



FIFTH OPINION ON PORTUGAL

ADVISORY COMMITTEE ON THE FRAMEWORK CONVENTION FOR THE PROTECTION OF NATIONAL MINORITIES

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SUMMARY OF THE FINDINGS

1. The Portuguese people consider their society to be increasingly diverse and multicultural, shaped by its history and growing traditional immigration from Portuguese speaking African countries and Brazil, and more recently also from Asia and Eastern Europe. This rapidly increasing diversity enriches its linguistic and cultural landscape and also affects its social and economic policies. Despite the official recognition of language rights for the Mirandese community in 1999, the Mirandese language continues to be critically endangered.

2. During the visit, the authorities at central and local levels consistently expressed an open and flexible approach to managing diversity in line with the provisions of the Framework Convention. In this context, diversity is understood as encompassing everyone living in Portugal, including more recent migrants, both Portuguese and non-Portuguese speaking. This increasing diversity requires targeted and data-informed policies that need to be developed based on strengthening dialogue with persons affiliating with different ethnic, linguistic and religious communities living in Portugal, as well as on raising awareness of cultural and linguistic diversity as an integral and valued part of Portugal's society. This remains key to promoting intercultural dialogue and mutual respect. This is particularly crucial in view of the lack of public awareness about the Framework Convention and the rights it enshrines.

3. The Framework Convention formally applies only to Portuguese Roma citizens, who despite a centuries-long presence, still struggle to be accepted as an equal part of Portugal's society. Although their overall situation differs across Portugal, persons affiliating with Roma communities still face direct and indirect discrimination, particularly in employment and housing, which often forces them to hide their Roma culture and identity. Roma without Portuguese citizenship are often excluded from broader migrant and asylum policies, with limited support extended to non-citizen Roma through isolated projects. Reliable, comprehensive data on Roma living conditions is lacking, despite recent national surveys.

Situation of persons affiliating with Roma communities

4. By the end of 2023, Portugal's Roma policy faced major setbacks. The previous Roma integration strategy, which had been extended by a year, ended without its evaluation being publicly available and without being discussed with persons affiliating with all Roma communities from across Portugal. A new strategy has not been adopted. Key support structures - like the Advisory Group of Roma Communities (CONCIG) and the Observatory of Roma

Communities (ObCig) - ceased to function. Funding, such as the Roma Associations Support Programme (PAAC), was insufficient for organisations supporting Roma and only a few Roma mediators are active in a few wealthier cities. These developments have increased frustration among Roma communities. There is a need for a permanent national consultative structure for persons affiliating with Roma communities from across Portugal to be created independently of a national Roma inclusion strategy.

5. Portugal has made progress in inclusive education for Roma through targeted programmes like TEIP, *Escolhas*, *ROMA Educa* and *OPRE*, though challenges such as higher dropout rates, absenteeism and illiteracy remain. While spatial segregation and school segregation as a result are declining, some schools still have a high proportion of Roma pupils. Efforts to include Roma culture and history in education are welcomed but remain limited in reach, often confined to specific projects, audiences or optional curricula, and dependent on the presence of a Roma mediator. Sustainable public funding for Roma culture and history needs to be increased and teaching about them extended to all schools.

6. Participation of Roma in public affairs has further diminished. There are no targeted empowerment policies and no guaranteed participation of representatives of Roma communities in public life. Roma also continue to be under-represented in public administration. Many Roma continue to live on the margins of society, in poor housing conditions, with some of them facing precarious conditions of forced nomadism. As they are being forced to move, these Roma often do not have access to basic human rights. Roma also experience lower life expectancy than the rest of the population, lower school attendance and educational performance and a high level of unemployment. While some progress has been made in labour market inclusion, intensified efforts are needed to combat housing discrimination and improve living conditions through sustainable, inclusive housing programmes which ensure access to decent and adequate housing through close co-operation by authorities at all levels.

Intercultural dialogue, mutual respect and protection from hostility

7. The Commission for Equality and Combating Racial Discrimination was re-established in 2024 as an independent body appointed and funded by the parliament. While the Advisory Committee welcomes this, it is also concerned by the absence of a regulatory law that would make it possible for the Commission to start functioning. Discrimination against Roma is under-reported

and more proactive investigations and outreach are needed to address widespread discriminatory practices.

8. In July 2021, Portugal approved its first National Plan to Combat Racism and Discrimination 2021-2025, which was a positive step. Its implementation, however, remains limited partly due to a lack of awareness of the national plan by municipal officers, notably in areas with significant Roma population. The authorities are yet to start drafting a strategy beyond 2025.

9. The Criminal Code was amended in 2024 and now includes language and nationality as prohibited grounds for discrimination and incitement to hatred and violence. Following the adoption of a new law in March 2025, “child, early and forced marriages” are banned for children under the age of 18, which was previously 16. The enforcement of this law within Roma communities needs further assessment. Given the experience of Roma-specific direct and indirect discrimination, there is a need to open a discussion on recognising antigypsyism as a specific form of racism in the Criminal Code.

Broader efforts are needed to address rising hate speech and stereotypes, especially on social media, which is a major concern for the Advisory Committee. Along with commendable training for police and the judiciary, stronger institutional responses and public awareness are required to combat intolerance and promote acceptance of Roma as Portugal's integral and valuable part, including through increased visibility and recognition of their various contributions to the Portuguese society.

Gender equality and other intersectional aspects of minority protection

10. During the fifth monitoring cycle, Portugal adopted two gender equality action plans, but they lack specific references to Roma communities or intersectional issues affecting Roma women and other women affiliating with communities living in Portugal. The number of female Roma mediators is largely insufficient and greater efforts to combat early marriage and traditional gender roles are needed. Employment policies also remain an area where intersectionality requires more attention to ensure equal opportunities for Roma women and men.

RECOMMENDATIONS

11. The Advisory Committee considers that the present concluding remarks and recommendations could serve as the basis for the resolution to be adopted by the Committee of Ministers with respect to the implementation of the Framework Convention by Portugal.

12. The authorities are invited to take account of the detailed observations and recommendations contained in the present Opinion of the Advisory Committee. In particular, they should take the following measures to improve further the implementation of the Framework Convention:

Recommendations for immediate action

13. The Advisory Committee urges the authorities to remedy the lack of functionality of the Commission for Equality and Combating Racial Discrimination by adopting without delay regulatory legislation providing for support services and making it possible for the commission to employ the required human resources.

14. The Advisory Committee urges the authorities to develop, in close consultation with representatives of Roma communities and their associations, and adopt a new national Roma communities inclusion strategy, ensuring alignment with local action plans and sectoral policies. This process should begin by making the external evaluation of the National Roma Communities Integration Strategy (2013-2022) public, and then discuss its findings and recommendations in an inclusive, gender sensitive and participatory manner.

15. The Advisory Committee urges the authorities to strengthen the position of Roma intercultural municipal mediators by ensuring sustainable and adequate funding, as well as to regulate their career status, ensuring their professional recognition, access to multidisciplinary training and stable career prospects. The Intercultural Mediation Municipal Teams programme should be revitalised and also include Roma mediators, particularly Roma women, and it should be extended to more municipalities, thereby enhancing their capacity to contribute to Roma inclusion.

16. The Advisory Committee urges the authorities to address the issues relating to Roma families living in a situation of forced nomadism by providing suitable housing, social and educational assistance and intercultural mediation. For this to be effective and functional, it should be designed in co-operation with relevant stakeholders, including individuals living in a situation of forced nomadism, representatives of Roma associations and other human rights civil society organisations helping those families and individuals and experts on social housing.

Further recommendations¹

17. The Advisory Committee calls on the authorities to consolidate and reinforce policies to combat direct and indirect discrimination faced by persons affiliating with Roma communities, by stepping up efforts to raise their awareness of legislative standards and of existing human rights and equality bodies, as well as of various mechanisms for filing complaints and remedies available to victims of discrimination, including racial discrimination.

18. The Advisory Committee calls on the authorities to ensure that the rights and situation of persons affiliating with Roma communities are monitored by an independent and adequately resourced body and that studies and publications on Roma communities in the repository of the Observatory of Roma Communities become once again available online.

19. The Advisory Committee calls on the authorities to effectively investigate and, as appropriate, prosecute and punish all forms of racist hate speech and hate crimes, including those committed by political figures, directed towards persons belonging to minority communities, including against Roma, Muslims and Afro-descendants.

20. The Advisory Committee calls on the authorities to intensify their efforts in promoting inclusive and quality education for Roma children at all stages, ensuring effective participation of their families. The authorities should resolutely address absenteeism and spatial segregation, provide the funding required for further improvement of educational outcomes and take measures to increase the proportion of young Roma completing higher education.

21. The Advisory Committee calls on the authorities to include information about Roma culture and history as a mandatory part of the national public-school curricula, with due regard to the identity and historical presence of Roma in Portugal and their valuable contribution to its diverse society.

22. The Advisory Committee calls on the authorities to further invest in teacher training, including mandatory training on intercultural awareness, and to develop educational materials that contain information about the history and culture of Roma communities, including their individual and collective contribution to Portuguese society. The content of these materials is to be developed with the participation of persons affiliating with Roma communities.

¹ The recommendations below are listed in the order of the corresponding articles of the Framework Convention.

23. The Advisory Committee calls on the authorities to ensure effective participation of Roma in public affairs, including through the creation of a dedicated structure for promoting inclusion of persons affiliating with Roma communities within the government, outside of the Agency for Integration, Migration and Asylum, in order to separate Portuguese Roma-related issues from migration and asylum-related issues and ensure more attention to be paid to specific Roma needs and interests, including those of Roma women and youth. Such a mechanism requires sufficient and sustainable funding, trained members of staff, including individuals affiliating with Roma communities, and a clearly defined remit.

24. The Advisory Committee calls on the authorities to establish a permanent national consultative structure for persons affiliating with Roma communities from across Portugal, taking into account diversity within those communities, especially the participation of women and youth. This structure should operate independently from a national Roma inclusion strategy and provide a consistent platform for participation of Roma in policy making. The authorities should also

promote Roma representation in political and administrative bodies, ensuring their effective participation in decision-making at all levels.

25. The Advisory Committee calls on the authorities to take measures to address practical barriers to healthcare for persons affiliating with Roma communities, in particular by ensuring effective access to and continuity of care for nomadic families, especially those facing forced nomadism, and by preventing any practices that could lead to the discrimination and stigmatisation of Roma patients within the healthcare system.

Follow-up to these recommendations

26. The Advisory Committee encourages the authorities to organise a follow-up event after the publication of this fifth-cycle Opinion. It considers that a follow-up dialogue to review the observations and recommendations made in this Opinion would be beneficial. Furthermore, the Advisory Committee stands ready to support the authorities in identifying the most efficient ways of implementing the recommendations contained in the present Opinion.

MONITORING PROCEDURE

Follow-up activities related to the recommendations of the Fourth Opinion of the Advisory Committee

27. A round table to follow up on the recommendations of the Fourth Opinion of the Advisory Committee took place in Lisbon on 29 September 2020, with the participation of Advisory Committee's members.² The Fourth Opinion on Portugal and the Resolution CM/ResCMN(2020)6 on the implementation of the Framework Convention by Portugal have not been translated into Portuguese but are available in English on the website of the Department for Judicial Co-operation and International Relations of the Public Prosecutor's Office.³

Preparation of the state report for the fifth cycle

28. The state report, due on 1 September 2023, was received on 13 May 2024. Some organisations representing and promoting the rights of persons belonging to the Roma were consulted in its preparation. Some gender-related aspects of minority rights were addressed in the report.⁴

² See [minutes](#) of the follow-up meeting.

