the future regulations also highlights the need for effectiveness, for a more focused approach, and for priorities related to employment, education and social inclusion; the possible inclusion of *ex ante* conditions related to NRIS need to be monitored in the next programming period.

The advantages and potentialities of SF render them not only a financial tool but also a policy tool: in fact, long-term sustainable projects, extensive financial support and the possibility of combining action levels (actions implemented concurrently at the national – policies – and local levels – grassroots) can contribute to achieving significant positive impacts. SF also open up opportunities for a holistic approach to economic development and social cohesion by covering different areas, including education, employment, investment in infrastructures and the fight against exclusion.

Many other European programmes managed directly by the Commission can support NRIS implementation and need to be regarded in the monitoring process. For instance, the Lifelong Learning Programme, including Comenius, Grundtvig and Leonardo³⁵ as well as other Community Action programmes: PROGRESS,³⁶ Fundamental Rights and Citizenship,³⁷ the

Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund covered by the Common Strategic Framework and laying down general provisions on the European Regional Development Fund, the European Social Fund and the Cohesion Fund and repealing Regulation (EC) No 1083/2006. Brussels, 6 October. COM (2011) 615 Final. Available at: http://ec.europa.eu/regional_policy/sources/docoffic/official/regulation/pdf/2014/proposals/regulation/general/general_proposal_en.pdf

³⁵ More information at: http://ec.europa.eu/education/lifelong-learning-programme/doc86_en.htm

³⁶ More information at: <http://ec.europa.eu/social/main.jsp?catId=327>

³⁷ More information at: http://ec.europa.eu/justice/fundamental-rights/programme/index_en.htm

Second Programme of Community action in the field of Health 2008-2013,³⁸ the European Progress Microfinance Facility,³⁹ the Europe for Citizens Programme 2007-2013.⁴⁰ Other relevant programmes for the Roma inclusion that should be monitored include: Multilingualism (Education and Training Programmes),⁴¹ the Youth in Action Programme⁴² and Cultural Policies and Intercultural Dialogue.⁴³

Finally, it must be noted that the connection between the national, regional and local level, which has been referred to previously to other items also applies to the legal, policy and financial instruments at the national level, apply also at the national and local one.

4.3 The role of the different actors in M&E

We have insisted that NRIS have to be monitored and evaluated at different levels European, national and local but also that different stakeholders should contribute to this task according to their capacities and competences. Below there is a description of how the different stakeholders can contribute to this process and to what extent the different stakeholders should contribute to this process:

The EU institutions and other international actors

The Commission will review annually the implementation of the NRIS, reporting to the European Parliament and the Council (Communication 2012). The Commission and the FRA together with the support of other international institutions can take an active role in the monitoring process through different means:

³⁸ More information at: http://ec.europa.eu/health/programme/policy/2008-2013/index_en.htm

³⁹ More information at: <http://ec.europa.eu/social/main.jsp?catId=836>

⁴⁰ More information at: http://eacea.ec.europa.eu/citizenship/index_en.php

⁴¹ More information at: http://ec.europa.eu/languages/index_en.htm

⁴² More information at: http://ec.europa.eu/youth/index_en.htm

⁴³ European Commission (2008b) Intercultural Dialogue: Support through EU programmes (Luxembourg: European Commission).

1. Providing tools for the monitoring process: for instance, Member states can build evaluation based on the Roma household survey pilot project carried out by the UNDP in cooperation with the WB and the FRA and which is foreseen to be extended by the FRA to all Member states and to run it regularly to measure progress on the field/grass-root level. Among the useful tools, may be useful the foreseen mapping exercise identifying existing secondary sources (data and reports) as well as the intensive qualitative research that will be done by the FRA. The European Foundation for the Improvement of Living and Working Condition could contribute to this aim by drawing data collection from specific research funded by the Socio-economic Sciences; also may contribute the Humanities Programme of the 7th Framework Programme as it is described in the EC Communication (2012).⁴⁴

2. Supporting the capacity of Member states in the evaluation process: there is a need to develop the capacity of national statistic and research bodies (research institutes and statistics institutions) in addressing Roma issues. Developing statistical capacity include the cooperation between national statistical offices and Eurostat so as to be able to identify methods to map the EU's least developed micro-regions, where the most marginalised groups live and in particular Roma. The FRA should work with and support Member States to develop monitoring methods, which can provide a comparative analysis of the situation of Roma across Europe.

3. Facilitating mechanisms of joint M&E between Member states and European institutions: among others by assessing the strategies, developing regular progress reports, organizing bilateral meeting identifying common issues for progress, peer reviews, facilitating spaces for mutual learning, etc. It is also important to keep the concept open for further development based on regular monitoring and impact assessment, to support the network of the NCPs, exchange best practices and foster the role of the European Platform for Roma Inclusion.

⁴⁴EC Communication 2012, op. cit.

Taking M&E to the local level

As mentioned previously in this report, it is crucial for Member States to make progress in the establishment of M&E systems and clarify how these will be carried out taking into account their own realities and their different possible options; always within the framework of the wider policy process related to social inclusion and social protection, education, employment and economic development. NRIS need adequate systems of inter ministerial horizontal cooperation in order to facilitate coherent Roma policies covering key areas of social inclusion. This necessarily must involve different departments and ministries at the national level and also at the regional and local level according to the respective competencies.

The report also makes recommendations and explains how Member states could establish concrete forms of robust M&E with the different options available. Data collection (lack of data, need of up-to-date data or underutilized data) is at this point a key aspect of M&E, which should be strongly improved. Evaluating result and the effectiveness of the measures in terms of cost will be the condition to legitimate specific policies in front of the public opinion.

It has also been mentioned that NCPs need to monitor this process and are to be more than just an appointed person or department that require at least three conditions for the effective development of its task: firstly, it must have adequate political capacity for leading the process of the implementation of the strategies; secondly, it must have institutional capacity in order to enforce horizontal coordination with other departments at the national level as well as vertical coordination with the regional and local level; thirdly, it must have adequate financial and human resources. A challenge in the coming years will be to strengthen NCPs' capacities and mandate, in order for them to put into practice the adequate institutional mechanisms as well as increasing their resources and powers.

The role of the local level has also been highlighted. In the past years, there has been a significant progress at the European level on achieving a common understanding of the Roma issue and the key elements for Roma policies: the four priority areas, the ten common basic principles, the need

for integrated long term actions, the importance of the data collection and monitoring processes, etc. Unfortunately these elements are not known by many municipalities and therefore are not followed by their local policies when dealing with Roma population. These principles and approaches need to be transferred and worked at local level.

The role and responsibilities of local and regional authorities is crucial for Roma inclusion; having inclusive local Roma policies is also a core issue for the European Commission and is essential for ensuring the expected results planned in NRIS. In fact, local administrations are confronted in their daily work to the duty of making policies and govern in favour of all citizens while addressing critical issues related to the socio-economic inclusion of Roma, including their access to services such as education, healthcare and social services, physical segregation, management of interethnic conflict, promotion of cultural diversity, and their active participation in the local communities.

The connection between EU processes and the local level must be improved in order to obtain a better and more effective implementation of Roma national policies. This represents a major challenge in many Member states and a key issue in the implementation of NRIS. M&E processes have to contribute to bridging the gap between national policies and the implementation process at local level and to include the local and regional dimensions of Roma issues into national and international agendas. For instance it is necessary to make progress on:

- Collecting data and developing indicators at the local level taking the example of some governments in Europe that have decided to produce small-area poverty maps by using the new national census information in combination with the EU Statistics on Income and Living Conditions (EU-SILC) which collects annual information on income, poverty, social exclusion, housing, labor, education, and health: such poverty maps provide the most appropriate instrument for this targeting exercise.
- Involving regional and local departments in the planning process and considering the need to promote the development of action plans at

regional and local level taking NRIS' objectives as a common framework.

- Identifying and allocate responsibilities of M&E at the regional and local level.
- Supporting forms of community-based and grass-root M&E.

