



How to monitor and evaluate Roma-related initiatives under Structural and Investment Funds

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 '*EURoma+ 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 (EURoma 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)**.

Monitoring and evaluation of Roma-related initiatives 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 and the elaboration of this thematic handbook.

¹ Created in 2007 by the Spanish European Social Fund Managing Authority (lead partner) and 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 Fund) and bodies responsible for Roma policies in 12 EU Member States. Detailed Information available at: <http://www.euromanet.eu>

The **workshop “How to monitor and evaluate Roma-related initiatives under European Structural and Investment Funds”** gathered on 13-14 November 2014 in Madrid (Spain) representatives of the ESF Managing Authorities, National Roma Contact Points and other key actors in the process of monitoring and evaluation in the Network partner countries as well as at European/international level (i.e. Agency for Fundamental Rights and World Bank).

The objective of the workshop was to look at key aspects related to the monitoring and evaluation of programmes and projects funded by ESI Funds targeting Roma, including the collection of data (notably data on ethnic origin) and the establishment of clear and measurable indicators (a requirement under the 2014-2020 ESI Funds Regulations).

In particular it aimed to:

- **Present the current framework as regards monitoring and evaluation under ESI Funds Regulations**, including the main mechanisms available (annual reports, evaluations, monitoring committees...)
- **Provide an overview of initiatives currently being implemented by different stakeholders at national and European level** as regards monitoring and evaluation mechanisms and the definition of indicators (e.g. Fundamental Rights Agency and World Bank).
- **Analyse initiatives and tools that Member States used in the 2007-2013 programming period or are planning to use in the 2014-2020 period**, focusing on the challenges encountered and the possible ideas to overcome them.
- Based on the review of experiences and discussion, **identify possible approaches to achieve effective monitoring and evaluation** of Roma-related initiatives.

The findings and conclusions regarding “monitoring, results and impact” included in the **“Joint report on the use of the Structural Funds for Roma inclusion based on country-by-country meetings”²** drawn up in the framework of the ESF 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 EURoma Network).

² ESF 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://www.euromanet.eu/resource_center/archive/105839.html

Why focusing on monitoring and evaluation?

Monitoring and Evaluation (M&E) is an essential part of the policy process, as it provides evidence of both the efficiency and adequacy of the respective policies and consequently allows for readjustments in order to ensure that a certain policy is achieving the desired results. Furthermore, M&E is becoming much more relevant in the new programming period of the ESI Funds.

During previous programming periods (2000-2006 and 2007-2013), major concerns were expressed about the absence of information on the extent to which Structural Funds were reaching the Roma and, what is more important, on the effective impact of these Funds on Roma inclusion. The **critical issues of this debate were the difficulty of gathering data based on people's ethnic origin, the lack of disaggregated information on Roma and the absence of specific indicators.**

With the establishment of the **EU Framework for National Roma Integration Strategies up to 2020**³, 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)⁴ stressed the need to make better use of the ESI Funds for Roma inclusion as well as on the need to strengthen the monitoring and evaluation mechanisms of these funds when referring to Roma.

The **ESI Funds Regulations for the 2014-2020 programming period** not only offer a variety of possibilities to finance initiatives aimed at the social inclusion of Roma, but also establish a specific Investment Priority which focuses on Roma inclusion (Investment priority 9.2. *Integration of marginalised communities such as the Roma*). Furthermore, the Regulations are much more explicit as regards the need to improve monitoring and evaluation systems. As the new programming period of ESI Funds 2014-2020 is about to conclude its first year of programme design, a stronger focus on results-orientation is expected, particularly in the new Operational Programmes that have been or are about to be approved in all Member States.

While there is broad agreement on the appropriateness of these recent policy developments aimed at fostering the social inclusion of Roma, the efficiency of these policies has been a big topic of debate. Furthermore, the absence of data and information on the impact of ESI Funds on Roma inclusion does not make a positive contribution to this debate. This highlights the importance of monitoring and evaluation in the policy process which should provide answers to the following questions: **Are Roma inclusion policies achieving their goals? Are the measures implemented adequate and efficient?** Furthermore, and given the context and target audience of this paper, **how can ESI Funds contribute to the adequate and efficient implementation of Roma inclusion policies?**

³ European Commission (2011), Communication "An EU Framework for National Roma Integration Strategies up to 2020". Available at: http://ec.europa.eu/justice/policies/discrimination/docs/com_2011_173_en.pdf

⁴ Council of the European Union (2013), "Council recommendation on effective Roma integration measures in the member states". Available at: http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/139979.pdf

Naturally, there is no one-size-fits-all solution to these questions. The **ESF Roma Inclusion Learning Network "Joint report on the use of Structural Funds for Roma inclusion based on country-by-country meetings"**⁵ suggests that:

Progress in the 2014-2020 programming period could be made by:

- advancing towards a model combining different options (setting indicators in programmes disaggregated by ethnic origin, evaluations and context analysis),
- reinforcing transnational cooperation in this field, and
- considering the support and guidance of the European Commission or specialised bodies such as the Fundamental Rights Agency (FRA).

The report also highlighted that key challenges faced by Managing Authorities in the previous programming period included coming up with indicators for data collection and the collection of data on ethnic origin. Furthermore, the report identified several shortcomings as regards evaluations and analysis of context and impact on the ground (e.g. many countries limited evaluations to the compulsory ones and only some countries produced poverty maps).

Thus, this document outlines the preliminary ideas on how monitoring and evaluation instruments established under the new regulatory framework can provide better information on the effective impact of ESI Funds on Roma inclusion.

⁵ *ibid.*

Executive Summary

This report focuses on **how to improve the Monitoring and Evaluation (M&E) of Roma-related initiatives under European Structural and Investments Funds (ESI Funds).**

It has been drawn up taking into account the monitoring and evaluation practices used during the 2007-2013 programming period,⁶ identifying potential advances in the ESI Funds Regulations for the 2014-2020 programming period⁷ and analysing relevant secondary sources. It was enriched with the ideas and debates of the **Transnational Mutual Learning Workshop "How to monitor and evaluate Roma-related initiatives under European Structural and Investment Funds"** held on 13-14 November 2014 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 provides an overview of monitoring and evaluation practices in the 2007-2013 programming period and presents the challenges and opportunities for enhancing effective monitoring and evaluation of ESI Funds to promote Roma inclusion in the 2014-2020 programming period. The second suggests ways to improve monitoring and evaluation for Roma-related initiatives financed by ESI Funds, notably concerning information collection systems and the establishment of indicators. The third focuses on the key elements of the new Regulations that could help provide better information on ESI Funds invested in Roma inclusion throughout the policy cycle of the new ESI Funds.

This paper expounds upon the following ideas:

1

Despite the increased importance given to monitoring and evaluation in measuring the real impact of Structural Funds targeting Roma integration, it is safe to say that **in the 2007-2013 programming period, with the exception of some specific projects, scant evidence was found of the effective use of these funds in addressing the needs of this target group.** While greater resources (including Structural Funds) were allocated to Roma integration, there is a lack of evidence on their effectiveness due to the absence of appropriate indicators and/or adequate evaluation mechanisms.

