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PERSPECTIVE

# ROMA AND TRAVELLER INCLUSION: TOWARDS A NEW EU FRAMEWORK LEARNING FROM THE WORK OF EQUALITY BODIES



**EQUINET**  
European Network  
of Equality Bodies

*Roma and Traveller Inclusion: Towards a new EU Framework learning from the work of Equality Bodies* is published by Equinet, European Network of Equality Bodies. Equinet brings together 49 organisations from across Europe which are empowered to counteract discrimination as national equality bodies across the range of grounds including age, disability, gender, race or ethnic origin, religion or belief, and sexual orientation. Equinet works to enable national equality bodies to achieve and exercise their full potential by sustaining and developing a network and a platform at European level.

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*\*This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*

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# 1. Introduction

## 1.1 EU Framework for National Roma Integration Strategies

The European Commission's EU Framework for National Roma Integration Strategies 2011-2020 draws to its conclusion this year.<sup>1</sup> This establishes the four integration goals pursued over the last decade:

- **access to education** - ensure that all Roma children complete at least primary school;
- **access to employment** - cut the employment gap between Roma and the rest of the population;
- **access to healthcare** - reduce the gap in health status between Roma and the rest of the population; and
- **access to housing and essential services** - close the gap between the share of Roma with access to housing and to public utilities (such as water, electricity and gas) and that of the rest of the population.

Measures are identified under each goal. Member States are invited to implement national Roma integration strategies and nominate national Roma contact points.

The mid-term evaluation of the implementation of the EU Framework, by the European Commission, pointed to the need for Member States to improve:

- Roma mainstreaming;
- focus on fighting discrimination and 'anti-gypsyism';
- partnership and Roma participation;
- focus on diversity among Roma (women, young people and children); and
- target setting, data collection and reporting for policy learning.<sup>2</sup>

The Commission work programme for 2020 commits to "take action to promote equality and better inclusion of Roma people" under the headline ambition of 'A new push for European democracy'.<sup>3</sup> In an annex, it specifically commits to "Post 2020 EU Framework on Roma Equality and Inclusion Strategies". The name reflects a significant and important shift in terminology from the language of integration.

## 1.2 Equinet Perspective

This perspective seeks to assist the Commission in preparing this post 2020 EU Framework by gathering, analysing and presenting the work and experience of equality bodies across Europe in responding to the situation, experience, and specific needs of Roma and Traveller communities.

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<sup>1</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions, [An EU Framework for National Roma Integration Strategies up to 2020](#), Brussels, 5.4.2011 COM(2011) 173 final.

<sup>2</sup> [Communication from the Commission to the European Parliament and the Council, Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020](#), SWD(2018) 480 final, COM(2018) 785 final, Brussels 4.2.2018.

<sup>3</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, [Commission Work Programme 2020 A Union that strives for more](#), Brussels, 29.1.2020 COM(2020) 37 final.

The preparation of this perspective involved:

- debates at two Equinet Policy Formation Working Group meetings, which draws its membership from all member equality bodies. The first Working Group discussion established key issues facing Roma and Traveller communities evident from the work of equality bodies and identified initial parameters for this perspective. The second Working Group discussion further developed a draft of the perspective.
- a membership survey that was completed by twenty equality bodies in twenty jurisdictions<sup>4</sup>.
- the draft perspective was then discussed and finalised by the Equinet Executive Board.

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<sup>4</sup> Commissioner for Protections from Discrimination, Albania; Ombud for Equal Treatment, Austria; Institution of Human Rights Ombudsman of Bosnia and Herzegovina; Unia, Belgium, Commission for Protection against Discrimination, Bulgaria; Office of the Ombudswoman of the Republic of Croatia; Commissioner for Administration and Protection of Human Rights, Cyprus; Public Defender of Rights, Czech Republic; Defender of Rights, France; Federal Anti-Discrimination Agency, Germany; Irish Human Rights and Equality Commission; Ombudsperson Institution, Kosovo; Office of the Equal Opportunities Ombudsperson, Lithuania; Equality Commission for Northern Ireland (by interview); Commissioner for Human Rights Office, Poland; Commissioner for Protection of Equality, Serbia; Slovak National Centre for Human Rights; Advocate of the Principle of Equality in Republic of Slovenia; Council for the Elimination of Racial or Ethnic Discrimination, Spain; and Equality Ombudsman, Sweden (by interview).

## 2. Context

### 2.1 Covid-19 Pandemic

This perspective was prepared in the context of the Covid-19 pandemic and the intensive efforts of European States to manage and respond to its impact. Equality bodies note the harsh light that the pandemic has shone on inequalities in our societies. This is particularly evident for Roma and Traveller communities. While there is no data available on impact, it is clear that these communities are at significantly higher levels of risk.

The poor health status of Roma and Traveller communities leaves them at significant risk. They suffer disproportionate levels of many of the underlying conditions deemed to leave people particularly vulnerable to the disease.

The public health responses to the pandemic require social distancing and strict hygiene protocols. Social distancing is difficult if not impossible in the contexts of overcrowded and poor living conditions experienced by many Roma and Traveller people. Strict hygiene protocols are difficult if not impossible to observe for communities that often lack the basic services, in particular for those living on illegal settlements or unofficial halting sites. There is a further issue where the communication of measures being taken is not effective in reaching Roma and Travellers due to the language or the channels of communication used.

The significant levels of socio-economic disadvantage and inequality experienced by these communities leaves them ill-equipped to deal with increasingly harsh economic circumstances. The difficult economic context created by these responses to the pandemic are particularly unforgiving when it comes to Roma and Traveller communities.

In particular, poverty and low levels of education have left them facing the significant barrier of access to education when based on home schooling. Low levels of labour market participation, widespread experiences of precarious work, high levels of dependence on social protection, and a significant presence in the informal economy have left them in a difficult and vulnerable situation as the economy retracts and moves into recession.

In Croatia, the **Office of the Ombudswoman** published analysis of the particular situation of Roma in relation to Covid-19 on its website. It communicated and engaged with relevant stakeholders in relation to this.

In Slovenia, the **Advocate of the Principle of Equality** conducted an inquiry, through the Government's Office for National Minorities, into measures taken by competent stakeholders in addressing the threat of Covid-19 to Roma. The inquiry included questions on measures to: ensure the provision of Covid-19 related information in a language and form understood by all Roma; ensure access to clean water; ensure alternatives for (potential) self-isolation in Roma settlements with inappropriate housing conditions; and ensure uninterrupted schooling processes for all Roma pupils. The inquiry included information and recommendations on good practice from other EU countries. At the outbreak of the Covid-19 pandemic, the equality body publicly highlighted the importance of ensuring access to clean water for all, including vulnerable groups living in settlements with poor public services such as water and sanitation systems, explicitly emphasising the vulnerability of Roma.

## 2.2 Priority Issues

In an earlier perspective, Equinet highlighted that the work of equality bodies on Roma and Traveller issues “affirms the importance of the priority areas identified in the current framework strategy and the need for continuity in pursuing current objectives, despite some progress made”.<sup>5</sup> The survey results confirm this situation.