The engagement of the civil society

Civil society organizations, including Roma organizations and representatives need to be fully involved in the entire process of the NRIS (planning, implementation, monitoring and evaluation) not only at the national but also at the local level. It is very important to ensure that M&E is carried out in dialogue with stakeholders, in particular civil society. Participation of CSOs in the M&E cannot be based on the willingness or voluntary decision of the department responsible of this task, but rather on systems of formal consultation and representation. For instance, it is important to progress towards the establishment of forms of civil dialogue carried out on a regular basis, with a predefined agenda, competencies and rules. CSOs can contribute to the M&E by:

- Mobilising key actors through a participative approach at the local level.
- Creating trust and appropriate environment for the participation of Roma citizens.
- Providing data and information that can facilitate better understanding of the situation.
- Preparing shadow reports that can complement official information and bring different perspectives that could show other important needs.
- Supporting the M&E process with qualitative information and grass-root knowledge.
- Organizing and steering specific forms of community monitoring.

Towards Mainstreaming of good practices for MONITORING OF ROMA INTEGRATION POLICIES

Dimitar Dimitrov and Mariana Milosheva-Krushe
CREDA Consulting (Creating Development Alternatives)

I. Why monitoring with active involvement of Roma is needed?

In the past decade, the need of more effective monitoring of policies aimed at equal inclusion of Roma is increasingly present in the debate of EU institutions, other donors and NGOs. It has been outlined as a priority in a number of key EU documents related to Roma inclusion. It has been at the core of the work for the Roma Decade and joint efforts of key international organizations and actors like the Secretariat for the Decade, Roma Initiatives Program of Open Society Foundation – Budapest, UNDP and the World Bank. At the same time, as outlined in previous reports, consistent systems for monitoring and evaluation that improve the real impact of adopted policies are still among the capacity gaps in most countries in the region. The presented review of recently adopted National Roma Integration Strategies provided a lot of evidence that they do not envisage complete and sufficient systems for monitoring and evaluation, often not even mentioning any specific indicators and measures to provide comprehensive and realistic information for their implementation. If the implementation of the strategies is not accompanied with clear provisions of what, who and how will provide for feedback and practical measurement, it is disputable that they are going to contribute to the strategic objective of EC “to make a difference until 2020”.

There are already lessons in this direction with the implementation of the Roma Decade Plans. The report of the Roma Initiatives Program of the

Open Society Foundation “No data – No progress”¹ has already elaborated on the problem with the lack of data about Roma, stating that the “data gap” remains the biggest impediment for conduction of a thorough assessment of how Governments are meeting their Decade commitments, despite the common agreement of governments about the crucial importance of generating and collecting data for the Roma community. While the issue of data is critical, another important issue is how and who will be collecting the data. It is questionable whether monitoring of implementation of strategies can be only administrative. This does not relate only to the technical capacity of state institutions to do monitoring, but to their ability to involve into this non-state actors like organized Roma civil society and/or community level groups and activists.

In general some of the predominant experiences of large scale initiatives monitoring show that in most cases the implemented monitoring involves only the large stakeholders on national or international level – governmental reports, EC reports, international NGOs reports, independent experts’ reports (Phare programs, Social inclusion reports of the EC, and etc.). While some of these attempts have contributed to map broadly the state of policies implementation they have rarely been directly informed by the local community level, where in fact the policies are practically implemented. In addition to that and being based on official sources that often lack data, monitoring reports are insufficiently informative and quite detached from the real situation in Roma communities – or the final beneficiaries of implemented policies.

II. Emerging Approaches and Practices of monitoring involving Roma organizations and communities

This paper was developed to assist the discussion and learning from emerging practices in the area of different types of monitoring of public policies and programmes. It does not have the ambition of covering all exist-

¹ “No data – No progress: Data collection in countries participating in the Decade of Roma inclusion”, Roma Initiatives Program, Open Society Foundations.

ing practices, as this will require another time and resources. Much work will be needed to cover all the work of Roma NGOs, and international organizations in different aspects of monitoring. Unfortunately a number of the existing practices are either not well documented, or are not publicly available on the websites of the organizations. Meetings of active organizations and other stakeholders can contribute further for learning from experiences and practice of monitoring.

Based on the quick exploration of some existing practices within projects of civil society (without the ambition to do a profound research) emerging approaches can be grouped in three main directions.

NGO monitoring: on national and international / EU levels

There are certain types of NGO monitoring and evaluation that proved their effectiveness: shadow reporting, budget monitoring and others. In most of the cases they are organized on:

- *national level* by *nationally recognized NGOs or by networks/consortiums of NGOs*²;
- *EU / international level* by *international organizations* (such as UNDP, European Network Against Racism, Open Society Institute, Decade of Roma Inclusion Secretariat, European anti-poverty network, etc.)³.

Even when the NGO monitoring is organized by one organization, it usually involves participation of other organizations and experts. Sharing and discussing the preliminary findings with broader range of organizations as well as with their constituencies (i.e. with the Roma communities they work for) is crucial for the quality of the conclusions drawn. That is why the NGO M&E differs from the expert one: it is done from the point of view of the civil society and its constituencies and reflects their vision, agenda and claims. Its main strengths lie on the possibility to involve and express variety of organizations and communities rather than on expert quality.

² See the attachment, Practice 1 and 2.

³ See the attachment, Practice 3 .

There are a big set of examples for different types of NGO monitoring. For half a decade, Centre Amalipe in partnership with other NGOs in Bulgaria has developed a shadow monitoring system which allows them to prepare shadow reports for the implementation of public policies affecting Roma – Education, Health, Social affairs, etc. The National Children’s Network, a network of around 100 organizations that work for the welfare of young people and children in Bulgaria, has prepared innovative type of evaluation called “Report Card”. Reports are prepared by involving experts from different organizations, fields of expertise and regions with extensive knowledge and professional experience on the topic of the different reports (see the attachment – Practice 1 and Practice 2), ensuring the highest possible quality. In addition, their preliminary findings are discussed with broader set of organizations. The main preliminary conclusions are sent to the main evaluated institutions for gaining their feedback before publishing the final versions. A positive result of most of Amalipe’s and NCN reports is that the process does not end with the publication of the paper. Reports are being presented at targeted audiences among decision makers at all levels – local, national and European, provoking debates and providing for evidence based advocacy action. In many cases recommendations provided by the report had been taken into account by government in their further policy discussions and development.

The advantages of NGO monitoring include: shadow monitoring and reports, which are independent from government; they are done by a common framework developed and applied by Roma NGO practitioners with extensive experience on working with Roma in the relevant issue areas and with practical experience of working both on national and community levels. They express certain common points of view shared by diverse organizations, groups and communities. In this way they could represent at certain level key common ideas and suggestions of the civil society and the Roma community. That is why the NGO M&E activities are useful basis for following advocacy actions.

The challenges to this type of monitoring are in two main directions. The first is the limitation of data and scope. The shadow reports provide data as available to participating NGOs and experts. They depend on the extent

of publicly available information, and the level of outreach at community level country wide. The second is the limitation of resources. In many cases such type of monitoring is done on project basis often with very limited funding. This does not provide for expanding the geographic scope of gathering data. It makes difficult to have shadow monitoring on systematic basis, as it is contingent on project funding, which if not aired on time can hamper the consistency of the effort.

Success factors and more reliability of this type of monitoring is achieved when it is done by NGOs and experts that work directly in the issue area, combine national work with community based work (or international work with national level work) and have credibility and recognition among decision makers, institutions and other stakeholders. This provides for increased probability that the shadow monitoring and other forms of NGO M&E will have more practical outcome in regard to concrete policy changes based on reports findings and recommendations.

Expert monitoring: on international and national level

Usually it includes forms of shadow reporting or alternative reports prepared by highly qualified experts on topics or policies reported also by the governments or other institutions. For example, in certain cases the European Commission requires the national governments to submit reports about the implementation of certain policy as well as assign independent experts to prepare independent evaluation / alternative report on the same policy. The same is done by UN, OSCE, Council of Europe. The expert monitoring provides another insight on the topics concerned as well as additional information. It is organized on international or national level by large international institutions and/or international NGOs. Very often it is done by consultant agencies that are assigned for this purpose.

One of the many examples is the Network of socio-economic experts in the field of anti-discrimination, established by the Human European Consultancy⁴ under a contract with the European Commission The network com-

⁴ <http://www.humanconsultancy.com/>

bines information and data of experts and organizations on international level and provide wider and more strategic opinion on the relevant topics. The network has produced five thematic and two synthesis reports that examine the impact of national or EU policies and measures on the corresponding target groups, evaluate policy effectiveness or validate good practices.