³ The state report, the Fourth Opinion on Portugal and the state's comments were [published](#) in September 2018.

⁴ See the [fifth state report](#) regarding Roma women participating in the Intercultural Municipal Mediators Programme on p. 15, the Painting and photography exhibition of the project "Women and Roma communities, it's the dream that moves us!" on p. 27, the *Kit Pedagógico Romano Atmo* produced by the Association for the Development of Portuguese Roma Women (AMUCIP) on p. 41, the *Projeto Cresce e Aparece* offering Roma women training sessions on literacy and basic skills on p. 46, as well as the *Círculos de Fala de Mulheres Ciganas* initiative implemented in collaboration with local Roma associations and/or other organisations that support women's empowerment on p. 57.

Country visit and adoption of the Fifth Opinion

29. This fifth-cycle Opinion on the implementation of the Framework Convention for the Protection of National Minorities (hereinafter "the Framework Convention") by Portugal was adopted in accordance with Article 26(1) of the Framework Convention and Rule 25 of Resolution (2019)49 of the Committee of Ministers. The findings are based on information contained in the fifth state report, other written sources, as well as information obtained by the Advisory Committee from governmental and non-governmental sources during its visit to Braga, Vila Nova de Famalicão, Porto, Seixal, Beja and Lisbon from 24 to 28 March 2025. An online meeting was also held with interlocutors from the Mirandese community. The authorities provided additional information after the visit. The Advisory Committee expresses its gratitude to the authorities for their excellent co-operation before, during and after the visit, and to the other interlocutors it met during the visit for their valuable contributions. The draft opinion, as approved by the Advisory Committee on 3 July 2025, was transmitted to the Portuguese authorities on 9 July 2025 for observations, according to Rule 37 of Resolution (2019)49. The Advisory Committee welcomes the observations received from the Portuguese authorities on 12 September 2025.

* * *

30. A number of articles of the Framework Convention are not covered in the present opinion. Based on the information currently at its disposal, the Advisory Committee considers that the implementation of these articles does not give rise to any specific observations. This statement is not to be understood as signalling that adequate measures have now been taken and that efforts in this respect may be diminished or even halted. Rather, the Advisory Committee considers that the obligations of the Framework Convention require a sustained effort by the authorities. Furthermore, a certain state of affairs which may be considered acceptable at this stage may not necessarily be so in further cycles of monitoring. Finally, it may be that issues which appear at this stage to be of relatively minor concern prove over time to have been underestimated.

ARTICLE-BY-ARTICLE FINDINGS

Personal scope of application (Article 3)

31. The scope of the application of the Framework Convention remained the same during the monitoring cycle. The fifth state report reiterates that Portugal does not recognise the existence of “national minorities” in the legal system and, therefore, Portugal continues to apply the provisions of the Framework Convention to Portuguese citizens affiliating with the Roma communities (*Ciganos*), who are acknowledged as an ethnic minority in the country.⁵

32. Apart from the welcome follow-up meeting on the Fourth Opinion on Portugal, which took place in Lisbon on 29 September 2020, and during which three parliamentarians of Afro-descendant communities were informed about the principles and main provisions of the Framework Convention,⁶ the Portuguese authorities have not made any dedicated efforts to raise general awareness about the Framework Convention and its objectives. During the monitoring cycle, neither the authorities nor the Advisory Committee were made aware of persons belonging to any communities who might have expressed their wish to benefit from the provisions of the Framework Convention. Nevertheless, during the visit, the authorities at central and local levels consistently expressed an open and flexible approach to managing diversity in line with the provisions of the Framework Convention. In this context, diversity is understood as applying to everyone living in Portugal, including long-established communities with a migrant background and more recent migrants, both Portuguese and non-Portuguese speaking.

33. Whilst referring to the cardinal importance of the right to free self-identification as protected by Article 3 of the Framework Convention,⁷ the Advisory Committee nevertheless reiterates that the application of the provisions of the Framework Convention to a group of persons does not necessarily require their formal recognition as a national minority or the existence of a specific legal status as a group. The Advisory Committee has always welcomed a pragmatic approach that *de facto* broadens the scope of application of the Framework Convention.⁸ In this context, when examining the scope of application of the Framework Convention, the Advisory Committee “has

consistently encouraged the authorities to be inclusive and context specific and to consider on an article-by-article basis which rights should be made available to whom. Such an approach [...] promotes a societal climate of dialogue and understanding, where cultural diversity is viewed as a source of enrichment rather than division.”⁹

34. Notwithstanding the official position expressed by the Portuguese authorities with regard to the scope of application of the Framework Convention, the Advisory Committee notes with interest that in the fifth state report, as well as in discussion with state and local authorities during the visit, extensive information was provided on various linguistic and cultural communities living in Portugal, such as the Mirandese speaking community,¹⁰ as well as about diversity resulting from migration, not only from Portuguese speaking African countries (PALOP), but also from Brazil and other countries, including in Asia and Eastern Europe.¹¹ The Advisory Committee further observes that institutions have been set up to meet the specific needs of these individuals, such as the Agency for Integration, Migration and Asylum (AIMA). In practice, the Portuguese authorities are committed to the protection of the human rights of all citizens, promote an inclusive and diverse society, and therefore apply the Framework Convention to persons affiliating with a broad range of communities on an article-by-article basis, including to Mirandese speakers and immigrants.

35. The language rights of persons speaking Mirandese are protected by Law no. 7/99 on Official Recognition of Linguistic Rights of the Mirandese Community. Mirandese speakers welcomed that Portugal signed the European

⁵ See the [fifth state report](#), p. 5.

⁶ See the [fifth state report](#), p. 7.

⁷ ACFC [Thematic Commentary No. 4](#), The Framework Convention: a key tool to managing diversity through minority rights. The scope of application of the Framework Convention for the Protection of National Minorities, adopted on 27 May 2016, para. 9.

⁸ ACFC [Thematic Commentary No. 4](#) (2016), para. 27.

⁹ ACFC [Thematic Commentary No. 4](#) (2016), para. 7.

¹⁰ A [study on Mirandese conducted by the University of Vigo](#) in Spain in 2020 indicated that 3 500 persons continue to speak Mirandese fluently in the region of Miranda do Douro, in the northeast of Portugal, while a further 1 500 persons use the language sporadically.

¹¹ According to the [AIMA Migration and Asylum Report 2023](#), a total of 1 044 606 foreign citizens have a Portuguese residence permit (9.8% of the total population), an increase of 33.6% compared to 2022. According to the [Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#) (ICOT), carried out by the National Statistics Institute in 2023, in addition to the Portuguese language, 486 400 people spoke another language at home until the age of 15. Languages from other European countries (82.7%) and PALOP languages or dialects (11.8%) are the most widely spoken. Of the people who did not speak Portuguese at home until they were 15 years old (247 000), more than half (56.9%) said they spoke a language from another European country, 21.7% spoke other languages and 18.5% spoke a language or dialect from the PALOP countries.

Charter for Regional or Minority Languages (hereafter “the Language Charter”) on 7 September 2021, but the ratification process is yet to be completed (see Article 5). The government made funds available through the adoption of a structure mission on 18 March 2025, to support the endangered Mirandese language and culture. This has been welcomed by the Mirandese interlocutors of the Advisory Committee. These interlocutors also reiterated that any measures to protect the language and ensure access to language rights and the promotion of Mirandese culture are urgently needed. The Advisory Committee therefore reminds the authorities of the language rights protected under the Framework Convention, as well as of the right to maintain and develop one’s own culture (see Article 5).

36. The Advisory Committee encourages the authorities to pursue an inclusive approach in relation to persons affiliating with communities who might be entitled to protection of rights under the Framework Convention and to effectively address the limited awareness about its specific provisions and protection it offers, including via the dissemination of information on the Framework Convention.

Data collection and population census (Article 3)

37. Collection of data based on ethnic affiliation, religion and language is very limited according to the Portuguese legislation.¹² Provisions of the Constitution of Portugal in general limit data collection and allow processing of statistical data that are not individually identifiable.¹³ Based on this general limitation, no open-ended questions on ethnic, language and religious affiliations have been included in the population census and no changes are currently planned. As a result, there is no census-based data concerning persons affiliating with Roma communities, regardless of their citizenship.

38. However, the National Statistics Institute (INE) conducted the Survey on Living Conditions, Origins and Trajectories of Population Resident in Portugal (ICOT) in 2023, which focused on

¹² See Article 35(3) of the Constitution: “Information technology may not be used to treat data concerning philosophical or political convictions, party or trade union affiliations, religious faith, private life or ethnic origins, save with the express consent of the data subject, or with an authorisation provided for by law and with guarantees of non-discrimination, or for the purpose of processing statistical data that are not individually identifiable.” See also Article 41(3) of the Constitution: “No authority may question anyone in relation to his convictions or religious observance, save in order to gather statistical data that cannot be individually identified, nor may anyone be prejudiced in any way for refusing to answer.”

¹³ See the [Fourth Opinion on Portugal](#), para. 21.

discrimination and inequality.¹⁴ The ICOT addressed, for the first time, the themes of ethnic affiliations and discrimination. The ICOT provides a detailed comparative analysis of various communities and persons affiliating with them and the total resident population of Portugal in domains such as education, religion, employment, health and housing. It also analyses individuals’ experience of discrimination. The collection and processing of the variable “ethnic belonging” in the ICOT followed the general principles of free, optional and multiple self-affiliation and the processing of sensitive data under the European Union General Data Protection Regulation and the European Code of Practice. In addition to choosing multiple options (more than one ethnic group) for ethnic affiliation, respondents could also opt for “Prefer not to answer” and “Do not know” options. The “ethnic groups” included in the main ICOT data collection were Asian; White; Roma; Black; Mixed origin; Other. Those who chose the option “Other”, were asked to clarify their answer in an open manner.

39. According to the specific results of the ICOT related to persons affiliating with the Roma communities,¹⁵ about 47 500 people living in Portugal aged between 18 and 74 years old self-identified as belonging to the Roma ethnic group.¹⁶ This population had a younger age profile (35% were aged between 18 and 34 years) compared to the total population (25%), a higher proportion of women (56.6% compared to 51.7% in the total population), but was less educated (91.9% had completed, at most, lower secondary education compared to 45.7% in the total population). Almost all of those who self-identified as Roma were Portuguese citizens (96.7%) and 88.1% had no personal or family immigration history.

¹⁴ National Statistics Institute, [Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#) (ICOT), 2023. Data collection started in January 2023 and the results were released in December 2023. The question and response options were developed and tested previously in an ICOT pilot survey carried out in 2022. According to the results of the 2023 ICOT, 6.4 million self-identified with the White ethnic group; 169 200 with the Black group; 56 600 with the Asian group; and 262 300 reported having a mixed origin or belonging.

¹⁵ The [specific results concerning the Roma population of the Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#) were published by the National Statistics Institute on 24 June 2024 on the occasion of Portugal’s celebration of the National Day of Roma People.

¹⁶ In the [Fourth Opinion on Portugal](#), based on the 2016 ObCig National Study on Roma Communities in Portugal, the estimated figure was 37 089 Portuguese Roma. Some associations of the Roma communities argue that 60 000 Roma live in Portugal.