Equality bodies identify significant inequalities, evident from their work, in the four fields covered by the EU Framework: education, health, employment, and accommodation:

- In **education**, instances of segregated education in schools or by classes, and of placement in special needs category schools or programmes are noted. Issues of discrimination, limited participation in pre-schooling, and early drop-out from school are reported.
- In **health**, inequalities in health status and barriers of discrimination, lack of health insurance, poor access to health services, and lack of personal documentation are noted. Instances of forced sterilisation of Roma women and segregation in maternity services are reported.
- In **employment**, particularly barriers due to discrimination, and low levels of education and employment readiness are noted. Particularly high levels of unemployment are reported for Roma and Traveller women.
- In **accommodation**, instances of forced evictions from illegal settlements without access to alternative accommodation, failure to spend budgets allocated to Roma and Traveller accommodation, lack of public and private sites to locate caravans, and segregation in living quarters are noted. Issues of discrimination in the private rented sector, poor quality housing, and lack of basic facilities are reported.

Equality bodies report widespread discrimination against, stereotyping of, and hate speech against Roma and Traveller communities. This is viewed as particularly problematic in a context of historical discrimination with such a significant level of inequality experienced as a result by Roma and Traveller communities.

**Discrimination and inequality** are seen across the four fields of accommodation, health, education, employment, and access to goods and services, in all jurisdictions. The central importance of equal treatment legislation and its effective implementation to improving the situation and experience of Roma and Traveller people is clear to equality bodies. There is a shared concern at under-reporting, with a need to enhance the capacity of Roma and Travellers to know and exercise their rights.

Equality bodies identify a particular failure to make adjustments for and to respond to the practical implications of Roma and Traveller culture and identity. There is a failure to design policy and programmes in a manner that takes account of cultural difference, which presents barriers to Roma and Traveller participation. Very specifically, information material in Romani is often not available. More generally, there is limited opportunity noted for the positive recognition of Roma and Traveller culture and identity, or to enable Roma and Traveller people to have access to their history and to explore and name their own culture and identity. There is a concern that there are interpretations of integration that might encourage a

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<sup>5</sup> Crowley N., [Taking Stock: A perspective from the work of equality bodies on European equality strategies, equal treatment directives, and standards for Equality Bodies](#), Brussels, 2020.

process of assimilation in such a context and the need for a language of equality and human rights in its place is promoted by equality bodies.

The inequalities identified in the course of the work of equality bodies emphasise the need for a goal of **substantive equality** to be established for policies and programmes, evident in outcomes for Roma and Travellers, adaptations for their culture and identity, and the elimination of discrimination.

This goal points to the need to address issues of **systemic or structural discrimination**. Systemic discrimination is understood as being evident in the inequalities that result from legislation, policy and practice, not by intent, but as a result of a range of institutional factors in the elaboration, implementation and review of legislation, policy and practice.

The work of the Supreme Court of Canada in progressively developing a concept of substantive equality has been examined in this regard by the EU Network of Legal Experts in the Field of Gender Equality and Non-Discrimination<sup>6</sup>. This work identifies that: “Beginning with the seminal case of *Andrews v Law Society*,<sup>170</sup> the Court has held that the Charter guarantees not just the right to formal equality, but also the right to substantive equality. In other words, the Charter protects individuals, not just against intentional discrimination by the State, but also against policy, legislation or practices which in effect create inequality. The Canadian Court has also used the concept of systemic inequality. In this context, there is no need for evidence of a specific discriminatory rule or standard: inequality can result from numerous factors and institutional factors which interact”.

**Poverty**, dependence on inadequate social welfare benefits, and low incomes are reported as a further linked, ongoing, and significant issue. **Policing** issues are also reported by a number of equality bodies. In particular, ethnic profiling, arbitrary actions by the authorities, and police aggression are identified along with lack of training for police on issues of equality, diversity, and discrimination.

**Public discourse** in most jurisdictions is noted as another problematic issue of importance, as it is characterised by hostility towards and stereotyping of Roma and Traveller people. This is exacerbated in the current Covid-19 pandemic context. Hate speech, both online and in public, is an issue in many instances. There is a blaming of the situation and experience of Roma and Traveller communities on their own culture and lifestyle and on their failure to adapt to dominant norms in public debate.

Societal cultures do not value the cultural difference of Roma and Traveller people, and the popular understanding of Roma and Traveller communities is limited. The Roma and Traveller voice is rarely given a platform or heard in this public debate. The mainstream media have an important contribution to make to the nature of this public discourse. This contribution is found to be missing or to be actively unhelpful in some jurisdictions. This issue has been addressed by some equality bodies.

The particular barriers to free circulation of **migrant Roma** and the importance of their inclusion in national strategies are emphasised by equality bodies. The hardship resultant on the application of the Habitual Residence Condition is noted as of particular concern for these Roma, as it leaves them ineligible for social protection and social welfare supports. Particular

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<sup>6</sup> Fredman S., [Comparative Study of Anti-Discrimination Laws in US, Canada, South Africa, and India](#), EU Network of Legal Experts in the Field of Gender Equality and Non-Discrimination, European Commission, Luxembourg, 2012.



mention is made by equality bodies of **limitations on movement** and migration which is problematic where this is a cultural tradition, and of a failure to respond effectively to linguistic diversity.

In some jurisdictions Roma and Travellers form a very small **proportion of the population**. This can render them relatively invisible, but does not free them from negative stereotypes, discrimination, and poor living conditions. Invisibility is a barrier to securing an adequate policy focus on these communities and to ensuring flexibility to adapt for their cultural diversity.

Progress on Roma and Traveller inclusion has been slow in the view and experience of equality bodies. It is clear to equality bodies that the EU Framework for National Roma Integration Strategies remains relevant and vital. Its further iteration will need to be characterised by strong ambition and reinforced with strict monitoring if the pace of progress is to intensify to the necessary level.

### 2.3 Equality Bodies & National Roma Integration Strategies

Equality bodies have sought to make constructive contributions to the development and implementation of national Roma integration strategies. They report playing a range of roles, including:

- membership of institutional structures established for implementing or monitoring the strategy;
- independent monitoring and reporting on the strategy;
- preparation of policy recommendations for inclusion in the strategy; and
- implementation of specific actions included in the strategy.

There is no uniform approach to including equality bodies. In part, it is a failure on the part of public authorities to engage the experience and expertise of the equality body which is particularly pertinent given the high levels of discrimination. This reflects the imperative of the independence of equality bodies and the different approaches taken by equality bodies to articulating their independence. However, the independence of equality bodies does not preclude a significant contribution to national Roma strategies and it is important that it is not interpreted by public authorities as a rationale for their exclusion from this process.

In Belgium, **Unia** works in close contact with the National Roma Contact Point, which takes the form of an administrative working group with representation from relevant bodies in federal government, the regions and communities, and is a member of the National Roma Platform.

In Cyprus, the office of the **Commissioner for Administration and Protection of Human Rights** participated on a National Platform on Roma which was formed to improve implementation of policy measures for the integration of Roma over a two-year period from 2016.

In the Czech Republic, the **Public Defender of Rights** is a member of the Government Council for Roma Minority Affairs, a permanent advisory and initiative body on issues related to Roma integration. The Council cooperates on preparation of the national Roma

integration strategy. The Public Defender of Rights informs the Council on progress in implementing the strategy, and implements some actions under the strategy.