As pointed above, the expert monitoring differs from the NGO one. It relies mainly on its independency (including the financial one) and high quality and does not pretend to express the point of view and suggestions of the civil society and the communities.

Advantages: International or national expert monitoring provides for systematic and professional gathering of data across borders and regions, comparability of data and analyses; targeted thematic and/or issue based regional analyses. It informs the policy process at EU level by mobilizing expertise from the different countries or at national level by mobilizing expertise from different regions. Important assets are its independency and high quality. The independency is guaranteed by independent way of financing. The high quality is supported by a competitive way of assigning the experts / implementing agency.

Challenges: This type of monitoring depends on the publicly available data, on the willingness of the institutions monitored to cooperate with the experts as well as on the capacity, knowledge and views of selected experts. The independent monitoring could not be applied if the actor monitored obstructs the process.

Success factors: Critical for this type of monitoring are the selected experts. Reports are more comprehensive if experts combine professional qualification for data gathering and analyses with practical experience and linkage with NGOs, networks and communities for which the policies have been developed.

Another important success factor is the authority of the institution that requires the report: the practice shows that independent monitoring backed up by European Commission is highly valued, etc.

New evolving practice of community based monitoring

Community based monitoring is a new approach that has been introduced and practiced in Bulgaria, Macedonia and Romania the past 2 years. This type of monitoring has been developed and tested in India. With the support of the Roma Health Program of Open Society Foundation, community monitoring has been adapted and piloted by the Center for Interethnic Dialogue and Tolerance “Amalipe” from Bulgaria, Roma Centre for Health Policies “Sastipen” from Romania and “Association for emancipation and equality of women in Macedonia” and mobilized coalition of other NGOs from Macedonia.⁵

Community monitoring is a system of public oversight of the direct impact of implementation of public services or policies in the communities served. It is driven by local information needs and community values and has the purpose to increase the accountability and quality of public services and to contribute to the management of public resources.

Within the Community Monitoring framework, members of a community affected by a public service or public policy assess and provide feedback to the implementing organization or institution about the quality of the services delivered at grass-root level. This happened through several methods. Community inquiry that is organized like semi-structured questionnaire and is done among representative sample of the community (for example, in the villages covered by Amalipe the questionnaire is done in every house) is the most used quantitative method. It is complemented with focus-groups as qualitative method.

Based on the assessment, the community generates demands, suggestions, critiques and organizes advocacy activities – before the institutions that control the service delivery⁶ and before the service providers – for overcoming the gaps found. Thus, the community monitoring approach also enables communities to be more effective in the local decision making process, to be better informed and better aware of their rights as citizens and human be-

⁵ See attachment, Practice 5, Practice 6, Practice 7.

⁶ For example, before the Regional Health care Inspectorates in Bulgaria.

ings. In addition, the community monitoring efforts at local level is complemented with national level advocacy – especially in Bulgaria and Macedonia.

At the core of this approach is that monitoring should involve the community itself. That is why the entire process – defining the main issues to be monitored, carrying out community inquiry and focus groups, drafting the analyses and organizing follow-up local advocacy – is done by the community activists. The role of the NGOs (like Amalipe, Sastipen and others) is to support methodologically the process but not to replace the community that has main responsibility.

In most cases communities are not mobilized, not informed, not active and thus not able to participate in the conduction of the monitoring. The first tasks of the community monitoring organizers is to overcome those issues and prepare the community through trainings, orientation sessions, information campaigns, meetings and debates with public institutions in order to make sure that community is fully aware and informed about the service or policy and is able to recognize its positive and negative impacts. Interesting experience is the attempt of Amalipe for structuring these community mobilization activities. In Bulgaria the community monitoring is done by Community Development Centers and Local Community Development Groups. The Local Groups operate at grass-root / village level and organize broad set of community mobilization activities: campaigns, community discussions, cleaning of the neighborhoods, forming voluntary clubs (women clubs, youth clubs, leaders groups), etc. The Community Development Centers operate at municipal level and in every Center two community moderators work. They coordinate the activities of the Local clubs and organize municipal level advocacy. These structures prepare the local communities and organize the entire cycle of community monitoring.

Thus the community would be ready to address recommendations for improvement and participate effectively in the decision making process. The process of implementation of monitoring involves good and well trained community monitoring organizers, able to facilitate the participation of the community and the professional supervision and guidance of the implementing NGO(s) that also systematizes and communicates to relevant insti-

tutions the information and recommendations coming from communities and this in turn serves for amendments of existing policies and practices or adoption of new ones, that would be more in favor of the community and more relevant to its real needs and interests.

All three NGOs that have piloted community monitoring in their countries have already visible achievements and outcomes. They have managed to activate and mobilize the local Roma communities to identify gaps and suggested improvement in the provision of health care services. As a result, there is direct improvement of the access of Roma to healthcare services:

- In the pilot communities in Bulgaria the share of Roma without personal physician decreased. The number of Roma who do not perform annual health check decreased too. The response to emergencies in the Roma neighborhoods improved (ambulances arrive faster and emergency medics demonstrate better attitude). Results of monitoring were used in the overall advocacy work of Amalipe in the area of health care, with concrete suggestions for improvement of government policies.

- In Romania, Sastipen assisted the self-organization of communities and a new local NGO was established. In addition, partnership with institutions at county level was stimulated by creating relevant commissions to monitor healthcare provision. Cases of violation of rights to healthcare were identified and brought to courts.

- Very interesting is the practice of the “Association for emancipation and equality of women in Macedonia”. It combines professional budget monitoring on national level to identify allocation of funds in the different areas of health care provision with community monitoring directly at community level organized in coalition with other Roma NGOs to identify to what extent these funds are actually reaching the communities. Results from this combined monitoring approach served for effective evidence based advocacy for improvement of policies in the area of Health care. As a result, government adopted concrete measures aimed for Roma communities in the Program for active health care of mothers and children for 2011, and allocated funds for implementation of these measures.

The main *advantages* of applying the community monitoring approach are that:

- It provides for active involvement of Roma communities, increases their awareness on regarding their rights to quality health care services, makes them direct participants in assessing and recommending improvements of the quality and accessibility of existing services.

- It provides data directly from the community level about the effectiveness of implementation of policy measures and related to this services: what is the actual coverage, accessibility and affordability of the services; how health professionals approach and treat Roma people, what are the possible obstacles that Roma in communities face when using services and where are the gaps where needed services are missing.

- It is an effective tool that can help identify gaps and needed improvement of adopted national measures, as well as an effective public awareness and advocacy tool for the rights of vulnerable groups, providing for direct relationship with the community. It may also serve as a guide for priority setting and decision making in regard to choice of programs, policies and practices to improve community's well-being.

The main *success factors* for the effectiveness of the community monitoring include:

- Good methodology and guidance for its application , in this pilot phase provided by the Roma Health Project and AMHI Program of OSF

- Leadership of the process by experienced Roma civil society organizations that combine work at the very community level with monitoring and/or advocacy at the national level. They have credibility within Roma communities, among other Roma NGOs, with key institutions.

- Mobilizing coalitions of different organizations and community groups

- Effective combining community monitoring with national level monitoring, especially of budget allocation and real spending (in the case of Macedonia).

The main *challenges* are that this is very new approach. It has proven potential to contribute to much more effective way of monitoring that can impact on-going improvement of policy implementation. However, it re-

quires well prepared NGOs and capacity for doing such type of monitoring is still not wide spread among Roma organizations. Spreading and mainstreaming the approach will require much more resources – time, finances and people; development of specific skills and knowledge that often lack within the members of the Roma communities. Another important challenge is that this approach relies on the well-organized communities that realize their rights (for example, the standards for health care services that should be delivered at local level) and is ready to defend and claim for these rights. Very often the Roma communities do not cover these characteristics, that is why a set of community mobilization activities are necessary. The success of community monitoring depends on the success of the community mobilization activities.

III. Some summary lessons and recommendations from practices

Monitoring is important for improving the quality of the public services (policies) on all levels: local, regional, national and international. Monitoring at these different levels may require different approaches. However, they all need well planned systems for monitoring – with clear provisions for methodological framework for data gathering and how the information will be used.

