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Understanding the EU Roma Policy

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Abstract

Roma Inclusion has become one of the flagships of the twenty-first century EU policies. In 2011, the Framework for Roma Integration Strategies marked the launch of a structured and targeted approach towards the inclusion of the most marginalized and vulnerable minority in Europe, which at the same time does not constitute a single coherent group. The acknowledgement that the 10-12 million people dispersed all over the continent are not only in need of targeted support but that they are also man-power predominantly lost to the European economy became the driver behind the policy changes. The new centralized approach was designed with the aim to overcome the scattered and inefficient efforts implemented the European countries in the past. The goal of the EU was to guide and synchronize the efforts of the national governments and to support each one of them to develop, plan and implement strategies for integration of Roma under the common Framework. Applying policy analysis models to examine the EU policies for Roma integration, the current paper analyses the potential efficiency and positive impact of the adopted approach. The aim of the text is to focus the attention of policy and decision makers on possible shortfalls that would eventually hamper the positive transformation of societies.

Keywords: Roma; EU; integration; policy analysis

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Policy for Roma Integration is a twenty-first century concept and phenomenon. The clarification needed here is that although different measures and approaches to support the inclusion of Roma¹ in societies have been there for decades, these programmes were limited in scope to the territories of the respective states. It was only in the 1990s when the international attention focused on the general situation of Roma in Europe and gradually, after the beginning of the new millennium, the focus shifted from the human rights towards the socio-economic benefits from the inclusion² and the need to adopt a synchronized approach³ at the EU level towards the improvement of their situation.

Although the European Council of December 2007 (Presidency Conclusions 2007) marks the beginning of the period of systematic EU policy efforts towards fostering social inclusion of Roma, a structured approach towards the development and implementation of the respective synchronized policies became visible after 2010. In 2011, the Council of the European Union, recalling ‘that the European Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities [...]’ and ‘that combating social exclusion, discrimination and inequality is an explicit commitment of the European Union’,⁴ *introduced the* Framework for Roma Integration Strategies up to 2020. Although the challenges faced by the largest European minority⁵ have attracted the political attention at the EU level in the 1990s and hence have become a part of the Enlargement policy and conditionality, the Framework marked the transition from a general concern about Roma towards coordinated efforts for bringing about a positive change.

Identifying four areas of huge existing gaps between Roma and the rest of the population, the document has set up the European goals for each one of them.⁶ Aiming to overcome the high drop-out rate,⁷ the key objective in the field of **education** was defined as ‘all Roma children to complete at least primary school’. In the field of **employment**, the aim is also to close the current gap between the employment rates.⁸ Reducing inequalities in life expectancy rates and decreasing levels of infant mortality have been defined as goals in the field of **healthcare**,⁹ as well as in the field of **housing** – ensuring adequate access to essential services and improving living conditions. The Framework envisages that EU Member States translate these EU goals into national goals, which should be achieved by 2020.

Within the two years after the Member States submitted their NRIS,¹⁰ the EC managed to issue country-specific recommendations to analyse the progress made and to produce several reports on the implementation of the NRIS.¹¹ Certainly, this is an achievement that needs to be acknowledged. Notwithstanding that all these efforts seem promising, there are several major issues that, if not addressed promptly, sooner rather than later would create significant impediments to policy making and would certainly hamper the achievement and/or the sustainability of the planned and expected results.

Assuming that the EU Roma policy is a product of this new approach to policy making in the twenty-first century, the current paper will explore its structural and functional coherence through some major policy theories. The paper aims also to inspire a debate whether the current policy design could contribute to the achievement of the expected outcomes and bring about a real positive change in the life of the 10 to 12 million EU Roma.

1. From concerns about Roma to EU Roma policy

While in the 1990s, in the context of the ethnic violence that Europe faced after the end of the Cold War, Roma-related issues were included as part of the EU enlargement policy and conditionality to accession,¹² in the beginning of the twenty-first century, as a result from the Eastern Enlargement impact on the Union, the agenda shifted towards prioritization of social cohesion and development.

Regardless of some earlier national and EU initiatives, systematic efforts at the European level to advance Roma inclusion into mainstream societies can be noted only after 2004, when all of the key EU policy documents have been produced. Before the turn of the Millennium, Council of Europe adopted only eight of its 32 texts related to Roma.¹³

With the official acknowledgement that EU policies for active inclusion should also address the specific situation of Roma,¹⁴ the targeted policy making process gained pace over the next few years. In January 2008, the European Parliament adopted a Resolution on a European Strategy on the Roma,¹⁵ where it

6. Urges the Commission to develop a European Framework Strategy on Roma Inclusion aimed at providing policy coherence at the EU level as regards the social inclusion of Roma and [...] to shape a comprehensive Community Action Plan on Roma Inclusion with the task of providing financial support for realizing the objective of the European Framework Strategy on Roma Inclusion;
7. Urges the Commission to comprehensively shape a Community action plan on Roma inclusion [...].

The first EU summit to address the problems faced by the Roma took place later in 2008 and included almost 400 people – high-level national officials, Roma leaders and human rights advocates – to discuss the paths for better and more efficient Roma integration policies and measures. The figures reported at the summit revealed that between 2000 and 2006 the EU spent 275 million Euro on projects specifically geared to Roma inclusion and a further 1 billion Euro – on disadvantaged groups in general, including Roma.¹⁶ Stressing the needs for exchanging good practices and experience between the Member States in the sphere of inclusion of Roma, the conclusions of the Council of Ministers¹⁷ of December 2008 advanced the development of a EU Roma inclusion policy. In 2009, during the Czech Presidency of the EU, the ten Common Basic Principles (CBP) of Roma Inclusion¹⁸ were adopted after several years of discussion between a variety of stakeholders and European institutions.¹⁹ The Conclusions of the Council of Ministers of Employment, Social Policy, Health and Consumer Affairs of 8 June 2009 (2947th Council Meeting) called for close cooperation between Member States in accordance with their respective competences and the identified principles of inclusion.

Despite all the efforts at the national and international level over the past decade, Roma continue to occupy the periphery of mainstream national Member States and ‘European society’, facing deep poverty, poor health, social exclusion and discrimination. The global financial and economic crises that hit Europe in 2008 emphasized the severity of these problems²⁰ and the vulnerability of Roma. The minority communities appeared among the most affected by the crisis, especially in terms of lack of financial buffers (savings), shortage of low-qualified jobs and a low level of *flexicurity*.²¹ The collapse of certain economic sectors in member-countries affected not only local communities but also migrant workers and their families residing in different EU countries.