In Ireland, the **Irish Human Rights and Equality Commission** is a member of the Steering Group to support and monitor implementation of the National Traveller and Roma Inclusion Strategy.

In the Slovak Republic, the **Slovak National Centre for Human Rights** was involved in the preparation of the Strategy for Integration of Roma by 2020 by the Office of the Plenipotentiary of the Government of the Slovak Republic for Roma Communities.

Equality bodies note particular limitations where a strong and specific anti-discrimination element is missing from national Roma integration strategies. They point out the dangers of strategies that in effect end up laying the onus for their situation and experience on the Roma and Travellers themselves. Strategies that fail to pursue institutional change and that focus solely on enabling change with Roma and Traveller communities in effect blame Roma and Travellers for their situation and experience. Equality bodies emphasise the need for a thorough evaluation of current strategies combined with a detailed analysis of current and future needs at Member State level.

The **involvement of equality bodies** with the development, implementation and monitoring of national Roma strategies needs to be subject to dialogue and agreement between the relevant authorities and the national equality body. This involvement should respect the following principles:

- respect for the independence of the equality body and how the equality body sees fit to give expression to its independence in the choices made as to how best to engage with the national Roma strategy;
- provision of adequate resources to the equality body that would enable its agreed involvement in the national Roma strategy; and
- commitment to a meaningful involvement for the equality body, that acknowledges, and maximises the influence of, the particular expertise and perspective that it brings to the development, implementation, and monitoring of the national Roma strategy.

This involvement could take different forms across the Member States depending on the results of the dialogue, in particular the equality body could:

- engage in developing the national Roma strategy and in establishing the standards to be met in its implementation;
- provide an independent monitoring of the impact of the national Roma strategy or particular elements of it;
- contribute to standards for and an effective implementation of the anti-discrimination measures in the national Roma strategy and, specifically, measures to eliminate systemic discrimination; and/or
- be involved as member or observer in the structures established to ensure an effective implementation of the national Roma strategy.

## 3. Equality Bodies

### 3.1 Level of Priority

Tackling discrimination against Roma and Travellers usually comes within the equality body mandate under the ground of racial or ethnic origin. Equality bodies reflect a range in the priority they accord to their work with Roma and Travellers, but most deem it of high priority<sup>7</sup>:

- Thirteen equality bodies report giving their work with Roma and Travellers high priority.
  - This reflects the numbers of Roma and Travellers present in the jurisdiction in some cases and the absence of a strong Roma and Traveller voice in others. In all cases, even where the numbers might be small, it reflects the scale of disadvantage, discrimination, stereotyping, and hate speech experienced by Roma and Travellers, and the gap between this situation and the quality and level of policy responses to the resultant inequality.
- Three equality bodies report giving their work with Roma and Travellers medium priority.
  - While acknowledging the scale of the issues experienced by Roma and Travellers, this can reflect limited resources, a sense of powerlessness to contribute to change, or barriers to engaging with Roma and Traveller communities. In one instance it further reflects a strategic choice to pursue a multi-ground approach that includes Roma with other grounds in action taken in relation to a range of policy areas.
- Two equality body reports giving their work with Roma and Travellers low priority.
  - While acknowledging the scale of the issues experienced by Roma and Travellers, this reflects the low level of reporting by Roma and Travellers allied to the quasi-judicial function of the equality body, and the limited resources of the equality body for work beyond this quasi-judicial function. In one instance it reflects the low numbers of Roma in the country.

### 3.2 Engagement with Roma and Traveller Communities

Equality bodies identify a strong relationship with civil society as a key enabling factor for all aspects of their work on Roma and Traveller issues. They report a wide range of engagement with Roma and Travellers, their representatives, and their organisations. This has a mutual benefit in informing the work of equality bodies on Roma and Traveller issues and in informing Roma and Travellers, their representatives, and their organisations on making use of equal treatment legislation and on the role of the equality body.

This engagement encompasses a range of activities, including:

- visits to and meetings at Roma settlements;
- provision of training to Roma and Traveller associations;
- meeting Roma and Traveller groups and associations as a source of learning;
- networking with Roma and Traveller associations within the official institutions established in relation to Roma and Traveller issues; and

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<sup>7</sup> Two equality bodies did not identify the level of priority.

- having Roma and Traveller representatives on equality body institutional structures.

In Croatia, the Human Rights Council, an advisory body of the **Office of the Ombudswoman**, includes Roma representatives, and the equality body engages in visits to local Roma communities and settlements, as well as meetings with Roma politicians and NGOs.

In Kosovo<sup>8</sup>, the **Ombudsperson Institution in Kosovo** hosted twenty children from the Roma, Ashkali and Egyptian communities, from the Municipality of Podujeva, to enable them to express their opinions, attitudes or concerns about the various problems they face every day, not only at school, but also on the streets and elsewhere, and to be heard by the Ombudsperson.

In the Slovak Republic, the **Slovak National Human Rights Centre** plans to establish an advisory body to assist in strengthening its work on Roma rights.

There are barriers identified by equality bodies that can limit or diminish this engagement. These include:

- divisions within the Roma and Traveller communities;
- lack of capacity among Roma and Traveller representatives and their organisations to make an impact; and
- lack of trust in public institutions including equality bodies.

These are seen as issues that need to be of concern in national Roma integration strategies, in particular that of strengthening Roma and Traveller organisations.

A number of equality bodies note the narrow civic space experienced by Roma and Traveller organisations. This can be reflected in inadequate funding in particular, low levels of support for capacity building, and limited political, media, or public attention to the issues they bring forward.

### 3.3 Enforcement

Equality bodies are engaged in actions to:

- provide advice and assistance to Roma and Travellers to bring forward discrimination cases;
- receive and hear complaints of discrimination by Roma and Travellers;
- act as amicus curiae in cases involving Roma and Travellers; and
- pursue own-initiative or ex-officio cases of discrimination that relate to Roma and Travellers.

The breadth of discrimination issues brought forward by Roma and Traveller complainants is seen as noteworthy in encompassing the full spectrum of areas covered by the mandate of equality bodies.

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<sup>8</sup> This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

The impact of casework is influenced by the level of implementation of or adherence to recommendations issued by equality bodies. This varies by jurisdiction, but a low level of implementation is an issue for some equality bodies.

In Albania, the **Commissioner for Protection from Discrimination** handled a case in relation to the eviction of Roma families from their residence of over twenty years, in Tirana in 2013. The Commissioner found there was no documentation to prove that the obligatory legal actions, providing for the eviction, were followed. There was no information on the measures that responsible institutions had taken to avoid negative consequences for the Roma community. The equality body made a recommendation to Tirana Municipality to implement a programme to provide social housing for Roma families. During the eviction, Roma families raised concerns that the police did not react to the forced removal or the verbal abuse they experienced. The equality body made a recommendation to the District Police Directorate of Tirana, to take measures necessary to respond to the issue in a legal and non-discriminatory way.

