



How to mainstream Roma inclusion in general programmes, projects and interventions

Reinforcing Policy Learning for Roma Inclusion
European Social Fund (ESF) Learning Network

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DISCLAIMER

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Introduction

This handbook has been drafted in the context of the **European Social Fund (ESF) Learning Network "Reinforcing policy learning for Roma inclusion"** (also referred to as **"ESF Roma Inclusion Network"** or **"EU4Roma+ Network"**).

About the ESF Roma Inclusion Learning Network and its activities

The **ESF Roma Inclusion Learning Network** was launched in February 2013 with the aim of increasing the impact and effectiveness of the Structural Funds for Roma inclusion by achieving, through transnational cooperation, greater political commitment to the planning process of the 2014-2020 programming period and ensuring that the lessons learnt during the 2007-2013 programming period are incorporated as policy decisions in this new programming period. The Network reinforces and complements the work done in the context of the **European Network on Social Inclusion and Roma under the Structural Funds (EU4Roma Network)**.¹

Led and co-financed by the Spanish European Social Fund (ESF) Managing Authority (Ministry of Employment and Social Security), the Network consists of the **ESF Managing Authorities and National Roma Contact Points from 8 Member States (Bulgaria, Czech Republic, Greece, Hungary, Italy, Romania, Slovak Republic and Spain) together with European Commission representatives**. The Network's Technical Secretariat is hosted by the **Fundación Secretariado Gitano (FSG)**.

The mainstreaming of Roma inclusion in general programmes was identified by members of the Network as one of the most challenging areas in which further reflection and progress are needed and where exchange of information and mutual learning between participating countries could be beneficial.

Against this background, particular attention has been given to the promotion of debate and reflection on this topic in the context of Network activities, notably through the organisation of a transnational mutual learning workshop focusing specifically on this topic, and the elaboration of this thematic handbook.

¹ Created in 2007 by the Spanish European Social Fund Managing Authority (led jointly with the Fundación Secretariado Gitano (FSG) acting as Technical Secretariat), it aims to promote the efficient use of Structural Funds for the social inclusion of the Roma population. The Network brings together Structural Funds Managing Authorities (principally European Social Funds) and bodies responsible for Roma policies in 12 EU Member States. Detailed information available at: <http://europa.eu/20072013/esf>

The workshop **"How to mainstream Roma inclusion in general programmes, projects and interventions"** gathered on 12-13 January 2015 in Madrid (Spain) representatives of the ECF Managing Authorities, National Roma Contact Points and other relevant stakeholders in the Network partner countries with the aim of looking at key aspects related to the mainstreaming of Roma inclusion in general programmes, projects and interventions funded by ECF Funds.

In particular it aimed to:

- **Review the ECF Funds thematic objectives/investment priorities of relevance for Roma beyond the explicit ESF investment priority on Roma inclusion (investment priority 9.2, "Integration of marginalised communities such as Roma).**
- **Identify how actions under the different ECF Funds thematic objectives may concern Roma inclusion.**
- **Analyse how Roma could be considered in the context of mainstream programmes, projects and interventions related to geographical or thematic areas of relevance for them (e.g. employment, education, access to services or infrastructures, local development...) even if they are not specifically targeted (as Roma or as part of vulnerable groups).**
- **Look at the measures and experiences adopted by different countries that, building upon national and local specificities and the prevailing circumstances of Roma communities in each country, ensure that Roma are considered in general programmes and initiatives.**

The findings and conclusions regarding the approaches used to address Roma inclusion included in the **"Joint report on the use of the Structural Funds for Roma inclusion based on country-by-country meetings"**³¹ drawn up in the framework of the ECF Roma Inclusion Learning Network, served as the basis for analysis and discussion. The report built upon the information gathered in the context of country-by-country meetings gathering key players involved in the planning and implementation of Structural Funds and in the development of Roma policies at national level in each of the eight countries participating in the Network, supplemented with information and data collected through desk-research. The report had a two-fold objective:

- **To take stock of the use made of Structural Funds for Roma inclusion during the 2007-2013 programming period in the eight countries participating in the Network.**
- **To make proposals and recommendations for the 2014-2020 programming period both for the planning process and implementation, based on mutual learning and prior experience of the different countries as well as the lessons learnt during the current programming period (i.e. work done by the ELRoma Network).**

³¹ ECF Learning Network, "Reinforcing Policy Learning for Roma Inclusion" (2014), Joint report on the use of Structural Funds for Roma inclusion based on country-by-country meetings, Available at: <http://ecm.europa.eu/learning-networks/docs/20140131/JR20140131.pdf>

Why focusing on mainstreaming?

With the establishment of the **EU Framework for National Roma Integration Strategies (NRIS) up to 2020** (2017), the European Commission stressed that Member States must make better use of EU Funds for Roma inclusion.

The **EU Recommendation on effective Roma integration measures in the Member States** (2013)¹ stressed that the promotion of social inclusion and combating poverty and discrimination, including inter alia, the socio-economic integration of marginalised communities such as Roma, should be facilitated by the allocation of at least 20% of the total ESF resources in each Member State to investment in people as set out in Articles 3 and 4 of ESF Regulation.

Besides establishing one specific investment priority that focuses on Roma inclusion, the new **ESF Funds Regulations for the 2014-2020 programming period** offer a variety of possibilities to finance initiatives aimed at the social inclusion of Roma. For instance, OPs focusing on thematic objective 8 (Promoting sustainable and quality employment and supporting labour mobility) and thematic objective 10 (Investing in education, training and vocational training for skills and lifelong learning) can tackle Roma needs by developing actions that include the education and employment of vulnerable groups. Additionally, OPs focusing on other objectives, such as thematic objective 2 (Access to, and use and quality of, ICT), thematic objective 5 (Climate change adaptation, risk prevention and management), thematic objective 6 (Preserving and protecting the environment, and promoting resource efficiency), etc. have great potential for reaching Roma people.

Furthermore, in the current ESF Funds regulations, **equality and non-discrimination are considered as horizontal principles to be applied by all the funds**. These principles should contribute to promoting the inclusion of Roma as beneficiaries of the mainstream programmes.

The **ESF Roma Inclusion Learning Network "Joint report on the use of Structural Funds for Roma inclusion based on country-by-country meetings"**² suggested combining approaches (target, mainstream and territorial) in programmes and operations in order to better address Roma needs.

Therefore, this document outlines the initial ideas on how to mainstream Roma inclusion in general programmes, projects and interventions in the 2014-2020 programming period in order to increase the effectiveness of the ESF Funds on Roma inclusion. It builds upon the assumption that targeted and mainstream approaches are complementary in promoting Roma inclusion. Therefore, mainstream programmes should be inclusive of Roma by applying the principle of non-discrimination and Roma needs should be taken into account in the different ESF Funds thematic objectives.

¹ European Commission (2013), Communication "An EU Framework for National Roma Integration Strategies up to 2020". Available at http://ec.europa.eu/justice/policies/antidiscrimination/docs/2013_175_en.pdf

² Council of the European Union (2016), "Council recommendation on effective Roma integration measures in the member states". Available at <http://www.consilium.europa.eu/media/136664/attachment/132022.pdf>

³ Ibid.