2

In the 2014-2020 programming period, the new policy framework and the new ESI Funds Regulations provide better conditions for reporting on progress in the use of these funds to promote Roma inclusion. For instance, there is a new policy framework at EU level that is helpful, the National Roma Integration Strategies (NRIS) need to work in close cooperation with the ESI Funds, the Charter of Fundamental Rights is now a binding document, and greater awareness on the part of the public administrations can be observed. Critical issues now focus on providing evidence on the allocation of funds, presenting effective results and improving data collection.

⁶ Based on the experience of the European Network on Social Inclusion and Roma under the Structural Funds (EUROMA Network) and the assessment 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://www.euromanet.eu/resource_center/archive/105839.html)

⁷ European Structural and Investment Funds Regulations 2014-2020
http://ec.europa.eu/regional_policy/index.cfm/en/information/legislation/regulations/

3

The establishment of indicators is a key requirement in the new ESI Funds programming period. For instance, regarding indicators for project participants, one of the “*common output indicators for participants*” in the European Social Fund (ESF) refers to “*migrants, people with a foreign background, minorities (including marginalised communities such as the Roma)*”. This can be viewed as positive development that should aim to achieve two practical objectives:

- a. Specific indicators focusing on the Roma population should be established for Operational Programmes that specifically target this group (explicit but not exclusive approach).
- b. For Operational Programmes in which Roma can be beneficiaries along with other groups, we suggest identifying process indicators that guarantee the impact of the initiatives and measures targeting the Roma population and adherence to the non-discrimination principle.

4

Indicators will not work if there are no appropriate data gathering and information collection systems in place. In the case of Roma, ethnic data collection (i.e. information disaggregated by ethnicity) is the best way to identify the effective impact of ESI Funds on the Roma; however, this remains a major challenge for Managing Authorities and Intermediate Bodies. The best method for ethnic data collection is self-identification (with appropriate safeguards and guarantees). If this is not possible, other complementary options may be considered, such as alter-identification, process indicators, territorial maps or ex post enquiries. The use of these alternative methods of ethnic data production should be subject to broad discussions among experts in the individual countries. Furthermore, National Statistical Offices could do more within existing national legal frameworks to generate such data.

5

A wide range of mechanisms and actors are responsible for implementing the Operational Programmes (OPs) in the different Member States. Establishing indicators, gathering information and setting up monitoring and evaluation systems are always required. Their practical design differs depending on the type of programme (e.g. OPs entirely or partially focused on Roma as a target group, OPs entirely or partially focused on the promotion of social inclusion and the fight against social exclusion, OPs developed in geographical areas or micro territories where there is a concentration of Roma).

6

Monitoring and evaluation of Roma-related initiatives needs to be improved throughout the programme cycle in the 2014-2020 programming period. The current Regulations offer many opportunities for making this possible. It is especially important to pay attention to the fulfilment of the ex ante conditionalities, the monitoring and reporting systems (notably annual reports, annual review meetings, progress reports, and Monitoring Committees), the evaluation systems and the governance and participation processes.

7

The availability of data and indicators will not automatically solve the challenges of monitoring and evaluation. Deliberate efforts are needed to promote the culture of evidence-driven policy-making. Effective monitoring and evaluation requires understanding data, rooting indicators in the appropriate context and seeing the bigger picture behind the figures.

1. Learning from the past and addressing future challenges

This section provides an overview of monitoring and evaluation practices in the 2007-2013 programming period and presents the challenges and opportunities of enhancing effective M&E of ESI Funds to promote Roma inclusion in the 2014-2020 programming period.

1.1 Taking stock of the 2007-2013 programming period

Based on previous assessments⁹, the following observations on monitoring and evaluation practices can be made with regards to the use of EU Structural Funds for Roma inclusion and the lessons learned during the 2007-2013 programming period:

- In the 2007-2013 programming period there was **general concern about the monitoring and evaluation of Roma-related initiatives under the Structural Funds**. This concern resulted in an open debate on how to improve the methods used to identify where and how interventions are taking place and on the actual impacts of these interventions on the Roma population. In this context, it is **important to draw a distinction between the monitoring and evaluation of programmes and projects**, i.e. assessing progress against objectives set, **and the assessment of context and state-of-play**, entailing needs identification and general impact evaluation.
- Previous difficulties encountered in monitoring and providing information on the results of Roma programmes have demonstrated that **a recommendable monitoring and evaluation practice is the combination of different options** (i.e. setting indicators in programmes disaggregated by ethnic origin of beneficiaries, evaluations and analysis of context), which should be **supported by transnational cooperation and guidance from the European Commission or specialised bodies such as the Fundamental Rights Agency**.
- For the monitoring of the implementation of programmes and projects, **indicators for data collection (ethnic data collection) must be set**. The controversy about the possibility of collecting data on ethnic origin remains a recurrent issue of debate. There is a general misperception and narrow interpretation of relevant legislation in this area. Although ethnic data collection may be difficult in some cases, it is legal to gather this type of data as long as certain safeguards are respected. Many countries have explored different methodological approaches to overcome this challenge; however, some of them have demonstrated important limitations, notably the self-identification by beneficiaries. In the 2007-2013 programming period, some countries already included indicators on Roma participation in their OPs, mainly using optional self-identification and focusing on those programmes in which Roma were expected to be beneficiaries.

⁹ Based on the experience of the European Network on Social Inclusion and Roma under the Structural Funds (EUROMA Network) and the assessment 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://www.euroromanet.eu/resource_center/archive/105839.html)

- **The involvement of stakeholders — notably civil society organisations working for the promotion of Roma inclusion**— mainly took place during the implementation phase and only to a limited extent in the monitoring and evaluation process, similar to involvement in the planning process. The active engagement of relevant stakeholders **throughout the policy cycle of the funds** was considered **important for improving monitoring and evaluation processes**.
- **Evaluations** are considered **of particular relevance in order to have information that helps, where deemed necessary, to redesign approaches, reset priorities and reallocate resources**. Some countries only conducted compulsory evaluations while others carried out specific evaluations on Roma-related measures.
- The **analysis of context and impact on the ground** (e.g. specific analyses, studies, maps etc.) is considered a positive approach as it permits the design of actions based on real needs and legitimises the implementation of new policies. It is therefore a positive development that many countries had the intention to design the Roma-related programmes and interventions for the 2014-2020 programming period based on the findings from analysis, studies and maps they already undertook or are planning to undertake.
- Most countries opted for the centralised management of EU Structural Funds in which implementation at regional level was managed at national level. Only a few countries —notably those with a high degree of decentralisation— decided to apply a model of decentralised public management combining national and regional OPs. This **decentralised management of OPs often causes major difficulties in the assumption of responsibilities for Roma priorities at different levels, notably at regional level**. The limited information, together with the lack of a clear mandate and competencies on the part of Managing Authorities to encourage regional OPs to follow certain guidelines, together with the absence of adequate communication channels between national and regional levels, pose a major challenge to the reporting of actions targeting Roma inclusion.
- The **monitoring role of the National Roma Contact Points (NRCP) is identified as crucial** in overcoming these difficulties by ensuring that Roma priorities are considered not only in the national OPs but also in the regional ones. This is particularly important in countries with a high degree of decentralisation where regional OPs play a central role. Structural and Investment Funds Managing Authorities at national level could work together with the National Roma Contact Points to provide information and guidelines to the regional authorities as regards the consideration of national priorities and commitments at regional level.