In Cyprus, the **Commissioner for Administration and the Protection of Human Rights** prepared a report on Roma education on foot of a complaint. This found that: measures taken to support Roma education were insufficient, resulting in discrimination; and the Ministry of Education had failed to recognise the Roma people as a different ethnic group that speaks its own language. While some positive measures had been taken by the State in schools where Roma students attend, no account had been taken of their specific identity and culture in the measures. The equality body recommended that the Ministry adopt policies to ensure that all children, regardless of ethnic origin, enjoy the right to education, and consider adapting the curriculum to include lessons on Roma cultural heritage. The Ministry subsequently adopted additional measures to employ two Turkish Cypriot teachers in the school where Roma students attended, and for the Roma language to be taught, on an optional basis.

In France, the **Defender of Rights** acted as *amicus curiae* in a case before the ECHR, 'Hirtu and Others v. France', concerning the eviction of Roma from an unauthorised encampment. The equality body has been involved since 2012 on the issue of evictions of families living on illegally occupied land. On 14 May 2020, the ECHR ruled against France in the case. The Court found that the authorities had been entitled in principle to evict the applicants. However it further found that: owing to the short time between the issuing of the prefect's order and its implementation, no account had been taken of the repercussions of the eviction or the applicants' particular circumstances; the remedy provided for by domestic law had come into play after the decision had been taken by the administrative authorities and had been ineffective; and there was a failure to take account of the particular needs of the applicants as belonging to an underprivileged group which breached their right to respect for their private and family life.

In Sweden, the **Equality Ombudsman** has taken a strategic approach to litigation in using casework as an opening step for a wider body of work on a particular issue and in taking a multi-ground approach in this. This enables systemic discrimination to be addressed and avoids a singular focus on Roma people. One example relates to children being placed in foster care which was a focus for a number of cases involving Roma and other grounds of discrimination. The learning from the cases was followed up with initiatives at local level to

review policy and procedure for placing children in foster care, engaging both municipalities and the communities affected. In a number of instances working groups, including Roma, were established to elaborate new policies. The issue was then made a national policy issue with political intervention sought for national policy change.

Under-reporting is a significant barrier to effective litigation and realising the full potential of equal treatment legislation. Under-reporting can reflect a sense that change is not possible, fear of victimisation for taking a case, or a lack of knowledge of rights and how to exercise them. It can also reflect the remote geographical location of many Roma and Traveller communities.

Equality bodies report a range of **activities to address under-reporting**. These include to:

- act ex-officio on Roma and Traveller issues;
- conduct research on discrimination against Roma and Travellers;
- make outreach visits to Roma settlement, communities and families;
- provide a dedicated legal consultation for Roma and Traveller individuals and associations;
- make links with Roma and Traveller organisations;
- work with NGOs as intermediaries to report and channel claims of discrimination;
- work with civil society and Roma and Traveller organisations to monitor and to develop monitoring mechanisms for the discrimination experienced;
- mediate in issues as they arise at a local level;
- establish local and regional offices of, or presence for, the equality body;
- translate information materials to Romani;
- train Roma and Traveller organisations on rights and the exercise of rights; and
- participate in Roma and Traveller events as a means of building trust.

In Belgium, **Unia** has developed a tight network of people directly working with Roma and Travellers, including people from civil society, municipalities, integration offices, and Roma mediators, to signal individual problems to the equality body that it then tries to bring to a structural solution. This is alongside direct contact with some Roma and Travellers.

In Cyprus, the **Commissioner for Administration and Protection of Human Rights** takes own-initiative investigations to respond to high levels of under-reporting and has recently launched a new own-initiative investigation on the living conditions of the Roma community (File no. AYT 3/2020).

In Croatia, the **Office of the Ombudswoman** cooperates with local and regional authorities (cities, municipalities and counties), as well as fostering and supporting their cooperation with central levels of government, in finding and implementing solutions for Roma communities in their areas. This can be a slow and complicated process, often burdened with various political and partisan issues, but is pursued both on an individual case level and through annual report recommendations and general initiatives.

In Kosovo, the **Ombudsperson Institution** visited thirteen settlements of Roma, Ashkali and Egyptian communities in 2019 and has conducted information campaigns, workshops, and roundtables with Roma, Ashkali and Egyptian organisations to address under-reporting.

In Poland, the **Commissioner for Human Rights Office** has acted ex-officio on Roma issues as a response to the issue of under-reporting by Roma. The Commissioner has also cooperated with various non-governmental organisations to learn about the situation of Roma communities and visits Roma settlements to meet directly with Roma residents.

In Serbia, the **Commissioner for Protection of Equality** pursues a suite of measures in response to under-reporting, including: training for national councils for minorities (including Roma national minority); visits to and awareness raising actions in informal Roma settlements; publication in Romani on identifying and reporting discrimination; cooperation with organisations working on Roma rights; publication of guidebooks and trainings for civil society organisations on conducting situation testing and litigating; and strategic litigation.

In Spain, the **Council for the Elimination of Racial or Ethnic Discrimination** supports an Assistance Service to Victims of Racial or Ethnic Discrimination, that is managed by the Fundación Secretariado Gitano (a Roma organisation) in collaboration with seven other non-governmental organisations specialised in immigration issues and combating racism and intolerance. Their technical staff are trained on discrimination and in the means of intervention in cases of discrimination. The service is provided from 87 locations, across all regions.

Equality bodies have used their powers of inquiry to expand their enforcement role, particularly in areas of systemic discrimination that involves a wide range of public authorities. This has a particular relevance to work on Roma and Traveller issues given that systemic discrimination is significant in the inequalities experienced by these communities, and given that there are difficulties in addressing systemic discrimination through casework alone.

In Ireland, the **Irish Human Rights and Equality Commission** used its powers to invite organisations to conduct equality reviews of their service provision to focus attention on the failure of local authorities to spend the budget provided to them for Traveller accommodation. All local authorities were invited to undertake an equality review on their provision of Traveller accommodation and have engaged in this process, which is ongoing.

Casework poses challenges to both equality bodies and to Roma and Traveller communities if it is to be effective. There is a challenge to equality bodies to understand the situation and experience of these communities and to introduce flexibility in their dealing with complaints brought forward. There is a challenge to Roma and Traveller complainants to understand their rights and the process for exercising these and to access the personal resources to stick with a case over the time required.

In a previous perspective, Equinet highlighted a good practice of mutual education in Sweden. Mutual education is a process of formal contact between the equality body and Roma and Traveller people and their organisations, involving “mutual listening, mutual challenge and mutual learning”.<sup>9</sup> It also provides a foundation for the trust building that is of central importance for effective casework.

The mandate and powers of equality bodies can affect their capacity to engage in effective litigation. Equality bodies point to areas that their mandate does not cover, whether a particular field of service provision, or a particular sector. One point of specific note is the number of equality bodies whose mandate does not cover the functions of the police. This is seen as problematic given the issues raised by Roma and Travellers in their interactions with the police in many jurisdictions. Limitations in the powers of equality bodies are noted, including: equality body decisions not being legally binding; and lack of powers to bring a case to court.

In a number of instances, equality bodies report that they do not gather data on the specific ethnic identity of complainants and thus do not have detailed data on Roma complainants.

In Belgium, **Unia** has a means of tracking dossiers related to Roma and Travellers specifically, in its system of complaint management, and report this data in its annual report.

In the Czech Republic, the **Public Defender of Rights** has taken steps to specifically identify and track dossiers for Roma and Traveller complainants, within the broader ground of racial or ethnic origin.