40. Furthermore, on 4 July 2023, the Economic and Social Centre (CES), the High Commissioner for Migration (ACM) and the Foundation for Science and Technology (FCT) signed a protocol to conduct a scientific national study on the socio-economic situation of the Roma communities in Portugal.¹⁷ A research team is carrying out this study covering, among others, access to the labour market, housing and living conditions, health and nutrition conditions, education, social and political participation, social representation, attitudes and relations with the majority population, and culture and traditions. Particular attention will be paid to questions related to Roma childhood, antigypsyism, evictions and Roma history and culture. For the first time, the study will include Roma families living in a state of forced nomadism (see also Article 15), notably in central Alentejo. The results, expected in 2026, will be compared with a similar national study on Roma Communities in Portugal supported by the Portuguese Government, the ACM and the ObCig that was published in December 2014.¹⁸

41. In September 2024, a research project on “Knowing, Mapping, Including: Roma/Gypsy Population in Portugal”¹⁹ was launched to address the lack of systematic, up-to-date information on the living conditions of Roma communities in Portugal. The project, which is co-ordinated by the University Institute of Lisbon and funded by the European Union Citizens, Equality, Rights and Values (CERV) programme 2021, seeks to combine disaggregated quantitative data (covering areas such as health, employment, education, housing, training, gender inequality, discrimination, and antigypsyism) with qualitative data. Research is to be carried out with Roma, rather than just about and for them. The results will be used to develop policy recommendations that effectively combat inequalities and discrimination faced by Roma.

42. The Advisory Committee encourages “states parties to base their equality promotion policy instruments or special measures on comprehensive data related to the situation and access to rights of persons belonging to national minorities, also taking into account the various manifestations of multiple discrimination that may be experienced, including those arising from factors that are unrelated to the national minority background such as age, gender, sexual

orientation and lifestyle markers. Moreover, particular attention must be paid to members of the most disadvantaged segments of society, that is those who have been disempowered economically, socially or geographically, due to their size or because of past experiences of conflict. In this context of special and targeted measures for the promotion of effective equality, the Advisory Committee has consistently emphasised the importance of regularly collecting reliable and disaggregated equality data related to the number and situation of persons belonging to national minorities. It has, however, cautioned states parties against the over-reliance on statistics and encouraged the authorities also to avail themselves of independent research, in particular when carried out by persons belonging to national minorities themselves, in order to assess and comprehensively address the particular shortcomings” faced by them.²⁰ “Authorities should also further avail themselves of other sources of information, including the general labour force and other surveys, as well as independent qualitative and quantitative research available on issues pertaining to the access to rights of persons belonging to national minorities.”²¹

43. The Advisory Committee, therefore, welcomes the INE’s initiative in carrying out the ICOT, and in particular the approach taken in this survey to collect data on ethnic affiliations and in doing so respect the principles of confidentiality, voluntary self-identification, as well as the freedoms to declare multiple affiliations and to list one’s own affiliation(s) as provided for in Article 3 of the Framework Convention. This has allowed the ICOT to obtain reliable information about the ethnic composition of the population as an essential condition for implementing effective policies on diversity management through minority rights, including for adoption of measures to protect the rights of persons belonging to the Roma communities. However, the ICOT fails to disaggregate data on ethnic affiliations by citizenship. There is therefore no separate data regarding non-Portuguese Roma residing in Portugal. Data disaggregation by citizenship may be warranted also in the context of the growing migrant population across Portugal,²² which may also include Roma.

¹⁷ See the [fifth state report](#), p. 18.

¹⁸ Manuela Mendes, Olga Magano and Pedro Candeias, [Estudo Nacional sobre as Comunidades Ciganas](#), (available in Portuguese), December 2014.

¹⁹ See the summary of the research [Conhecer, Mapear, Incluir: População Roma/Cigana em Portugal](#) (available in Portuguese) which is planned from September 2024 to September 2026, and the [fifth state report](#), pp. 40-41.

²⁰ ACFC [Thematic Commentary No. 4](#) (2016), para. 66.

²¹ ACFC [Thematic Commentary No. 4](#) (2016), para. 18.

²² The Advisory Committee learnt during its visit that in Braga 109 nationalities are represented in the public schools with 20% of the pupils being non-Portuguese, including Brazilians, APOC, Ukrainians and Syrians. In Porto, there are 23 000 legal migrants, including 3 000

Furthermore, the Advisory Committee welcomes the independent national study on Roma communities in Portugal supported by the authorities. It will be important that all these results are analysed together with persons affiliating with Roma communities, to design targeted measures addressing their specific needs and interests.

44. The Advisory Committee welcomes the measures taken by Portugal to collect disaggregated data, in particular through the research project on “Knowing, Mapping, Including: Roma/Gypsy Population in Portugal”. However, it remains concerned about the lack of comprehensive and reliable data on the demographic composition of the population and data on various indicators, including socio-economic ones, disaggregated by ethnic affiliation. This lack of disaggregated data limits Portugal’s capacity to identify and acknowledge the entrenched ethnic disparities and structural racism that sustain and perpetuate racial discrimination and inequalities, and to evaluate the ways in which persons affiliating with different communities in Portugal exercise their rights under the Framework Convention. Moreover, the Advisory Committee regrets the authorities’ decision not to include questions in the next population census that would have generated data on the ethnic and religious composition of the population.

45. The Advisory Committee encourages the authorities to ensure that quantitative and qualitative data, disaggregated by ethnic affiliation, gender, age and geographical distribution, is made available. This data should be supplemented by independent research to inform the design and periodic assessment of targeted policies and measures aimed at promoting effective equality, especially of persons belonging to the Roma communities.

46. The Advisory Committee invites the authorities to periodically collect comprehensive data, including in the population census, based on voluntary consent and the principle of free self-identification, disaggregated by ethnic, language and religious affiliations, gender and age, and to formulate evidence-based public policies and design specific measures for persons affiliating with communities most at risk of discrimination and exclusion.

Institutional framework for combatting discrimination (Article 4)

47. In Portugal, several public institutions are responsible for anti-discrimination and are

children in schools. Vila Nova de Famalicão is home to more than 9 000 individuals representing 70 nationalities, including many Brazilians, Indians, Pakistani and Ukrainians.

entitled to receive discrimination-based complaints on various grounds. These institutions include the Commission for Equality and Combating Racial Discrimination (CICDR) which is the central anti-discrimination complaints body in Portugal,²³ the Ombudsperson (*Provedor de Justiça*), the Public Prosecutor, which has the power to prosecute criminal cases, the Commission for Citizenship and Gender Equality (CIG)²⁴ and the National Institute for Rehabilitation (INR),²⁵ as well as several sectoral bodies, such as the Inspectorate General of Home Affairs (IGAI) (see Article 6),²⁶ the Portuguese Regulatory Authority for the Media (ERC) (see Article 9), the Authority for the Prevention and Combat of Violence in Sport (APCVD) and the Authority for Work Conditions (ACT).²⁷

48. Until the end of 2023, the CICDR provided training to introduce associations and individuals from the Roma communities to the legal framework for preventing and combating discrimination and racism. This training also covered procedures for filing complaints and seeking redress.²⁸ These training sessions have

²³ The CICDR was established by the Law no. 134/99 and has powers to take decisions and impose sanctions, including fines. See the [Fourth Opinion on Portugal](#), para. 34.

²⁴ The CIG aims to ensure implementation of public policies concerning the promotion of gender-based equality, including the prevention and fight against domestic and gender-based violence and trafficking in human beings. It only analyses complaints and decides whether or not to send them to the judicial system.

²⁵ The INR is to ensure the planning, implementation and co-ordination of national policies aimed at promoting the rights of persons with disabilities. It receives the complaints of discrimination submitted, forwards them to the competent authorities and draws up an annual report on the application of Law no. 46/2006.

²⁶ The IGAJ was created by the Decree Law no. 227/95. It works directly under the authority of the Ministry of Home Affairs and its control includes all security forces and services within this ministry. It is responsible for, *inter alia*, investigating all instances of serious violations of the fundamental rights of citizens by the security forces and services. It performs inquiries, audits and expertise work and initiates or collaborates in the opening of proceedings in the scope of those services, whenever its collaboration is required and authorised by a superior authority. It communicates the facts of a relevant criminal nature to the competent authorities investigating criminal behaviour and collaborates with them to obtain pertinent evidence when asked.

²⁷ The ACT deals with cases related to access to the labour market, labour relations, safety and health at work, according to Law no. 7/2009.

²⁸ Between 2017 and 2023, the CICDR delivered over 300 hours of training tailored to the Roma

proven to be a crucial mechanism for addressing deficiencies in knowledge, equipping professionals working closely with the Roma communities with the necessary knowledge, tools and materials to address conflicts arising from discriminatory practices. The Roma associations have played a crucial role, both in supporting victims and in referring complaints to the CICDR. Between 2017 and 2022, 97 of the total of 386 complaints filed with the CICDR by alleged Roma victims were brought to its attention through these associations.

49. In January 2024, a new Commission for Equality and against Racial Discrimination (CICDR) was established as an independent body operating under the parliament. It is tasked with processing complaints of discrimination on the grounds of “race”, ethnicity, colour, nationality, language, descent (ancestry) and territory of origin. When receiving complaints, the CICDR initiates the respective administrative offence proceedings and decides and applies fines and additional penalties. On 3 December 2024, the CICDR president was elected, alongside 32 members of the enlarged CICDR.²⁹ In matters related to discrimination in the workplace or in access to employment, the CICDR must refer any complaints received to the ACT as the entity responsible for monitoring compliance with legal, regulatory and conventional provisions concerning labour in economic sectors.

50. Despite these promising changes, there are a number of practical obstacles to the functioning of the CICDR. The CICDR president has not received the necessary support services and has not been able to hire personnel as a regulatory law to this effect has yet to be approved by the parliament. As a result, during this ongoing standstill, the CICDR has not been able to process any complaints of racism. During the visit, the CICDR president regretted this situation, which has been prolonged due to the political situation (the fall of the government in March 2024 and March 2025 and the new parliamentary elections scheduled in May 2025). The Advisory Committee further learnt that AIMA also receives complaints via its website. However, AIMA was not able to provide the Advisory Committee with an exact number of complaints that it had received.

51. The Portuguese Ombudsperson,³⁰ acting as the National Human Rights Institution, is mandated to receive complaints from natural or

legal persons who believe they have been harmed by the allegedly unfair or illegal actions of public institutions, or who consider that their fundamental rights have been violated by these institutions. The Ombudsperson has been accredited with A status by the Global Alliance of Human Rights Institutions for being fully compliant with the Paris Principles.³¹ According to Law no. 3/2024 establishing the CICDR, if a complaint relates to discrimination, the Ombudsperson must forward it to the CICDR for administrative procedure and analysis. The Ombudsperson streamlines and categorises complaints, notably through a specialised Screening Unit set up under a new law in 2021.³² Besides dealing with complaints on its own initiative, the Ombudsperson, while acting as a National Human Rights Institution, has emphasised some of the challenges faced by the Roma communities. In November 2023, the office of the Ombudsperson also moved to Lisbon city centre to improve access both for persons with disabilities and individuals in a vulnerable situation. During its visit, the Advisory Committee was informed by the Ombudsperson that the office has sufficient resources.

52. Despite its location and its many awareness-raising activities, numerous Roma interlocutors reported to the Advisory Committee that the Ombudsperson is still not widely known or seen as an institution they would turn to. The very few complaints made to the Ombudsperson on housing issues are mostly reported by third parties. The Ombudsperson recognised that renting social and privately owned housing is among the remaining challenges faced by Roma, while also referring to overlapping vulnerabilities (minority status, domestic violence, single mothers, etc.). During the Covid-19 pandemic, Roma pupils and students were struggling with online classes. Although the Ombudsperson is aware of all these issues and has undertaken several initiatives (e.g. during the Covid-19 pandemic regarding access to education for Roma), they have not been systematically prioritised and the Advisory Committee has been informed that it is difficult for the Ombudsperson to reach out to Roma across Portugal, including those living in rural areas and in substandard conditions, and to facilitate their reporting of unfair or illegal actions by public authorities and act upon such complaints.