Furthermore, in its **2014 assessment of the implementation of the EU Framework for National Roma Integration Strategies (NRIS)**⁹, the European Commission (EC) concluded that:

- ▶ Although the adoption of National Roma Integration Strategies is a major step in providing a framework for Roma inclusion, experience shows that **alignment between general and Roma-specific policies and funding should be further improved, building on better monitoring of results and the impact of EU-funded interventions.** Where relevant, such an integrated approach can be further enhanced by **introducing a territorial approach, focusing on the most disadvantaged micro-regions.**
- ▶ Regular dialogue with civil society, support of grassroots NGOs and **the involvement of civil society in the monitoring of progress** are pointed out as important factors to move forward and to which the European Commission would pay particular attention.
- ▶ Tangible change in the situation of Roma will only be achieved if **Member States, together with the Commission, ensure monitoring and evaluation of the effective use of available ESI Funds** in line with the relevant shared management regulatory framework.
- ▶ The monitoring mechanism should have a **stronger focus on assessing the impact.**
- ▶ The **conclusions of the monitoring** should be **channelled into policy development.**

1.2 Current scenario: challenges and opportunities

Taking the lessons learned from the 2007-2013 programming period into account, the new setting provides better conditions under which to report on progress in the use of ESI Funds to promote Roma inclusion. Nevertheless, the current scenario continues to pose a series of challenges for the effective monitoring and evaluation of Roma-related initiatives. These challenges are related to the effective use of the legal and policy framework and to the effective implementation of programmes by establishing adequate M&E systems:

Challenges and opportunities of the current legal and policy framework:

1

New policy framework (National Roma Integration Strategies, NRIS). While a clear policy framework has been established at European level giving Member States a strong mandate to promote Roma inclusion —particularly through recommendations that promote the use of ESI Funds—, the implementation of such policies is less clear. Moreover, guidelines on measuring the desired objective are still missing.

⁹ European Commission (2014), Report on the implementation of the EU Framework for National Roma Integration Strategies. Available at: http://ec.europa.eu/justice/discrimination/files/roma_implementation_strategies2014_en.pdf

2

Combining ESI Funds and NRIS reporting. The new policy framework opens up new opportunities for periodic M&E. Annual reports (a requirement under ESI Funds) and NRIS reports (a requirement under the EU framework) are both strong instruments capable of enhancing annual reporting on the progress towards Roma integration through ESI Funds. Nevertheless, combining these two mechanisms remains a challenge.

3

Realisation of Fundamental Rights. From a rights-perspective, there is a very important difference between the 2007-2013 and the 2014-2020 programming periods: the Charter of Fundamental Rights of the European Union¹⁰ is now a binding document. This also implies that in the current period, more importance will be given to whether fund allocation complies with fundamental rights. In this context, European Commission Directorate General Justice has been given a greater role in monitoring equal opportunities and ensuring rights. The “progressive realisation” of rights needs to be highlighted as a key argument for setting, justifying and monitoring OP indicators. Therefore, drawing a distinction between the time needed to guarantee the realisation of rights —i.e. immediately (e.g. the case of access to compulsory education) or more gradually (e.g. equal access to quality education)— is highly recommended when setting indicators. The Council Recommendation on Roma inclusion from December 2013¹¹ provides suggestions on how to translate fundamental rights into Roma integration strategies and policies.

4

Heightened awareness at local and regional level. Recently, an important change in the degree of awareness among public administration can be observed. It appears that local and regional authorities are more conscious about how funds are being spent. This development provides new opportunities to raise the priority put on Roma inclusion at the local and regional political level. However, at the same time, this new level of awareness also requires greater cooperation between the different levels of government.

Three critical areas for more effective M&E systems:

A number of areas are considered critical in achieving potential improvements in M&E systems:

⊗ **Demonstrating allocation**

Although more countries appear to be addressing Roma issues to different degrees in the framework of EU Funds (especially ESF in the previous programming period), one of the challenges is demonstrating how funds are being allocated – not simply “in support of Roma integration” but actually reaching the Roma communities and producing tangible results translating in improved standards of living for the people in question.

In this context, we should highlight that it is generally easier to identify results at the project level than at the Operational Programme level. Indeed, it is difficult to precisely measure what percentage of resources under a particular OP explicitly benefits the Roma. Horizontal measures or “national projects” targeting social exclusion may benefit Roma explicitly, but only if special measures are taken to overcome the structural disadvantages and discrimination preventing them from effectively benefitting from such measures.

¹⁰ http://ec.europa.eu/justice/fundamental-rights/charter/index_en.htm

¹¹ *ibid.*

Following are **recommendations to improve the effective allocation of funds to Roma** based on the experience of the **World Bank**:

- Focus more on a results-based approach.
- Promote accountability: make sure that resources translate into action on the ground.
- Promote better targeting: make sure project outputs are reaching Roma.
- Promote improved programme implementation through more continuous process evaluation.
- Identify the most cost-effective project types through selective use of rigorous impact evaluations.

Demonstrating results

While the new focus on results-based management is generally seen as a positive development, there is still debate about the extent to which Member States will be able to demonstrate results on the suggested set of indicators (i.e. financial, output, results). Moreover, the question of disaggregating indicators by ethnic group remains an important challenge – and in the view of some Member States, virtually impossible at OP level.

The **Fundamental Rights Agency (FRA) of the European Union** has been given a greater mandate as regards monitoring the implementation of the National Roma Integration Strategies in the Member States, looking more specifically at the fundamental rights dimension. The FRA's Working Party (WP) on Roma Integration has been working in the development of an indicator framework and in the area of data collection.

In terms of indicator construction, the Working Party has highlighted the importance of distinguishing between indicators depending on the approach being applied. For instance, Input-Output-Outcome indicators are more suitable for project-level monitoring whereas Structure-Process-Outcome indicators are more appropriate for programme-level monitoring with particular attention paid to fundamental rights. The monitoring framework developed by the Working Party integrates project level and programme level monitoring systems. The framework does not assume that the resources devoted to Roma integration will automatically translate into tangible outcomes. The processes engaged are critical and, as shown by the experience gained from Roma integration, various obstacles at process level prevent translating financial resources into tangible and sustainable results. Thus, the Structure-Process-Outcome framework would help identify and unblock such bottlenecks at process level.

FRA has also been collecting ethnic data; however, this practice has only been useful for the aggregate picture, i.e. the outcome level evaluation of Roma integration policies, and it cannot be applied to OPs per se. Complementary methods of demonstrating the effect of ESI Funds on Roma inclusion would need to be used.

The **World Bank** reflected on its experience in impact evaluation of Roma-related initiatives and concluded with some general recommendations:

- First and foremost, it is absolutely necessary to clearly define the different objectives of a monitoring and evaluation system and to align M&E tools with each objective.
- Furthermore, when monitoring and evaluating, the following cross-cutting issues should be taken into account:
 - Ensure each M&E objective is separately budgeted.
 - Align scope of civil society engagement with specific objectives.
 - Use modern, increasingly low-cost technology to collect, compile, and report M&E information.
 - Avoid complicated, burdensome M&E systems.