### 3.4 Promotion of Good Practice

The promotion of good practice by equality bodies contributes to the institutional change required to dismantle systemic discrimination experienced by Roma and Travellers in many jurisdictions. The work reported by equality bodies includes:

- the provision of training;
- the development of guidance documents;
- creating platforms for peer support and exchange of good practice; and
- supporting a positive engagement between service providers and Roma and Travellers.

The fields of education, health, and social care emerge as a particular focus in this work. Casework and follow-up of recommendations made in cases by equality bodies is a further important stimulus for good practice and institutional change.

This work is enabled by long-term cooperation with the sector concerned, partnership with state inspectorates with responsibility for standards in particular sectors, and strong relationships with civil society organisations. The initiatives reported tend to have a greater focus on the public sector than the private sector, though it is clear that good practice is

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<sup>9</sup> [Making Equal Treatment Legislation Work for Roma and Travellers](#), Equinet, Brussels, 2010.



required in both. It is clear from the survey that this is an area of work that could usefully be expanded by equality bodies.

In the Czech Republic, the **Public Defender of Rights** is using a strategic mix of powers to advance good practice in inclusive education for Roma children. A recommendation for inclusive education of Roma and non-Roma children was issued to provide guidance on how to address segregation in education. This was accompanied by litigation on complaints of discrimination, research on inclusive education of Roma and non-Roma children, information leaflets in Romani for Roma parents on enrolment to elementary schools and prevention of discrimination, and a series of YouTube videos on education of Roma children.

In Northern Ireland, the **Equality Commission for Northern Ireland** hosted an engagement event for Travellers and service providers in 2019. The aim of the event was to raise awareness of the key inequalities experienced by Travellers and encourage action by public authorities to address them. The event created a space for Traveller voices to be raised and heard by a range of service providers.

In Poland, the **Commissioner for Human Rights Office** participated in the "Coalition for strengthening the role of intercultural and Roma assistants and assistants in education" initiated by the "Foundation for Social Diversity". The activities sought to ensure that there were more intercultural and Roma assistants in schools, the work of the assistants was appreciated and carried out under good conditions, the schools made full use of the potential for cooperation with assistants, and the assistants were given the professional support they needed.

In the Slovak Republic, the **Slovak National Centre for Human Rights** has established a long-term cooperation with the State School Inspection. During the inspection, the State School Inspection focuses on identifying any practices of segregation. Where such practices are identified in a school by the State School Inspection, the information is forwarded to the Centre. The Centre monitors the situation, engages in dialogue with the school, and assists them to adopt appropriate measures to eliminate the segregation.

A number of equality bodies note the importance of positive duties in equal treatment legislation as a stimulus to good practice in employment of and in the provision of services to Roma and Traveller communities. Equinet has previously published a report on the range of such duties across Europe, their potential, and the role of equality bodies in their implementation<sup>10</sup>. This report recommended that the European Commission could further promote good practice among the Member States in legislating for and implementing statutory duties.

The EU Network of Legal Experts in the Field of Gender Equality note that positive duties play a key role in addressing systemic discrimination<sup>11</sup>. They point to the potential in positive

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<sup>10</sup> Crowley N., [Making Europe More Equal: A Legal Duty?](#), Equinet, Brussels, 2016.

<sup>11</sup> Fredmand S., [Making Equality Effective: The Role of Proactive Measures](#), EU Network of Legal Experts in the Field of Gender Equality, European Commission, 2009.

duties in that, “rather than determining a breach of the law, the focus is on identifying systemic discrimination and creating institutional mechanisms for its elimination”.

Even in the absence of a positive duty in equal treatment legislation, the institutional mechanisms involved could be employed by public bodies as a means of eliminating systemic discrimination. This could be promoted from a European level. The Equinet report identified key mechanisms: equality impact assessment; equality plan; institutional structures for coordination and peer support among public bodies; and integrating this focus into strategic planning by public bodies.

### 3.5 Research

Equality bodies report significant levels of research in relation to Roma and Traveller communities. The research has a particular focus on the level and nature of discrimination experienced by these communities, public attitudes to diversity and to Roma and Travellers in particular, and Roma and Traveller attitudes to discrimination. This research lends itself to repeat over time to assess progress, and this aspiration is noted by equality bodies. Employment, accommodation, and education emerge as further key research themes.

Partnership with national research institutes has enabled this work in a number of jurisdictions. Limited resources available to equality bodies is noted by some as an impediment to research work. External funding has been important in enabling this work in some instances. The lack of data being collected on Roma and Travellers in specific policy areas, such as health, is identified as a barrier to this research work.

In Bosnia and Herzegovina, the **Institution of Human Rights Ombudsman of Bosnia and Herzegovina** conducted research on the situation of Roma that included formal monitoring of responses to recommendations made. In 2014, a Special Report on the Status of Roma in Bosnia and Herzegovina was published and, in 2017, a Report on Implementation of Measures recommended in the 2014 report was published.

In Lithuania, the **Office of the Equal Opportunities Ombudsperson** conducted a study to gather information on Roma children attending pre-school and pre-primary education institutions in different municipalities. It was established that the numbers of Roma children attending pre-school and pre-primary educational establishments in 2013-2014 was very low. This data clearly demonstrated inequality in that the involvement of Roma children in pre-school and pre-primary education differs significantly from the national average.

In Serbia, the **Commissioner for Protection of Equality** as part of the project “Support to inclusion of Roma persons and other vulnerable groups in Serbia” implemented by Deutsche Gesellschaft für Internationale Zusammenarbeit, published three research reports, “Discrimination in the labour market”, “Attitudes of citizens toward discrimination”, and “Attitudes of Roma persons toward discrimination” (to be published).

### 3.6 Policy Advice

Equality bodies have an advisory function in relation to policy-making. Equality bodies report engaging in this work through:

- making policy recommendations and publishing opinions;
- making recommendations in their annual reports;
- shadow reporting on international human rights instruments; and
- engaging in the processes relating to national Roma integration strategies.

Education, health, social care, and accommodation emerge as a focus in this work.

In Belgium, the region of Brussels is to develop a future Roma strategy in close cooperation with **Unia**, and the equality body has also, jointly with the Minderhedenforum (an organisation representing minorities in Flanders), organised a meeting on the right to housing for Travellers in the Flemish parliament to inform and influence Flemish regional policy on housing for Travellers. Travellers themselves were also present to make their voice heard.

In Croatia, the **Office of the Ombudswoman** made recommendations, in its two most recent annual reports, to competent public administration bodies and authorities, especially in the area of interior affairs, health, social welfare, labour, pension insurance and education. They suggested to start collecting and processing special categories of personal data, including those on ethnicity or national origin, including Roma, along with adequate protective measures. While previous responses to these had been negative or without response, there has now been a positive indication that ethnic data in the social care system is to be collected and systemised, provided users accept to state their ethnicity.

In France, two opinions of the **Defender of Rights** contributed to the repeal and replacement of a 1969 Act, that laid down provisions relating to travel documents (special travel documents and travel books) and the commune of residence, which constituted a considerable obstacle to free movement and led to discrimination against Travellers. These were: the opinion 16-19 of 21 July 2016 on the draft law on Equality and Citizenship in favour of Travellers' rights, and the opinion 15-11 of 20 May 2015 on the status, reception and housing of Travellers: bill n° 1610 on the status of Travellers. The Law of 27 January 2017 in article 195 repealed the Act of 3 January 1969.