53. During the monitoring period, the Commission for Citizenship and Gender Equality (CIG) adopted two Action Plans for Equality between Women and Men, one for 2018-2021

communities, leaders and professionals from Roma associations, and intercultural mediators. See the [fifth state report](#), p. 10.

²⁹ For more news, see an [article from the national newspaper *Público*](#), January 2025.

³⁰ The Ombudsperson is a state body protected by the Constitution (Article 23).

³¹ [Principles relating to the Status of National Institutions \(The Paris Principles\)](#) adopted by United Nations General Assembly resolution 48/134 of 20 December 1993.

³² Decree Law no. 80/2021 of 6 October 2021.

and another one for 2022-2026.³³ Unfortunately, neither of the action plans refers explicitly to Roma. In addition, the glossary publicly available on the CIG website,³⁴ which lists intersectional factors contributing to inequality, does not have any definitions of “*Ciganos*”, “antigypsyism” or “Romaphobia”.

54. The CIG also continues to implement the National Strategy for Equality and Non-Discrimination 2018-2030 which includes training and awareness-raising activities concerning migrant women, Roma women and LGBTI+ communities.³⁵ Three action plans define concrete measures to be pursued within the scope of the objectives of the national strategy: the Action Plan for the Prevention and Combat of Violence Against Women and Domestic Violence 2023-2026 (PAVMVD),³⁶ the Action Plan for Combating Discrimination on the Grounds of Sexual Orientation, Gender Identity and Expression, and Sexual Characteristics (2023-2026) (PAOIEC), as well as the Plan for Equality between Women and Men (PAIMH)³⁷ prepared by the Shared Services of the Ministry of Health, including seven priority dimensions.³⁸ Although some of the priority dimensions are particularly relevant for the Roma, this plan does not refer specifically to them.

55. The Advisory Committee reiterates that “[p]ersons belonging to national minorities must have access to information [...] about their rights, the work of the anti-discrimination institutions and the remedies against any form of discrimination available to them, including indirect forms of discrimination, as well as cases of multiple discrimination”.³⁹

³³ Commission for Citizenship and Gender Equality, [Action Plan for Equality between Women and Men](#).

³⁴ See the [Glossary](#) on the Commission for Citizenship and Gender Equality (CIG) website.

³⁵ According to the authorities, there is a €60 000 European Union funding allocated for gender equality initiatives. This includes €10 000 annual grant for a specific programme for Roma women implemented through the Association for the Development of Portuguese Roma Women AMUCIP.

³⁶ See the [CIG website](#) for the Prevention and Combat of Violence Against Women and Domestic Violence 2023-2026 (PAVMVD).

³⁷ Shared Services of the Ministry of Health, [Plano para a Igualdade entre Mulheres e Homens 2025](#) (Plan for Equality between Women and Men for the year 2025).

³⁸ These are: company strategy, mission and values; equality in access to employment; initial and continuing training; equality in working conditions; protection in parenting; balancing work life with family and personal life; prevention of harassment at work. See [Plano para a Igualdade entre Mulheres e Homens 2025](#), p. 2.

³⁹ ACFC [Thematic Commentary No. 3](#), The Language Rights of Persons Belonging to National Minorities under the Framework Convention, adopted on 24 May 2012, para. 28.

56. While the Advisory Committee praises the establishment of the CICDR as an independent body in 2024, it considers it of the utmost importance for the parliament to adopt, as soon as possible, regulatory legislation that would provide the CICDR with full support services. The CICDR, which is crucial for handling discrimination cases, will otherwise continue to be unable to function. Nevertheless, the Advisory Committee notes that one Roma person continues to be included in the composition of the CICDR, as was the case previously.⁴⁰

57. The Advisory Committee recognises the Ombudsperson’s efforts in streamlining and categorising complaints, as well as its efforts in launching some *ex officio* initiatives. As the Ombudsperson does not receive many complaints directly from persons affiliating with Roma communities, there is a need for conducting more *ex officio* investigations concerning their discriminatory situations, namely concerning housing in Alentejo and Algarve where forced nomadism continues to be a problem (see Article 15).

58. The Advisory Committee notes the large institutional architecture of equality bodies in Portugal. However, it is concerned about the reported low levels of awareness among the general public, in particular among various ethnic communities, regarding the mandates and competencies of these bodies relating to (racial) discrimination. While welcoming the intersectional approach of the CIG, the Advisory Committee regrets that both the Action Plan for Equality between Women and Men and the PAVMVD do not refer specifically to persons affiliating with Roma communities.

59. The Advisory Committee urges the authorities to remedy the lack of functionality of the Commission for Equality and Combating Racial Discrimination by adopting without delay regulatory legislation providing for support services and making it possible for the commission to employ the required human resources.

60. The Advisory Committee calls on the authorities to consolidate and reinforce policies to combat direct and indirect discrimination faced by persons affiliating with Roma communities, by stepping up efforts to raise their awareness of legislative standards and of existing human rights and equality bodies, as well as of various mechanisms for filing complaints and remedies available to victims of discrimination, including racial discrimination.

61. The Advisory Committee invites the authorities to provide specific support to ensure that the Ombudsperson conducts greater outreach work within the Roma communities and

⁴⁰ See the [Fourth Opinion on Portugal](#), para. 126.

conducts *ex officio* investigations into Roma-related issues, *inter alia* access to adequate housing in the south of Portugal, particularly tackling the problem of forced nomadism.

Legal framework for combatting discrimination (Article 4)

62. The legal framework on combating discrimination is now covered by Law no. 3/2024, which established the CICDR and amends Law no. 93/2017 on preventing, prohibiting and combatting discrimination based on racial and ethnic origin, colour, nationality, descent, and territory of origin.⁴¹ In the Programme of the 22nd Constitutional Government, the authorities recognised that “Portugal continues to be confronted with the problems of racism and xenophobia, which need to be better understood, challenged and tackled.”⁴² In July 2021, Portugal approved its first National Plan to Combat Racism and Discrimination 2021-2025 (PNCRD).⁴³ Its development involved contributions from all government sectors (multisectoral commitment), as well as inputs from civil society (representatives of anti-racist associations and of Roma and migrant communities). A public consultation was held in May 2021. The PNCRD is structured around four principles: deconstructing stereotypes; co-ordinated, integrated governance and territorialisation; integrated intervention in combating inequalities; and intersectionality. With approximately 80 concrete measures, the PNCRD contains 10 areas of action,⁴⁴ specific measures, activities, indicators, governmental department and entities responsible, and goals disaggregated by year. The PNCRD was publicly promoted.⁴⁵

⁴¹ [Law no. 3/2024 of 15 January 2024](#) (in Portuguese).

⁴² See [Resolution of the Council of Ministers no. 101/2021](#).

⁴³ See the [National Plan to Combat Racism and Discrimination 2021-2025](#) available in Portuguese and English.

⁴⁴ The 10 areas of action include: governance, information and knowledge for a non-discriminatory society (with eight measures); education and culture (11 measures); higher education (nine measures); labour and employment (six measures); housing (six measures); health and social welfare (seven measures); justice, security and rights (13 measures); participation and representation (five measures); sport (nine measures); means of communication and the digital (eight measures).

⁴⁵ To this effect, an event was organised in 2022, which was broadcast on social media and attended by mainstream media. During this event, a debate on “Combatting racism in Portugal: actors, policies, and strategies” was conducted, with a panel composed of representatives from Roma community associations, migrant associations and academics. See the [fifth state report](#), p. 11.

63. However, many interlocutors informed the Advisory Committee that the implementation of the PNCRD remains limited. In the period between 2021 and 2023, the PNCRD had planned 652 activities, but 63% of these had not been started, 21% were underway and only 16% were completed.⁴⁶ Associations shared with the government concrete proposals for revising the current PNCRD implementation and for adopting a second national plan. The Advisory Committee heard during its visit that the authorities are yet to start drafting a strategy beyond 2025.

64. Furthermore, while Article 155 of the Criminal Code already enshrined hatred motivated by the prejudice criteria of forced marriage, on 25 March 2025, a new law was adopted (Law no. 39/2025) that bans marriage of minors before they reach 18 years of age (previously this had been 16),⁴⁷ and which considers “child, early or forced marriage” (CIPF) a situation of risk that justifies intervention by authorities to protect the rights of children.⁴⁸ This law will particularly impact some communities, including Roma where early marriages sometimes still occur, though they are often not registered. Such cases would now classify as forced marriages under the new law. The Advisory Committee learnt that AIMA sees the need to raise awareness about and explain specificities of CIPF among young Roma (see Article 12). The White Paper - Recommendations to Prevent and Combat Child, Early and/or Forced Marriage was published in October 2024.⁴⁹ The collection of data on CIPF through the questionnaire survey identified relevant information on an often invisible phenomenon, registering 836 cases of CIPF between 2015 and 2023 (493 child marriages, 261 early marriages and 82 forced marriages), not disaggregated by ethnicity. The lack of clarity or uniformity in the understanding of the concepts of “child marriage” and “early marriage”, which are not widely known or established among the

⁴⁶ See an [article](#) in *Público*, 5 January 2025.

⁴⁷ Previously, in Portugal, the law banned marriage for children below 16 but allowed those aged between 16 and 18 to marry, provided that they had the consent of their parents or legal guardians.

⁴⁸ [Law no. 39/2025](#) of 25 March 2025 (available in Portuguese). See also Plataforma, [Portugal: Underage marriages increase by 190% before ban](#), 9 April 2025. Portugal has registered 470 marriages with minors since 2023, a phenomenon that has increased by almost 190% since 2020, with six adults aged 30 or over marrying minors under the age of 18 in 2023-2024. Most of the minors were female (65%).

⁴⁹ Commission for Citizenship and Gender Equality (CIG), [White Paper - Recommendations to Prevent and Combat Child, Early and/or Forced Marriage](#), October 2024. AMUCIP was part of the Working Group on Child, Early and Forced Marriages. See definitions, available in Portuguese, of child, early and forced

entities, may have affected the way the cases were classified, or data collected.⁵⁰

65. The level of discrimination, notably affecting persons affiliating with Roma communities, remains high. According to the results of the INE ICOT survey, more than half of persons of Roma ethnicity (51.3%) have suffered discrimination in Portugal, a figure much higher than that recorded in the total population (16.1%). More than four fifths (82.8%) said that discrimination is present in the country and around three quarters (74.3%) considered that ethnically based discrimination occurs frequently or very frequently (48.8% in the total population). More than half of the Roma population (52.7%) has witnessed situations of discrimination (compared with 35.9% for the total population).⁵¹

66. State and municipal authorities acknowledge the widespread discrimination faced by the Roma. Persons affiliating with Roma communities often encounter prejudice, racism and social exclusion in education, employment, housing and healthcare. Roma children face barriers in education due to poverty, discrimination and cultural differences (see Article 12). Language and cultural gaps hinder inclusion in mainstream society, while symbols like ceramic frogs in shops reinforce exclusion.⁵² High unemployment and poverty restrict economic mobility and many live in overcrowded or informal housing with limited services. Access to healthcare is also hindered by financial, informational and social barriers (see Article 15). Roma are under-represented in politics and decision-making, limiting their civic participation and influence on relevant policies (see Article 15).