Acknowledging the need for a new approach to development based on long-term sustainability, economy of knowledge and higher added value, and on higher levels of *flexicurity* through investments in human capital, the European Commission introduced the Strategy Europe 2020. Its targets however projected with regard to European Roma clearly indicated the economic and social disparities between mainstream society and the Roma minority as well as the regional disparities within the European Union.²² The increased awareness that the social and economic exclusion of this large group of European citizens has not only imminent but also a long-term negative impact on the community as a whole because of the accumulation of negative costs (in terms of human capital and productivity), which resulted in the *decision to join efforts at the European level*.²³

In 2011, pursuing the goals set in the European Platform against Poverty and Social Exclusion,²⁴ the European Parliament Resolution on a European strategy on Roma inclusion²⁵ (2010) and the recommendations made in a range of EU policy documents,²⁶ the European Commission invited all Member States to develop and present their National Roma Inclusion Strategies (NRIS) or sets of policy measures. The supportive EU Framework for Roma integration²⁷ instructed the Member States to tailor their national strategies with reference to the identified goals at the EU level projected in the key policy documents, but also in compliance with the specific country-related needs of Roma as marginalized and disadvantaged groups. By March 2012, all Member State governments provided the Commission with the required documents.²⁸

Aiming to shift from the scattered, project-based and unrelated interventions to integrated and coordinated approaches for enabling positive change and to provide further support to Member States, the European Commission assessed the submitted national strategies.²⁹ The assessment has focused on examination of the NRIS's consistency with the structural requirements specified in the EU Framework (in terms of content, covered areas, compliance with EU policies) and on the technical assurance planned (including the involvement of all important national stakeholders, the creation of a robust monitoring system, the appointment of a national contact point, ensuring the protection of fundamental rights). It also has addressed the provisioned usage of EU funding and resources secured for ensuring the effective and sustainable implementation of the strategies, and the strategic thinking as projected in the documents.

In a set of specific summaries, the Commission provided its recommendations to the Member States outlining the identified key priorities for each of the four areas in focus: education, employment, healthcare and housing.³⁰ Apart from the particular guidelines provided under each of the four dimensions of the planned strategic support,³¹ the European Commission has established that the aimed integrated approach would require:

- development of monitoring systems by setting a baseline, appropriate indicators and measurable targets;
- coordination between the different layers of governance, between regional and local authorities;
- involvement of civil society, including Roma organizations;
- ensuring that all Roma are registered with the appropriate authorities;
- fighting against racism and discrimination including multiple discrimination;

- building public understanding of the common benefits of Roma inclusion.

Pursuing the agenda set, the progress reports delivered by the Member States are regularly monitored and further recommendations are provided by the European Commission.³² Based on the first assessment in 2012,³³ in the end of 2013 the European Council adopted a recommendation on effective Roma integration measures in the Member States.³⁴

2. Profiling the EU Roma policy

Assessing the EU policies targeting Roma inclusion in order to achieve better understanding of the system (or lack thereof) requires that several aspects are analysed. First, it is important to verify the appropriateness of the term ‘EU Roma policy’.

As mentioned above, the official document that pushed forward EU targeted efforts towards Roma inclusion – the Presidency Conclusions of 2007³⁵ – make a specific reference to Roma but in the context of the overall policies for active inclusion. The First Roma Summit of 2008 was viewed as an awareness raising activity that would contribute to the identification of ‘policies that work’ and would provide an input for the debates at EU level and for further action.³⁶ The Framework, adopted in 2011, provides that the Commission would support the regional- and national-level efforts of the Member States to improve the social and economic inclusion of Roma through its financial instruments, mechanisms for involvement of civil society and institutional accountability, and through monitoring the progress made by each country.³⁷ It is therefore an instrument for coordination of Member State policies and a product of the active European involvement in the process aiming at Roma integration.³⁸ The Council Conclusions of May 2014 also suggest that the EU is expected to be the driving engine for the development and implementation of national-level policies for Roma inclusion throughout the Member States, while the European Commission would be responsible for the monitoring of the implementation and the assessment of its success.³⁹ Although paragraph 29 of the document stipulates that the European Commission should ensure that Roma inclusion becomes a horizontal crosscutting issue, there is no clear reference to ‘EU Roma policy’. Strictly speaking, the concept of ‘EU Roma policy’ is rarely used in official EU documents and communications.⁴⁰

Without any clearly stated reasons for this terminological uncertainty, which could hardly be taken for a mistake or coincidence, one could only speculate that placed beyond the policy definition, the process and its mechanisms are formally not to be assessed through the guiding principles for EU policies adopted in the 2001 (e.g. openness, participation, accountability, effectiveness and coordination).⁴¹ This certainly would limit the possibility for challenging the openness of the EU decision making process, the pro-forma involvement of stakeholders in the

process of defining the key goals and objectives as well as the four priority areas (e.g. the Roma Summits), and the delegated responsibility to the Member States for effective implementation. Certainly, another reason could be that the EU is being careful not to fall in the trap of positive discrimination and to provoke the aspirations of other minorities to claim for a specific policy to protect their rights.

Acknowledging that this terminological issue can constitute a debate per se, the current analysis will not explore it further and will focus on the assessment of the EU Roma policy through the theoretical policy models questioning whether the current policy design is contributing or hampering the achievement of the specified objectives.

The interplay of problems, issues, goals and actors that currently constitutes the field of the Roma-targeted activities throughout the EU suggests that the EU Roma policy can be viewed as a system, following the theoretical perspective outlined by David Easton.⁴² Multiple players at multiple levels are currently focused on the coordination of the variety of actions and initiatives to ensure the achievement of the identified objectives. The goals set by the EU Framework as common policy objective for all Member States, which need to become guiding principles for the development of the national strategies, are in the core of the system, whose functionality has been planned and ensured from the centre. The operational procedures are transferred to the periphery where the Member States are expected to implement effective measures in order to achieve the prescribed objectives.

However, examining the interconnectedness of the different components, it appears that the EU Roma policy has characteristics of a system only when assessed through the centre-periphery point of view. To achieve the goals formulated by the centre, all the individual units (Member States) need to be actively involved. The centre coordinates and regularly tunes the work of the units and balances between particular situations and the common functionality. The malfunctioning of one of the components would eventually have a negative impact on the general performance of the system; and certainly, the effective functioning of the system would be challenged if a single unit fails to comply with the centrally-defined requirements or drops out.⁴³ The centre therefore needs to keep the periphery in balance and regularly verify its dynamic relation with the centre.