In Germany, the **Federal Anti-Discrimination Agency** is a member of the Alliance for Solidarity with the Sinti and Roma of Europe which organised a conference ahead of the last federal election that encouraged Sinti and Roma to formulate political demands and discuss them with key political actors. One key demand, an expert commission on anti-gypsyism, was met by the new government.

In Northern Ireland, the **Equality Commission for Northern Ireland** has updated its evidence base by developing and publishing a number of 'Statements of Key Inequalities' across specific areas of public policy. These Statements have highlighted and evidenced a range of inequalities facing the Traveller community. The focus for this work encompasses education, employment, housing, health, and participation in public life. These have formed the basis for the equality body's call for action to address these inequalities. The

equality body is engaging with the Northern Ireland Statistics and Research Agency and with key government departments to secure action to address a number of identified data gaps on Travellers.

In Slovenia, the **Advocate for Equality** made several recommendations to the Ministry of Justice on the draft Personal Data Protection Act (implementation of GDPR) regarding the collection of equality data, particularly data disaggregated by ethnicity. This would allow for the monitoring of advances in substantive equality and current inequality of Roma and for the planning and evaluation of measures to address persisting inequalities of Roma. This process is still ongoing.

Policy work is hampered in many jurisdictions by a lack of response from policy makers or limited cooperation by policy makers with the advisory function of the equality body. Policy work is rendered more difficult in contexts where data on Roma and Travellers is limited or not available. Equality bodies also point to a lack of coordination between the national and local levels as an impediment in policy implementation, which needs to be addressed if policy is to be effective.

### 3.7 Communication

Equality bodies address a range of audiences in their communication work on Roma and Traveller issues. In particular they address:

- Roma and Traveller communities in relation to their rights and how to exercise these;
- the general public to promote a recognition of cultural diversity and an understanding of Roma and Traveller aspirations and situations; and
- public and private sector institutions on good practice and on the implications of equal treatment legislation for their work.

Equality bodies identify the scale of Roma and Traveller stereotyping, political insensitivity or hostility to Roma and Travellers, public disinterest and language barriers as particular barriers encountered in seeking to communicate on matters relating to Traveller and Roma. The casework and the annual reports of equality bodies can provide important moments to enable equality bodies to stimulate debate on Roma and Traveller issues.

The limitation of their own resources is a particular impediment to communication work noted by many equality bodies. The need to have an effective communication plan in place is noted by some. The communication work of equality bodies can often depend on external funding and can risk reflecting donor priorities.

Equality bodies have taken it on themselves to challenge media outlets in relation to their coverage of Roma and Travellers. This has included casework and provision of guidance to media organisations on enabling a more accurate and helpful debate.

Social media is a particular focus for communication work in a context of the significant levels of hate speech noted in this area against Roma and Travellers. Equality bodies have taken

legal action, acted as ‘trusted reporters’ to the relevant social media companies, and sought to present alternative narratives about Roma and Travellers on social media<sup>12</sup>.

In Austria, the **Ombud for Equal Treatment** uses casework outcomes to stimulate debate on Roma issues. The cases are published in the equality body reports, newsletter, and on the website. In one case, a person of Hungarian Roma background was regularly harassed by his colleagues and his supervisors and was required to do harder work than his colleagues. The case was settled and company paid the applicant a compensation of 6000 Euros, which served to raise awareness of anti-gypsyism in a large private sector company.

In Bulgaria, a panel of the **Commission for Protection against Discrimination** ruled on a case concerning hate speech against Roma in a published article (Decision No. 50 of 23.01.2019, the panel). The Panel found that the article was prejudicial to the dignity of the Roma ethnicity, gave Roma a highly negative image as organised criminals, suggested that the Roma were abusers and thieves, and created a public attitude of contempt and aversion to the Roma, thereby creating a humiliating, degrading and abusive environment for the applicant. It concluded that the defendants cumulatively and directly promoted discrimination, which constituted an incitement to discrimination. A fine was applied, the author was required to refrain from future discrimination, and the proprietor to introduce controls to prevent future discrimination.

In Croatia, the **Office of the Ombudswoman** includes a dedicated section on Roma in the annual report. The report is used to secure a high media visibility and is subject to debate in the national parliament. The report includes recommendations for policy change seen as being required.

In Germany, the **Federal Anti-Discrimination Agency** is a member of the Alliance for Solidarity with the Sinti and Roma of Europe. This brings together Sinti and Roma organisations and other civil society organisations (e.g. Central Council of Jews in Germany, Association of Lesbians and Gays in Germany) with the joint aim of raising awareness of the situation of the Roma minority in Europe and for persisting anti-gypsyism in Germany and elsewhere. The campaign has successfully established a tradition of celebrating International Roma Day in Berlin with high-profile politicians attending and committing to the issue.

In Spain, the **Council for the Elimination of Racial or Ethnic Discrimination** published the guide "Recommendations for the treatment of the Roma community in the media". This made recommendations for media professionals, communication companies and public authorities.

### 3.8 Intersectionality

Intersectionality and multiple discrimination are a feature in the work of equality bodies on Roma and Traveller issues. The two most significant intersections reported relate to the grounds of gender and socio-economic status. There is some focus on Roma and Traveller older people and children, intersection with the age ground, and on Roma and Traveller

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<sup>12</sup> See: [Extending the Agenda: Equality Bodies Addressing Hate Speech](#), Equinet, Brussels, 2018.

people with disabilities, intersection with the disability ground, but these intersections might merit further attention along with the intersection with the sexual orientation ground.

The socio-economic status intersection reflects the significant levels of poverty and disadvantage endured by Roma and Traveller communities. The mandate of some equality bodies includes a socio-economic status ground which enables a focus on this intersection. Some equality bodies report barriers to addressing this intersection effectively in the absence of such a ground.

It is important to address socio-economic status as an intersection, not only to ensure issues of poverty and disadvantage faced by Roma and Travellers are addressed, but to ensure they are addressed in a manner that takes account of cultural diversity, the barriers of discrimination, and the goal of substantive equality. One of the initial criticisms of the current EU Framework Strategy was that, without a strong non-discrimination and equality element, it risked taking an anti-poverty approach that was diminished in its potential for failing to address and respond to the culture and identity of Roma and Travellers.

The gender intersection reflects Roma and Traveller women's experiences of multiple discrimination, additional disadvantage, and issues that can be present within the community such as early marriage and gender-based violence. The importance of positive action targeting Roma and Traveller women is stressed.

In the Slovak Republic, the **Slovak National Centre for Human Rights** is implementing a project in 2020 on mainstreaming the rights of Roma women. The project includes communication campaigns, sensitising activities, capacity building activities, and awareness raising targeting predominantly Roma.

Intersections have been identified with regard to legal status for Roma migrants moving to another jurisdiction. These are noted in section 2.2 above.

Many equality bodies work to a multi-ground mandate. This is noted as enabling another approach to intersectionality in allowing action on issues of relevance to a number of the grounds in a multi-ground manner. This can capture intersectional issues given the range of groups covered by the approach.