Executive Summary

This document focuses on how to make mainstream programmes¹ under the European Structural and Investment Funds (ESI Funds) inclusive of Roma, i.e. how Roma can better access and benefit from the projects and interventions carried out in the framework of the different Operational Programmes (OPs) even where the latter do not target them directly. This paper builds upon the premise that promoting the inclusion of the Roma in mainstream society should be the ultimate aim of all policies and, as a consequence, policies and projects should be inclusive of Roma.

It was drawn up taking account of the use made of EU Structural Funds for Roma inclusion during the 2007-2013 programming period,² identifying potential advances in the ESI Funds Regulations for the 2014-2020 programming period³ and analysing relevant secondary sources. It was enriched with the ideas and debates of the **Transnational Mutual Learning Workshop "How to mainstream Roma inclusion in general programmes, projects and interventions"** organised on 12-13 January 2015 in Madrid (Spain) in the context of the activities of the European Social Fund (ESF) Learning Network "Reinforcing policy learning for Roma inclusion".

This paper is divided into three sections. The first section presents the targeted and mainstream approaches and reviews the approaches used to address Roma inclusion during the 2007-2013 Structural Funds programming period. The second section explains conditions and criteria for making mainstream programmes inclusive of Roma under the 2014-2020 programming period. The third explains how to implement mainstream programmes through the different thematic objectives and mechanisms.

This paper expounds upon the following ideas:

1 Targeted and mainstream interventions are two complementary approaches for effective Roma inclusion. While in the 2007-2013 programming period, Roma were targeted in a higher number of OPs and to a larger extent than before, further efforts are needed to ensure that they are also taken into account and benefit from programmes, projects and interventions not directly targeting them, whether as Roma or as members of vulnerable groups.

2 The 2014-2020 ESI Funds programming period raises the question of how to make mainstream programmes inclusive of Roma, in other words, how interventions under OPs related to geographical areas, thematic objectives and investment priorities of relevance for Roma can have an effective impact on their integration even where Roma are not specifically targeted. An anti-discrimination and equal opportunities approach, flexible and sound criteria and a focus on the key fields of intervention for Roma inclusion (education, employment, access to services including health services and housing) are crucial elements to make this happen.

¹ For the purposes of this paper we will consider as "Mainstream Programmes" those Operational Programmes, projects and interventions aimed at strengthening a capability and/or eradicating Roma specificity.

² Based on the experience of the European Network on Social Inclusion and Roma under the Structural Funds (ENSRIS) Network and the outcomes made in the context of the European Social Fund (ESF) Learning Network "Reinforcing policy learning for Roma inclusion" in the eight countries involved in the Network see http://ec.europa.eu/social/en/initiatives_en/learning-network_en/learning-network-2014-2015

³ European Structural and Investment Funds Regulations 2014-2020
http://ec.europa.eu/eu-ops/en/regional_and_local_development/information/regulations/regulations

3

If mainstream OPs, projects and interventions relevant for Roma inclusion are to have an effective impact, Roma inclusion must be considered in the context of the different thematic objectives and investment priorities addressing areas of specific concern to Roma and not only under the European Social Fund's (ESF) thematic objective 9 (Promoting social inclusion and combating poverty), in particular investment priority 9.2 (Integration of marginalised communities such as Roma). Therefore, the mainstreaming of Roma inclusion can be achieved by ensuring that Roma benefit from:

- OPs focusing on investment priorities under thematic objective 9 other than investment priority 9.2, especially the investment priorities related to active inclusion (number 3), combating discrimination (number 2) and access to services (number 4);
- OPs focusing on other thematic objectives, notably 8 (Promoting employment and supporting labour mobility) and 10 (Investing in education, skills and lifelong learning), especially in the investment priorities "Access to employment, notably youth employment and Youth Guarantee" and "Reducing early school-leaving & promoting equal access to good quality early-childhood, primary & secondary education";
- Projects aimed at local development (urban or rural development) through different means including a community-led local development approach.

4

Other ESF funds thematic objectives (TO) which are especially supported by the European Regional Development Fund (ERDF) and the European Agricultural Fund for Rural Development (EAFRD) are of special relevance for Roma inclusion and should reach the Roma when investing in geographical areas where they live or when operating in key thematic areas important for the promotion of Roma inclusion, such as projects aimed at social innovation (TO 1), projects developing ICT applications for e-learning, e-inclusion, e-culture and e-health (TO 2), projects aiming to promote entrepreneurship including in rural area (TO 3), projects aiming to prevent disaster risks and to manage disasters (i.e. floods) (TO 5), projects aiming to improve the urban environment (TO 6) or projects aiming to promote sustainable transport in urban area by connecting isolated neighborhoods as well as remote rural areas (TO 7). Furthermore, full advantage should be taken of the possibilities offered by the Regulation to combine different ES funds.

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An effective mainstream approach not only requires good intentions but also equipping the Intermediate Bodies and the Managing Authorities with the adequate tools to guarantee the access of Roma and other vulnerable groups to the planned projects. In fact, the Intermediate Bodies and Implementing Institutions may follow different strategies that have demonstrated effective results: e.g. developing projects that are culturally sensitive, adapted, and flexible by responding to particular needs, stabilising measures to facilitate Roma access to and take-up of the services (positive actions, anti-discrimination clauses, prerequisites applicable to the institutions for managing funds, affirmative action, etc.); taking Roma needs into account when there are programmed projects with a territorial approach, etc.

6

Managing Authorities, Intermediate Bodies and National Roma Contact Points have a crucial role to play in the policy cycle of the ESF Funds in order to promote Roma inclusion through mainstream programmes: decisions need to be made more aware that mainstream policies do not always benefit Roma and that there is frequently a gap between planning (good intentions) and implementation (poor achievement). National Roma Inclusion Strategies (NRIS) need to follow a targeted and mainstreaming approach as two complementary approaches for Roma inclusion while ESF Funds have to operate in conjunction with them.

1. Targeted and mainstream: two complementary approaches for Roma inclusion

Experience has shown that mainstream measures by themselves do not reach the majority of socially excluded groups, and this is even more true for groups like Roma who are often far away from the system. On the other hand, countries that have mainly opted for measures exclusively targeting the Roma population have found that in some cases these have led to segregation in public policy and have had limited social impact.

The combined use of mainstream and targeted actions appears, therefore, to be the option most likely to succeed when addressing the socio-economic inclusion of Roma. This balance is reached by combining social policies inclusive of the Roma population with targeted measures to compensate for existing inequalities, thus enabling a sustained social inclusion process.

1.1 Targeted and mainstream: what exactly are we talking about?

'Explicit but not exclusive targeting' and 'aiming for the mainstream' are among the 10 Common Basic Principles for Roma Inclusion (principles 2 and 4 respectively) presented and debated at the first meeting of the Integrated European Platform for Roma Inclusion held in Prague in April 2009 and annexed to the Council Conclusions on Inclusion of the Roma¹.

What do we mean by targeted interventions?