When the processes are examined from a bottom-up (periphery-centre) perspective, the situation looks rather different. By transferring the responsibility to the Member States to transpose the common objectives into specific national policies, to develop national strategies and to implement them through the national mechanisms over the particular territories, the EU Roma policy has in fact constituted autonomous sub-systems. The effectiveness of the

established sub-systems would not necessarily suffer if any of them were detached from the others or from the centre. The malfunctioning of a sub-system would hardly affect the functioning of the rest, although it would destroy the cohesion from a central point of view.

Considering all of the above, the EU Roma policy does not seem to be a system of the type of a 'living organism'. It rather possesses the characteristics of an environment or a meta-system. Examining it further, the theoretical approach of Shakun⁴⁴ outlines other interesting aspects to reflect upon. In Shakun's view, policy making is the design of a purposeful system to deliver values. Values are viewed as nonoperational goals, which are delivered in the form of operational goals defined by specific operations and performance measures. A key element in the system is the two-direction referral process between values (non-operational goals) and operational goals, which enables the redefinition of the two components and the adaptation of the system to the changed environment.

Projecting the theory over the examined case, it appears rather difficult to qualify the EU Roma policy as a purposeful system since the operational level per se is transferred beyond the policy frameworks. Setting up the four priority areas of intervention and the goals that all national governments should aim at, the EU has delegated the responsibility to the Member States to identify the appropriate operational measures, the mechanisms for their implementation and the system for their monitoring and evaluation. Referring to the theory, this set-up hampers the referral process between the non-operational goals (values) defined at the EU level and the operational goals at the 27⁴⁵ national levels. This break in the process limits the possibility for the adaptation of the system. Furthermore, even if at the current stage there might be similarities between the operational goals of the 27 states, future significant discrepancies can be expected due to the lack of synchronization between the functioning and the performance of the sub-systems. Then, a process of adaptation would require development of sub-policies at the central level to accommodate the diversity in the stages reached by the Member States. At the same time, from a bottom-up perspective, the fact that the non-operational goals are defined at the central level limits the possibility of a sub-system to eventually adapt the referral values and therefore perform as a purposeful system.

Referring to the history of the process that has brought forward the Roma-topic and has placed it high on the EU policy agenda, the stages model seems rather appropriate to contribute to the analysis. Explored by a number of theorists⁴⁶ and referred to as the 'linear model', 'sequential model', 'heuristic stages model' or 'public policy cycle', the model suggests that the policy process is a chain of procedures that starts with a definition of a (problematic) issue, develops while addressing it and ends with a re-definition of a new agenda. Although some

authors identify nine different stages of the policy process,⁴⁷ the simplified five-stage model of Howlett and Ramesh⁴⁸ will be considered below.

Perhaps in contrast to a range of other policies, the *agenda setting stage* can be clearly identified. As discussed above, the EU public interest in Roma issues grew only after the waves of Enlargement, when the poorest communities of Europe started enjoying the right to free movement stemming from the EU citizenship. In the end of 2007, the problematic situation was publically acknowledged and the Roma issue was introduced in the formal agenda.⁴⁹ And over the next few years, the *policy has been formulated* and the priority areas with their specific goals have been finalized in the EU Framework for Roma integration.⁵⁰

The analysis of the stage of *adoption (decision making)* however looks rather problematic. The decision made at the EU level was that there would not be a central decision of how the formulated policy goals are to be achieved but that Member States would be required to develop national policies for the implementation of the EU Roma policy. And hence, in 2011, all the Member States were invited by the European Commission to submit their National Roma Integration Strategies. The decision-making process, with regards to the achievement of the EU-determined policy objectives, has been ascribed to the national governments.

Problems therefore emerge, also with the analysis of the *implementation stage*. The implementation obviously occurs at the level of each Member State. If applying the theoretical stage model, the analysis needs to shift from the wider EU level to the fragmented space of the 28 Member States since it is here where the policy's implementation parameters are established. And yet, although contributing to the achievement of the common EU goals, those national-level parameters could hardly be accepted for EU Roma policy parameters.

This discrepancy and mismatch between levels could be seen also as a factor for the shortfalls that the EU has been accounting for over the last years. According to the stage theory, among the several factors in the implementation stage that determine the effects and outcomes of a policy are:

- The type and complexity of the problem addressed;
- The magnitude of the expected change and the groups targeted by the policy;
- The human and financial resources devoted to implementation, and;
- The administrative structures and regulations that will be put in place to support the implementation of the policy.⁵¹

As will be discussed in the next section, despite the significant lack of understanding of the complexity of the problem and the unclear definition of groups targeted by the policy and

their size, both national governments and the EU allocate significant resources to the implementation of projects and initiatives targeting Roma.

Although the policy implementation is fully delegated to Member States, the stage of **evaluation** is performed at the EU level. First, the European Commission assessed the NRIS submitted in 2012 and adopted the earlier-mentioned communication ‘National Roma Integration Strategies: a first step in the implementation of the EU Framework’. The assessment report of 2013 ‘Steps forward in implementing National Roma Integration Strategies’⁵² focused specifically on the structural preconditions needed in each country, while the 2014 report⁵³ looks at overall progress in all key areas.

According to the stage model, the purpose of the evaluation is to verify whether the policy implementation and its effects are aligned with the objectives that were set out.⁵⁴ And although the European Commission might not have developed indicators and an efficient system for the evaluation of the policy progress towards specified policy goals,⁵⁵ it clearly has a functioning system for monitoring the compliance and performance of Member States.

Similar to the system-theories, the stage model also reveals that the EU Roma policy fails beyond the theoretical frameworks for policy analysis at the level of the (transposed) operational component. Assessing the policy through theories that focus on the agenda setting process (such as the streams model⁵⁶) or on the dynamics between problems, solutions and actors (such as the ‘garbage can’ model⁵⁷) would hardly contribute to the understanding of the identified structural problem.

At the same time, two further ‘cognitive’ challenges, revealing another problematic aspect, might bring insights into how the EU Roma policy needs to be approached and analysed.