Collecting data

In view of the above, data collection remains a critical issue. Firstly, due to the aforementioned challenges in obtaining ethnically disaggregated data and secondly, due to the requirement of setting indicators that guarantee conformity with ESF Fund Regulations (e.g. different types of indicators).

Prior experience in several Member States shows that ethnic data collection is possible. For example, it has been successfully tested in **Hungary** where ethnic data has been used for ESF indicators and in the 'ACCEDER' employment programme in **Spain**. The **Bulgarian** Managing Authority is planning to gradually move towards this approach by self-identification of beneficiaries. These experiences demonstrate that ethnic data collection is not a technical issue but rather a question of political will and commitment.

Collection of ethnically disaggregated data by the **National Statistical Offices** is also an option – and a low-cost one. One way would be to include ethnic markers in large sample surveys such as Labour Force Surveys or EU SILC (an approach successfully tested in Hungary). **Territorial mapping** is another approach (successfully tested in the **Slovak Republic** with the Atlas of Roma communities 2013) providing the data needed to monitor implementation and evaluate the effects of implementing Roma inclusion policies/programmes.

2. Establishing indicators and gathering data: potential strategies and tools

Establishing indicators and gathering data are a prerequisite for improving monitoring and evaluation. This section focuses on the difficulty of collecting ethnic data and the question of how to gather information on relevant indicators when referring to Roma. It then explores potential ways of how this could be done in practical terms.

Both quantitative and qualitative data play an important role in understanding the impact of certain policies. Therefore, it is also important to evaluate how a particular result has been reached. In order to obtain this information, the Fundamental Rights Agency recommends measuring outcomes through process indicators.

In today's context, there are **three critical questions that can have an important impact on the efficiency of future monitoring and evaluation practices:**

1 First, **to what extent is it still possible to include Roma inclusion-related indicators in the OP planning process of the 2014-2020 programming period**, even though the OP has already been approved. It appears that some countries are going to include some Roma inclusion-related indicators; others are planning to include targeted approaches and employ specific indicators while other countries do not have any Roma-specific objectives.

2 Second, **how can the information needed to populate the indicators be gathered.** Data collection is easier in some contexts than in others and different approaches have proven to be more effective than others, depending on each specific situation.

3 Third, thought must be given to **what is the most suitable way to collect necessary data** given that there are different ways in which Roma inclusion can be addressed in different types of OPs.

2.1 Establishing indicators – a key requirement in the 2014-2020 programming period

Indicators not only form the basis of all types of monitoring and evaluation systems, but are also essential in keeping track of whether a particular policy is achieving its desired objectives. In this respect, the importance given to indicators in the 2014-2020 programming period can be viewed as a positive development.

Regulations requirements

❖ Consistency between priorities, indicators and targets

Article 27(4) of the General Regulation¹² establishes that in the OPs, *each priority shall set out indicators and corresponding targets expressed in qualitative or quantitative terms, in accordance with the Fund-specific rules, in order to assess progress in programme implementation aimed at achievement of objectives as the basis for monitoring, evaluation and review of performance.*

❖ Three types of indicators

The new Regulations establish three types of indicators that need to be consistent: financial indicators relating to expenditure allocated, output indicators relating to the operations supported and result indicators relating to the priority concerned. All OPs must detail these three types of indicators in a consistent manner and according to the specific objectives proposed.

❖ A common set of output and result indicators for ESF investments

The Regulation for the European Social Fund (ESF) 2014-2020¹³ proposes a common set of output and result indicators for M&E which should contribute to ensuring that monitoring produces robust and reliable data and allows an evaluation of the effectiveness and impact of ESF support.

❖ Four categories of indicators in the ESF Regulation, including reporting on participants from marginalised communities such as the Roma

The ESF Regulation establishes four categories of indicators referring to project participants and entities as well as to immediate and long-term results of ESF investment. Regarding indicators for project participants, one of the “common output indicators on participants” refers to “migrants, people with a foreign background, minorities (including marginalised communities such as the Roma)” (see table).

¹² <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013R1303>

¹³ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013R1304> (see Annex D)

Common Output and Results Indicators for European Social Fund Investments

Indicators for participants (i.e. persons benefiting directly from an ESF intervention who can be identified and asked for their characteristics, and for whom specific expenditure is earmarked)*:

- One of the indicators refers to "migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma)".
- The other common output indicators for participants are:
 - unemployed, including long-term unemployed
 - long-term unemployed
 - inactive
 - inactive, not in education or training
 - employed, including self-employed
 - below 25 years of age
 - above 54 years of age
 - above 54 years of age who are unemployed, including long-term unemployed, or inactive not in education or training
 - with primary (ISCED 1) or lower secondary education (ISCED 2)
 - with upper secondary (ISCED 3) or post-secondary education (ISCED 4)
 - with tertiary education (ISCED 5 to 8)
 - participants who live in jobless households
 - participants who live in jobless households with dependent children
 - participants who live in a single adult household with dependent children
 - participants with disabilities
 - other disadvantaged
 - homeless or affected by housing exclusion
 - from rural areas

Indicators for entities (implementing the projects or benefiting from them):

- Number of projects fully or partially implemented by social partners or non-governmental organisations
- Number of projects dedicated at sustainable participation and progress of women in employment
- Number of projects targeting public administrations or public services at national, regional or local level
- Number of supported micro, small and medium-sized enterprises (including cooperative enterprises, enterprises of the social economy)

Immediate result indicators for participants*

- inactive participants engaged in job searching upon leaving
- participants in education/training upon leaving
- participants gaining a qualification upon leaving
- participants in employment, including self-employment, upon leaving
- disadvantaged participants engaged in job searching, education/ training, gaining a qualification, in employment, including self-employment, upon leaving

Longer-term result indicators for participants*

- participants in employment, including self-employment, six months after leaving
- participants with an improved labour market situation six months after leaving
- participants above 54 years of age in employment, including self-employment, six months after leaving
- disadvantaged participants in employment, including self-employment, six months after leaving

*Data shall be broken down by gender.

Opportunities offered by the Regulations for interventions with Roma

The higher priority put on indicators in the 2014-2020 programming period sets the stage for substantial progress in terms of improving M&E, especially through annual reporting on the extent to which the European Social Fund is reaching the Roma. It is important to take into account that in many cases a distinction must be drawn between programme (Operational Programmes) and project indicators (projects developed within an Operational Programme), as the same level of reporting is not always feasible. Following are **two concrete proposals regarding the scope of Roma inclusion indicators** and reporting systems, based on the Regulations and the reflection made in the context of the ESF Roma Inclusion Learning Network. Note that even if the Operational Programmes have already been presented, many of these proposals still apply.

⊗ *The scope of the Roma inclusion indicators:*

For **Operational Programmes that specifically target the Roma population** (explicit but not exclusive approach), specific indicators that focus on this target group should be established. These may be estimates of the final beneficiaries (people or households benefitting from the intervention in question) or territorial units where interventions are prioritised (municipalities or other administrative units with a higher percentage of Roma population or whose population is deprived in accordance with basic socio-economic indicators).

For **Operational Programmes in which Roma can be beneficiaries along with other groups**, we would recommend identifying process indicators that guarantee the effectiveness of initiatives and measures targeting Roma inclusion as well as adherence to the non-discrimination principle. Particular attention should be paid to addressing the issue of structural barriers and structural discrimination.