Effective monitoring requires good political will, engagement and practical support from governments and institutions. But it cannot be confined only in administrative type of monitoring of performance done by the institutions themselves. *Involvement of independent experts and Roma NGOs provides for increasing the data gathered directly from communities and practical knowledge of what actually works well or not in the different issue area of policy implementation.*

There are three types of monitoring and evaluation approaches that are necessary for complementing the administrative monitoring envisaged by the NRIS:

(1) Monitoring at community level (community based monitoring)

It should be organized by the local communities and their Community Based Organizations with the involvement of the local authorities, NGOs and service providers. Its added value is the combination of stakeholders, providing opportunity for inclusion of the opinion of all relevant local stakeholders. Community based monitoring would contribute to the reflection of a realistic picture of the local processes and would encourage positive partnership and collaboration between the institutions and the community, establishing conditions for participation of the community in the decision-making process. For its successful implementation, however, it requires resources that should be allocated in order to prepare the local environment and to provide the needed capacity of the role-players. Professional supervision of qualified Roma NGOs is necessary in order to guarantee the successful planning, implementation and achievement of targeted outcomes: as it has happened in the presented practices from Bulgaria, Macedonia and Romania.

Community based approach to monitoring is especially effective if combined with national level monitoring and advocacy. Though each public service (policy) is unique and requires specific tools and period of monitoring, this type of combined monitoring can be applied to all aspects of the NRIS. It provides direct feedback from the citizens on the level of satisfaction from the relevant service (policy). If done on regular basis it can contribute to more systematic link and adaptation of policies and measures with the end beneficiaries – the Roma communities themselves. It also contributes to establishment of working model for interaction between the citizens and the authorities/institutions.

(2) Independent expert monitoring

It involves independent experts and professionals with expertise in Roma integration issues. The examples show that this is independent monitoring which is being realized mostly as a shadow reports or alternative reports analyzing topics or policies that are object of official data and reports. In this particular case, however, this type of monitoring may be much improved if it

is based on the data collected through the community based monitoring. Those monitorings have proven to be effective for increasing the public awareness towards the reported issue and may serve as a base for initiating advocacy activities on all levels. Again, resources will need to be allocated in order to provide for consistency of the monitoring process and wider national coverage of data gathering.

(3) *NGO monitoring*

The added value of this type of monitoring is that it “brings into agenda” the civil society and its constituencies expressing common vision and claims of the broad range of NGOs. In this way the NGO forms of M&E could be easily developed into advocacy activities. This type of monitoring could be also much improved if it is based on the data collected through the community based monitoring: as the experience in Macedonia shows, combining NGO monitoring with community one improves both of them.

The application of the three approaches of monitoring with direct involvement of Roma organizations and/or independent experts would provide the environment that will contribute to a professional, transparent and realistic monitoring and evaluation of the implementation of the NRIS. That would require the development of a very good monitoring system, where again, all relevant stakeholders should participate – from local, national and international level – in order to provide for their full participation. Since the NRIS is a governmental commitment, the responsibility for the process should be again on the governments, including the provision of financial resources. New governmental department may be established to coordinate the implementation of the NRIS itself, as well as the monitoring implementation.

In the same time, the overall supervision of the process may be delivered by the European Commission or other relevant agency of the European Union – that would prevent potential conflicts of interests if the supervisor is again a national institution.

Different types of monitoring reports under all monitoring approaches, may be developed on regular basis (e.g. community monitoring – every six months, administrative monitoring – twice per year and the rest – once per

year) and may serve for an annual NRIS implementation report that would allow timely and accurate reflection of the NRIS realization.

In the same time, this system of monitoring would secure that the NRIS implementation is in-line with the community needs and the monitoring process would be driven by the community itself.

ATTACHMENT – Some emerging practices

Shadow reporting

Practice 1: The Amalipe Monitoring programme

Shadow reports (often also called “alternative reports”) are a method for NGOs to supplement or present alternative information to national reports that governments are required to submit under different treaties and programs.

Center for interethnic dialogue and tolerance “Amalipe” has developed a serious shadow reporting system. The system is comprised of a Monitoring committee and local organizations and experts. They collect monthly information for their communities on all the activities and initiatives in the major fields of interest. On the basis of the information collected Center Amalipe and the experts prepare an annual report on the policies for Roma integration in the areas of education, employment/ social issues, living conditions, health, gender issues, representation and participation. These reports raise public interest and have strong outcomes. For example, one of them provoked numerous publications in national media and caused the investigation of the case it monitored in the Parliamentary Commission against Corruption. Another report was presented in the European Parliament.

Some of the reports, initiated by or developed with the participation of Amalipe are:

- “Evaluation Report for the Implementation of Phare BG 0104.01”⁷

⁷ Kolev, D., Krumova, T., Zahariev, B. Evaluation Report for the Implementation of Phare BG 0104.0”, 2006.

- “The Roma strategies in Bulgaria in the Eve of EU Accession”⁸
- “Annual report about the implementation of the policies for Roma integration in Bulgaria”⁹
- “The health status of Romani women in Bulgaria”¹⁰
- “Annual report on Roma integration in Bulgaria” 2007–2008¹¹
- “European structural funds and Roma integration in Bulgaria”¹²

And many more, most of them available online on the internet at: www.amalipe.com.

Practice 2: National children’s network¹³ (NNC), Bulgaria – “Report card: Assessment of the implementation of state commitments towards Bulgaria’s children”¹⁴

The Bulgarian “Report Card” is inspired from the practice of Children’s Rights Alliance – Ireland¹⁵. On January 24, 2011 the Irish government received a D score (which is analogous to 3 within the 6 grade scoring system in Bulgaria) in a report card called “Is the government keeping its promises to children?”. The main aim of the development of the school report card is to carry out annual, independent monitoring of children’s rights based on the commitments on behalf of the government and supported by facts and data.

⁸ Center Amalipe, Hot Line Agency. The Roma strategies in Bulgaria in the Eve of EU Accession, 2006.

⁹ Center Amalipe. Annual report about the implementation of the policies for Roma integration in Bulgaria 2007.

¹⁰ Centre Amalipe. Krumova, T., Ilieva, M. The health status of Romani women in Bulgaria, 2008.

¹¹ Centre Amalipe. Kolev, D., Metodieva, M., Panayotov, S., Bogdanov, G., Krumova, T. Annual report on Roma integration in Bulgaria 2007–2008, 2010.

¹² Kolev, D. Grigorova, Y., Dimitrov, D. European structural funds and Roma integration in Bulgaria, Centre Amalipe and OSI Sofia, 2010.

¹³ <http://nmd.bg/>

¹⁴ http://nmd.bg/wp-content/uploads/2012/03/Report-Card-2011_EN.pdf

¹⁵ <http://www.childrensrights.ie/campaign/report-card-series>

In addition, through the report card the NNC aim to suggest recommendations which to support the decision-making process of the state administration.

The first “Report Card” with scores of the implementation of state commitments to children in Bulgaria contains 5 areas (school subjects), 17 sub-areas and 43 commitments. When choosing the areas, the NNC reviewed all national strategies, plans and programmes which concern policies or measures related to children. NNC chose commitments which were envisaged to be implemented in 2011 or in a longer period of time. They kept mainly to two criteria about the priority of the problems – significance (spreading of the problem, urgency) and possibility for solving (availability of instruments, experience, resources, and consensus). In order to assess implementation correctly, the NNC used facts and data provided by the respective agencies under the Act for Access to Public Information. Other sources were reports of different institutions, independent researchers and non-governmental organizations as well as publications in the media. All data and sources of information are quoted in the text of the school report to support the conclusions and the assessments of the different commitments and to prove that the analysis is based on reliable sources and is not a subjective expression of NNC opinion.



The analysis includes: brief description of the commitment; description of facts and data from the experts assessment and the answers of the state institutions about the respective commitment; recommendations for urgent actions (concrete steps and possible directions of interventions); concluding remarks about each subarea (which includes one or more commitments). Six grades system is used similar to the assessment in the Bulgarian educational system. The interpretation of the grades could be seen in the report card within the part “Grades for 2011”. The original grades were put by the experts who developed the respective analytical parts and subsequently confirmed by the civil organizations, members of NNC. The final grades were consulted and validated with a group of external evaluation experts - people who work in the public interest and professionals with relevant experience and position on the concerned problems.