3. Who is the EU Roma policy for?

Although this question might look provocative, the critical analysis of the EU Roma policy reveals that it fails to provide a clear answer to two basic questions:

- Who are the Roma? – so that all actors in the policy chain refer to the same target group, and;
- What is the scope? – so that policy makers could estimate the needed coverage, resources, timeframes, and develop adequate budgets and action plans.

The text below will focus on only two of the identified cognitive challenges, which are considered key factors hampering the effectiveness of policy making targeting Roma at the EU level. At the same time, they have also become triggers for analysis to defragment theoretical frameworks and critically address the discourse.

3.1 Roma from the EU point of view

Over the last two decades, the concepts of ‘Roma issues’, ‘Roma policies’ and ‘Roma inclusion’ have become so popular that their meaning is often taken for axiom and nobody questions the underlying connotations. Nevertheless, a disclaimer by the European Commission in 2010 points out that:

... the term “Roma” is used – similarly to other political documents of the European Council, European Parliament etc. – as an umbrella term **including also other groups of people** who share more or less similar cultural characteristics and a history of persistent marginalisation in European societies, such as the Sinti, Travellers, Kalé etc. The European Commission is aware that the extension of the term “Roma” to all these groups is contentious, and it has no intention to “assimilate” the members of these other groups to the Roma themselves in cultural terms. Nonetheless, it considers the use of “Roma” as an umbrella term practical and justifiable within the context of a policy document, which is dealing above all with issues of social exclusion and discrimination, not with specific issues of cultural identity.⁵⁸

The definition is anything but precise. The clear message however is that Roma are considered people who are socially excluded and discriminated against but not necessarily people sharing a cultural identity. And although in 2013 the concept evolved to emphasize the similarities between Roma and ‘the other groups’, again it did not clarify what are those ‘similar cultural characteristics’ that constitute them as a group:

(6) For the purposes of this recommendation, as in other political documents of the European Parliament and of the Council, the term “Roma” is used as an umbrella term which includes groups of people who have more or less similar cultural characteristics, such as Sinti, Travellers, Kalé, Gens du voyage, etc., whether sedentary or not.⁵⁹

It is commonly known that there is no single and united Roma community, not only at the EU level but also at the national level within and beyond the EU. The term Roma is therefore used as a collective noun to refer to the representatives of groups of people who do not have a common identity, do not speak a common language, do not share a common (single) religion and do not share a common past. Roma (possibly) have some similar racial features, similar cultural predispositions and traditions, and certainly are largely marginalized, experiencing extreme poverty, social exclusion and discrimination.

On the basis of this vague profile of the target group, at least three dimensions of conceptualization of *Roma policies* could be identified. Depending on the particular approach to *Roma* and the adopted leading perspective, the policies logically promote and develop around different priorities. The key problem however is not only in the simultaneous existence of the diverse and sometimes clashing approaches, but that the lack of coherent terminology and

language at the policy level challenges the feasibility of elaborating a meaningful strategy for achieving a real positive change and for efficient use of resources.

3.2 Roma as an ‘economically targeted audience’

This recently introduces perspective promoted officially by the MEP Livia Jaroka in 2010 with her report on the EU strategy on Roma inclusion,⁶⁰ which calls for addressing the ethnic-based discrimination through increasing the awareness of the majority about the benefits of Roma inclusion as contrasted to the costs of non-inclusion. Taking into account that the average age of the 10 to 12 million Europeans from Roma origin⁶¹ is about 25.1 years (vs. 40.2 years for EU-27),⁶² the reasons to address this group of people as an ‘important and growing source of an increasing workforce’⁶³ become apparent.

The lack of appropriate education and skills is a structural objective for the vast majority of working-age Roma to participate successfully in the labour market; therefore the annual loss for EU countries in terms of productivity and in fiscal contributions accounts for hundreds of millions of euros.⁶⁴ The current policy approach advocates that by fostering inclusion of Roma into mainstream society and bringing the levels of employment to the EU average there could be an expected 4-5 % GDP increase – more than the defence budget of any European country.⁶⁵ Hence the investments to overcome ethnic-based discrimination and marginalization of European Roma and to reduce the levels of the socio-economic deprivation and exclusion would have a significant positive economic impact on the EU and a greater return in a longer-term perspective.

Addressing Roma as an ‘economically targeted audience’ appears as a step forward with regard to the common basic principles on Roma inclusion⁶⁶ adopted as a key policy toolkit at the EU level. But before looking at the problems of elaborating strategies for Roma inclusion through defining the targeted communities on the basis of common economic attributes instead of ethnicity,⁶⁷ it is worth considering the challenges associated with the perspective discussed here.

Developing policies with an ultimate goal to contribute to the benefits for the states and the majority are if not discriminatory, at least provocative in terms of viewing the investments in what should be a basic human right (as education is) as a calculated profit. No matter the underlying objective facts and pragmatic approaches, looking at the human development through the perspective of *people serving economic purposes* is by any means contradictory to all concepts of equality, freedoms and rights. It is therefore obvious that such an approach to Roma needs significant reconsideration.

3.3 Roma as a vulnerable group

Aiming to overcome the debates on whether there is a need for specific policies targeting Roma or not, the EU has embarked on promoting an ‘explicit but not exclusive approach’.⁶⁸

Elaborating on Principle 2, the document suggests that:

This approach implies focusing on Roma people as a target group without excluding others who live under similar socio-economic conditions. Policies and projects should be geared towards “vulnerable groups”, “groups at the margins of the labour market”, “disadvantaged groups”, or “groups living in deprived areas”, etc. with a clear mention that these groups include the Roma. This approach is particularly relevant for policies or projects taking place in areas populated by the Roma together with other ethnic minorities or marginalised members of society.⁶⁹

The shortfalls of this approach are quite a few. Referring to Roma as a vulnerable group alongside others suffering socio-economic deprivation shifts the policy focus from the ethnically-based to the structural obstacles to Roma inclusion, which in fact is the goal. Firstly, this is problematic because there is a contradiction in terms. If the concept of Roma is the politically-correct replacement of offensive ethnonyms, if it is generally accepted as an umbrella notion ‘unifying’ the great diversity of various Roma peoples and if the term is used in national and regional Constitutions⁷⁰ to identify a particular ethnic minority, then there are no mechanisms to revoke the underlying ethnic component.