## 4. Looking Forward

### 4.1 Equality Bodies

Equality bodies identify that they remain committed to an ongoing prioritisation of Roma and Traveller issues in their plans for the future. This reflects the high levels of inequality and discrimination evident for these communities across all jurisdictions.

Particular priorities identified by specific equality bodies for their ongoing work include to continue and expand initiative to:

- pursue **strategic litigation**, including own-initiative casework;
- address **under-reporting** and enhance access to justice;
- respond to, prevent, and secure more **effective action on hate speech and hate crime** against Roma and Travellers;
- **collaborate with Roma and Traveller civil society organisations**, including initiatives to build trust and engage in mutual education;
- provide **policy advice** on improving the living conditions and life experience of Roma and Traveller communities and pursue its implementation; and
- conduct **research** to enable deeper knowledge of the situation and experience of Roma and Traveller communities to inform policy responses.

This is an expansive agenda that could usefully be considered by all equality bodies in further evolving their responses to Roma and Traveller issues, within the resources available to them.

In pursuing this agenda, equality bodies could usefully pursue a **proactive engagement with the national Roma strategies**, and identify and activate the most effective approaches and means to do so within their mandate.

### 4.2 European Commission: Equality Bodies

The European Commission could usefully continue its work to enable an active and effective engagement by equality bodies on Roma and Traveller issues. This could include initiatives to sustain and enhance:

- **implementation of the European Commission Communication on standards for equality bodies**, with particular attention to standards in relation to the resources made available to equality bodies, enabling the policy advisory function of equality bodies, and the mandate and powers afforded to equality bodies, which emerge as being at issue in their work on Roma and Traveller issues<sup>13</sup>; and
- naming **equality bodies as valued actors within the EU Framework**, making specific reference to:
  - the potential in their functions of: enforcement in relation to a critical mass of casework in relation to discrimination, harassment, and hate speech; policy advice and recommendations; and good practice guidance;
  - the need to adequately resource the equality bodies to implement these functions; and

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<sup>13</sup> [Commission Recommendation of 22.6.2018 on standards for equality bodies](#), Brussels, 22.6.2018 C(2018) 3850 final

- ensure the outputs of these functions can be effectively brought to bear to improve the situation and experience of Roma and Traveller communities.

#### 4.3 European Commission: Post-2020 EU Framework

The EU Institutions, and in particular the European Commission with its forthcoming post 2020 EU Framework on Roma Equality and Inclusion Strategies, are seen by equality bodies as key in securing the step-change needed in the situation and experience of Roma and Traveller communities across Europe.

It would be important for the forthcoming EU framework to include a **comprehensive anti-discrimination focus** with specific measures to:

- **strengthen access to justice with the objectives to ensure a critical mass of cases** brought forward by Roma and Travellers sufficient to build a culture of compliance with equal treatment legislation among employers and service providers, measuring progress by way of:
  - increase in levels of casework under equal treatment legislation;
  - increase in numbers of employers and service providers with equality policies, naming Roma and Travellers, in place and operational; and
- **develop and implement systems to dismantle and prevent forms of institutional or systemic discrimination** experienced by Roma and Traveller communities with the objectives to realise outcomes of substantive equality in key policy fields, measuring progress by way of:
  - amendment of equal treatment legislation to introduce positive duties to promote equality;
  - level and quality of implementation by public bodies of equality impact assessment, including Roma and Travellers, in preparing legislation, policies, and programmes; and
  - creation and operation of coordination structures for peer support in implementing institutional mechanisms to eliminate systemic discrimination.

Furthermore, the forthcoming EU Framework could usefully:

- **establish a standard of substantive equality** to underpin all headline targets set across the different policy fields, to inform all measures targeted at Roma and Travellers, and to be reflected in a mainstreaming of Roma and Travellers in policy making and programme design at EU and national levels;
- continue and **strengthen priorities for national level action in the fields of education, health, accommodation, and employment**, including positive action to advance substantive equality in each area;
- address the need for **cultural change at a societal level**. This could include initiatives to:
  - enable the elimination of stereotyping;
  - underpin and engage a positive values-based public and political discourse on Roma and Traveller issues; and
  - drive effective action to prevent and eliminate hate speech with the promotion of alternative narratives;



- include further priorities for: **income, social protection and the elimination of poverty**; anti-discrimination as defined above; and responses to climate change including for **environmental justice** for Roma and Travellers.
- address difficulties for Roma in **securing adequate personal documentation and use of civil registration systems**, and secure an effective response to the difficulties for Roma and Travellers on moving to another Member State;
- take an **intersectional approach** in targeting specific groups within Roma and Traveller communities and ensuring that general measures taken benefit all members of these communities;
- **support cultural action** within Roma and Traveller communities and **support an appreciation of Roma and Traveller culture and identity** among the majority population; and
- **invest in Roma and Traveller empowerment** through:
  - providing support and resources for self-advocacy;
  - providing support and resources for Roma and Traveller community organisations to engage in community development and advocacy work; and
  - creating platforms for mutual education to sustain the capacity of public bodies to create benefit for Roma and Travellers, and the capacity of Roma and Traveller organisations to engage in effective advocacy with public bodies.

The **implementation of national Roma integration strategies** could usefully be strengthened, with attention given in the EU Framework to:

- standard setting for and monitoring of initiatives;
- a horizontal equality principle to ensure intersectionality is addressed across grounds of gender, disability, age, sexual orientation, and socio-economic status in all initiatives, alongside a targeting of specific groups as required;
- inclusion of Roma and Traveller civil society organisations as partners to ensure initiatives are tailored to their specific situation, experience, and identity and supporting their capacity in this regard;
- securing the role of equality bodies in relation to national Roma integration strategies by establishing the need for dialogue between the relevant authorities and the equality body to establish this role based on the principles outlined in section 2.3 above and drawing from the menu of options set out in that section;
- stimuli to ensure that funding allocated is spent and, in particular, local government bodies make use of the resources made available to them; and
- enhanced equality data collection to inform policy and initiatives and to enable impact indicators to be established and monitored.

#### 4.4 European Institutions: Beyond the Framework

The European institutions could usefully take specific actions beyond the EU Framework itself:

- The **Council could adopt, on foot of a Commission proposal, an overarching and ambitious Recommendation on Roma and Traveller equality**. This would expand on

the 2013 Recommendation<sup>14</sup> with commitments based on the goal of substantive equality and elimination of all forms of discrimination, including systemic discrimination, mainstreaming equality and non-discrimination across all measures, and making reference to enabling the contribution of equality bodies with adequate resources and sufficient powers to fully realise their potential.

- Ensure an **adequate and appropriate response**, at European and national levels, to the particular risks experienced by Roma and Traveller communities due to the **Covid-19 pandemic**, and ensure adequate and appropriate mainstreaming and inclusion for these communities in the social and economic policies and programmes deployed to address and repair the impact of the pandemic.
- Ensure the **European structural and investment funds (ESIF)** continue to play a central role in enabling implementation of initiatives to improve the situation and experience of Roma and Traveller communities. Particular attention could usefully be given to:
  - ensuring the enabling condition relating to a national Roma integration strategy is met to a high standard;
  - the horizontal equality and non-discrimination principle is implemented on a more systematic basis and includes a stronger focus on Roma and Travellers; and
  - specific funds could be ring-fenced to advance equality for and improve the living conditions of Roma and Traveller communities;
- The **European Semester** and the **Europe 2020 strategy** and its successor are **attuned to the challenges of and the need to mainstream and include Roma and Travellers in the economic and labour market policy areas covered**. The increased focus on the Pillar of Social Rights in this process is welcome. It would be important to ensure that the process of including Roma and Travellers as a specific focus in Country Specific Recommendations made through this process, continues and deepens over the next period.
- Agree and enact the **Horizontal Equal Treatment Directive** to a high level of ambition.