⊗ *Reporting systems*

Any European Social Fund Operational Programme focusing on Roma inclusion could **report annually on the number of Roma participants** (as established in Annex I of the ESF Regulation).

For any OP, especially those that intend to address the Roma community, specific **indicators on Roma inclusion could be provided upon presentation of the OP** according to the three kinds of indicators established in the Regulations: (a) financial indicators - budgets allocated to and expenditures incurred for Roma inclusion; (b) output indicators - operations/activities targeting Roma inclusion; (c) result indicators - effects of the actions undertaken on the Roma population.

The different ESF OPs addressing Roma or marginalised communities could **regularly provide disaggregated information for this group covering at least some relevant indicators** (e.g. age, gender, education and other characteristics) when reporting annually on activities and results. This latter proposal could also apply to programmes related to the Youth Employment Initiative (YEI), taking into account the indicators established in Annex II of the ESF Regulation (Result indicators for the YEI), as many Roma within this age bracket can be considered potential beneficiaries of the YEI.

2.2

Data and information-gathering mechanisms for indicators

Collecting ethnic data and disaggregating information by ethnic group is the best way to measure the impact of ESI Funds on Roma – the FRA even considers this as a strict requirement.

While there are successful examples of disaggregating data according to ethnic group in ESI-funded projects, it is well known that many institutions are reluctant to collect data on ethnic origin. In some cases, this is due to a **misperception and narrow interpretation of applicable legislation in this area**. We would note that **it is legal to gather this type of data as long as certain safeguards are respected**.

It is also important to stress that, even though some Managing Authorities are aware of the need to collect data by ethnic origin and intend to do so, this task is not always easy and is often subject to important limitations such as having to resort to self-identification of beneficiaries. However, experience shows that there are options to overcome this challenge such as the ones identified by participants in the ESF Roma Inclusion Learning Network Transnational Workshop: getting public authorities to understand the importance of creating trust and confidence (especially when doing surveys) and strengthening collaboration with National Statistical Institutes, civil society and, most importantly, Roma organisations and Roma mediators.

Against this background, the critical question remains *'how to demonstrate the effective impact of ESI Funds on Roma?'*, and *'how can Member States and Managing Authorities overcome this challenge and explore different ways of demonstrating this impact?'*. The answer lies in a combination of political will (i.e. political commitment) and methodological solutions. To delve a bit further into this debate, the following non-exclusive but rather complementary methodological approaches provide an idea of the options available:

Self-identification

Self-identification of Roma participating as project beneficiaries has proven to be the most effective way to gather information disaggregated by ethnic group. This mechanism is feasible for the programmes/projects that primarily focus on Roma, as they will be less reluctant to identify themselves as such when the reason for doing so is clear (trust in organisations/staff managing such programmes is a key factor). Participation in projects targeting Roma may favour the self-identification. When participants agree to take part in a project, they can be asked to sign a consent form stating that personal data will be used for project monitoring and evaluation. This way, the explicit self-identification and personal data protection rules are satisfied. Nevertheless, this mechanism is less feasible in the case of programmes aimed at the general population, as the Roma will not see the benefits of such identification and are unlikely to trust institutions thus resulting in under-identification.

- > Moreover, self-identification raises the issue of identity, which may often result in ambiguous answers – particularly if the purpose of the identification is not clear (e.g. people belonging to a certain group might not entirely identify with it because they think they also belong to another one, e.g. mixed marriages). To address this problem, several countries are providing different options such as disaggregating information on Roma minorities by subgroups (e.g. **Bulgaria**) or allowing dual identity reporting (e.g. **Hungary**).

For the 2014-2020 programming period in **Bulgaria**, each participant fills out a one-page questionnaire that includes questions addressing whether the person is a member of an ethnic minority and other sensitive data. In order to solve problems encountered in previous periods (e.g. in mainstream programmes where they did not self-identify themselves as Roma), the questionnaire will provide multiple options including different Roma subgroups.

The experience from other more advanced institutions in terms of ethnic data collection (e.g. **British Statistics Office**) demonstrates that progress in this direction requires extensive discussion with the community involved and takes a long time. An atmosphere of trust must be created if people are expected to answer the survey honestly. Also, illiterate beneficiaries need to be taken into account (e.g. assistance in filling out forms).

National Statistical Institutes could play an important role in gathering ethnic data but guarantees must be in place. The Fundamental Rights Agency has started to move in this direction with some National Statistical Institutes.

Alter-identification

In some cases, the alter-identification method may be applied for the purpose of monitoring and evaluating ESI Funds. This method could be useful when the alter-identification is made by Roma organisations or organisations and professionals with deep knowledge of the Roma community. For example, they can provide their opinion on the effective participation of Roma in programmes and projects, etc. Of course, alter-identification requires safeguards and should not be made based on individual data.

Hungary, for example, makes estimates on Roma participation in some programmes based on the information provided by Roma mentors that are involved in the programmes.

Process-indicators

When it is not possible to demonstrate the effective impact of ESI Funds on Roma by means of detailed figures and based on individualised data, it is possible to at least demonstrate the effectiveness of measures taken to facilitate Roma participation and to ensure that the funds actually reach Roma.

Process indicators can provide evidence of the measures taken in the framework of ESI Funds that could lead to effective Roma policies even though they do not demonstrate end results. Process indicators are especially suited to programmes and projects targeting the general population or vulnerable groups including, but not limited to, Roma.

Micro-territorial maps and projects

The use of micro-territorial poverty maps (e.g. **Hungary**) focusing on social needs rather than on ethnic identification, could help in concentrating ESI Funds on areas with a high concentration of Roma living in deprived socio-economic conditions. As a consequence, this approach may indicate that economic resources are primarily targeting Roma if proper attention is paid to facilitating their involvement and participation.

Ex post enquiries

Different approaches may be followed in evaluating the OPs slated for implementation during the programming period (e.g. surveys, enquiries, etc.) and may employ different quantitative or qualitative methods. In this type of evaluation, a specific survey may be envisaged or a sub-sample introduced in a survey to specifically measure the impact of the programmes on Roma.