Principle no. 2: Explicit but not exclusive targeting

Explicit but not exclusive targeting of the Roma is essential for inclusion policy initiatives. It implies focusing on Roma people as a target group but not to the exclusion of other people who share similar socio-economic circumstances. This approach does not separate Roma-focused interventions from broader policy initiatives. In addition, where relevant, consideration must be given to the likely impact of broader policies and decisions on the social inclusion of Roma people.

'Explicit targeting' means focusing on Roma and implementing measures specifically tailored to their needs, or focusing explicitly on disadvantaged groups including Roma. 'Explicit but not exclusive' Roma targeting, i.e. focusing on Roma people as a target group without excluding others who live in similar socio-economic circumstances, has proven to be one of the most effective ways of promoting the socio-economic integration of the Roma population. Several countries are including specific measures targeting Roma in their OPs. Explicit targeting requires clear objectives, specific themes, adequate forms of implementation as well as specific forms of reporting, including indicators.

¹ Council of the European Union (2010), "Council Conclusions on Inclusion of the Roma". Available at: <http://www.consilium.europa.eu/media/10666/press/attachments/press/20101210.pdf>

When Roma are excluded or have specific needs, some compensation must be made for their disadvantages in order to ensure that they are able to enjoy the same rights and opportunities as any other citizen.

In practical terms, this can be achieved in different ways including:



The design of projects and policies that focus on Roma as a target group but that are open to and do not exclude other people in similar socio-economic circumstances (e.g. vulnerable groups, people living in deprived areas etc.).



The development of specific projects in geographical areas that are populated by Roma and other ethnic minorities or marginalised groups (e.g. socially disadvantaged neighbourhoods, etc.).

A classical example of a programme targeting Roma

An EU OP focuses on thematic objective 9 (Promoting social inclusion, combating poverty and any form of discrimination) and includes investment priority number 2 (Roma and other marginalised communities). The OP allocates specific resources to develop projects aiming at Roma inclusion in the areas of education, employment, healthcare and access to services. These projects are focused on Roma and aim to enhance their inclusion; they are open to non-Roma (notably vulnerable groups living in similar circumstances or in the same geographical area). The programme develops specific intervention tools, collects data and monitors results measuring the effective impact on Roma.

What do we mean by mainstream interventions?

Principle no. 4: Aiming for the mainstream

All inclusion policies aim to insert the Roma in the mainstream of society (mainstream educational institutions, mainstream jobs, and mainstream housing). Where partially or entirely segregated education or housing still exist, Roma inclusion policies must aim to overcome this legacy. The development of artificial and separate 'Roma' labour markets is to be avoided.

Mainstreaming means taking into account the needs of the Roma in thematic fields or geographical areas covered by different thematic Operational Programmes aimed at all citizens (where relevant). This is one option that Member States may follow in order to develop policies inclusive of Roma people. In fact, promoting the inclusion of the Roma in mainstream society should be the ultimate aim of all policies if their intent is to be inclusive.

This principle, very much related to the previous one, has important implications at the social protection system level. Welfare systems must engage with Roma, just as with the rest of the citizenry, according to their needs. To this end, the key question is the extent to which public services/education systems, health systems, housing policies, incomes and benefits... are inclusive of the Roma and serve to compensate their disadvantages or, in contrast, foster their exclusion.

Yet effective access of the Roma population to mainstream services means providing these services in a flexible manner, to a sufficient extent and adapted to Roma needs in order to avoid discrimination. This would imply different approaches tailored to specific situations and depending on areas of action. It should be stressed that effective access to mainstream services requires that they be adapted to Roma needs and that a lack of adequate adaptation will only further limit Roma's access to mainstream services.

Furthermore, mainstreaming of Roma inclusion should be viewed together with the mainstreaming of other groups. In other words, sometimes it may be better to identify common aspects of other beneficiary groups in order to address Roma needs that also apply to other groups. For this purpose, the non-discrimination and equal opportunity approach is particularly useful.

In practical terms, the mainstreaming approach has two consequences for the implementation of the EU Funds:



Programmes and projects developed in a given field of intervention (i.e. education, employment, health care, housing), or geographical area (i.e. neighbourhoods or rural areas where Roma are being) must lead to the inclusion of the Roma instead of their segregation or to the creation of additional barriers. This means that Roma have to benefit from them according to their needs in order to guarantee equal access and equal enjoyment of mainstream services. This, however, may require specific positive actions, as will be explained later.



Mainstream services need to be adjusted to the diversity of the needs of their beneficiaries, including Roma, which means taking their characteristics into account and putting mechanisms in place that facilitate their access and effective use.

A classical example of a mainstream programme inclusive of Roma

An EGF OP focuses on thematic objective 8 (Sustainable and quality employment and labour mobility) and 10 (Investing in education, training and vocational training for skills and lifelong learning) and includes investment priorities in the area of employment - some of them are related to 8.1 (Access to employment for job-seekers & inactive people), 8.2 (Sustainable integration of young people not in employment, education or training into the labour market) and 8.3 (Self-employment, entrepreneurship & business creation).

The actions developed under these priorities are implemented by the Public Employment Services as the Intermediate Body. Actions and projects are open to all citizens but, in order to facilitate access to the Roma population, the Intermediate and Beneficiary Bodies develop positive measures and specific activities for and with Roma (e.g. information campaigns undertaken by civil society organisations working for Roma inclusion, pre-training activities for Roma further from the labour market, accompanying measures for vulnerable groups, including Roma, etc.). Furthermore, the Managing Authority of the programme guarantees not to discriminate anyone during the OP's implementation and to report regularly, based on process indicators on the actions undertaken, in order to facilitate the take-up of the programme by the Roma.

Targeted and mainstreaming approaches working hand-in-hand

As noted earlier, targeted and mainstreaming approaches should not be considered mutually exclusive but rather as two complementary approaches to promote Roma inclusion. In the absence of these two complementary approaches, social policies and Roma policies may be limited in their aim to achieve Roma inclusion. Furthermore, if they do not complement each other, there is a possibility that they may result in an unintended situation causing further exclusion. A typical example could be a city that provides specific housing programmes for Roma but whose public housing programmes do not take Roma needs into account or set requirements preventing Roma from accessing these public services (e.g. lack of appropriate information, special documentation requirements or no campaigning or preparatory measures).

An example of complementarity between the targeted and mainstream approach

An ESF OP focused on thematic objective 9 (Promoting social inclusion, combating poverty and any discrimination) may include investment priority 1 (Active inclusion) and 2 (Roma and other marginalised communities). In its implementation, the OP may have different Intermediate Bodies and simultaneously develop different types of activities such as:

- Integrated pathways for employability, individualised support, counselling, guidance, access to general and vocational education and training focused on vulnerable groups and inclusive of Roma (adapted information, special individual support, campaigning measures, etc.)
- Specific targeted actions or a specific project developing integrated pathways to the labour market, including individualised support, counselling, guidance and access to general and vocational education and training focused on Roma but also open to people in similar situations. In order to promote Roma inclusion most effectively, the two approaches should complement one other.