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<sup>14</sup> Council recommendation on effective Roma integration measures in the member states, Employment, Social Policy, Health and Consumer Affairs Council meeting Brussels, 9 and 10 December 2013, Council of the European Union.

# EQUINET MEMBER EQUALITY BODIES

## ALBANIA

Commissioner for the Protection from Discrimination  
[www.kmd.al](http://www.kmd.al)

## AUSTRIA

Austrian Disability Ombudsman  
[www.behindertenanwalt.gv.at](http://www.behindertenanwalt.gv.at)

## AUSTRIA

Ombud for Equal Treatment  
[www.gleichbehandlungsanwaltschaft.gv.at](http://www.gleichbehandlungsanwaltschaft.gv.at)

## BELGIUM

Institute for the Equality of Women and Men  
[www.igvm-iefh.belgium.be](http://www.igvm-iefh.belgium.be)

## BELGIUM

Unia (Interfederal Centre for Equal Opportunities)  
[www.unia.be](http://www.unia.be)

## BOSNIA AND HERZEGOVINA

Institution of Human Rights Ombudsman of Bosnia and Herzegovina  
[www.ombudsmen.gov.ba](http://www.ombudsmen.gov.ba)

## BULGARIA

Commission for Protection against Discrimination  
[www.kzd-nondiscrimination.com](http://www.kzd-nondiscrimination.com)

## CROATIA

Office of the Ombudsman  
[www.ombudsman.hr](http://www.ombudsman.hr)

## CROATIA

Ombudsperson for Gender Equality  
[www.prs.hr](http://www.prs.hr)

## CROATIA

Ombudswoman for Persons with Disabilities  
[www.posi.hr](http://www.posi.hr)

## CYPRUS

Commissioner for Administration and Human Rights (Ombudsman)  
[www.ombudsman.gov.cy](http://www.ombudsman.gov.cy)

## CZECH REPUBLIC

Public Defender of Rights  
[www.ochrance.cz](http://www.ochrance.cz)

## DENMARK

Board of Equal Treatment  
[www.ast.dk](http://www.ast.dk)

## DENMARK

Danish Institute for Human Rights  
[www.humanrights.dk](http://www.humanrights.dk)

## ESTONIA

Gender Equality and Equal Treatment Commissioner  
[www.volinik.ee](http://www.volinik.ee)

## FINLAND

Non-Discrimination Ombudsman  
[www.syrjinta.fi](http://www.syrjinta.fi)

## FINLAND

Ombudsman for Equality  
[www.tasa-arvo.fi](http://www.tasa-arvo.fi)

## FRANCE

Defender of Rights  
[www.defenseurdesdroits.fr](http://www.defenseurdesdroits.fr)

## GEORGIA

Public Defender of Georgia (Ombudsman)  
[www.ombudsman.ge](http://www.ombudsman.ge)

## GERMANY

Federal Anti-Discrimination Agency  
[www.antidiskriminierungsstelle.de](http://www.antidiskriminierungsstelle.de)

## GREECE

Greek Ombudsman  
[www.synigoros.gr](http://www.synigoros.gr)

## HUNGARY

Equal Treatment Authority  
[www.egyenlobanasmod.hu](http://www.egyenlobanasmod.hu)

## HUNGARY

Office of the Commissioner for Fundamental Rights  
[www.ajbh.hu](http://www.ajbh.hu)

## IRELAND

Irish Human Rights and Equality Commission  
[www.ihrec.ie](http://www.ihrec.ie)

## ITALY

National Office against Racial Discrimination - UNAR  
[www.unar.it](http://www.unar.it)

## KOSOVO\*

Ombudsperson Institution  
[www.oik-rks.org](http://www.oik-rks.org)

## LATVIA

Office of the Ombudsman  
[www.tiesibsargs.lv](http://www.tiesibsargs.lv)

## LITHUANIA

Office of the Equal Opportunities Ombudsperson  
[www.lygybe.lt](http://www.lygybe.lt)

## LUXEMBURG

Centre for Equal Treatment  
[www.cet.lu](http://www.cet.lu)

## MALTA

Commission for the Rights of Persons with Disability  
[www.crpdp.org.mt](http://www.crpdp.org.mt)

## MALTA

National Commission for the Promotion of Equality  
[www.equality.gov.mt](http://www.equality.gov.mt)

## MOLDOVA

Council on Preventing and Eliminating Discrimination and Ensuring Equality  
[www.egalitate.md](http://www.egalitate.md)

## MONTENEGRO

Protector of Human Rights and Freedoms (Ombudsman)  
[www.ombudsman.co.me](http://www.ombudsman.co.me)

## NETHERLANDS

Netherlands Institute for Human Rights  
[www.mensenrechten.nl](http://www.mensenrechten.nl)

## NORTH MACEDONIA

Commission for the Protection against Discrimination  
[www.kzd.mk](http://www.kzd.mk)

## NORWAY

Equality and Anti-Discrimination Ombud  
[www.ldo.no](http://www.ldo.no)

## POLAND

Commissioner for Human Rights  
[www.rpo.gov.pl](http://www.rpo.gov.pl)

## PORTUGAL

Commission for Citizenship and Gender Equality  
[www.cig.gov.pt](http://www.cig.gov.pt)

## PORTUGAL

Commission for Equality in Labour and Employment  
[www.cite.gov.pt](http://www.cite.gov.pt)

## PORTUGAL

High Commission for Migration  
[www.acm.gov.pt](http://www.acm.gov.pt)

## ROMANIA

National Council for Combating Discrimination  
[www.cncd.org.ro](http://www.cncd.org.ro)

## SERBIA

Commissioner for Protection of Equality  
[www.ravnopravnost.gov.rs](http://www.ravnopravnost.gov.rs)

## SLOVAKIA

Slovak National Centre for Human Rights  
[www.snspl.sk](http://www.snspl.sk)

## SLOVENIA

Advocate of the Principle of Equality  
[www.zagovornik.si](http://www.zagovornik.si)

## SPAIN

Council for the Elimination of Ethnic or Racial Discrimination  
[www.igualdadynodiscriminacion.msssi.es](http://www.igualdadynodiscriminacion.msssi.es)

## SPAIN

Institute of Women and for Equal Opportunities  
[www.inmujer.es](http://www.inmujer.es)

## SWEDEN

Equality Ombudsman  
[www.do.se](http://www.do.se)

## UNITED KINGDOM - GREAT BRITAIN

Equality and Human Rights Commission  
[www.equalityhumanrights.com](http://www.equalityhumanrights.com)

## UNITED KINGDOM - NORTHERN IRELAND

Equality Commission for Northern Ireland  
[www.equalityni.org](http://www.equalityni.org)

\* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



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[www.equineteurope.org](http://www.equineteurope.org)

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