2.3 Monitoring and evaluation in the context of different types of Operational Programmes (OPs)

The first important element that needs to be highlighted when considering the different Member States is the wide range of Operational Programme implementation mechanisms and actors involved. While in some cases there may be ways envisaged to monitor and evaluate the impact of activities —notably OPs focusing on specific Roma activities—, in other cases the identification of their potential impact on the Roma may be more difficult, notably in OPs targeting the general population. This means that **different potential options can be envisaged, but with different levels of effectiveness depending on the type or approach of the programme.**

A critical concern in the debate on monitoring and evaluation is the issue of data and how to gather disaggregated information about the Roma as this is a prerequisite for identifying indicators and measuring progress and the extent to which objectives are met. While not claiming to be exhaustive, the following pages try to shed light and identifying solutions for this critical aspect by proposing some options to be applied in the different types of Operational Programmes:

OPs entirely or partially focused on Roma as a target group	
Description	<p>This is a classical OP (usually ESF) focusing entirely (N.B. this scenario is rarely the case) or partially on the Roma as a target group (N.B. frequently the case in countries with a large Roma population). This type of programme will have to choose Roma and other marginalised communities as one of its investment priorities and allocate a specific budget to this priority.</p> <p>An example of this type of programme would be the ESF Multiregional Programme Fight Against Discrimination in Spain with the example of the <i>Acceder</i> employment programme.</p>
Establishing indicators	<p>Common result indicators for this type of programme could be established and include data disaggregated by the ethnic origin of the beneficiaries and by gender, age and other criteria.</p> <p>As a result, financial indicators could be defined, e.g. related to expenditure allocated to Roma, output indicators focused on Roma of the operations supported and result indicators on Roma of the actions undertaken.</p> <p>Indicators could be quantitative and complemented by qualitative information as established in the Regulations.</p>
How to gather information	<p>Intermediate Bodies implementing measures targeting Roma should have a working tool (database of beneficiaries) for the purpose of reporting on the progress and results of the programme. This database could include traceability of the beneficiaries and their development as they move through the programme and could be as comprehensive as necessary in the provision of data, unit cost, etc.</p> <p>As regards identification of ethnic origin, self-identification is the best system. As experience has demonstrated, when the programme specifically focuses on Roma, the latter are not reluctant to declare their ethnic identity, if the adequate conditions are provided.</p>
The role of monitoring systems	<p>There are several ways to improve the effectiveness of reporting in this type of programme:</p> <ul style="list-style-type: none"> • When Member States report on the annual implementation of the programme, they should provide data on the programmes and results of the activities targeting Roma inclusion. The European Commission could request such data if they are not provided. • The annual review meeting could provide another opportunity to furnish this information. • The progress report to be submitted to the European Commission by 31 August 2017 and by 31 August 2019 could report on fulfilment of the ex ante conditionalities as well as on how the principle of non-discrimination has been followed in the case of Roma (i.e. demonstrating effective results with data). • Additionally, the Monitoring Committees could focus on assessing progress made towards achieving the objectives proposed for Roma inclusion.
The role of evaluation systems	<p>Both the ex ante evaluation and the evaluation during the programming period could assess the effectiveness, efficiency and impact of these programmes on Roma inclusion.</p> <p>If Member States fail to provide such data, the European Commission could conduct a specific evaluation in order to gather information on results.</p>

OPs entirely or partially focused on the promotion of social inclusion and the fight against social exclusion

Description	<p>This is an OP (usually ESF) focusing entirely or partially on the promotion of social inclusion and the fight against social exclusion. This may be a typical case in almost every Member State as all of them have to invest 20% of the ESF in promoting social inclusion.</p> <p>In this type of programme, six different investment priorities can be chosen. Although one of them specifically addresses <i>Roma and other marginalised communities</i>, Roma can benefit from all of the different investment priorities.</p>
Establishing indicators	<p>When an OP focuses on the fight against exclusion and the promotion of social inclusion, it may follow two options which are not exclusive but rather complementary:</p> <ul style="list-style-type: none"> • The first is to focus on a specific problem, such as youth unemployment, child poverty, access to services, etc. • The second is to focus on specific target groups, for example people with a migrant background, homeless people, people with a disability, Roma, etc. <p>As a consequence, in the planning process of an OP, the common result indicators could include elements of disaggregated data, e.g. number of Roma as beneficiaries along with data collected by gender, age and other relevant criteria, if information is available.</p> <p>Financial indicators related to expenditure, output indicators on operations and result indicators on actions undertaken can also be disaggregated by target group, including Roma, if adequate information is available (see below).</p>
How to gather information	<p>Intermediate Bodies of an OP focused on the promotion of social inclusion should have a working tool (database on beneficiaries) for the purpose of reporting on the progress and results of the programme. This database could include traceability of the beneficiaries and their development as they move through the programme and could be as comprehensive as necessary in the provision of data, unit cost, etc.</p> <p>While the identification of beneficiaries belonging to specific groups may be more obvious (e.g. people with disabilities or people of immigrant origin), the identification of other groups such as the Roma may be more problematic. Some potential options could be considered to solve this problem:</p> <ul style="list-style-type: none"> • If the Intermediate Body implementing the OP is a specialised organization working with a specific target group, that is, if actions aimed at the Roma are implemented by an Intermediate Body or by a final entity specialised in Roma (such as a (pro) Roma organization), self-identification could potentially be an option. • If that is not the case, another option would be to employ a system of alter-identification as described in chapter 4.2. (in this case data should be anonymous).
The role of monitoring systems	<p>In order to guarantee that the progress towards Roma inclusion is effectively reported under this type of programme, it is important that:</p> <ul style="list-style-type: none"> • When Member States report on the annual implementation of the programme, they provide data on the programmes and the results of activities targeting Roma inclusion. The European Commission could request such data if they are not provided. • The annual review meeting could be used as a further opportunity to provide this information. • Additionally, the Monitoring Committees could focus on assessing the progress made towards achieving the objectives proposed for Roma inclusion.
The role of evaluation systems	<p>Both the ex ante evaluation and the evaluation during the programming period could assess the effectiveness, efficiency and impact of these programmes on Roma inclusion.</p> <p>Several potential methods could be envisaged:</p> <ul style="list-style-type: none"> • An ad hoc survey of the beneficiaries of the OP (e.g. based on a representative sample) to identify how many are Roma. This evaluation could be undertaken by the technical assistance unit or by the European Commission. • Identify process indicators that can demonstrate that the programme has made a special effort and has undertaken specific measures to facilitate Roma access to services and/or has tailored its services to the Roma.

OPs carried out in geographical areas or micro territories where there is a concentration of Roma