Secondly, Roma activists promoting the value of Roma identity as a horizontal line that would enable the positive identification among stakeholders and would foster the fight against wide-spread prejudices and discriminatory practices, cannot accept that the community of Roma should be regarded within the same category as ‘people with disabilities’ for example. Apart from the fact that such a classification is contributing to the reinforcement of existing negative stereotypes about Roma, it is certainly destructive to the idea of self-identification of people of Roma origin who do not belong to any of the deprived socio-economic categories.⁷¹

Thirdly, undertaking the socio-economic approach to define Roma as a targeted group of particular policies, the logical question about the validity of the generalization that Roma are vulnerable (unemployed, uneducated, poor, etc) emerges. Certainly, there are people of Roma origin who do not live in ghettos, who are well educated, employed and quite affluent. Should they be also considered a targeted audience, or should Roma policies exclude those Roma because they do not fit the outlined categories? Obviously, the socio-economic perspective challenges the possibility for a positive self-identification of these ‘other’ groups of people and also excludes them from the Roma-construct.

And lastly, using ethnic/identity markers for socio-economic terms pushes forward the provocative feeling for hidden racist rhetoric. And this becomes visible as soon as ‘Roma’ is replaced with another concept denoting a group of people sharing common racial features and increased levels of socio-economic deprivation. It would hardly be welcome throughout the EU if ‘Black’, ‘Yellow’, or ‘Arab’ people become also social categories for the purposes of economic analysis or policies for inclusion. This also leads to the question whether the definition of a ‘vulnerable group’ as introduced by the Social Protection and Social inclusion Glossary⁷² should not be reconsidered to exclude the reference to ethnic minorities alongside the socio-economic categories.

3.4 Roma as an ethnic minority

From the discussion above, one could expect that the text would advocate for addressing Roma as an ethnic minority. This however is also a problematic perspective when the focus falls on the policy approaches to this targeted group of EU and non-EU citizens.

Challenges arise from at least two points. The first one is certainly the lack of homogeneity of the constituency of Europe’s largest ethnic minority.⁷³ Despite there being no internationally agreed definition of the concept *minority*, following the provisions of the United Nations Minorities Declaration of 1992⁷⁴ there are both objective factors (shared ethnicity, language or religion) and subjective factors (including that individuals must identify themselves as members of a minority).⁷⁵ So, taking the objective markers, people from Roma origin all over Europe are regarded as sharing certain ethnic similarities but many more differences with regard to language, religion, traditions, identity and even notion of a ‘common past’.⁷⁶ Based on geographical spread, authors recognize the existence of five main groups⁷⁷ on the basis of historical ancestry – there are two theories for their initial lineage and further for the subsequent waves of migration to Europe. More important however is that these theories are not only a platform for academic reflection, but they also serve as a basis for the self-identification of stakeholders. Anthropological research⁷⁸ even suggests that the general assumptions that Roma living in the same location constitute a community by default are false and that the kin-relations are the basis of social identification and interaction among people. Taking into account the examples from the field that Roma are not a single community,⁷⁹ what would the grounds be to address Roma as ‘a minority’? Would it not be more correct to introduce the plural term ‘minorities’ as a basis for conceptualizing future policies at both national and EU levels?

If the subjective factors for defining *minority* are taken into account, then the ongoing project for creating/promoting the Roma identity could provide grounds for approaching Roma

as a minority group. Such a perspective to defining the target group of the developmental policies would clash instantly with the cultural rights that minorities are entitled to following the provisions of the international legal frameworks.⁸⁰ It is however arguable whether the efforts to impose the modernization standards without the explicit consent of the targeted groups might well be contested as an assimilatory practice.

3.5 Determining the scope

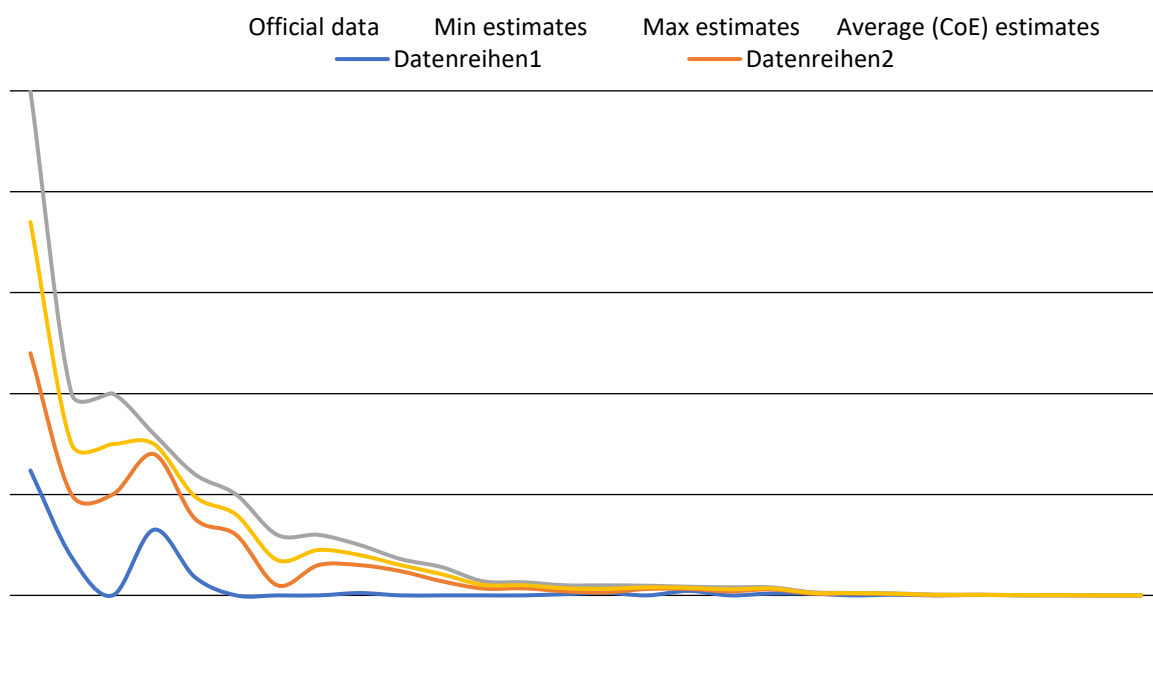
Apart from the problems arising from the lack of a clear definition of the target group, ‘Roma policies’ face a second significant challenge with regard to the lack of statistical data to help establish the relevant number of policy addressees. Although the planning of national and/or EU policies without a reference to the potential direct beneficiaries is possible at the level of the conceptual strategy design, it is highly arguable whether such theoretical platforms could be implemented successfully in practice. Transforming the outlined objectives into an appropriate set of measures, procedures and achievable results requires a realistic action plan supported by relevant resources. Planning and budgeting activities with regard to Roma at any level higher than this of a local community is essentially problematic when the size of the targeted audience is unknown.