67. The Advisory Committee underlines the particular importance of raising awareness

marriages contained in the White Paper (pp.14-15).

⁵⁰ Commission for Citizenship and Gender Equality (CIG), [news](#), 31 October 2024.

⁵¹ See the [specific results concerning the Roma population of the Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal \(ICOT\)](#), p. 1.

⁵² For the negative effect of ceramic frogs on Roma fearing to enter such shops and restaurants, see the [Fourth Opinion on Portugal](#), paras. 73 and 77. The Directorate-General for the Arts (DGARTES) funded *Amarelo Silvestre* – Cultural Association, for the national tour of the theatre play *Engolir Sapos* (Swallowing Toads) from 2023 to 2026. This play offers an artistic reflection on prejudice and ceramic toads, aiming to engage young school audiences in discussions about discrimination and about relations between Roma and non-Roma. The project seeks to foster interactions between communities and persons affiliating with them by emphasising the value of individual identities over collective stereotypes. Each performance included a mandatory workshop (90 minutes per class), culminating in a discussion following the play.

among the general public and institutions about these obstacles to inclusion and the need for measures to address and prevent them. More awareness-raising campaigns among national minorities, particularly those in the most vulnerable situations such as the Roma communities, on measures they can take when faced with discrimination are needed so that individuals are not prevented from accessing justice in such cases due to a lack of awareness and financial means.

68. The Advisory Committee observes that despite the many legislative, administrative and policy measures taken by Portugal, persons affiliating with Roma communities continue to face discrimination in many spheres of life, most markedly in effective access to housing, education and the labour market. The Advisory Committee acknowledges the importance of the PNCRD in specifying relevant measures, indicators and the authorities responsible, but it regrets the lack of budgetary allocations for each measure. It is also concerned about reports indicating that the goals in the PNCRD are largely input-based and lack impact-oriented targets to ensure the full and equal enjoyment of human rights and fundamental freedoms by individuals from disadvantaged and marginalised communities. The Advisory Committee is also concerned about the reported lack of awareness of the PNCRD by municipal officers in areas with a significant Roma population, as well as of their duty to address incidents of racial discrimination. As the PNCRD comes to an end in 2025, it is concerning that the process to develop a new national plan to combat racism and discrimination has not been initiated by the authorities. Furthermore, the Advisory Committee considers that the Law no. 39/2025 condemning the marriage of minors is an important step in the protection of children's rights and underlines that its application needs to be accompanied by awareness raising activities amongst the communities most concerned. As regards its implementation *vis-à-vis* the Roma, it should be noted that marriage with minors may occur without being registered. In such cases, the judiciary needs to be trained so as to refrain from basing their decisions on stereotypes about the Roma in considering early marriage as their cultural practice.

69. The Advisory Committee encourages the authorities to complete the National Plan to Combat Racism and Discrimination and then evaluate it in consultation with those most affected by racism and discrimination, including Roma. The authorities should ensure that awareness-raising campaigns about the National Plan are intensified, notably *vis-à-vis* public officials at all levels and in all jurisdictions, in particular those working in areas with Roma communities, so that they can address incidents

of racial discrimination. The authorities should also start drafting a new national plan beyond 2025, which takes into consideration proposals from the Roma communities, and allocate sustainable funding for its implementation.

70. The Advisory Committee invites the authorities to raise awareness among the general population and the relevant institutions regarding the implementation of the Law no. 39/2025 banning the marriage of minors, while making sure that marriage involving minors affiliating with Roma communities is not considered as a cultural practice.

National Roma Communities Integration Strategy (Article 4)

71. The National Roma Communities Integration Strategy (ENICC) 2013-2022 was extended until 31 December 2023.⁵³ An external evaluation of the ENICC, carried out between June and August 2023, was assigned to the Institute of Sociology of the Faculty of Arts and Humanities of the University of Porto. The cross-sectional, external and independent final report was sent to the ACM in September 2023. Surveys were conducted in all 19 districts of all regions⁵⁴ and in the Azores and Madeira. Its general objective was to reflect on the implementation of the ENICC (progress, limitations, obstacles) and to understand the current and concrete needs of the Roma communities and persons affiliating with them as a basis for the next strategy. The methodological roadmap incorporated four instruments for collecting and analysing data and six thematic focus groups (poverty and discrimination, gender equality, employment and vocational training, education, health and housing).⁵⁵

72. The evaluation faced methodological constraints due to the short timeframe of just three months, dispersed interlocutors and budgetary limitations, which prevented field visits, in-person interviews and closer

⁵³ See [Resolution of the Council of Ministers no. 36/2023](#) of 3 May 2023.

⁵⁴ Porto and North, Centre, Lisbon and Tagus Valley, Alentejo and Algarve.

⁵⁵ The analysis of documents, including legislation, news, reports and studies, also included an online questionnaire survey of the Roma population over the age of 18 years old, semi-structured interviews with 19 key informants and six thematic focus groups. The evaluation of the strategy involved a total of 57 participants, of which 39 women, a third were Roma (20), including: intercultural mediators, association leaders, OPRE grantees, NACI technicians, CONCIG and FAPE project representatives; OBCig co-ordinator, and the ACM. The focus groups also included social workers; representatives from *Escolhas*, *Roma Educa* and *Romed*; the Evangelical pastors, activists from social movements and NGOs

collaboration with Roma associations. Very few Roma associations and civil society actors who participated in the implementation of ENICC were involved in its evaluation. Researchers also identified the low response to the survey from certain geographical areas and local institutions. Some districts remained under-represented, in particular Guarda, Viana do Castelo and the archipelagos of Madeira and the Azores.⁵⁶ The Advisory Committee was also informed during its visit that while many Roma representatives recognised it was important to respond to the interview invitation, following certain inappropriate public remarks by representatives of institutions, they often opted to remain silent or provide evasive answers. Despite being financed by public money, the 2023 external evaluation of the ENICC has not yet been made publicly available by AIMA.

73. According to the results of the evaluation obtained from the Advisory Committee's interlocutors,⁵⁷ the ENICC implementation rate in the 2018-2022 quadrennium was 68%. In 2020, despite the Covid-19 pandemic, the rate increased compared to previous years (74.4%). Measures related to knowledge about Roma, education and integration into the labour market had a higher level of implementation. The areas that fell short were intercultural mediation, housing and health. It should be noted that in the four years under review, the strategic objective of housing never exceeded a 2% execution rate. The evaluation showed that 8.9% of the online questionnaire respondents found that ENICC was (very) well known, whilst 30.4% had little knowledge about ENICC and 59.5% did not know about it. As regards its impact, 11.1% felt it important for the inclusion of persons affiliating with Roma communities and 10.8% that it helped to improve their living conditions. For 8.4% of the respondents, there was little impact and for 3.6% ENICC had no impact. Only 46.4% of respondents considered that there have been improvements in terms of the social inclusion of the Roma. At least 50% indicated that they did not know about ENICC programmes and instruments, including the generally well-known programmes *Escolhas* (see Article 12), the personal employment plan (see Article 15) and the intercultural municipal mediators (see Article 6). The evaluation also revealed that

(*SOS Racismo*, *Habitação Hoje*, *Habita*, etc.).

⁵⁶ Two replies were received from Madeira and one from the Azores.

⁵⁷ On 24 October 2023, at the 6th edition of ObCig's International Seminar on "10 Years of the National Strategy for the Integration of Roma Communities" ([ObCig reflete os 10 Anos da Estratégia Nacional para a Integração das Comunidades Ciganas](#)) discussions were held on the preliminary results of the ENICC external evaluation. The results of the evaluation were based on 857 responses (527 online and 308 on paper).

women showed a lower awareness of those programmes than men and that higher educated Roma were more likely to know about and participate in ENICC activities. The evaluation also showed that 83.1% feel that the next Roma generation will live with more opportunities.

74. The external evaluation formulated recommendations and presented a proposal for a new national strategy for the integration of Roma communities by 2030, which was submitted to the ACM in November 2023. The evaluation report identified housing, discrimination, employment and vocational training as the priorities for the next strategy, requiring more robust and sustainable investment at local and national levels due to the pressing needs of the Roma, followed by education, eradication of poverty, and health. The new strategy was yet to be adopted by AIMA at the time the Advisory Committee was drafting this Opinion.⁵⁸ Portugal is currently the only country of the European Union with a Roma population which does not have a Roma strategy in place covering the seven key focus areas (equality, inclusion, participation, education, employment, health, housing) of the European Commission's 10-year plan to support Roma in the European Union.⁵⁹

75. The Observatory of Roma Communities (ObCig) was created under the ENICC 2013-2022, but its activities were suspended at the beginning of 2024.⁶⁰ Its objective was to promote the production and publication of studies on Roma communities. It also aimed to deconstruct representations and stereotypes about Roma in general, which persist in Portuguese society. The ObCig website, which contains Roma-related news, studies, publications and events, has been deactivated as a repository of resources. The ObCig's budget was integrated into that of the ACM, but since 2024, this unit has no longer been included in AIMA's organisational chart, and its future operation is yet to be decided.⁶¹

76. The Advisory Committee acknowledges the efforts of the Portuguese authorities until the end of 2023 to implement the ENICC, especially in the field of education. *Escolhas* is one of the most visible programmes due to its large geographical dispersion and long duration. *ROMA Educa* and the *OPRE* scholarships have also been important for providing, extending and delivering continuity

⁵⁸ In June 2024, the action plan for drafting the new strategy was approved.

⁵⁹ European Commission, [National Roma strategic frameworks for the period up to 2030](#).

⁶⁰ Following the entry into force of the Organic Law and Statutes of AIMA, I. P., approved by Decree Law no. 41/2023, of 2 June 2023, and by Ministerial Order no. 324-A/2023, of 3 August 2023.

⁶¹ The reactivation of ObCig website is planned, as per additional information submitted by AIMA, 2 April 2025.

to students' education. The Advisory Committee considers that these measures need to be continued and publicised more widely to become even more effective. Despite the persistence of challenges related to gender equality (early marriages and girls dropping out of school), progress has been made in extending schooling. However, this progress is mainly attributed to the emancipatory influence exerted by Roma women and their associations. Internal and external pressures and constraints have been identified that impact the progress of empowering Roma women and girls. The Advisory Committee is of the view that under the new strategy, effective change must come from the Roma communities, involving Roma women and youth, as recommended by the Council of Europe Recommendation CM/Rec(2024)1 on equality of Roma and Traveller women and girls and Recommendation CM/Rec(2023)4 on Roma Youth Participation.⁶²

77. Difficulties were observed in the ENICC external evaluation in collecting statistical data on Roma in the fields of employment, health and housing, which made it impossible to fully evaluate the implementation and effectiveness of the ENICC. The lack of access to employment, despite modest progress, is considered one of the aspects that conditions the future of the Roma most. The need to find mechanisms to promote participation in vocational training was highlighted, particularly for Roma women (adjusted hours, training grants, childcare). Employers have been frequently accused of racism and discrimination against Roma when hiring employees. The Advisory Committee is of the view that creating incentives for self-employment, as well as temporary positive measures would help improve access to employment for persons affiliating with Roma communities, including women.