Expert international reporting

Practice 3: The Network of socio-economic experts in the field of anti-discrimination, European Commission



One of the best examples for expert monitoring at EU level is the Network of socio-economic experts in the field of anti-discrimination, established by the Human European Consultancy¹⁶ under a contract with the European Commission. The objective of the network is to provide the Commission with independent expertise and advice: first through informed analysis of national situations and policy developments with regard to discrimination on the grounds of age, disability, ethnic or racial origin, sexual orientation, religion or belief and multiple grounds; second through a series of exchanges of good practices between EU Member States' representatives on non-discrimination policies and practices with a view to facilitate the exchange of information on non-discrimination issues and transferability of good practices between countries¹⁷.

The network has produced five thematic and two synthesis reports:

- Public policies combating discrimination based on **sexual orientation** and **gender identity** and how to overcome barriers – Tallinn seminar – Report 2011  [97 KB] ;
- Public policies combating discrimination based on **age** in accessing and progressing in employment – Vienna seminar – Report 2011  [138 KB];
- Public policies combating discrimination based on **racial or ethnic origin** in accessing and progressing in employment – Berlin seminar – Report 2010;
- Public policies combating discrimination against and promoting equality for *Lesbian, Gay, Bisexual and Transgendered people (LGBT)*, The Hague seminar – Report 2010;

¹⁶ <http://www.humanconsultancy.com/>

¹⁷ More information about the network is available in the Internet at: http://ec.europa.eu/justice/discrimination/experts/index_en.htm

- **Non-discrimination mainstreaming**, Helsinki seminar – Report 2009.
- **Synthesis report 2010** – part I on the *situation of LGBT groups*  [666 KB] and part II on *ethnic minorities, migrants and employment*  [608 KB] .
- **Synthesis report 2009** – presenting a general picture of non-discrimination in the 27 EU countries and a description of the institutional framework and governance issues.

Practice 4: European Network against Racism and Intolerance (ENAR)¹⁸

ENAR's Reports¹⁹ are a compilation of information and data collected by its member organizations – NGOs working on anti-racism, protection of human rights and provision of legal and other support to those facing discrimination, unequal treatment and marginalization in the European Union.

The ENAR Reports are produced yearly with the purpose to **close the gap in the official and academic data**, to offer an alternative to that data and to **offer an NGO perspective** on the realities of racism with the EU and its Member States. NGO reports are based on many sources of data, official, unofficial, academic and experiential. This allows access to information which, (sometimes not backed up by the rigorous of academic standards), provides the vital perspective of those that either are or work directly with those affected by racism. It is this that gives NGO reports their added value, complementing academic and official reporting.

¹⁸ http://www.enar-eu.org/Page_Generale.asp?DocID=15276&langue=EN

¹⁹ http://www.enar-eu.org/Page_Generale.asp?DocID=15294&la=1&langue=

Community monitoring in healthcare

Practice 5: Centre for Interethnic Dialogue and tolerance “Amalipe”, Bulgaria – “Promoting access to quality health care for Roma in Bulgaria: a case of community monitoring”²⁰

Community monitoring approach

In 2011 Center Amalipe introduced community monitoring of health care services in their work in Veliko Turnovo District, in Pavlikeni and Veliko Turnovo Municipalities. They saw community monitoring as a means to strengthen community-informed and driven advocacy to improve health service delivery and health outcomes. The monitoring approach would also enable Amalipe to support the Roma communities they work with to engage effectively in local level policy and governance processes. The actual monitoring was preceded by various community mobilization and organization activities, such as community clean-ups, dramatic reenactments of community experiences with health service delivery, and the formation of community groups for youth, women and traditional leaders to discuss community-related problems and local responses.

Community mobilization and monitoring were undertaken by the local community activists organized within two structures, namely the Community Development Centers (CDCs) and Local Community Development Groups (LCDGs):

- The LCDGs operate at grass-root / village level and organize broad set of community mobilization activities: campaigns, community discussions, cleaning of the neighborhoods, forming voluntary clubs (women clubs, youth clubs, leaders groups), etc. One local moderator is responsible – on voluntary basis – for coordinating the activities of the local group;
- The Community Development Centers operate at municipal level and in every Center two community moderators work. The commu-

²⁰ The project has been funded by the Open Society Institute – New York.

nity moderators are Roma activists from the same municipality with secondary education and proved ability for community work. They coordinate the activities of the Local clubs and organize municipal level advocacy.

These structures prepare the local communities and organize the entire cycle of community monitoring in 2 municipalities and 7 places (5 villages and 2 towns). Two rounds of monitoring (or “community inquiries”) using standardized tools looking at women and children’s health, and emergency medical services were conducted between July and November 2011. Approximately 500 women over age eighteen participated in each inquiry. Results were shared with the municipal coordinators and local activists who were tasked with sharing the results with the community and engaging them in local advocacy. Findings were also presented to the Regional Health Inspectorate, given their oversight role for primary care physicians, and specific issues were raised to improve health service delivery, such as how and whether physicians comply with the professional obligations in their contracts.

Results

Between the two rounds, respondents who could identify their local primary care physician increased from 83% to 94% and those not receiving an annual health check-up decreased from 72% to 60%. In addition, respondents able to access medical examinations free of charge increased from 46% to 58%. However, both inquiries reflected significant problems in access to health care, for example, over 50% of women over 18 years did not have health insurance and payments for services that are supposed to be free, remain prevalent.

One of the strongest achievements of the project has been the mobilization of Roma communities around health, which has resulted in increased demand for annual health check-ups and government guaranteed free services. Amalipe has also seen positive changes in the health system, including more rapid and adequate response times by emergency services to Roma communities. As a result of the advocacy with the Regional Health Inspectorate, they have recognized the problem of the absence of primary care

doctors in Roma communities, an issue identified by community concern and validated through monitoring. The Inspectorate is now exerting greater oversight over contracted doctors to ensure they are present in Roma communities on their assigned days and hours. Through monitoring, problems were also uncovered that cannot be resolved at the local or regional levels, such as lack of access to health insurance for marginalized groups. To address these larger issues, Amalipe plans to advocate with the national Ministry of Health and the centralized Health Insurance Fund for a minimum package of health services for disadvantaged persons. Finally, community monitoring has helped Amalipe connect their advocacy at the national and European Union levels with the direct experiences of Roma communities.

Follow up plans

The power of the type of community monitoring undertaken by Amalipe is its ability to transform the relationship between communities, service providers and decision-makers at the local level. It focuses on community experience as the central indicator for assessing both access to and quality of services. When Amalipe first began community monitoring work, they found it difficult to interest communities in health-related issues because of the significant challenges faced as a result of poverty, lack of education and job opportunities and poor housing. By starting their organizing efforts with community priorities, then slowly introducing health, they were able to overcome this challenge.

Amalipe is now leveraging their monitoring efforts to promote the validity of community experiences to inform policy and practice and secure additional space for civil society and community participation. For example, in early 2011, the Bulgarian national Roma strategy and action plan was approved by the Parliament, but it did not contain provisions for the inclusion of civil society participation and/or community perspectives in monitoring or specify ways to strengthen government's own monitoring mechanisms in the future, Amalipe proposes to expand the community monitoring throughout Bulgaria using a network of community and health-social centers they have established with EU funds. They hope that this strategy will

help ensure that the results of multiple monitoring efforts are relevant for national advocacy.

**Practice 6: Sastipen – Roma Centre for Health Policies, Romania:
“Improving the access of Roma to public health
services”²¹**

The project for applying community monitoring on health care services in Romania was implemented by Sastipen Roma Center for Health Policies. It had three objectives:

1) Empowering the local NGOs and community leaders in order to become a dialogue partner for the local authorities in the process of improving the access of Roma to public health services by using the community monitoring tools.

2) Developing a partnership relation with the local/sanitary authorities at the level of the two localities in order to develop an action plan that would contribute to improving the quality standards of the services provided by the hospitals.

3) Developing and implementing the community monitoring methodology, including the tools (Community Score Card) and a revised mechanism, with the purpose of improving the quality standards of the services provided by the hospitals, adapted to the needs of the Roma community members.