To a large extent, the lack of ethnically disintegrated data with regard to Roma in Europe results from the established mechanisms for protection from discrimination and from the fundamental right for self-identification. Although collecting ethnic data is prohibited by law in a number of EU countries, some states rely on the offered possibilities to citizens to indicate voluntarily their origin, belonging or mother tongue at census or other official surveys.⁸¹ In cases as Italy, for example, even though census questions do not include any that could help establish the ethnic origin and affiliation of a person, data about the linguistic (and respectively) the ethnic diversity in the country is collected for the purposes of managing the educational system.⁸²

Alongside the objective law-based restrictions and challenges to collecting ethnically disintegrated data, there are subjective factors that put people off from disclosing their origin and identifying themselves as belonging to the Roma ethnicity. It is arguable whether the low level of ethnic awareness⁸³ among Roma is a factor of a significant impact for obtaining official data about the size of the population. Apart from the existing administrative obstacles and/or registration irregularities,⁸⁴ fears of discrimination or reprisal⁸⁵ and memories from the negative historical experience⁸⁶ have been identified as key factors for the reluctance of Roma to identify themselves as such.

Leaving the underlying reasons aside, the lack of reliable official statistical data about Roma per se is a significant challenge to policy making. The common practice at regional, national and EU levels over the past decades has been to develop strategies and to plan policy measures on the basis of officially collected data (mostly referring to reported self-identification) and/or on the estimated average size of the targeted population.⁸⁷ Shortfalls of such an approach can be expected due to the significant gaps between the minimum and the maximum of the estimated numbers, and due to the unreliability of the official data.

The visualization of the Council of Europe⁸⁸ minimum and maximum estimates alongside the officially reported number of Roma in the EU countries suggests that planning strategies and the respective resources for their implementation should only refer to the average levels (official or calculated figures) if the gap between those and the highest estimates about the size of the communities is insignificant.



Source: CoE

Roma-related policy making in countries such as Romania, Hungary, Spain, Slovakia, France or Greece certainly needs to address or at least consider the discrepancy between the levels. Because, taking the case of Romania as example, a policy planned for 1,200,000 people would hardly achieve significant positive results if the real number of the targeted beneficiaries is higher, with another million people. Respectively, EU level policies should also be developed and implemented with awareness about the possible shortfalls in relation to the mismatching

scope of the provisioned measures and the size of the targeted audience. The differences among the Member States with regard to the size of Roma communities also suggest that these are to be taken into consideration when policies on the allocation of funds are planned at the EU level.

Conclusion

Before explaining how the terminological confusion contributes to the understanding of the structural failures of the EU Roma policy, a short summary of the findings in the first section will be presented below.

The assessment of the EU Roma policy through the theoretical models revealed a rather interesting situation:

- To understand the poor efficiency of the EU Roma policy, the first thing to assess is its structure and functionality. The agenda-setting process, policy developments and interplay between multiple actors are additional factors that need to be assessed if the analysis reveals that there are no deformities in the policy design.
- The EU Roma policy can be viewed as a system but not of the ‘living organism’ type. It performs as a meta-system whose units could function independently, which suggests that their compliance is a preference and not a necessity (i.e. a political and not a ‘survival’ choice).
- The EU Roma policy is not a purposeful system since its structure obstructs the dynamic balance between the operational and non-operational goals. The same is also valid for the sub-systems (Member States policies) since the non-operational goals are external for them.
- The EU Roma policy has clear stages, although the stages of adoption (partially) and implementation (fully) have been ‘outsourced’.

Translated from the language of theory to the language of the case study, the findings suggest that:

- The EU has formulated the objectives and has taken measures to address the identified problems. It has, however, delegated the responsibility for policy implementation (and obviously for achieving the expected outcomes) to the national governments.
- At the same time, the EU has overtaken the evaluation procedure aiming to ensure the coordination and the coherence among the national policies.⁸⁹ And yet, the non-organic structure of the system does not allow for a general synergy between its units. National Roma policies currently resemble mismatching pieces of a puzzle.

- Despite that Member States are expected to deliver and implement policy programmes, they are not the primary holders of the policy formulation and the policy agenda. This, as it becomes clear from the NRIS submitted to the European Commission, has created a type of resistance of some national governments to the recommendations and policy formulations at the EU level.⁹⁰
- The current structure of Roma-targeted-efforts at the EU level in fact constitutes the EU as the owner of the policy process and primary policy designer, while Member States are allocated the role of service-providers.
- All of the above is certainly hampering the effectiveness of the policy and the achievement of real positive change.

Furthermore, the lack of a clear definition of the target group and its size challenge the feasibility of the EU Roma policy as a whole since these factors have direct negative impact on the designing of adequate action plans and their budgeting.

As it was stated above, the presented terminological perplexity enables the understanding by provoking critical reflection about the discourse. The fact that the skilful policy making of the EU has allowed for a policy lacking fundamental components evokes the question ‘why’, which in turn focuses the attention not on the examined frameworks but on the context and on the role of the frameworks within that context.

Then the mistake that has been currently dominant for the analysis of the EU Roma policy becomes more than visible. The EU Roma policy is not a new theoretical phenomenon but a case of misinterpreted goals. The current policy goals to which experts are referring are goals-by-proxy. The real goals of the EU Roma policy are silent or at least not explicitly communicated. Looking at the document that has officially launched the policy through the perspective of this new idea, a different picture reveals:

(50)...In this connection the European Council, conscious of the very specific situation faced by the Roma across the Union, **invites Member States and the Union to use all means to improve their inclusion...**

The real policy goal of the EU Roma policy is to make Member States do something about the situation of Roma. And to ‘facilitate’ the process, the European Commission has defined the four priority areas for intervention and the particular objectives within each. Now, considering the EU Roma policy through the theoretical frameworks, it certainly appears as a purposeful system with clear and coherent stages. Obviously, it does not need any conceptual

clarification with regard to the profile or the size of Roma in Europe, because they are not the direct target group.