Based on previous assessments¹², the following observations can be made with regards to the approaches used to address Roma inclusion under the EU Structural Funds during the 2007-2013 programming period and the lessons learned:

- In the 2007-2013 programming period Member States used different modalities to develop Operational Programmes and projects inclusive of Roma. In general terms, **Member States followed a combination of mainstream (the most common one) and targeted interventions, along with a territorial approach to Roma inclusion.** However, there seems to be much confusion when defining the approaches and how they are implemented in practice. While targeted actions are easy to identify, in many cases it is difficult to recognise whether and to what extent mainstreaming and territorial approaches are benefiting Roma in practice.
- **Roma are considered as an explicit target group/direct beneficiaries or as indirect beneficiaries**, which may benefit from the funding available for socially vulnerable or excluded communities of the OPs. There are **only a few countries in which Roma are not mentioned explicitly or are mentioned in a subtle way**, arguably due to reasons such as tradition, the fact that Roma are not recognised as a minority or that the percentage of Roma is not significant. Nevertheless, this does not mean that Roma have not been beneficiaries of the Operational Programmes in these countries. There seems to be also some discrepancy as regards the conceptualisation of terms such as explicit target group, or direct/indirect beneficiaries, which at the end of the day make the comparison of the country approaches in precise.
- **No major changes are foreseen in this regard** for the upcoming programming period. There seems to be a **positive trend towards a model in which Roma issues are considered with an 'explicit but not exclusive approach'**. Progress has been made regarding the inclusion of Roma as a target group as well as the existence of specific actions for Roma. There appears to be an increasing awareness of the need to mention Roma explicitly in order to ensure that Structural Funds interventions reach them. In most countries Roma are named as beneficiaries in one or several OPs.

However, targeted actions are in many cases limited to certain specific interventions. While welcoming this positive trend towards an "explicit but not exclusive approach", it is **important to bear in mind the need to ensure that Roma also become beneficiaries of other general measures and OPs**. Targeted actions are conceived to compensate existing disadvantages and imbalances, but have a limited impact.
- **For the mainstreaming approach to be effective**, it is very important to develop a detailed planning process identifying how the different actions/foreseen in the OPs will reach Roma, how activities and working methods will be adapted when necessary to Roma needs, how information about results and Roma participation will be gathered and how the active participation of Roma will be guaranteed. Otherwise, there is an evident risk of not reaching Roma despite initial intentions.

In general terms, it is widely acknowledged that there is no single "right" approach; the important thing is to ensure that Roma are effectively reached. There is also a consensus on the need of having a combination of various approaches according to national, regional and local circumstances rather than one single model.

Further efforts are deemed necessary to promote an increased understanding of each of the approaches used and to facilitate the identification on their implementation on the ground. In the case of the mainstreaming approach, further efforts are also needed to ensure that Roma issues are really mainstreamed in the general programmes, and effective achievements in Roma inclusion can and should be monitored and evaluated. It is also crucial to make progress as regards the conceptualisation of terms such as explicit target group, or direct/indirect beneficiaries.

Why mainstreaming Roma inclusion?

Countries following a **mainstreaming approach** believe that:

It is not enough to have thematic OPs with actions theoretically open to all citizens or to merely name the Roma as potential beneficiaries of the interventions.

There is a need to design comprehensive programmes that are adapted to and inclusive of diverse realities and circumstances and tackle all of them in a coherent fashion.

When used properly, programmes under the mainstreaming approach are more inclusive and lead to normalisation, have a higher impact and an easier connection with mainstream services.

What are the potential challenges and risks?

But it is also important to identify the potential challenges and risks of mainstreaming interventions, including:

Failing to reach Roma despite good intentions or even having a perverse effect resulting in the exclusion of Roma from the policies aimed at encouraging inclusion of the most vulnerable groups.

Reduction in potential impact due to a lack of adaptation throughout the process.

Difficulty to monitor the results and impact of programmes on Roma beneficiaries. While it is easy to identify the effective impact of targeted action on Roma, the extent to which mainstreaming programs reach Roma is not so easy to assess.

Examples of modalities used by Member States during the 2007-2013 programming period:

In **Bulgaria**, a scheme called INTEGRA was launched in 2011 combining interventions from the Human Resources Development OP with interventions under the Regional Development OP with Roma as indirect beneficiaries. This approach complemented ESF with ERDF and followed a targeted and mainstream approach. It is foreseen that the INTEGRA scheme continues in the 2014-2020 programming period.

The **Czech Republic** also used a combined approach in which Roma inclusion was mainly addressed by the ESF Human Resources and Employment OP, under which Roma formed a part of vulnerable groups. A specific priority axis targeted Roma explicitly (3.2. Support of the social integration of members of the Roma communities), furthermore, specific continuation was followed in two OPs. However, monitoring and evaluation was a big challenge: even with a priority axis on Roma it was difficult to collect data on the number of Roma that benefited from projects (mainly due to different data collection criteria). For this programming period, the Partnership Agreement does not mention Roma explicitly but refers to "socially excluded groups" or "socially excluded localities" which indicates a trend towards mainstreaming and territorial approaches. In fact, in order to avoid anti-Roma feelings there will not be a priority axis focused exclusively on Roma but rather the opposite: the future intervention introduces a programme with 30 municipalities that have to draft an inclusion plan. Municipalities will have to identify problems and challenges related to exclusion, and by doing so it is likely that Roma inclusion will be one of the priorities to be addressed in these plans.

In **Romania**, the approach to Roma inclusion used in the design of the past OPs was a combination of targeted and mainstreaming approaches, while the territorial approach was not really relevant.

In **Spain**, the approach was a combination of targeted interventions (the most common one) and mainstreaming approach. The targeted approach was followed in the ESF Multiregional OP Fight against Discrimination, while the mainstream approach was followed, to some extent, by the Regional OPs. For the new programming period, the intention is to strengthen the mainstream approach in the Regional OPs. In order to progress in this direction it is planned to strengthen the cooperation between bodies in charge of the ESF Funds and the National Roma Contact Point (NRCF).

In **Italy**, Roma were included within the group of "disadvantaged people" and mainstreamed in general programmes at the national level. At the regional level, some OPs Liguria, Abruzzi and Calabria included Roma as target groups, while in others Roma were considered as part of vulnerable groups. For the 2014-2020 programming period, Italy is considering maintaining the mainstreaming approach while introducing the territorial perspective.

In **Greece**, Roma were considered as part of "socially vulnerable groups", or more specifically "individuals with cultural and religious differences" and were therefore mainstreamed in general programmes. Since there are high concentrations of Roma in certain areas, the territorial approach was applied by regional OPs, considering Roma as one of the vulnerable groups. This combination of mainstreaming and territorial approach is foreseen again for this programming period, e.g. there will be an OP aimed at vulnerable groups, in particular Roma.