78. The Advisory Committee regrets the low implementation rate of the strategic objective of housing. Roma families living in camps or tents, forced nomadism and socio-spatial segregation remain alarming. The Advisory Committee heard, on the one hand, municipalities asking for help from the central government, notably in Beja where the situation in slums and tents is alarming and continuously deteriorating, and, on the other hand, the state authorities saying that this was a municipal responsibility. The Advisory Committee considers that the localised specificities of the housing situation mean that increasingly territorialised diagnostic mechanisms need to be included in the new

⁶² See the Council of Europe [Recommendation CM/Rec\(2024\)1 on equality of Roma and Traveller women and girls](#), adopted by the Committee of Ministers on 5 April 2024, and [Recommendation CM/Rec\(2023\)4 on Roma Youth Participation](#), adopted by the Committee of Ministers on 5 April 2023.

strategy. The Alentejo and Algarve districts emerged as the most neglected and forgotten ones and thus most in need of special measures, including joint site visits and effective joint follow-up actions by the state and local authorities (see Article 15).

79. The Advisory Committee regrets the lack of comprehensive statistics on the enjoyment of political, economic, social and cultural rights by Roma. It also regrets the lack of specific, updated information on the impact of the ENICC 2013-2022 concerning educational attainment, effective access to and retention in education, housing conditions, labour market insertion and (un)employment rates. The Advisory Committee insists that the evaluation of the ENICC 2013-2022 should be made public and expects to see timely action to finalise a new comprehensive strategy, in close consultation with the Roma, taking into account the recommendations contained in the evaluation and address the priorities identified by Roma associations, including associations of Roma women. As regards the ENICC and other public policies and strategies (regarding housing, the fight against poverty), the Advisory Committee expects greater efforts, better co-operation and a more integrated approach on the part of central and local authorities and service providers, to improve the implementation of policies for the Roma.

80. The Advisory Committee urges the authorities to develop, in close consultation with representatives of Roma communities and their associations, and adopt a new national Roma communities inclusion strategy, ensuring alignment with local action plans and sectoral policies. This process should begin by making the external evaluation of the National Roma Communities Integration Strategy (2013-2022) public, and then discuss its findings and recommendations in an inclusive, gender sensitive and participatory manner.

81. The Advisory Committee calls on the authorities to ensure that the rights and situation of persons affiliating with Roma communities are monitored by an independent and adequately resourced body and that studies and publications on Roma communities in the repository of the Observatory of Roma Communities become once again available online.

Support for the preservation and promotion of identities, languages and cultures (Article 5)

82. AIMA disburses two types of funds: the Fund to Support the National Strategy for the Integration of Roma Communities (FAPE) which aims to finance projects on combating discrimination against Roma and supporting their

inclusion;⁶³ and the Roma Associations Support Programme (PAAC) supporting only organisations representing Roma communities, which aims to build Roma capacities, promote equal opportunities, provide for citizenship education, mediation and combat discrimination.⁶⁴ The ongoing FAPE⁶⁵ seeks to financially support civil society entities (associations, NGOs) to develop projects that directly contribute to the implementation of the priorities and goals established in the ENICC 2013-2022. The third and fourth editions of FAPE increased both the overall budget to €250 000 and allowed applications for one-off or continuous projects with a financial allocation of €5 000 and €25 000, respectively, and the implementation period to up to 18 months (instead of nine months for the previous editions).⁶⁶ The PAAC⁶⁷ contributes directly to achieving the priorities set out in the ENICC 2013-2022 and projects, lasting for 12 months, received financial allocations of between €2 000 and €10 000 each. The seventh edition (2025-2026) funds projects of up to 18 months with a maximum value of €25 000 per project.⁶⁸

⁶³ See the [fifth state report](#), pp. 26-27, as well as additional information provided by the authorities, 2 April 2025.

⁶⁴ See the [fifth state report](#), pp. 27-28, as well as additional information provided by the authorities, 2 April 2025.

⁶⁵ From the first edition of FAPE in 2015 until the sixth edition in 2023-2024, the total funding allocated to this programme was €1 093 000, with 204 applications submitted and 90 projects approved, of which 32 by associations representing Roma communities. See additional information provided by the authorities, 2 April 2025.

⁶⁶ With an overall budget of €173 000, the fifth edition approved 11 projects, six of which for Roma associations. The sixth edition of FAPE (2023-2024) had a financial allocation of €260 000 and required applicants to form partnerships with associations representing the Roma communities. The sixth edition of FAPE received 22 applications and supported 14 projects with a maximum value of €20 000 per project. The projects cover the following areas: Matosinhos, Vila Nova de Gaia, Figueira da Foz (2), Coimbra, Covilhã, Castelo Branco, Lisbon, Almada, Seixal, Barreiro, Estremoz, Elvas and Beja. See the [fifth state report](#), pp. 26-27, and additional information provided by the authorities, 2 April 2025.

⁶⁷ From the first edition (2017) to the sixth edition (2023-2024), the total funding allocated to the PAAC was €403 500. All these editions have resulted in a total of 57 applications submitted and 51 projects approved. See additional information provided by the authorities, 2 April 2025.

⁶⁸ In the sixth edition of the PAAC (2023-2024) the total financial allocation was €124 000. The seventh edition (2025-2026) funds projects of up to 18 months with a maximum value of €25 000 per project. For the sixth edition of PAAC, nine applications were submitted, resulting in eight approved projects with a maximum value of €10 000 that ended on 31 May 2024. See additional information provided by the authorities, 2 April 2025.

83. Under the FAPE and the PAAC, several projects have been undertaken by Roma associations to promote Roma culture, foster dialogue between Roma and non-Roma communities and combat stereotypes.⁶⁹ National museums and theatre performances promote Roma art and culture, raise awareness about the history of Roma persecution, and combat stereotypes and antigypsyism. Alongside these projects, the Calouste Gulbenkian Foundation and “La Caixa” Foundation supported, through the PARTIS & Art for Change programme (2021–2025),⁷⁰ several participatory artistic projects involving Roma associations and individuals. Projects like *Lungo Drom*⁷¹ and *ZHA!*⁷² sought to raise awareness of the Roma presence in Portugal and Roma history, culture and music. Other initiatives were funded by the Directorate-General for the Arts (DGARTES).⁷³

84. The Ministry of Culture supported initiatives to promote Roma art and culture and to combat stereotypes, such as through the theatrical

⁶⁹ For example, during this monitoring cycle, the 2020 launching of the book “Pieces of Me”, organised by *Associação Agarrar Exemplos* based in Almada; the 2021-2022 Theatre play *A História do Ciganinho Chico* promoted by *Sílaba Dinâmica Associação* based in Elvas; the 2022 Painting and photography exhibition of the project “Women and Roma communities, it's the dream that moves us!” promoted by *Ribaltambição Associação* based in Figueira da Foz. For further details, see the [fifth state report](#), pp. 27-28.

⁷⁰ The [PARTIS & Art for Change programme](#)'s first edition (2021-2022) supported 16 projects, the second edition (2022-2025) 15 projects including *Lungo Drom* and *Zha!*, and the third edition (2025) supports 15 projects.

⁷¹ [Lungo Drom](#) means long journey in Romani. The project proposes, through interdisciplinary artistic practices, to build a long road, in the form of a “Nomadic Museum”, which will bridge the ancient divides between the societal majority and the Roma communities.

⁷² The objective of [Zha!](#) is to promote the living traditions of Roma communities, a huge cultural and heritage legacy that tends to be invisible outside their territories and communities. Music, dance and songs are natural forms of celebration, expression and communication and are present in many moments of these communities' daily lives.

⁷³ Examples include a photographic project, [Histórias do povo cigano](#) (Stories of the Roma People) carried out by the Photographic Expression Movement in partnership with *Costume Colossal* (Association for the Integration of Roma Communities), in which visual images are used as a form of expression by Roma to raise awareness and promote the development and the preservation of their traditions, customs and knowledge, thus seeking to end some of the negative stereotypes. Additionally, the “Art and Urban Peripheries” competition, launched in 2024 by DGARTES and AIMA, seeks to promote access to cultural creation and enhance the interconnection between the cultural dynamics of the urban peripheries and city centres. See additional information provided by the authorities, 2 April 2025.

performance *Homo Sacer*.⁷⁴ AIMA organised several cultural events, including celebrations for International and National Roma Days (8 April and 24 June, respectively), the Intercultural Roma Festival in Lisbon, in partnership with the Intercultural Roma Association (InCig), the *ROMA Educa* Meeting in Entroncamento and the SANACAY Festival to promote Roma culture in Lisbon in July 2024.⁷⁵ In 2024, the project *Margarida Girão nas Bétulas*, linked to visual arts and photography, together with a concert *Sons do Bairro*, were carried out in Vila Nova de Famalicão.⁷⁶

85. Representatives of Roma associations and other interlocutors told the Advisory Committee that opportunities to receive funding for cultural projects exist in Portugal but are limited and competitive. They were particularly frustrated with the 12-month duration of PAAC projects. There is no dedicated continuous public funding for Roma cultural, social and educational projects. Moreover, there is a lack of clarity regarding the division of responsibilities between central and local authorities, leading to confusion and inefficiency in the execution of programmes aimed at *inter alia* protecting and promoting Roma cultures. Also celebrating Roma days often depends on the level of support provided by the authorities in promoting the visibility of Roma communities in society.

86. The authorities established a Working Group for the Promotion of the Mirandese Language,⁷⁷ which presented a strategy for promoting and protecting the Mirandese language and a plan for the implementation of an organisational unit for the operationalisation of this strategy to the members of the government responsible for foreign affairs, culture and education, recommending the creation of a mission structure. Law no. 45-A/2024 allocated funding for this initiative (€500 000) and the Council of Ministers Resolution 66/2025 of 18 March 2025 established the Mission Structure for the Promotion of the Mirandese Language (*Estrutura de Missão para a Promoção da Língua*

⁷⁴ This initiative, which included the creator and actors/actresses from Roma communities, was carried out in Montemor-o-Novo, Elvas and Serpa from 3 November to 8 December 2023. Six theatrical workshops based on the *Homo Sacer* performance were conducted, beginning with a conference titled “Manual for a Protest”, which provided an overview of the history of the Roma diaspora and the *Porajmos* (Roma Holocaust), drawing parallels with contemporary discrimination. See additional information provided by the authorities, 2 April 2025.

⁷⁵ See additional information provided by the authorities, 2 April 2025.

⁷⁶ For more information about this project carried out between April and September 2024, see the [Famalicão webpage](#).

⁷⁷ See the Legislative [Order no. 1294/2024](#), of 2 February 2024.

Mirandesa), tasked with promoting, co-ordinating and implementing policies for the preservation, teaching, dissemination and enhancement of the Mirandese language, while also ensuring the implementation of the Strategic Plan for the Promotion of the Mirandese Language and liaising with relevant public and private entities.⁷⁸ The Working Group produced a Final Report, of which the Strategic Plan 2024-2028 map is an integral part. According to Legislative Order no. 10471/2024 of 5 September 2024, the Working Group was formally dissolved at the end of September 2024.

87. Furthermore, the ratification process of the Language Charter, which Portugal signed in 2021 (see Article 3), is yet to be completed. According to the authorities, at least 23 out of 35 provisions of Part III of the Language Charter had been ensured, and the government is pursuing efforts to finalise the ratification process. Also, the Mirandese interlocutors informed the Advisory Committee that many provisions of the Language Charter are *de facto* applied on the ground, but they also emphasised that ratifying the Language Charter is crucial, as it would provide both international and national recognition and protection of the critically endangered Mirandese language and culture. They have not received any further information as to why the Language Charter has not yet been ratified by the Portuguese Government.