Whether the EU Roma policy is a positive example for good governance policy making, as defined by the White Paper,⁹¹ is an interesting question for further debate. In conclusion, the analysis has shown that the EU Roma policy is not aimed at changing the situation of Roma but at making the Member States change it. Analysing the effectiveness of the EU Roma policy therefore requires that the focus be placed on assessing the impact that the EU has managed to achieve on the particular Member States. The quality of the policy design should therefore be evaluated through the progress achieved at the national level. Needless to say, since 2011, all Member States but one have become active partners of the new EU-designed policy, following the agreed procedures, developing and submitting required documents, taking into account and addressing recommendations provided by the European Commission with the monitoring and assessment reports. Taking into account that the submission of the initial strategies and set of integrated measures in 2011 already showed that not all Member States are committed to fundamental changes in their national approaches to Roma inclusion, the analysis of how the inputs of the national governments are truly contributing to the EU policy can become a focus of an additional research and analysis. Such a study would perhaps reveal why although the EU Roma policy could be evaluated as successful at a political level, it still fails to bring any positive change in the situation of Roma in Europe. Within the frameworks of the policy analysis, however, this concern falls beyond the real direct *policy goals* of the European Union.

Notes

¹ The current paper adopts the European Parliament / European Council approach to the term ‘Roma’ as an ‘umbrella term including also other groups of people who share more or less similar cultural characteristics and a history of persistent marginalisation in European societies, such as the Sinti, Travellers, Kalé etc. The European Commission is aware that the extension of the term “Roma” to all these groups is contentious, and it has no intention to “assimilate” the members of these other groups to the Roma themselves in cultural terms. Nonetheless, it considers the use of “Roma” as an umbrella term practical and justifiable within the context of a policy document which is dealing above all with issues of social exclusion and discrimination, not with specific issues of cultural identity’ (see European Commission, ‘Roma in Europe: The Implementation of European Union Instruments and Policies for Roma Inclusion – Progress Report 2008-2010’ (2010)).

² Friedman (2014).

³ The Decade of Roma inclusion 2005–2015, one of the first international initiative addressing Roma, resulted from a high-level regional conference in Budapest, Hungary in 2003. Over the years, the political commitment brought together twelve countries with significant Roma minorities (Albania, Bosnia and Herzegovina, Bulgaria, Croatia, the Czech Republic, Hungary, Macedonia, Montenegro, Romania, Serbia, Slovakia and Spain), intergovernmental, nongovernmental organizations, and a range of international organizations.

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- ⁴ Council of the European Union (2011).
- ⁵ The estimates on the Roma population in Europe are available at the Council of Europe Portal (see Reference list).
- ⁶ European Commission, 'Working together for Roma inclusion: The EU Framework explained' (2008).
- ⁷ According to the International Comparative Data Set on Roma Education (Open Society Institute, 2008), in some EU member states the rate of Roma children completing primary school is as low as 42%.
- ⁸ World Bank (2010).
- ⁹ European Commission, 'Solidarity in Health: Reducing Health Inequalities in the EU' (2009).
- ¹⁰ In 2012, all the member states have submitted their NRIS except Malta. Instead of a plan for integration, the government submitted an official letter claiming that a national strategy would be irrelevant due to the insignificant number (if any) of Roma in the country.
- ¹¹ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012); European Commission, Steps forward in Implementing ... (2013); European Commission, 'Report on the implementation of the EU framework for National Roma Integration Strategies' (2014).
- ¹² Sobotka and Vermeersch (2012).
- ¹³ Council of Europe, 'Roma Portal'.
- ¹⁴ Council of the European Union, 'Brussels European Council - Presidency Conclusions' (2007).
- ¹⁵ European Parliament, 'Resolution on a European strategy on the Roma' (2008).
- ¹⁶ European Commission, An EU Framework for National Roma Integration Strategies up to 2020 (2011), 9. In the beginning of the second decade of the twenty-first century, the EU funding programed to support Member States' efforts in the field of social inclusion, including to support efforts to help the Roma were about 26.5 billion euro. Between 2007-2013, the European Social Fund has allocated 9.6 billion euro have for measures targeting socio-economic inclusion of disadvantaged people – among them marginalized Roma – and 172 million Euro have been explicitly allocated for actions aiming at integrating the Roma. In the case of the European Regional Development Fund (ERDF), more than 16.8 Euro billion were planned for social infrastructure (see also European Commission, European Roma Summit – MEMO (2008)).
- ¹⁷ European Union Council of Ministers, 2008.
- ¹⁸ The Common Basic Principles, which advocate an integrated approach, were developed on the basis of several reports and recommendations by the EU Agency for Fundamental Rights, the Council of Europe, the Organization for Security and Cooperation in Europe (OSCE) as well as the relevant European Parliament resolutions, but also by advocacy groups and Roma civil society organizations.
- ¹⁹ Sobotka and Vermeersch (2012).
- ²⁰ European Commission, A European Framework for Social and Territorial Cohesion (2010).
- ²¹ The notion of *flexicurity* was coined in mid 1990s and became widely used in the last decade to reconcile the needs of a flexible labour market with those of a robust social security. In the 2000s, it entered the EU discourse as a guideline to modernising employment policies and welfare provisions (European Commission, 'Flexicurity in Europe Administrative Agreement' (2013)).
- ²² A significant proportion of the Roma community live in regions which are among the least economically and socially advanced in the Union (Jaroka, 'Report on the EU strategy on Roma inclusion' (2010)).
- ²³ Ibid.
- ²⁴ European Commission, 'Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The European Platform against Poverty and Social Exclusion: A European Framework for Social and Territorial Cohesion' (2010).
- ²⁵ European Parliament, 'Resolution on a European strategy on the Roma' (2010).
- ²⁶ The Spanish Presidency of the EU set the following goals: to advance the mainstreaming of Roma issues in European and national policies on fundamental rights and protection against racism, poverty and social exclusion; to improve the design of the roadmap of the Integrated Platform on Roma Inclusion and prioritizing key objectives and results; to ensure that existing financial instruments of the European Union, in particular the Structural Funds, are made available to the Roma (European Union, 'Promoting Policies in Favour of the Roma Population. Spanish Presidency of the European Union 2010' (2010)).
- ²⁷ European Parliament (2011).
- ²⁸ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).
- ²⁹ Ibid.
- ³⁰ Ibid.

³¹ In the area of **education**, Member States are expected to:

- eliminate school segregation and misuse of special needs education;
- enforce full compulsory education and promote vocational training;
- increase enrolment in early childhood education and care;
- improve teacher training and school mediation;
- raise parents' awareness of the importance of education.