The horizontal priority 'Marginalised Roma Communities' used in six OPs in the **Slovak Republic** is a case worth highlighting. With this priority to be respected in all OPs in the 2007-2013 programming period, the government intended to create the preconditions for an efficient use of assistance from the Structural Funds for addressing the problems of 'Marginalised Roma Communities'. Political responsibility for this priority was initially borne by the Deputy Prime Minister for Knowledge Society, European Affairs, Human Rights and Minorities. Later, the Office of the Representative of the Slovak Government for Roma Communities, which is part of the Ministry for Interior, coordinated this priority. In this programming period, the Slovak Republic will change to an integrated approach and prioritise certain geographical areas with a higher concentration of Roma population. This change occurred mainly due to coordination challenges between the different managing authorities included in the same project, which at times caused timing and financial disbursement issues.

Hungary is probably the country where the territorial approach was the most visible since interventions were based on the identification of disadvantaged localities. Roma were mainly featured in the Human Resources Development OP, where there are some interventions explicitly mentioning Roma as part of other disadvantaged groups. For the upcoming programming period, the Human Resources Development OP will continue to include interventions aimed at Roma inclusion; Roma being considered as direct beneficiaries as part of vulnerable groups.

2. Making mainstream programmes inclusive of Roma under the 2014-2020 ESI Funds programming period: opportunities and criteria to consider

All social policies should aim to include the Roma in mainstream society (see Common Basic Principle no. 4) and therefore, Roma inclusion policies have to be integrated in mainstream policies (Common Basic Principle no. 1). These principles apply to the ESI Funds and need to be understood in conjunction with other principles such as 'explicit but not exclusive targeting' (Common Basic Principle no. 2).

In the ESI Funds Regulations for the 2014-2020 programming period, **equality and non-discrimination are considered as horizontal principles to be followed by all the Funds**¹¹. This new step should contribute to promoting the inclusion of Roma as beneficiaries of the mainstream programmes, especially those in the key thematic areas for Roma integration or in geographical areas in which the Roma population is highly represented. The effective engagement of Managing Authorities, Intermediate Bodies and National Roma Contact Points (NRCPs) as well as the adoption of flexible solutions are crucial to ensure the effective implementation of these principles.

2.1

The equality and non-discrimination approach in the Regulations

This section describes the main developments in the 2014-2020 programming period, pointing to the specific references included in the Common Provisions, its Annex I (Common Strategic Framework) and the Implementing Regulation¹². In addition it refers to some of the implications of these Regulations for Managing Authorities, National Roma Contact Points and other relevant stakeholders.

Development 1

"In the context of its effort to increase economic, territorial and social cohesion, the Union should, at all stages of implementation of the ESI Funds, aim at eliminating inequalities and at promoting equality between men and women and integrating the gender perspective, as well as at combating discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation" (Common Provisions, Annexes I).

As a consequence, programmes and projects developed with the support of ESI Funds should be inclusive of Roma and combat Roma discrimination.

¹¹ Regulation (EU) No 1303/2013 of the European Parliament and the Council of 17 December 2013. See <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013R1303&fromDoc=1>

¹² Art.

Development 2

"For the Partnership Agreement and each programme, each Member State shall in accordance with its institutional and legal framework organise a partnership with [...] relevant bodies representing civil society, including environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, gender equality and non-discrimination". (Common Provisions, Article 5)

Equality Bodies can contribute to monitoring the effectiveness of mainstream programmes in relation to Roma inclusion.

Development 3

"The Member States and the Commission shall take appropriate steps to prevent any discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the preparation and implementation of programmes". (Common Provisions, Article 7)

Managing Authorities and National Roma-Contact Points should monitor the planning and implementation of the OPs in order to prevent any form of direct or indirect discrimination towards Roma. When pursuing their objectives, Member States shall describe actions to be taken, in particular with regard to the selection of operations, setting of objectives for interventions, and arrangements for monitoring and reporting.

Development 4

"Each operational programme [...] shall, subject to the Member State's duly justified assessment of their relevance to the content and objectives of the Operational Programmes, include a description of [...] the specific actions to promote equal opportunities and prevent discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the preparation, design and implementation of the Operational Programme and in particular in relation to access to funding, taking account of the needs of the various target groups at risk of such discrimination". (Common Provisions, Article 96, 7, b)

The Operational Programmes should specify the actions to be undertaken to prevent discrimination and to facilitate Roma's access to funding.

Development 5

"The monitoring committee shall examine in particular: (f) actions to promote equality between men and women, equal opportunities, and non-discrimination, including accessibility for persons with disabilities...". (Common provisions, Article 110 1, f)

The Monitoring Committees should examine the actions undertaken in the OPs to prevent discrimination of Roma.

Development 6

"The annual implementation reports submitted in 2017 and 2019 may, depending on the content and objectives of operational programmes, set out information and assess the following [...] the specific actions taken to promote equality between men and women and to prevent discrimination, in particular accessibility for persons with disabilities, and the arrangements implemented to ensure the integration of the gender perspective in the operational programme and operations". (Common provisions, Article 111.4.e)

The implementations reports in 2017 and 2019 could specify the actions undertaken to prevent discrimination of Roma.

Development 7

"Member States shall assess in accordance with their institutional and legal framework and in the context of the preparation of the programmes and, where appropriate, the Partnership Agreement, whether the ex ante conditionalities laid down in the respective Fund-specific rules and the general ex ante conditionalities set out in Part II of Annex XI are applicable to the specific objectives pursued within the priorities of their programmes and whether the applicable ex ante conditionalities are fulfilled". (Common provisions, Article 19)

Member States could foster the administrative capacity of the Equality Bodies as part of their mission to combat Roma discrimination.

Additionally to aforementioned developments, **Article 8 of the ESF Regulation** focuses on the promotion of equal opportunities and non-discrimination and states that:

"Member States and the Commission shall promote equal opportunities for all, without discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation through mainstreaming the principle of non-discrimination, as referred to in Article 7 of Regulation (EU) No 1303/2013. Through the ESF, the Member States and the Commission shall also support specific actions within any of the investment priorities referred to in Article 3, and in particular Article 3(3)(b)(i) of this Regulation. Such actions shall aim to combat all forms of discrimination as well as to improve accessibility for persons with disabilities, with a view to improving integration into employment, education and training, thereby enhancing social inclusion, reducing inequalities in terms of educational attainment and health status, and facilitating the transition from institutional to community-based care, in particular for those who face multiple discrimination."

Criteria, conditions and options for an inclusive approach in mainstream programmes

Key criteria for an inclusive approach

Experience has taught us that if we truly intend to make mainstream programmes inclusive of Roma, declaring that 'services are open and equally accessible to everyone' is not enough; mainstream services need to be adapted to the Roma needs in order to work effectively.

In the framework of the Europe 2020 Strategy, the European Commission has stressed the need for substantial reforms in social protection systems and social policies by steering them towards social investment and better adaptation to people's needs¹⁷.

The **Social Investment Package (SIP)** insists on the need for simplification of services in order to gain efficiency. The need for efficient social policies is related to easier access to services, including the one-stop-shop approach. This implies avoiding duplications, eliminating overlapping services provided by different administrations, enhancing coordination, reducing administrative complexity and facilitating easy take-up. The SIP also insists on the need for better targeted social policies in order to provide adequate and sustainable social protection systems; in the case of Roma, simplified and better targeted services implies making adaptations to facilitate access with the aim of guaranteeing full access to and use of services.