88. The Advisory Committee reiterates that the creation of suitable conditions for persons belonging to national minorities to preserve and develop their cultures and languages and to assert their respective identities is considered essential for an integrated society.⁷⁹ The Advisory Committee welcomes the efforts under the FAPE and the PAAC to promote Roma culture, combat stereotypes and foster inter-community dialogue, as well as the artistic initiatives under the PARTIS & Art for Change programme. However, the Advisory Committee is also concerned by the overall limited support for Roma cultural projects, notably in certain geographical areas. The FAPE-supported projects left out several districts in the north and centre of Portugal. This regional disparity could be due to the absence of Roma associations in these regions (for example in Braga) or the lack of preparation or information on how to access this support. Furthermore, the scarcity and lack

of continuity of financial support for Roma cultures and identities, notably since the end of the ENICC 2013-2022 and the short duration of the projects submitted to the PAAC, undermine their sustainability and impact. The Advisory Committee therefore welcomes the governmental decision to extend, as of 2025, the duration of PAAC projects to up to 18 months, aligning them with the FAPE framework. It also highlights the need to further clarify the division of responsibilities between the central and local authorities, which hampers effective implementation in practice. The Advisory Committee, whilst praising the steps taken to protect the endangered Mirandese language and culture, including the significant funds allocated to this effect and the establishment of the working group and the Mission Structure for the Promotion of the Mirandese Language, is also concerned over delays in appointing its members.

89. The Advisory Committee encourages the authorities at all levels to continue promoting and preserving Roma identities and cultures with long-term earmarked budgets. The authorities should guarantee that support is allocated both centrally and locally to ensure sustainable baseline funding for associations promoting Roma identities and cultures, including associations of Roma women.

90. The Advisory Committee encourages the authorities to strengthen their commitment to the protection and recognition of the Mirandese language and culture through timely institutional measures which are to be implemented with effective participation of persons affiliating with the Mirandese community. The authorities are further encouraged to complete the ratification process of the European Charter for Regional or Minority Languages in a timely manner.

Intercultural dialogue and mutual respect (Article 6)

91. Three recent national and international studies show the general perception of the climate of tolerance experienced by the Roma in Portugal, including “Roma in 10 European Countries - Main results” by the European Union Agency for Fundamental Rights (FRA) from October 2022,⁸⁰ the 2023 INE ICOT Survey and the 2023 ObCig publication *Populismo e a segregação das comunidades ciganas em*

⁷⁸ The EMPLM’s Advisory Board includes representatives of the Cultural Strategy, Planning and Assessment Office (GEPAC), the Directorate-General for Education (DGE), the Camões Institute, the Miranda do Douro City Council, the *Associação de la Lhéngua i Cultura Mirandesa*, the Universities of Coimbra and Porto, the Polytechnic Institute of Bragança, and the Miranda do Douro School Group.

⁷⁹ ACFC [Thematic Commentary No. 3](#) (2012), para. 25.

⁸⁰ European Union Agency for Fundamental Rights (FRA), [Roma in 10 European Countries - Main results](#), 25 October 2022. This survey presents findings from the 2021 survey on Roma in 10 countries, including Portugal. It includes interviews with more than 8 400 Roma, collecting information on more than 20 000 individuals living in their households (for Portugal, this includes 568 interviews with 1 439 individuals living in their households).

*Portugal: O caso mediática do chega!*⁸¹ Until 2019, Portugal had been seen as an exception in Europe regarding the influence of populist movements on its national political landscape. However, this dynamic has shifted since then, with a noticeable increase in hate speech directed at Roma.

92. Immigrants make up 9.8% of Portugal's population. According to the "Portugal: Immigration Barometer",⁸² a majority of respondents (68%) view immigration policy as too permissive, associate migrants with higher crime rates (67.4%) and lower wages (68.9%), yet also recognise their significant economic contribution, particularly in construction, agriculture and services (68%). Furthermore, 51% of the respondents believe immigration may threaten national culture and security (a figure that has nearly doubled since 2010). Greater social trust and more positive views of immigrants were also seen in municipalities with active inclusion policies and opportunities for interaction with immigrants.

93. Some examples of FAPE- and PAAC-funded projects highlight positive Roma role models, such as the campaign "If you change your outlook, everything can change".⁸³ Some programmes also involve Roma who are not Portuguese citizens, such as the *ROMA Educa*

⁸¹ Rodrigo Alves Alferes Galhardas, [Populismo e a segregação das comunidades ciganas em Portugal: O caso mediática do chega!](#), ObCig publication as part of the Olhares Collection no. 16, 2023. The study provides an analysis of the media discourse used by Chega! political leadership when referring to Portuguese Roma and aims to understand whether Roma feel discriminated against by Chega!. To this end, a questionnaire was applied to people of Roma affiliation. This study also sought to understand whether there were any changes in the living standards and dimensions of social integration as applicable to this community since the establishment of this political party.

⁸² European Commission, Migration and Home Affairs, [Portugal: Immigration Barometer](#), 30 January 2025. The survey was conducted between 13 July and 30 August 2024, online and telephone interviews. The sample included 1 072 individuals - with Portuguese citizenship and who are Portuguese-speaking, aged 18 or older and living in mainland Portugal.

⁸³ This campaign, promoted by *Ribaltambição*, Association for Gender Equality in Roma Communities based in Figueira da Foz (FAPE 2023-2024), shows pictures of Roma women and girls successful in their professions using them as role models. See *Ribaltambição*, [video 1](#) and [video 2](#) of the Campaign "If you change your outlook, everything can change". The painting and photography exhibition of the project "Women and Roma, it's the dream that moves us!", also promoted by *Ribaltambição* (PAAC 2022) is an initiative highlighting the role of Roma women in today's society through 11 photographs and

Programme with some scholarships available for Bulgarian Roma students. Through its Local Plan for the Integration of Roma Communities (PLICC), the municipality of Alfândega da Fé has developed a number of measures aimed at including the Bulgarian Roma community living in the municipality, particularly in the area of health. Portuguese Roma from the local community are also involved.

94. AIMA conducts various training sessions for civil servants on *inter alia* "intercultural dialogue" and "interreligious dialogue", with an increasing demand as a result of the increased diversity and the presence of different cultures in Portugal. Certain areas such as the Police Force sector and the Network of Schools Libraries that work more directly with this population have established training protocols over the years. Since 2020, the CICDR also provided more than 10 000 hours of training to officials from public institutions, civil society, security force professionals, media professionals, people and associations of Roma communities and migrants.⁸⁴ In addition, since 2022, the National Institute for Public Administration (INA) runs a free online human rights training programme for civil servants. With a capacity of 60 places, and usually two training cycles per year, its purpose is to promote and disseminate information about human rights, anti-racism, non-discrimination, equality and inclusion.⁸⁵ For 2024, the INA created a subsection exclusively dedicated to training activities related to "Citizenship and Participation", which includes courses on intercultural competences and literacy on racism and racial discrimination.⁸⁶ Trainees who successfully complete the training cycles are invited to present successfully implemented proposals to be incorporated in a Guide to Good Practices in Public Administration.⁸⁷

95. Beja, Braga, Vila Nova de Famalicão, Lisbon and Porto have all acceded to the Portuguese Network of Intercultural Cities,⁸⁸ which supports cities in reviewing their diversity and inclusion policies through an intercultural lens and developing comprehensive intercultural strategies to manage diversity positively by viewing it as an advantage. These intercultural cities value their heterogeneous and multicultural

illustrations of Portuguese Roma women.

⁸⁴ See additional information provided by the authorities, 2 April 2025.

⁸⁵ See the [webinars](#).

⁸⁶ See the [fifth state report](#), pp. 8-9 and 23-24.

⁸⁷ This initiative, called the "Network of Ambassadors for the Promotion of Human Rights in Public Administration", promotes the application of the knowledge acquired in practice in the workplace, with the aim of transforming services and exploiting a transformative potential of each trainee.

⁸⁸ See the [Portuguese Network of Intercultural Cities](#). Lisbon is also part of the Council of Europe's [International Intercultural Cities Network](#).

population and encourage inter-community interactions in public spaces. Several aspects are taken into consideration such as respecting human rights, recognising the potential value of immigration and diversity as an asset for the city and adopting an intercultural perspective on the relevant aspects of municipal policies.⁸⁹

96. According to its 2024 annual report on Portugal,⁹⁰ Amnesty International advocates for increased measures to combat discrimination and social exclusion of Roma, Afro-descendants, migrants, refugees, LGBTI people and other marginalised groups and minorities. Victims should be provided with support and relevant information to defend their rights, and others in the same situation should be encouraged to report cases of discriminatory treatment. Resources and mechanisms should be made available to encourage dialogue between persons affiliating with different communities, law enforcement and the judiciary to improve and promote mutual trust. Strengthening training for government officials to prevent cases of discrimination, racism and xenophobia is suggested. Political authorities must ensure that broader measures are taken to address the root causes of intolerance, promoting intercultural dialogue, education on diversity, pluralism and the empowerment of minorities.

97. During its visit, the Advisory Committee was informed about social street workers whose role is to go directly to streets, neighbourhoods and informal gathering spaces and engage with children, youth, and young adults, including from Roma communities. The targeted audiences experience multiple vulnerabilities and social exclusion whilst facing systematic barriers to education, vocational training, healthcare, employment and civic participation. Social street work is essential in reaching out to Roma who do not seek institutional support and often mistrust public institutions due to historical discrimination. It provides personalised support to access education, employment, healthcare and social services, as well as mediate conflicts, prevent discrimination and strengthen cultural identity and community empowerment. Social street work initiatives are, however, not a public policy in Portugal.⁹¹

⁸⁹ As the Advisory Committee learnt during its visit, the Braga City Council developed the C4I project “Communication for integration”, which aims to promote cohesion and social inclusion by promoting awareness of positive diversity, deconstructing/fighting prejudice and discrimination, mediating and resolving conflicts through communication.

⁹⁰ Amnesty International, [The State of the World's Human Rights](#) (entry on Portugal), April 2025.

⁹¹ For more information about social street work(ers),

98. The Advisory Committee reiterates that “the promotion of tolerance and openness towards diversity in society is essential not only for the development and implementation of successful integration strategies, but it is also a central precondition for persons belonging to national minorities to self-identify as such without hesitation and proactively claim the rights contained in the Framework Convention.”⁹² Importantly, “all segments of society, majorities and minorities alike, are [to be] addressed in order for integration strategies to effectively facilitate the formation of societal structures where diversity and respect for difference are acknowledged and encouraged as normal, through recognition, mutual accommodation and active engagement on all sides.”⁹³

99. The Advisory Committee welcomes the various projects and forms of training aimed at respecting and promoting intercultural dialogue, including in relation to immigrants. Nevertheless, despite these efforts, knowledge about Roma communities and persons affiliating with them remains limited in society and is still fuelled by mistrust and prejudice. Efforts over the past two decades have improved living and social conditions for persons affiliating with these communities and put an end, particularly in the north, to Roma leading a parallel existence, which is still the case in the south. The Advisory Committee is concerned about reports by interlocutors across Portugal that it is still difficult to declare Roma ethnic identity openly without any fear of discrimination (e.g. in accessing employment or renting apartments or in a workplace), bullying (for children in school) or hate speech (adults). It is concerning that anti-Roma prejudice, stereotypes and negative images of Roma are still present among the general population, as reflected also on social media.

100. The Advisory Committee strongly encourages the authorities to undertake systematic and targeted actions, including by supporting projects throughout the country, aimed at combating anti-Roma stereotypes and prejudice, as well as to promote Roma role models and the dissemination of good practices in working with Roma communities. Such actions could also include training and education.

see the [Dynamo International – Street Workers Network \(DISWN\)](#) website. The Street work Training Institute (SwTI) is the branch of DISWN based in Lisbon. It provides specialised training for professionals working in the field.