The project has been implemented in 2 localities and a set of activities have been undertaken that have led to the following results:

- one training curricula on the following themes: social determinants in health, right to health, and conducting a community enquiry in two Roma communities: one rural, traditional community and one urban, assimilated community;
- 1 Roma NGO founded in Bicaz locality, Neamt County;

²¹ The project has been funded by the Roma Health Programme of the Open Society Institute.

- Strengthening a team of volunteers from the Roma community in Biczaz;
- Support for newly-founded organization in writing two financing proposals;
- Reactivating a Mixed Workgroup at the level of Neamt County Prefecture and organizing work meetings for supporting and strengthening the local project team in Vanatori.
- 1 IEC campaign on reproductive health and maternal and child health;
- 1 handbook for implementing the campaign and 1 training program on education for health;
- involving and empowering the two mediators who are Roma women (health mediator and school mediator) in the community mobilization process;
- 10 IEC sessions carried out and 30 people informed;
- 1 lobby and advocacy plan for improving the situation of Roma at the level of Neamt county focused on health;
- 2 meetings organized at the level of Neamt PHD on identifying the quality standards;
- 1 policy review on the quality standards of health care provided within hospital units;
- 2 work meetings with the Counselor of the Ministry of Health and the Coordinator of Social Inclusion Unit and Focus point on Roma issues at WHO;
- memorandum for collaboration with the representative of the Government in Neamt County, respectively Neamt Prefecture Institution, responsible for implementing public policies at county level;
- founding a Technical Assistance Commission with the role of ensuring technical assistance and specialized support in order to implement the measures carried out at county level, aiming to improve the access of Roma from the perspective of a comprehensive approach;
- 5 work meetings of the Technical Assistance Commission organized;

- developing a county action plan which would include concrete measures that would be implemented, on increasing the access of Roma to health services;
- 1 public debate organized at Neamt County with the purpose of initiating a discussion regarding the quality standards on health services at the level of Neamt county and to present the county action plan for improving the access of Roma to health services;
- 1 memorandum for collaboration with Bicaz City Hall;
- Organizing the 4 meetings has resulted in strengthening the local mixed working group, but also to empower the role of the two Roma community leaders, thus becoming dialogue partners for the local authorities.
- Change of approach from local level to county level, thus it was changed the paradigm of approaching the Roma issue at the level of Neamt County.
- 2 health profiles for Vanatori and Bicaz communities based on the community enquiries;
- 4 persons trained for collecting data;
- 1 methodology for community monitoring report;
- 2 testimonials that present the experiences on accessing the health services in the absence of Bicaz City Hospital;
- 1 monitoring report on closing down the hospital;
- 1 medico-social center founded in Bicaz locality;
- 5 persons active within the newly-founded medico-social center;
- 1 training stage for the Center's team on methods and techniques for approaching the beneficiary;
- 1 informing campaign on opening the center, a campaign implemented by the center's volunteers;
- 1 conference for launching the center;
- 123 members of Bicaz community, beneficiaries of the services delivered within the center;
- 2 people within Vanatori community, trained and involved in the IEC campaigns carried out at the level of Vanatori community;

- Information materials distributed in the two communities;
- Realizing a series of recommendations on the need to improve the quality standards of the health services provided within hospitals in Neamt County, submitted to Neamt Public Health Authority
- Other results following the advocacy efforts that Sastipen carried out regard the monitoring and documenting of cases of discrimination on restricting the access of Roma women to public health services in Neamt County

SASTIPEN has also investigated 2 cases of human rights violation on access to public health services, submitting the files before the institutions authorized with solving such issues (National Council for Combating Discrimination and Neamt College of Physicians). The cases were also reported in the US State Department's report in the year of 2009. Currently, following the fact that both cases have been won in 2010–2011 before the National Council for Combating Discrimination, Sastipen has initiated 2 actions before the Court of Targu Neamt County with the purpose of repairing the moral prejudice caused to the 2 victims, and also, based on the court's decision, to develop a plan of measures at the level of Tg. Neamt Hospital which would prevent the discrimination against Roma who access health services.

Aside from these legal actions, Sastipen has also initiated an action before the National College of Physicians, a case which has been assigned to Bacau Court of Appeal. Regarding this action, Sastipen aims to obtain an administrative sanction for the respective doctor who discriminated the two Roma women.

Practice 7: Association for emancipation, solidarity and equality of women in Macedonia: Advocating for improved health status of Roma children in Macedonia

Promoting increased coverage of Roma children with preventive health care measures through Health budget monitoring and community monitoring approach

Approach

Since 2009 Association for emancipation, solidarity and equality of women in Macedonia – ESE, in a partnership with a Roma CSO started to implement the concept of Health budget monitoring and advocacy in the activities aimed for increased immunization rates of Roma children in Macedonia. First of all the association have made analysis on the amounts that were allocated for the National action plan for Roma health and the amounts that were spent for the past couple of years. Through this analysis they have found that the amounts allocated for the National action plan were insufficient in 2009, since only 850.000,00 MK Denars were allocated (approximately 13.843 Euro), which is even reduced since 2008 when 1.000.000,00 MK Denars were allocated. This amount was not sufficient according to the costing that was performed for the implementation of the National action plan. Moreover even these funds remained unspent, meaning that the entire amount was not spent for the years 2009 and 2010. That led to conclusion that activities from the National action plan were not implemented at all.

Since the lack of disaggregated data according to ethnicity, the next step of the organization was to determine the actual immunization coverage of Roma children and to define the possible reasons for the lower immunization coverage rate among Roma children. For this purpose the Association has conducted a research including Roma people from 10 municipalities in Macedonia where majority of Roma people live and health workers from the preventive primary health care services. The research showed the discrepancy among the immunization coverage rates, since the immunization coverage among Roma children varied between 33%–81% for different vaccines, in contrary to the national immunization coverage rate of 92%. Through the research they found out that the main reasons for this situation are the following: insufficient distribution of invitations for immunization in Roma communities; lack of outreach services to reach Roma children not attending schools; low levels of knowledge and awareness among Roma parents for the importance of vaccination and for the entire process of vaccination; understaffing in the preventive primary health care facilities, especially in the im-

munization wards and among the preventive teams, which represents obstacle for them to carry out outreach work.

After that they have conducted budget monitoring on the 13 Preventive programs under the Ministry of health with main emphasis on the Program for immunization and Program for active health care of mothers and children, since the last contains outreach activities for health education and for identification of non-immunized children, yet in the period of the analysis 2009–2010 there were no specific activities aimed for Roma communities. With the budget monitoring the Association have found out that from the 13 Preventive programs in 2009 there are unspent funds in amount of 101.535.000,00 MK Denars (approximately 1.653.664 Euros). The information needed for this process was gathered from the publicly available Governmental documents and through submitting requests according to the Law for freedom of information to the Governmental institutions. Then the budget execution data were compared with the allocated funds according to the budgets for each of the Programs and were compared to the costing that Government performs for each of the budget items in the Programs. This analysis provides useful data in order to determine whether the Government allocates sufficient amount of funds and whether these funds are spent according to the planning. If there is no sufficient allocations or certain funds remained unspent it immediately gives signal that certain policies and actions are not properly implemented. That is why this approach can be used by CSOs for holding Government accountable for implementing the adopted policies and actions.

On the base of the gathered data from the research among Roma people the association has drafted the following measures which the Government should adopt:

- Additional patronage nurse visits in Roma communities in order to identify non-vaccinated Roma children provided in the activities and budget of the Program for active health care of mothers and children;
- Educational workshops aimed for Roma parents for child's health and immunization provided in the activities and budget of the Program for active health care of mothers and children;

- Translation of the brochure for immunization on Roma language and its distribution among Roma communities;
- Employment of one patronage nurse in the Primary health centre in the largest Roma municipality – Shuto Orizari.

After drafting these measures they have determined the needed amount of their implementation and have performed costing of the proposed measures. For the measures that should be incorporated in the Program for active health care of mothers and children they have determined that proposed measures will increase the Programs' budget for 2,1%, yet the requested allocation represents only 0,5% of the amount that remained unspent from the 13 Preventive programs in the last year and they have suggested that these funds should be used to cover the proposed measures aimed for Roma communities. This practice of reallocating funds from one Preventive program to another was already established practice in the Ministry of health, which the Association found out through our budget monitoring work. They have made the costing for the employment of one patronage nurse in Shuto Orizari, according to the official data from the Ministry and the Association proposed these funds to be allocated from the Health insurance fund. The costing methods and suggestions for allocation of funds were also enabled from the data collected by the health budget monitoring and analysis process.