Description	<p>This is typically the situation when countries implement European Social Fund (ESF), European Regional Development Fund (ERDF) or European Regional Development Fund (ERDF) OPs in three types of circumstances:</p> <ul style="list-style-type: none"> • Programmes focused on specific territorial areas, where it may be considered that there is large concentration of Roma people; • Programmes that foresee specific actions focused on Roma neighbourhoods or settlements (e.g. integrated housing operations of Roma families who live in settlements); • Programmes developing Community-led Local Development Initiatives in areas where Roma are living.
Establishing indicators	<p>Indicators for these programmes depend on their objectives and should be formulated according to priorities, types of operations and established targets:</p> <ul style="list-style-type: none"> • Where the programme focuses on specific territorial areas with a large Roma population, it is difficult to measure the extent to which Roma benefit from the programmes. Specific indicators are required as suggested below. • Where the programme envisages specific actions targeting Roma neighbourhoods or settlement, all programme indicators need to report on the results on Roma. • Where the programme envisages developing Community-led Local Development Initiatives in areas not exclusively inhabited by Roma, the challenge is to measure the results of the programme on the Roma. <p>In all these cases, OPs should include financial indicators related to expenditure, output indicators on operations and result indicators on actions undertaken. However, desegregating all these indicators by ethnic origin is not always feasible.</p>
How to gather information	<p>Depending on the three aforementioned circumstances, the information gathering system designed to feed the indicators may differ:</p> <ul style="list-style-type: none"> • When programmes envisage specific actions focused on Roma neighbourhoods or settlements, it is easy to gather information as all the data will apply to Roma. • In contrast, when programmes focus on specific territorial areas where it may be assumed that there is a large concentration of Roma, or when OPs develop Community-Led Local Development Initiatives in areas not exclusively inhabited by Roma, it will not be so obvious and other options need to be used, including: <ul style="list-style-type: none"> > To develop micro territorial poverty maps (Hungary) without following an ethnic approach but rather focused on social needs; > To identify proxies in a position to infer the potential impact of the programmes on Roma; > Where it is impossible to gather specific information on Roma, process indicators could be developed. These could at least indicate that programmes are going in the right direction, even if it is not always possible to demonstrate specific quantitative results on Roma. > Additionally, stakeholders could meet and agree on an estimate of the extent to which Roma (or other groups) benefited from the territorially focused programme.
The role of monitoring systems	<p>In order to guarantee that progress towards Roma inclusion is effectively reported on under this type of programme, it is important that:</p> <ul style="list-style-type: none"> • When Member States report on the annual implementation of the programme, they provide data on the programmes and results of activities targeting Roma inclusion. The European Commission could request such data if they are not provided. • The annual review meeting could be another opportunity to provide this information. • Additionally, the Monitoring Committees could focus on assessing the progress made towards achieving the objectives proposed for Roma inclusion.
The role of evaluation systems	<p>Both the ex ante evaluation and the evaluation during the programming period can assess the effectiveness, efficiency and impact of these programmes on Roma inclusion. Several potential methods could be envisaged:</p> <ul style="list-style-type: none"> • An ad hoc survey of the beneficiaries of the OP (e.g. based on a representative sample) to identify how many are Roma. This evaluation could be undertaken by the technical assistance unit or by the European Commission. • Identify process indicators that can demonstrate that the programme has made a special effort and has undertaken specific measures to facilitate Roma access to services and/or has tailored its services to the Roma.

3. How to improve monitoring and evaluation of Roma-related initiatives throughout the programme cycle

Monitoring and evaluation is becoming increasingly important in the 2014–2020 programming period. For instance, the new ESI Funds Regulations are much more insistent on the fact that the Operational Programmes have to consider M&E procedures and also describe concrete instruments that should be used. This development could spell substantial progress when planning actions targeting Roma inclusion and when providing information on results as greater specificity is required in both instances.

This section focuses on the key elements of the new Regulations that could help provide better information on ESI Funds invested in Roma inclusion along the cycle of the different programmes. Without purporting to be exhaustive, this section focuses on four elements: ex ante conditionalities, monitoring and reporting systems, evaluation systems and governance and participation. The following sections outline the key elements of the Regulations and explore possibilities of how these could apply to Roma-related programmes and initiatives, taking into account that throughout the seven-year policy cycle (ten years if we include n+3), programmes and projects should constantly strive to improve.

3.1 Ex ante conditionalities

Novelties in the Regulations

One of the ex ante conditionalities established under ESF Thematic Objective 9 (Promoting social inclusion, combating poverty and any discrimination), and in particular Investment Priority 9.2, is the need to have a “National Roma inclusion strategic policy framework in place”. This ex ante conditionality must be met by all Member States by 2017. **Member States are required to have a national Roma inclusion strategic policy framework** that:

- Sets achievable national goals for Roma integration to bridge the gap with the general population. These targets should address the four EU Roma integration goals relating to access to education, employment, healthcare and housing;
- Identifies where relevant those disadvantaged micro-regions or segregated neighbourhoods, where communities are most deprived, using already available socio-economic and territorial indicators (i.e. very low educational level, long-term unemployment, etc);
- Includes strong monitoring methods to evaluate the impact of Roma integration actions and a review mechanism for the adaptation of the strategy;
- Is designed, implemented and monitored in close cooperation and continuous dialogue with Roma civil society, regional and local authorities.

Furthermore, the Regulations state that *upon request and where justified, relevant stakeholders will be provided with support for submitting project applications and for implementing and managing the selected projects.*

Potential opportunities for interventions with Roma

Based on the criteria established to meet this ex ante conditionality, the Partnership Agreements and the Operational Programmes could include process indicators related to:

- How the different OPs will contribute to targets relating to Roma access to education, healthcare, employment and housing;
- How OPs will focus on disadvantaged micro-regions or segregated neighbourhoods where communities are more deprived and to what extent they will reach Roma populations in these communities;
- What monitoring methods will be used to evaluate Roma integration actions;
- What kind of support will be provided to the stakeholders related to the Roma project in order to support them in gaining access to and implementation of projects.

Additionally, fulfilment of this ex ante conditionality could support the case for increased investment of ESI Funds to support better and more accurate knowledge of the Roma situation with a view to designing suitable policies and targeting investment.

When it comes to fulfilling the different dimensions of this ex ante conditionality, the Fundamental Rights Agency could assist Member States in these four dimensions. For instance, the FRA could lend support in setting targets, identifying micro-regions (as in the FRA's recently launched pilot projects in Romania), setting up M&E systems (Working Party on Roma integration indicators mentioned above) and in finding ways to foster cooperation with civil society (the FRA's current project on Local Engagement for Roma Inclusion rolled out in 11 Member States).

3.2 Monitoring and reporting systems

Annual reports

Novelties in the Regulations

According to the Regulations, *from 2016 until and including 2023, each Member State shall submit to the Commission an annual report on implementation of the programme in the previous financial year. Each Member State shall submit to the Commission a final report on implementation of the programme for the ERDF, ESF and the Cohesion Fund.*

Potential opportunities for interventions with Roma

- When Member States report on annual implementation —especially the ESF— they could provide information on how the different programmes address Roma issues.
- In the case of the 2017 annual report, Member States could report on how the funds contributed to achieving the ex ante conditionalities.
- Additionally, when the European Commission examines the annual and final implementation reports and informs the Member State of its findings, it could highlight references to Roma.

Annual review meetings

Novelties in the Regulations

According to the Regulations an annual review meeting shall be organised every year from 2016 until and including 2023 between the Commission and each Member State to examine the performance of each programme, taking account of the annual implementation report and the Commission's observations where applicable. Annual review meetings can be organised per programme or cover more than one programme.

Potential opportunities for interventions with Roma

- In this annual review meeting, and when reviewing the programmes addressing Roma specifically or together with other groups, Roma issues may be raised at the request of the European Commission. Member States should also ensure that there is appropriate follow-up to the Commission's Observations concerning issues which significantly affect the implementation of the programme and, where appropriate, inform the Commission, within three months of the measures taken.

Progress reports

Novelties in the Regulations

Article 52 of the Regulation stresses that by 31 August 2017 and by 31 August 2019, the Member State shall submit to the Commission a progress report on implementation of the Partnership Agreement as at 31 December 2016 and 31 December 2018 respectively.

Along with the information and assessment, the progress report should explain whether the actions taken to fulfil the applicable ex ante conditionalities set out in the Partnership Agreement not fulfilled at the date of adoption of the Partnership Agreement have been implemented in accordance with the timetable established (this point shall only apply to the progress report to be submitted in 2017).

Potential opportunities for interventions with Roma

- As a consequence, the progress report could be a good opportunity to report on how ex ante conditionalities related to Roma have been fulfilled.
- Additionally, if countries have to implement an integrated approach to territorial development, and if any of these are envisaged for development in areas where Roma reside, the effective impact of these investments on Roma could be examined during the progress report.
- As established in the Regulations, non-discrimination is a horizontal principle of the ESI Funds. The progress report may also look at the way this horizontal principle is implemented, especially concerning the Roma.