In the area of **employment**:

- provide tailored job search assistance and employment services;
- support transitional public work schemes combined with education as well as social enterprises employing Roma or providing them with specific services;
- support a first work experience and on-the-job training;
- eliminate the barriers, including discrimination, to (re)enter the labour market, especially for women;
- provide stronger support for self-employment and entrepreneurship.

In the area of **healthcare**:

- extend health and basic social security coverage and services (also via addressing registration with local authorities);
- improve the access of Roma, alongside other vulnerable groups, to basic, emergency and specialized services;
- launch awareness-raising campaigns on regular medical checks, pre- and postnatal care, family planning and immunisation;
- ensure that preventive health measures reach out to Roma, in particular women and children;
- improve living conditions with a focus on segregated settlements.

In the area of **housing**:

- promote desegregation;
- facilitate local integrated housing approaches with special attention to public utility and social service infrastructures;
- where applicable, improve the availability, affordability and quality of social housing and halting sites with access to affordable services as part of an integrated approach.

³² European Commission, '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' (2011).

³³ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).

³⁴ Ibid.

³⁵ European Commission, 'Communication from the commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Steps forward in Implementing National Roma Integration Strategies' (2013).

³⁶ European Union, 'Promoting Policies in Favour of the Roma Population. Spanish Presidency of the European Union 2010' (2010).

³⁷ European Commission, 'Memo: Roma integration: Progress Report and Recommendation - Frequently Asked Questions' (2013).

³⁸ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).

³⁹ Council of the European Union (2011), §15 and §29-30.

⁴⁰ European Parliament, 'Resolution on a European strategy on the Roma' (2008); European Parliament, 'Resolution on the EU strategy on Roma inclusion' (2011).

⁴¹ European Commission, 'Communication from the Commission of 25 July 2001 "European governance - A white paper"' (2001).

⁴² Easton (1953).

⁴³ Although the non-participation of Malta in the processes has been legitimized by the lack of relevant target group, it still creates a negative precedent and a problem for the system.

⁴⁴ Shakun (1981).

⁴⁵ Without Malta.

⁴⁶ E.g. Anderson (2011); Smith and Larimer (2009); DeLeon (1999); Jones (1997); Hogwood, Brian, and Gunn (1984); Brewer and DeLeon (1983).

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- ⁴⁷ Hogwood, Brian, and Gunn (1984).
- ⁴⁸ Howlett and Ramesh (2003).
- ⁴⁹ Cobb and Elder (1972).
- ⁵⁰ Council of the European Union (2011).
- ⁵¹ Sabatier and Mazmanian (1995), 153-173.
- ⁵² European Commission, 'Communication from the commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Steps forward in Implementing National Roma Integration Strategies' (2013).
- ⁵³ European Commission, 'Report on the implementation of the EU framework for National Roma Integration Strategies' (2014).
- ⁵⁴ Howlett and Ramesh (2003).
- ⁵⁵ European Commission, 'Communication from the commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Steps forward in Implementing National Roma Integration Strategies' (2013), 8.
- ⁵⁶ Kingdon (1995).
- ⁵⁷ Cohen, March, and Olsen (1972), 1-25.
- ⁵⁸ European Commission, 'Commission Staff Working Document: Roma in Europe: The Implementation of European Union Instruments and Policies for Roma Inclusion – Progress Report 2008-2010' (2010), 3.
- ⁵⁹ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).
- ⁶⁰ Jaroka, 'Report on the EU strategy on Roma inclusion' (2010).
- ⁶¹ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).
- ⁶² Fundación Secretariado Gitano (2009)
- ⁶³ Jaroka, Interview (2011).
- ⁶⁴ *Ibid*; According to the World Bank estimates, the lower bound of annual productivity losses ranges from 231 million Euro (Serbia) to 887 million Euro (Romania); the lower bound annual fiscal losses are between 58 million Euro (Serbia) to 370 million Euro (Bulgaria).
- ⁶⁵ Jaroka, 'Report on the EU strategy on Roma inclusion' (2010).
- ⁶⁶ European Commission, 'Vademecum: The Ten Common Basic Principles on Roma Inclusion, Directorate-General for Employment, Social Affairs and Inclusion' (2009).
- ⁶⁷ Jaroka, Interview.
- ⁶⁸ Jaroka, Interview (2011).
- ⁶⁹ *Ibid*.
- ⁷⁰ Schleswig-Holstein, Romania, Hungary.
- ⁷¹ Views, expressed by stakeholders at the Workshop on Roma issues organized by Naumann Foundation in Sofia (September 2014).
- ⁷² European Commission, 'Social Protection and Social Inclusion Glossary'.
- ⁷³ European Commission, 'Accompanying Commission Staff Working Document (COM (2012) 226 final) to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a First Step in the Implementation of the EU Framework' (2012).
- ⁷⁴ United Nations, 'UN Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities' (1992).
- ⁷⁵ United Nations, 'Minorities under international law' . .
- ⁷⁶ ROMANINET.
- ⁷⁷ *Ibid.*, 13.
- ⁷⁸ Budilová and Jakoubek (2009).
- ⁷⁹ ECMI (2014).
- ⁸⁰ E.g. the Council of Europe Framework Convention (1995) and the range of the UN Conventions. The 1992 United Nations Declaration, for example, is the document which sets essential standards and offers guidance to States in adopting appropriate legislative and other measures to secure the rights of persons belonging to minorities. Overall, States through their commitments under treaty law, and minorities themselves, or their representatives can influence the human rights monitoring and implementation procedures and work toward securing effective participation and inclusion.
- ⁸¹ E.g. Bulgaria.

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- ⁸² Direzione Generale per gli Ordinamenti Scolastici e per l'Autonomia Scolastica (2010).
- ⁸³ Plichtová (1993), 11-18.
- ⁸⁴ Druker (1997), 22-23.
- ⁸⁵ Clark (1998), 35-46.
- ⁸⁶ Guy (1998).
- ⁸⁷ This approach becomes explicitly apparent when NRIS are assessed in a comparative perspective.
- ⁸⁸ Council of the European Union (2011).
- ⁸⁹ European Commission. 'Memo: Roma integration: Progress Report and Recommendation - Frequently Asked Questions'. Brussels, June 26, 2013. http://europa.eu/rapid/press-release_MEMO-13-610_en.htm.
- ⁹⁰ E.g. France, Belgium, Germany as communicated through the NRIS submitted to the EC in 2012.
- ⁹¹ European Commission, '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' (2001).

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