The Association used the arguments from the population-based survey and from the budget monitoring work to develop their advocacy strategy for adoption of the proposed measures which was aimed towards the Ministry of health and Ministry of finance. Representatives from these Ministries, as well as representatives from other Governmental institutions connected with health care and Roma issues (like Institute for health care of mothers and children, Institute for public health, Ministry for labor and social policy and Minister without portfolio in charge for the implementation of the Decade for Roma inclusion in Macedonia) were included in the process from its very beginning. They were constantly updated for the findings and proposed solutions. This was of a great importance for implementing the targeted advocacy strategy based on the collected evidence.

Results/Outcomes

As a result of the advocacy strategy the Ministry of health and Government adopted the following measures aimed for Roma communities in the Program for active health care of mothers and children for 2011: 2.476 additional patronage nurse visits in Roma households; 30 health education workshops in Roma communities on the following topics: child's health, immunization, safe motherhood and adolescents health; 50 educational workshops for parents in kindergartens and centers for early child development with special emphasis on Roma parents; translation of the brochure for child's health aimed for parents on Roma language. Each activity was followed with a separate budget item in the Program's budget and proper amount of funds were allocated for each activity. Total of 825.200,00 MK Denars (app. 13.439 Euros) were allocated by the Government for implementation of these measures.

Monitoring of the adopted measures through health budget monitoring and community monitoring

Since 2011 four Roma CSOs – Roma S.O.S from Prilep, KHAM from Delcevo, LIL from Skopje and CDRIM from Shuto Orizari, Skopje, started applying community monitoring approach in order to monitor the implementation of the adopted measures from the Program for active health care of mothers and children, but also to monitor service delivery for Roma people in the immunization wards of the Primary health care centers. Through this approach Roma community will be strengthen regarding their awareness for their rights from the preventive health care measures, but also Roma community will provide feedback regarding the delivery of these services and the quality of the same services. Through this type of monitoring the association will collect data regarding to the coverage of Roma people with these services, accessibility and affordability of the services, treatment of the health professionals towards Roma people and possible obstacles that Roma people face when using these services. The main benefits of the community monitoring approach are the following:

- Roma people (community) are actively involved in the preparation and implementation of the activities;
- Building of increased awareness among Roma community for the importance of the vaccination and preventive health care services;
- Building increased awareness among Roma community regarding their rights to health and health care, with emphasis on the preventive health care services and immunization;
- Roma community members will themselves identify the problems regarding the delivery and quality of the preventive health care services and immunization services;
- Roma community will advocate for improved coverage and improved quality with the preventive health care services.

In the same time the Association has continued to monitor the implementation of the activities and budget execution for the activities aimed for Roma communities from the Program for active health care of mothers and children on national level. This monitoring will provide data regarding the spending of the allocated funds for these activities and implementation of the activities on national level.

Results from both types of monitoring will give full picture for the implementation of the Program on national and local level, but also it will reveal the potential obstacles that Roma people face in using these services. All the findings will be used in an advocacy strategy in order to improve the coverage of Roma people with preventive health care services, but also to improve the quality of the delivered services for Roma people.

Conclusion

Using both approaches i.e. Community monitoring on local level and Budget monitoring on national level will provide overall picture of the implementation and quality of the preventive health care measures aimed for Roma communities. Moreover the community monitoring will provide Roma community's participation in the monitoring and advocacy process and will give the community perspective in the monitoring of delivery of health care services. The budget monitoring process enables to monitor whether the Gov-

ernment is allocating sufficient funds for implementation of different policies and actions, but also to monitor whether the allocated funds were properly spend (for the aim that they were allocated) or not, and to determine why the funds were not spent and for what purposes they were reallocated. Also it enables the CSOs to detect from which budget items additional funds could be provided in order to support new policies and actions or to strengthen and broaden the existing ones. The community monitoring process enables CSOs to monitor whether the services and measures aimed for Roma people are actually reaching this population and to determine whether Roma people are satisfied with the received services.

Using both approaches is useful way for monitoring of public policies and health care services and holding the Government accountable for the provision of the necessary and legally binding health care services especially for marginalized groups of population, like Roma ethnic minority.

RECOMMENDATIONS FOR ROBUST NATIONAL ROMA INTEGRATION STRATEGY MONITORING AND EVALUATION

GENERAL REMARKS

The present recommendations summarize the main conclusions from the Hearing on Monitoring and Evaluation of the National Roma Integration Strategies that took place in Brussels on June 26th, 2012. They aim at suggesting system of robust M&E of the National Roma Integration that is comprehensive, multi-layered and participatory. They aim also to ensure the participation of civil society, independent experts and Roma communities themselves in the process since this is key precondition for the effectiveness not only of the NRIS monitoring but also of the NRIS implementation as a whole.

M&E is crucial for supporting accurate programming processes. Supporting robust M&E process will help to focus on the action plans, to identify specific measures, to develop projects and actions, to establish clear timetables and allocate appropriate funding in order to produce results. In addition, the well-organized M&E will allow evidence based changes and redesign of the action plans for NRIS implementation and of the Strategies themselves.

M&E is not only a process but has a policy dimension; in fact, it will help keeping the work on track and to enable to decide whether the resources are sufficient and are being well used, whether the institutional capacity is sufficient and appropriate or whether actions are being implemented according to plan.

The EU Framework for National Roma Integration Strategies stresses the key role of the national level in the entire process of Roma integration. It calls upon the Member States to put in place “a **robust monitoring mecha-**

nism with clear benchmarks which will ensure that tangible results are measured, that money directed to Roma integration has reached its final beneficiaries, that there is progress towards the achievement of the EU Roma integration goals and that national Roma integration strategies have been implemented”.

That is why the role of and the support to the National Contact Points must be enhanced for a proper M&E. This support to the NCP must to be done both at the EU and at the National level, including means and training capacities. The EC has a key role at this time; it needs to focus in the M&E processes and put this issue at the top of the agenda in its relations to the NCP.

Improving data collection and systems of gathering information is a prerequisite for developing and implementing effective NRIS, and this idea has to remain at the heart of the NRIS.

M&E is not only a public responsibility and a public process, quite the opposite, it needs to be opened to the active participation of civil society, Roma organizations and Roma communities. The EU Framework for NRISs calls upon the Member States to engage civil society and Roma community in the entire NRIS implementation and in its monitoring in particular.

Following all these principles, the participants in the Hearing on Monitoring and Evaluation of the National Roma Integration Strategies agreed on the following recommendations:

1. Methodological framework

The robust monitoring and evaluation of the National Roma Integration Strategies (NRIS M&E) should be comprehensive, multi-layered and participatory. To ensure its effectiveness the M&E needs to be adapted to the particularities of each Member State (MS), used different and complementary methodologies and involve all relevant stakeholders. For ensuring proper methodological framework for NRIS M&E we recommend:

1.1. The EU institutions and other international actors

1.1.1. European Commission:

- to make use and encourage diverse forms of M&E focused on the NRIS's implementation when prepares its annual reports for the Parliament and for the Council such as: shadow reporting, budget monitoring and other forms of civil society watch (carried out by national NGOs, NGO networks or umbrella organizations), expert assessment (carried out by independent experts with proved expertise in the field) and administrative monitoring;
- to request a annual implementation report from each MS reflecting the achievements , challenges and proposed reviews of the NRIS;
- to base the annual implementation report of the NRIS on input from the above mentioned methods of the M&E
- to start a yearly or twice a year -process of review and redesign of the NRIS through direct consultations with the MS and other stakeholders based on the M&E reports submitted by the stakeholders and the annual implementation report of the NRIS (based on the experience of consultations regarding the National Reform Plans);

1.1.2. Fundamental Rights Agency to encourage and help member states to set national M&E framework that incorporates diverse forms implemented by different stakeholders such as: shadow reporting, budget monitoring, watchdog reports (carried out by national NGOs, NGO networks or umbrella organizations), expert assessment (carried out by independent experts with proved expertise in the field) and administrative monitoring.