Monitoring Committees

Novelties in the Regulations

According to Article 47, Monitoring Committees should be formed to monitor the implementation of the programme. The Monitoring Committee shall *review implementation of the programme and progress made towards achieving its objectives. In doing so, it shall have regard to the financial data, common and programme-specific indicators, including changes in the value of result indicators and progress towards quantified target values, and the milestones defined in the performance framework referred to in Article 21(1), and, where relevant, the results of qualitative analyses.*

Potential opportunities for interventions with Roma

- The Monitoring Committees may pay special attention to the progress of the OPs in achieving Roma inclusion goals by looking at effective investment in this area and achievement of the proposed targets.

3.3 Evaluation systems

Novelties in the Regulations

According to Article 54 of the General Regulation, *evaluations shall be carried out to improve the quality of the design and implementation of programmes, as well as to assess their effectiveness, efficiency and impact. For an evaluation to be effective, Member States need to ensure that procedures are in place to produce and collect the data necessary for evaluations, including data related to common and where appropriate programme-specific indicators.*

Potential opportunities for interventions with Roma

Based on the criteria established to meet this *ex ante* conditionality, the Partnership Agreements and the Operational Programmes could include process indicators related to:

- Special attention should be paid to *ex ante* evaluations. In the *ex ante* evaluations (internal or external) undertaken by the Member States, special attention should be paid to the selection of indicators, consistency of outputs and their contribution to results, and to how the OPs plan measures to prevent all discrimination against Roma.
- An evaluation during the programming period could be instrumental in assessing the effectiveness, efficiency and impact of each programme on the Roma. Note that the mechanisms undertaken by Member States to appropriately follow-up on the conclusions and recommendations are as important as the evaluation itself.
- According to the regulations, the Commission may carry out, at its own initiative, evaluations of programmes. We would strongly recommend that in the case of countries or programmes that aim at Roma inclusion, the European Commission conducts specific evaluations and focuses, among other issues, on how these programmes are being implemented and whether they achieve the expected results.

3.4 Governance and participation

Novelties in the Regulations

The new Regulations stress the importance of participation of the relevant partners at all levels of ESI Funds and provide different ways of improving governance systems. Article 6 of the ESF focuses on the involvement of partners and makes several provisions for their effective engagement.

The **European Code of Conduct on Partnership** in the framework of the European Structural and Investment Funds¹⁴ stresses that:

Managing Authorities shall involve the partners, within the framework of the monitoring committee and their working groups, in assessing performance of the programme, including the conclusions of the performance review, and in the preparation of the annual implementation reports on the programmes (Art 15)

Managing Authorities shall involve the relevant partners in the evaluation of programmes within the framework of the monitoring committees and, where appropriate, specific working groups established by monitoring committees for this purpose.

Managing Authorities for the European Regional Development Fund (ERDF), the European Social Fund (ESF) and the Cohesion Fund programmes shall consult the partners on the reports summarising the findings on the evaluation carried out during the programming period in accordance with Article 114(2) of Regulation (EU) No 1303/2013.

Potential opportunities for interventions with Roma

- The participation of specialised partners in the projects, especially those targeting Roma, can help provide data and specific sources of information by supporting data collection.
- The engagement of civil society organisations in monitoring and evaluation systems can help address the issue of specific information on Roma and also contribute to identifying potential sources of information.
- As required under the European Commission Recommendation, the active engagement of the National Roma Contact Points in the policy cycle of the ESI Funds will contribute to the enhancement of monitoring and evaluation as concerns Roma.

¹⁴ <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1400503003770&uri=CELEX:32014R0240>

Improving monitoring and evaluation along the policy cycle of ESI Funds

Ex ante conditionalities

POLICY CYCLE	WHAT TO DO	WHO	WHEN
Partnership Agreement	OPs contribute to the targets of education, employment, housing and healthcare	Member States (Managing Authorities) European Commission to verify Managing Authorities with the support of Intermediate Bodies	At the negotiation of the Partnership Agreements (2014)
Operational Programmes	Focus actions on disadvantaged micro-regions or segregated neighbourhoods	European Commission to verify Managing Authorities with the support of Intermediate Bodies	At the negotiation of the Operational Programmes (2014-2015)
Planning of the Operational Programmes	Describe the monitoring methods to be used to evaluate Roma integration actions	Support from the Fundamental Rights Agency Member States	At the design of the Operational Programmes (2014-2015)
Implementation of the Operational Programmes	Support stakeholders in the implementation of Roma projects	European Commission to monitor the fulfilment at desk level and coordination level	During the implementation process (2014-2020)

Monitoring and reporting systems

POLICY CYCLE	WHAT TO DO	WHO	WHEN
Annual and final reports	Provide information on how the different programmes address Roma issues Report on the achievement of the ex ante conditionalities Highlight references to Roma in the Observations	Managing Authorities Member States (through Managing Authorities) European Commission	At the end of each implementing year Annual report 2017 (beginning of 2018) At the examination of the annual reports (every year) and at the end when examining the final report (2020-2023)
Annual review meeting	Review how Roma issues have been addressed in the OPs and review the follow-up to Commission Observations	European Commission (Review) Managing Authorities (Report on follow-up)	At the end of each implementing year
Progress report	Report on how ex ante conditionalities concerning Roma have been fulfilled Examine the impact that implementation of the integrated approach to territorial development has had on Roma Examine how the horizontal principle of non-discrimination is being implemented	Managing Authorities Managing Authorities and the European Commission Managing Authorities and the European Commission	By 31 August 2017 and by 31 August 2019
Monitoring Committees	Monitor progress of the OPs in achieving Roma inclusion goals	Participants in the Monitoring Committees (European Commission, Member States and stakeholders)	Every year

Improving monitoring and evaluation along the policy cycle of ESI Funds

Evaluation systems

POLICY CYCLE	WHAT TO DO	WHO	WHEN
Ex ante evaluation	Appropriate selection of indicators, consistency of outputs and the latter's contribution to results, prevention of discrimination	Managing Authorities with the support of the public institutions concerned	Before the presentation of the OP (2013-2014)
Evaluation during the programming period	Assess the effectiveness, efficiency and impact of each programme on Roma	Managing Authorities Follow-up by the European Commission	Mid-term (2018)
Evaluations at the initiative of the European Commission	Evaluate how OPs are being implemented and whether they are on course to achieve the expected results (regarding Roma)	European Commission Court of auditors	Any time during OP implementation

Governance and participation

POLICY CYCLE	WHAT TO DO	WHO	WHEN
The entire policy cycle (planning, implementation, monitoring and evaluation)	Participation of specialised partners in the projects	Member States (European Commission to verify)	Any time, especially during implementation (2014-2020)
	Engagement of civil society organisations in the monitoring and evaluation system	Member States (European Commission to verify)	Any time, especially during implementation (2014-2020)
	Active engagement of the National Roma Contact Points in the ESI Funds policy cycle	Member States (European Commission to verify)	Any time from the planning process to evaluation (2013-2023)



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