Application of the Social Investment Package to Roma inclusion means that ESI Funds Operational Programmes will have to:

Follow an equality approach in the provision of services while understanding that equality also requires cultural sensitivity, adaptation and flexibility when responding to particular needs;

Remove barriers (economic, social and cultural barriers, physical distance, rules and practices) that impede Roma community access;

Be primarily focused on needs and practical results, rather than on regulations;

Link specific services targeting Roma (where these exist) with mainstream services in order to avoid overlapping; targeted action projects should lead to normalisation and form part of a transitional process;

Avoid measures leading to segregation (i.e. special housing and neighbourhoods, Roma concentration in schools...)

¹⁷ European Commission (2013), Communication 'New Deal for Growth and Jobs' – including implementing the European Social Fund 2014-2020 Available at <http://ec.europa.eu/social/ssi/index.cfm?id=55020>

Ways of making the inclusive approach effective

As explained above, most Member States participating in the ESF Roma Inclusion Learning Network intend to follow a mainstream approach in the 2014-2020 programming period and to address Roma inclusion in different OPs. The question remains whether this will be effective if adequate conditions are not being created from the planning phase onwards. In fact, following an effective mainstream approach requires not only having the intention but also effectively providing the Intermediate Bodies and Managing Authorities with adequate tools that will guarantee that Roma can access the projects.

In order to ensure the take-up of Roma in the Operational Programmes and projects in the key areas for inclusion (projects focused on education, employment, social inclusion, housing and urban regeneration, etc.), and to guarantee equal opportunities and avoiding direct or indirect discrimination, **the Intermediate Bodies and implementing institutions may follow different strategies that have proven effective with Roma and with other groups.**



Establishing anti-discrimination clauses or prerequisites that must be met by organisations to access EU Funds

In order to facilitate Roma access to mainstream programmes, **organisations that intend to access EU Funds can be called on to meet certain conditionalities such as:**

- ✓ To have an anti-discrimination plan focused on Roma or groups at risk of discrimination.
- ✓ For OPs focusing on urban regeneration or housing, to demonstrate that funds will not contribute to any form of physical segregation, but rather the opposite.

Experience in several countries has shown that explicit reference to the Roma situation in policy documents can be key in mobilising important players and maximising the effectiveness of mainstream interventions. Therefore, **it is proposed here that Member States and other stakeholders insert explicit references to Roma in key policy documents in relation to the social inclusion goals relevant to their situation.**

Examples:

In the 2007-2013 programming period, the Government of **Hungary** established as a prerequisite for municipalities receiving EU Funds to have an anti-segregation plan for Roma.

The **Romanian** Government intends to follow a similar approach in the current programming period at the request of the National Council for Combating Discrimination (NCCD).

In the **Czech Republic**, an OP will focus on 70 municipalities that will have to draft an inclusion plan in coordination with the Agency for Social Inclusion before applying for ESF funds. The following criteria will be applied when choosing municipalities: localities/municipalities with high concentrations of socially excluded population will be targeted (the presumption is that Roma live in those areas). The Agency for Social Inclusion is in charge of pre-evaluating the municipalities that will participate in the programme and working in close cooperation with them. The inclusion plans need to include a section on context and specific problems. While this is not a targeted approach, by identifying problems, municipalities are likely to have Roma inclusion as one of the priorities to be addressed in these plans. Another challenge is to ensure equal opportunities among different vulnerable groups as this has an impact on the criteria used in selecting projects in the calls for proposals.

Facilitating access to and take-up of services

Many Roma frequently find it difficult to access mainstream programmes and services. There are a number of reasons for these problems: lack of information, expired/irregular documentation, difficulty in understanding requirements, geographical distance, etc. As a result, many Roma do not benefit from the services as they should, despite having the right to do so. As a consequence, the equal opportunity principle is not guaranteed creating disadvantages from the very outset. Mainstream programmes can undertake measures to prevent this situation and facilitate Roma access. Successful experiences in this regard include:

- ✓ Providing direct tailored information
- ✓ Making access requirements more flexible
- ✓ Working with civil society organisations working to promote Roma inclusion

Examples:

Greece will develop a **"Local Partnerships" programme** which aims to identify people with specific needs in order to provide them with specific services (done from a mainstreaming point of view) through community centres that focus on referring vulnerable people to suitable and appropriate needs-based services. Such an approach is particularly important to avoid duplication of services and to better match services to people's needs.

Developing transitory processes and adapting services through positive action

A classic problem affecting many services and Structural Funds projects in the areas of employment, education and inclusion is that despite their intention to reach Roma they are unable to do so due to the gap that lies between the services provided and the situation of the Roma. Positive action to compensate disadvantages is needed to remedy this situation.

Taking the **area of education** as an example, it is widely accepted that 'special' schools or Roma schools are neither desirable nor recommendable; therefore, mainstreaming Roma in the school system implies adapting public education services. However, the level of adjustment and degree of flexibility required differs according to the circumstances of each situation and form of exclusion. For example, in an urban or suburban context, this may imply establishing dispersion criteria for Roma students or the provision of compensatory services; Roma living in neighbourhoods that are isolated from urban areas may require transportation services; Roma migrants may require language training and Roma travellers more flexible school enrolment rules.

Specific strategies to adapt general services are also needed in other areas of intervention in order to facilitate access to **health services** (e.g. different needs depending on the group in question), to **employment services** (e.g. different degrees of qualification and skills, labour market situations etc.) and to **public housing** (e.g. income levels, criteria for access etc.)

It is important to emphasise that services should always lead to normalisation (to avoid duplication). Services targeting Roma must be linked to and complement general services while aiming to facilitate Roma access to them. However, the extent to which adapted services truly lead to normalisation and are complementary to global services depends on the approach chosen, the context, type of situation and group.

Examples:

In the area of health, a **health mediation service** in an urban Roma neighbourhood may act as a go-between to facilitate Roma access to mainstream public health services (e.g. Navarra in Spain) while **medical-social centres** for Roma in remote settlements (e.g. Greece) will take longer but may help give Roma access to mainstream health services by remaining connected to the nearest urban medical centre and, whenever possible, by including transport services for patients. In Slovakia there is a **public procurement initiative** that aims to promote access to employment for vulnerable groups, especially Roma.

Establishing affirmative action

Affirmative action is intended to promote opportunities for defined minority groups within a society giving them access on an equal footing with the majority population. It is often instituted in government and educational settings to ensure that certain designated minority groups are included "in all programmes". The stated justification for affirmative action is that it helps to compensate for past discrimination, persecution or exploitation by the ruling class of a culture, and to address existing discrimination.

The classical affirmative action approach is to establish legal quotas for access to certain services and programmes. Affirmative action is more common in certain areas i.e. to guarantee gender equality.

Given the gap between Roma and the rest of the society, especially in some areas, and the difficulties they face in accessing mainstream programmes and services, affirmative action can contribute to compensating disadvantages and combating discrimination, especially in areas such as education.