FRA should also consult and involve the Roma civil society organizations when preparing inquiries and process of research and specially in the process of gathering qualitative information.

1.2. National Contact Points and other Member States institutions

1.2.1. Member states and NCPs to prepare a framework for NRIS M&E. This document needs to include input received during consultations with Roma organizations and leaders and set up the basis of yearly or twice a year reviews and redesigns of the implementation action plans of the NRIS.

The purpose of this framework is to set the main institutional responsibilities and terms in the process of NRIS M&E and the ways different stakeholders could contribute. It should also set the possibilities for redesign of the Action plans for NRIS implementation.

The framework should incorporate diverse forms of M&E implemented by different stakeholders such as: shadow reporting, budget monitoring and other forms of civil society watch-dog reports (carried out by national NGOs, NGO networks or umbrella organizations), expert assessment (carried out by independent experts with proved expertise in the field and with community experience) and administrative monitoring.

The framework should envisage links with the National Reform Programs M&E in terms of aligning tools and timing in order to avoid that these become separated processes;

1.2.2. The National Contact Points (NCP) to establish annual procedure for including contributions from civil society and expert M&E of the NRIS in the annual implementation report of the NRIS .

1.2.3. Member states to set M&E framework at regional and local levels that incorporates forms of grass-root community monitoring for assessing the results of the initiatives and projects implemented in Roma community. We recommend grass-root community monitoring to be especially required for assessing the results of the national initiatives implemented at local level (for example, the so-called “state delegated activities”).

2. Administrative framework

We have insisted that NRIS have to be monitored and evaluated at different levels (European, national and program) and different methods should be used. We also insist that different stakeholders should contribute to this task according to their capacities and competences. For achieving this we recommend:

2.1. The EU institutions and other international actors

The Commission and the FRA to take an active role in the monitoring process through supporting the capacity of Member states in the evaluation process and encouraging the dialogue “national focal point – Roma organizations” in monitoring the NRIS implementation. To fulfil these tasks EC and FRA need to strengthen their administrative capacity to work on Roma integration M&E and should also establish expert network and partnership framework though:

2.1.1. We recommend EC to encourage the use of the Technical Assistance Funds (significantly underused especially by countries with a large Roma population) to fund expert national or regional working groups focused on helping the M&E and implementation of NRISs;

2.1.2. We recommend EC to encourage the creation of a technical secretariat of the European Roma Platform able to act as a clearing house for feed-back from the expert national and regional expert groups (also financed using Technical Assistance Funds). Such a Secretariat should also ensure the much needed steering of NRIS in order to complement the existing EU policies and ensure the alignment with the EU 2020 strategy;

2.1.3. We recommend EC to set network of independent experts to provide feed-back on NRIS implementation in all Member states. This network should function in a way similar to the network of social inclusion experts (maintained by DG EMPL), anti-discrimination experts (maintained by DG JUST), etc. EC could support it financially and methodologically and could ensure that its contributions is taken into account;

2.1.4. FRA should improve its limited internal expertise and establish partnership with European and national Roma NGOs for fulfilling the tasks assigned to FRA by the EU Framework for NRIS. FRA needs to find or/and finance mechanisms able to collect the needed data

2.2. National Contact Points and other Member States institutions

It is crucial for Member States to make progress in the establishment of M&E systems and clarify how these will be carried out taking into account their own realities always within the framework of the wider policy process related to social inclusion and social protection, education, employment and economic development. NRIS need adequate systems of inter-ministerial horizontal cooperation in order to facilitate coherent Roma policies covering key areas of social inclusion. This necessarily must involve different departments and ministries at the national level, but also at the regional and local level according to the respective competencies.

NCPs need to monitor this process and are to be more than just an appointed person or department that require at least three conditions for the effective development of its task: adequate political capacity for leading the process of the implementation of the strategies; institutional capacity in order to enforce horizontal coordination with other departments at the national level as well as vertical coordination with the regional and local level; adequate financial and human resources. To strengthen NCPs' capacities, human resources and mandate, in order for them to put into practice the adequate institutional mechanisms for NRIS M&E we recommend:

2.2.1. Member states to establish Roma integration units in the key institutions related to health, education, employment, social inclusion and living conditions as well as to assign expert/s on M&E in these units. Appointing experts preferably of Roma origin would be significant asset.

We particularly stress the importance of establishing Roma integration unit in the Health care ministries in order to raise the political attention to Roma health integration;

2.2.2. NCPs to assign experts whose main responsibilities to be NRIS M&E. Appointing experts of Roma origin and / or with significant community experience would contribute to capacity building and increase legitimacy of the NCPs;

2.2.3. NCPs to establish formal partnership and working mechanisms (see proposals at the end of the paper) with national Roma NGOs for implementing the tasks of NRIS M&E. NCPs could appoint Roma NGOs to contribute for certain tasks or delegate them.

2.2.4. NCPs to establish and maintain a network of municipal and regional experts to work on Roma integration M&E at regional and local levels. This network should be supported financially, logistically and methodologically by the NCPs. In addition, the experts should use data gathered through community monitoring as one of the main sources of information;

2.2.5. NCPs to assign community-based organizations for organizing community monitoring at grass-root level. The information used from this monitoring should be obligatory used within the other forms of NRIS M&E.

3. Financial framework

Ensuring the necessary financial resources is of crucial importance for establishing robust mechanism for NRIS M&E. Combining funds from programs run directly by EC; ESF, ERDF, EARADP programs at national level; state budgets and other means could back up the variety of M&E forms and the participation of all relevant stakeholders.

For establishing the proper financial framework we recommend:

3.1.The EU institutions and other international actors

3.1.1. To use programs run directly by EC for supporting shadow reporting and other forms of civil society watch-dog reports. PROGRESS, Fundamental Rights and Citizenship, the Second Programme of Community action in the field of Health 2008–2013, the Europe for Citizens Programme 2007–2013 and others could be proper instruments for ensuring the participation of the civil society to the NRIS's M&E.

We recommend special priority “Civil society contribution for NRIS M&E” to be set in PROGRESS program. Project of national NGOs for

preparing contribution to the national M&E system could be supported within this priority;

3.1.2. To encourage Member States to dedicate funds for community monitoring at grass-root level and for civil society M&E in the Operational Programs and Rural Areas Development Programs for the next planning period.

3.1.3. To encourage Member states to ensure in the ESF funded operational programs funds for strengthening the capacity of the NCPs to carry out M&E, including within the technical assistance funds;

3.1.4. To provide funds for and to organize independent expert NRIS M&E as well as to encourage Member States to dedicate funds within the operational programs (see 2.1.2)

3.2. National Contact Points and other Member States institutions

3.2.1. Member states to set financial mechanisms for supporting civil society watch and community monitoring on the social inclusion policy, initiatives and projects: funds from the state budget should be used for this purpose. European funds could be also used if necessary.

3.2.2. NCPs to set financial mechanisms for supporting civil society watch-dog reports and community monitoring on Roma integration and NRIS implementation as well as for supporting contributions from national networks of independent experts: funds from ESF, ERDF and EARADP programs run at national level as well as from the state budget could be used for these mechanisms.

NGOs would be responsible for both kind of contribution. In the case of civil society watch consortium of NGOs that represent larger groups of civil society should be encouraged. In the case of community monitoring participation of community based organizations and community groups (together with NGOs) should be required in order to guarantee that community perspective is the leading one.

We recommend “M&E of the NRIS implementation” to be included as sub-activity to the possible investment priority “Integration of marginalised communities (such as Roma)” or in another investment priority in the new Operational Programs. We recommend also calls for proposals for civil society contributions and community monitoring contributions to NRIS M&E to be announced regularly: consortiums of NGOs and of NGO and CBOs/ community groups would be the eligible applicants;

3.2.3. NCPs to set financial mechanisms for the network of municipal and regional experts to work on Roma integration M&E at regional and local levels;

3.2.4. The Managing Authorities of ESF funded programs to dedicate funds with the technical assistance funds for the NRIS M&E at national level, including for raising the capacity of the NCP and the civil society actors engaged.

Deyan Kolev, editor
**Monitoring and evaluation of the National Roma
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(focus on Bulgaria and Romania)

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