3. How to mainstream Roma inclusion through different thematic objectives and mechanisms

In the previous sections we stressed that EU Funds can contribute to Roma integration both by supporting specific targeted measures and by addressing Roma in mainstream programmes. In this section we will first review the main areas of intervention to promote Roma inclusion; we will then analyse how mainstream programmes under the different thematic objectives and investment priorities could be inclusive of Roma; lastly we will make some practical recommendations to address Roma inclusion throughout the different phases of the programme project cycle, namely planning and design, management and implementation, monitoring and evaluation.



The principal risk that should be avoided is limiting interventions targeting Roma inclusion to only investment priority 2 (Integration of marginalised communities such as the Roma) of thematic objective 9 (Promoting social inclusion, combating poverty and any form of discrimination).

It is therefore of the utmost importance to ensure that Roma benefit from programmes under other investment priorities and thematic objectives/in particular thematic objectives 8 (Promoting employment and labour mobility) and 10 (Investing in education, training and vocational training for skills and lifelong learning).

In its **Communication "An EU Framework for National Roma Integration Strategies up to 2020"** the European Commission stressed the key areas for Roma integration: access to education, employment, health-care, housing and essential services.

In access to education, the challenge is to ensure that all Roma children complete at least primary school.

Member States should ensure that all Roma children have access to quality education and are not subject to discrimination or segregation, regardless of whether they are secondary or not. Member States should, as a minimum, ensure primary school completion. They should also widen access to quality early childhood education and care and reduce the number of early school leavers from secondary education pursuant to the Europe 2020 strategy. Roma youngsters should be strongly encouraged to participate also in secondary and tertiary education.

In access to healthcare, the challenge is to reduce the health gap between the Roma and the rest of the population.

Member States should provide access to quality healthcare especially for children and women as well as preventive care and social services at a similar level and under the same conditions to the Roma as to the rest of the population. Where possible, qualified Roma should be involved in healthcare programmes targeting their communities.

In access to employment, the challenge is to reduce the employment gap between Roma and the rest of the population.

Member States should grant Roma people full access in a non-discriminatory way to vocational training, to the job market and to self-employment tools and initiatives. Access to micro-credit should be encouraged. In the public sector, due attention should be given to employment of qualified Roma civil servants. Public Employment Services can reach out to the Roma by providing personalised services and mediation. This can help attract Roma to the labour market and thus increase the employment rate.

In access to housing and essential services, the challenge is to reduce the gap between the percentage of Roma with access to housing and to public utilities (such as water, electricity and gas) and that of the rest of the population.

Member States should promote non-discriminatory access to housing, including social housing. Action on housing needs to be part of an integrated approach including, in particular, education, health, social affairs, employment and security and segregation measures. Member States should also address the particular needs of non-sedentary Roma and provide access to suitable halting sites for non-sedentary Roma. They should actively intervene with targeted programmes involving regional and local authorities.

The "Council Recommendation on effective Roma integration measures in the Member States" calls on Member States to implement effective policy measures to ensure equal treatment and respect of the fundamental rights of Roma in the four areas mentioned above and to provide detailed actions for each of them.

The Council stressed that these goals could be achieved either by means of mainstream measures or by means of targeted measures, including specific measures to prevent or compensate for disadvantages, or by a combination of both, paying special attention to the gender dimension [...] or by focusing on geographical areas that are marginalised and/or segregated.

As regards the ESF Funds, the Recommendation calls for:

1. Facilitating the promotion of social inclusion and combating poverty and discrimination, including, *inter alia*, the socio-economic integration of marginalised communities such as Roma, by the allocation of at least 20% of the total ESF resources in each Member State to investment in people.
2. Taking appropriate measures to include Roma integration among the priorities in the Partnership Agreements on the use of the ESF funds for the period 2014-2020 (depending on the national situations).
3. Improving the management, monitoring and evaluation capacities of public administrations and other stakeholders with the support of the ESF Funds Technical Assistance as well as facilitating the use of national and EU funds to support capacity building for local authorities and civil society organisations so that they can effectively implement projects.
4. Involving relevant representatives and stakeholders as regards Partnership Agreements and Operational Programmes co-financed by the ESF funds (in the framework of the National Roma Integration Strategies).

3.2 Including Roma in the different thematic objectives and investment priorities

As highlighted above, in addition to developing targeted projects under investment priority 9.2 "Integration of marginalised communities such as the Roma", Roma can benefit from mainstream programmes and projects under other thematic objectives and investment priorities. The following section provides an overview of some relevant areas and potential forms of intervention from which Roma could benefit in mainstream OPs. Success depends on programmes and projects following the aforementioned criteria (see chapter 2.2 Criteria, conditions and options for an inclusive approach in mainstream programmes).

From the following list, a number of areas of special interest for mainstreaming Roma inclusion can be highlighted:

- 1 Ensuring that Roma benefit from OPs focusing on thematic objective 9 but under investment priorities other than investment priority 9.2. (Integration of marginalised communities such as the Roma), especially in terms of investment priorities related to active inclusion, combating discrimination and access to services

INVESTMENT PRIORITIES	MAINSTREAM PROGRAMMES AND PROJECTS WHERE ROMA CAN BENEFIT
Active inclusion (no. 1)	Programmes aiming at the inclusion of vulnerable groups through the provision of income and support in access to employment and adequate services.
Combating all forms of discrimination (no. 2)	Programmes aiming to combat discrimination and promote equal opportunities.
Enhancing access to services (no. 4)	Programmes enhancing access to affordable, sustainable and high-quality services, including health care and social services of general interest, including investing in health and social infrastructures. Programmes providing support for physical, economic and social regeneration of deprived communities in urban and rural areas.
Promoting social economy and social enterprises (no. 10)	Programmes providing support for social enterprises and the social and solidarity economy in order to facilitate access to employment.

2

Ensuring that Roma benefit from OPs focusing on other ESF thematic objectives, notably 8 and 10, especially under the investment priorities "Access to employment for job-seekers and inactive people, including the long-term unemployed and people far from the labour market, also through local employment initiatives and support for labour mobility" and "Reducing and preventing early school-leaving and promoting equal access to good quality early-childhood, primary and secondary education including formal, non-formal and informal learning pathways for reintegrating into education and training"

THEMATIC OBJECTIVES	MAINSTREAM PROGRAMMES AND PROJECTS WHERE ROMAS CAN BENEFIT
<p>Promoting sustainable and quality employment and supporting labour mobility (no. 8)</p>	<p>Programmes providing tailored job search assistance and employment services, supporting transitional public work schemes combined with education, supporting a first work experience and on-the-job training as well as social enterprises employing people in situations of exclusion or providing them with specific services.</p> <p>Programmes supporting self-employment, entrepreneurship and business creation, supporting local development initiatives and assistance for structures providing neighbourhood services to create jobs.</p> <p>Programmes aiming at sustainable integration of young people into the labour market, in particular those not in employment, education or training, including young people at risk of social exclusion and young people from marginalized communities, including through the implementation of the Youth Guarantee.</p>
<p>Investing in education, training and vocational training for skills and lifelong learning (no. 10)</p>	<p>Programmes aiming to reduce and prevent early school-leaving and promoting equal access to good quality early-childhood, primary and secondary education, including formal, non-formal and informal learning.</p> <p>Programmes improving the quality and efficiency of, and access to, tertiary and equivalent education with a view to increasing participation and attainment levels, especially for disadvantaged groups.</p> <p>Programmes enhancing equal access to lifelong learning for all age groups in formal, non-formal and informal settings, and promoting flexible learning pathways including through career guidance and validation of acquired competences.</p> <p>Programmes facilitating the transition from education to work, development of work-based learning systems, including dual learning systems and apprenticeship schemes.</p>
<p>Enhancing institutional capacity of public authorities and other stakeholders (no. 17)</p>	<p>Programmes fostering capacity-building for all stakeholders delivering education, lifelong learning, training and employment and social policies.</p>

3 Ensuring that Roma benefit from OPs implementing the Youth Guarantee and supporting youth employment.

4 Ensuring that Roma benefit from other ESI Funds thematic objectives which are supported notably by the European Regional Development Fund (ERDF) and the European Agricultural Fund for Rural Development (EAFRD), which could be of special relevance for Roma inclusion and should reach the Roma when investing in geographical areas where they live or when operating in key thematic areas important for the promotion of Roma inclusion:

THEMATIC OBJECTIVES	MAINSTREAM PROGRAMMES AND PROJECTS WHERE ROMAS CAN BENEFIT
Strengthening research, technological development and innovation (no. 1)	Projects aiming at social innovation.
Enhancing access to, and use and quality of, ICT (no.2)	Projects aiming to provide ICT services in remote areas. Projects developing ICT applications for e-learning, e-inclusion, e-culture and e-health.
Enhancing the competitiveness of SMEs (no. 3)	Projects aiming to promote entrepreneurship, including in rural areas.
Supporting the shift towards a low-carbon economy in all sectors (no. 4)	Projects aiming to support energy efficiency in the housing sector (social housing) by combining energy poverty.
Promoting climate change adaptation, risk prevention and management (no.5)	Projects aiming to prevent disaster risks and to manage disasters (i.e. floods).
Preserving and protecting the environment and promoting resource efficiency (no. 6)	Projects aiming to invest in the waste sector. Projects aiming to improve urban environment.
Promoting sustainable transport (no. 7)	Project aiming to promote sustainable transport in urban by connecting isolated neighbourhoods as well as in remote rural areas.
Enhancing institutional capacity of public authorities and stakeholders and efficient public administration (no. 11)	Programmes fostering capacitybuilding for all stakeholders delivering education, lifelong learning, training and employment and social policies.

5

Ensuring that Roma benefit from projects aiming at local development (urban or rural) through different means, among others, by a community-led local development approach and Integrated Territorial Investments

FORMS OF INTERVENTION

Community led local development	Community-led local development focused on areas or neighbourhoods where Roma and other groups are living
Integrated territorial investment	Projects aiming to develop integrated territorial investment in urban or rural areas where Roma and other groups are living
Major projects	Major projects that include areas or fields where Roma can benefit
Joint action plan	Action plans that include areas or fields where Roma can benefit

3.3

Acting through the management cycle: practical recommendations

Certain criteria must be followed and attention given to the entire cycle of the ERD Funds if Roma are to be included in mainstream programmes. Despite good intentions, many institutions fail to do this properly. This is sometimes due to the lack of appropriate adaptation or adjustment of programmes, projects and interventions, or because they fail to pay sufficient attention to critical issues of the management cycle. The following section presents some practical recommendations to address the potential challenges that may emerge in the different phases of the programme and project cycle as well as a Checklist focusing on the critical elements to be taken into account.

Ways of making the inclusive approach effective

In the conception and design phase of the Operational Programmes, projects and interventions, it is important to pay attention to:

- Monitoring how Roma will be considered in the mainstream programmes in the Partnership Agreement (i.e. as regards meeting ex ante conditionalities and the horizontal principle of equality and non-discrimination).
- Explaining how the different Operational Programmes will deal with Roma needs when addressing different issues and areas of intervention.
- Explaining which measures will be undertaken to guarantee the implementation of the horizontal principle of equality and non-discrimination.
- Proposing operations (based on the catalogue of operations) that can address Roma needs.
- Disaggregating, whenever possible, the data to be collected on Roma and based on sets of indicators (operation indicators and result indicators).
- Consulting stakeholders, including the civil society organisations working to promote Roma inclusion.
- Involving and consulting with the National Roma Contact Points in the planning and design of the OPs relevant to Roma inclusion.
- Involving stakeholders, including Equality Bodies and the organisations working for Roma inclusion, in the Monitoring Committees.

In the management and implementation phase of the Operational Programmes, projects and interventions, it is important to pay attention to:

- Guaranteeing access of Roma as beneficiaries to the different measures and actions using different means such as antidiscrimination clauses, effective take up, compensatory measures, transition processes, affirmative action measures, etc.
- Involving the civil society organisations working to promote Roma inclusion in the design and implementation of operations.
- Collecting data on the beneficiaries of the projects, including data disaggregated by ethnicity, with the proper safeguards in place.
- Including social classes in public procurement.
- Following inclusive criteria in the implementation of actions as well as in the communication and dissemination of results.
- Training staff working in the OP projects with regard to Roma needs and cultural sensitivity and building capacity of institutions by using technical assistance and other means.

In the monitoring and evaluation phase of the Operational Programmes, projects and interventions, it is important to pay attention to:

- Including civil society organisations promoting Roma inclusion in the Monitoring Committees where relevant.
- Including a reference to how Roma have participated in the programmes in the annual implementation reports.
- Including Equality Bodies in the Monitoring Committees where relevant.
- Including a database with indicators on Roma results in the annual reports.
- Including how the principle of equality and non-discrimination is being implemented on the agenda of the Monitoring Committees.
- Reporting on the results and specifying Roma targets and the extent to which existing gaps have been reduced.

Checklist for effective mainstreaming

- Managing Authorities, Equality Bodies and National Roma Contact Points monitor the planning and implementation of the Operational Programmes in order to prevent any form of direct or indirect discrimination towards Roma.
- Relevant Operational Programmes specify the actions to be taken to facilitate Roma access to funding.
- Roma benefit from Operational Programmes that focus on thematic objective 9 but under an investment priority other than "Integration of marginalised communities such as the Roma", especially under investment priorities focusing on active inclusion, combating discrimination and access to services.
- Roma benefit from Operational Programmes under thematic objectives 8 and 10, especially through investment priorities "Access to employment for job-seekers and inactive people" and "Reducing and preventing early school-leaving and promoting equal access to good quality early childhood, primary and secondary education."
- Roma benefit from Operational Programmes implementing the Youth Guarantee and supporting youth employment.
- Operational Programmes, projects and interventions in which Roma could be potential beneficiaries are culturally sensitive, adapted, and flexible by responding to particular needs.
- Measures are established to facilitate Roma access to and take-up of services (positive actions, anti-discrimination clauses, prerequisites applicable to institutions managing funds, affirmative action, etc.).
- Roma needs are taken into account in programmes and/or projects with a territorial approach.
- Roma benefit from projects aiming at different types of local development (urban or rural), i.e. community-led local development, urban development, etc.

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