⁹² ACFC [Thematic Commentary No. 4](#) (2016), para. 53.

⁹³ ACFC [Thematic Commentary No. 4](#) (2016), para. 54.

Intercultural Mediation Municipal Teams (Article 6)

101. The Intercultural Municipal Mediators Programme for migrants residing in Portugal is a governmental policy implemented since 2009. Another programme, entitled Roma Municipal Mediators and intended specifically for Roma communities and persons affiliating with them, was also launched in 2009. They co-existed independently from each other although both were financed by the European Social Fund (ESF) under the Operational Employment and Social Inclusion Operational Programme (PO ISE). This covered between 70% and 85% of the overall costs, with municipalities contributing between 15% and 30%. Between 2018 and 2023, a national programme for Intercultural Mediation Municipal Teams existed and included both Roma mediators and those working with migrants. Municipalities were obliged to identify local civil society organisations as partners, preferably migrant and Roma community associations, for the setting-up of such teams.⁹⁴ Since 2023, when the ESF funding ended, only a few municipalities have financed their own intercultural mediation teams. In January 2025, the Ministry of Education launched a recruitment procedure for mediators to work in schools, funded by the European Asylum, Migration and Integration Fund, but only for “mediators with migrant background” (no Roma mediators are included).⁹⁵ In the second semester of 2025, two regional programmes for municipal mediators and cultural facilitators are to be launched for the Alentejo and Algarve regions, financed by their respective regional programmes (Alentejo 2030 and Algarve 2030, respectively), possibly including Roma mediators.⁹⁶

102. In January 2022, the intercultural mediator professional profile was included in the National Qualifications Catalogue. Interlocutors see this as an important step towards the regularisation of the status of the intercultural municipal mediator. Mediators can be hired directly by municipalities and by NGOs working in the field of education and social inclusion. However, many interlocutors, including from Roma communities, pointed out the lack of

regularisation of the status. Concretely, although the position of intercultural municipal mediator is included in the National Qualifications Catalogue, and the profile description is provided,⁹⁷ individuals are in practice still recruited as technical assistants, educational, health or social security services facilitators.

103. Unfortunately, since 2023, the Intercultural Mediation Municipal Teams programme is no longer supported by the ESF and municipalities. Only wealthier municipalities manage to cover the costs of mediators. The establishment of a post of a Roma mediator depends on the good will of local authorities and their capacity to cover the associated costs. During the visit, the municipality of Porto highlighted their project of municipal intercultural mediators who help vulnerable populations such as Roma and migrant communities,⁹⁸ using intercultural mediation as a social action methodology that promotes healthy inter-community coexistence in the city. The project also aims to empower those who, due to socio-economic, labour-related and cultural circumstances, are at higher risk of social exclusion. It seeks to achieve intercultural inclusion by working with these communities and majority population, ensuring that everyone is committed to positive intercultural civic coexistence. Porto has managed to ensure, through the local Recovery and Resilience Plan,⁹⁹ to employ three intercultural municipal mediators for Roma, one belonging to the Roma community.¹⁰⁰ The mediators support the Roma to facilitate their inclusion by helping them obtain higher school qualifications and improve their professional skills, increase their civic participation and ensure a full understanding of rights and duties in civic matters, and address stereotypes and ethical issues.

104. Roma representatives praised intercultural municipal mediation, and Roma mediators in particular. It has generated positive results in various spheres, such as family, school, hospitals and public services. However, its lack

authorities, 2 April 2025.

⁹⁷ See the definition of the [legal status of socio-cultural mediator](#) dating back to 2001.

⁹⁸ As the Advisory Committee learnt during its visit, since 2018, Porto has been notably more diverse. With a 23% increase, there are about 23 300 migrants from Brazil, India, China, Angola, Italy, France and Ukraine. The estimated number of Roma living in Porto is 1 662 persons.

⁹⁹ The [Recovery and Resilience Plan \(RRP\)](#) (*Plano de Recuperação e Resiliência*) is a nationally implemented European Union programme, which aims to implement (until 2026) a set of reforms and investments to restore sustained economic growth after the pandemic and reinforce convergence with Europe over the next decade.

¹⁰⁰ Previously, Porto had two Roma intercultural mediators covered by the PLICC, as the Advisory Committee learnt during its visit.

⁹⁴ In 2021, 12 municipalities hired 41 mediators (21 women and 20 men), including five women and 16 men with Roma affiliation, with an ESF budget of €3 500 000. In 2022-2023, 20 projects were approved, and 45 mediators (31 women and 14 men) were hired, of which six were Roma women and 11 Roma men, with an ESF budget of €2 500 000. See the [fifth state report](#), p. 15.

⁹⁵ See [Order no. 656/2025](#) of 15 January 2025 and additional information provided by the authorities, 4 June 2025.

⁹⁶ See additional information provided by the

of continuous financial support from the state and the lack of corresponding recognition of professional career status are barriers to the professionalisation of mediators. The vagueness of their status means that they often perform various duties or are seen as “a panacea for all problems”, leading to personal and professional overload. While intercultural municipal mediators for migrants are an important innovative factor of inclusion for the migrant population, more specialised Roma intercultural municipal mediators are needed, including mediators of Roma ethnicity and in particular Roma women who are particularly needed in education and health.¹⁰¹ It is important that comprehensive training that involves interpersonal and technical aspects is offered.

105. The Advisory Committee urges the authorities to strengthen the position of Roma intercultural municipal mediators by ensuring sustainable and adequate funding, as well as to regulate their career status, ensuring their professional recognition, access to multidisciplinary training and stable career prospects. The Intercultural Mediation Municipal Teams programme should be revitalised and also include Roma mediators, particularly Roma women, and it should be extended to more municipalities, thereby enhancing their capacity to contribute to Roma inclusion.

Protection from hate crime and hate speech (Article 6)

106. Law no. 4/2024, applying to both natural and legal persons, whether acting in the exercise of public office or professional activity, amended Article 240(1) of the Criminal Code. This amendment *inter alia* added new grounds for prohibited discrimination (language, nationality, territory of origin, gender expression, sexual characteristics, political or ideological opinions, education, economic situation, or social status) and established the autonomous criminalisation of incitement to discrimination, hatred or violence, as foreseen in the National Plan to Combat Racism and Discrimination 2021-2025 (see Article 4).¹⁰² Furthermore, Article 240(2)

¹⁰¹ A school in Porto complained to the Advisory Committee that the Roma intercultural mediator, a Roma man, provides an intercultural class for one hour per day, but he refuses to address school dropouts and absenteeism.

¹⁰² [Law no. 4/2024 of 15 January 2024](#) (in Portuguese). This amendment also removed the restriction requiring incitement to be committed through organised propaganda activity; introduced a provision whereby if the offences set forth in Article 240(3) are committed through a computer system, the court may order the deletion of data or content, or the interruption, cessation, or blocking of

sets out the penalties associated with any person (natural or legal) who, publicly and by any means intended for dissemination: causes acts of violence against a person or group of persons on the grounds of their racial or ethnic origin, national or religious origin, colour, nationality, descent, territory of origin, religion, language, sex, sexual orientation, gender identity or expression, sexual characteristics, or physical or mental disability. Article 240(2) also sets out the foundation for the persecution of any person who defames or insults, threatens and incites discrimination, hatred, or violence against a person or group of persons on the same grounds.

107. The statistical data of the Ministry of Justice on the number of cases launched on complaints regarding discrimination on the basis of racial and ethnic origin, colour, nationality, descent and territory of origin shows that in 2021, five cases concerned discrimination and incitement to hatred and violence (three have led to a conviction), in 2022, five cases and 13 convictions and in 2023 another five cases and three convictions.¹⁰³ Between 2019 and 2023, no aggravated circumstance of “race” or colour were taken into account.

108. The authorities informed the Advisory Committee that antigypsyism is not specifically included in legislation, but rather addressed under broader racism provisions. The authorities do not plan to add antigypsyism as a specific form of racism to the Criminal Code, although many interlocutors of the Advisory Committee, including Roma, believe that this is needed in order to combat and criminalise structural anti-Roma racism. This has proven to be a good practice in some other states. In Portugal, antigypsyism impedes access to social rights, with added concerns stemming from the growing number of far-right political figures who propagate anti-Roma hate speech.¹⁰⁴

109. From 1 March 2022 until 31 August 2024, the CICDR, *SOS Racismo* and Roma association *Rizoma* were part of the “kNOwHATE” project,

access to a service provider or computer data that exclusively or predominantly disseminates discriminatory content. Also, Article 240(1) criminalises the establishment of racist organisations and participation in their activities for the purpose of inciting hatred or violence. These amendments follow one of the recommendations made by the European Commission against Racism and Intolerance (ECRI), see [ECRI Report on Portugal \(fifth monitoring cycle\)](#), adopted on 19 June 2018 and published on 2 October 2018, para. 9.

¹⁰³ See additional information provided by the authorities, 2 April 2025. The 2024 data will be available in November 2025.

¹⁰⁴ Reuters, [Portugal to investigate far-right leader over anti-Roma remarks](#), 21 May 2025. Portuguese prosecutors have opened a probe into remarks made by far-right leader against the Roma communities, three days after the 18 May 2025 election.

aimed at detecting, analysing and countering direct and indirect online hate speech.¹⁰⁵ This project provided guidance and tools tailored to the detection, prevention and combating of online hate speech narratives, both for individual social media users and civil society organisations. Also noteworthy is the collaboration between the CICDR and the *Linha Internet Segura* (Safe Internet Line), where individuals can anonymously report potentially illegal content, including materials promoting racism and xenophobia. Reports received are analysed by operators, who take appropriate action, including involving national or international law enforcement authorities. In July 2023, the Lisbon Youth Centre of the Portuguese Institute for Sport and Youth (IPDJ) organised a training session on combating hate speech.¹⁰⁶

110. According to the 2024 annual report of Amnesty International,¹⁰⁷ the Prosecutor General Office reported in October 2024 that investigations into 895 hate crimes had resulted in 17 prosecutions between 2020 and the first half of 2024, while 761 of the cases were dismissed. Disaggregated data was not gathered on these hate crimes. The high threshold for hate-motivated prosecutions continued throughout the rest of 2024. The trend is consistent with previous years. In 2022, 255 enquiries were opened, three charges were prosecuted, and 194 cases were dismissed. In 2023, 262 enquiries were opened, five charges were prosecuted, and 214 cases were dismissed.¹⁰⁸

111. The Advisory Committee concurs with the concerns of the Committee on the Elimination of Racial Discrimination (CERD) which found “information showing an increase in incidents of racist hate speech in the form of xenophobia, Afrophobia, anti-Gypsyism, antisemitism and Islamophobia, including in sports, in the media and on the Internet, including discriminatory remarks made by political and public figures. It also remains concerned by reports indicating the persistence of threats, harassment, physical violence and assaults, property damage and hate crimes against persons belonging to minorities, in particular Roma, Muslims, Africans and people of African descent, other people from former colonies and migrants”.¹⁰⁹ As already identified

by ECRI in its 2025 report, the Advisory Committee is also concerned by the increase in antisemitic and anti-Muslim hate speech in Portugal following the new increased violence in the Middle East.¹¹⁰

112. The Advisory Committee considers that “ethnically based violence must be recognised as an especially nefarious form of violence that concerns and threatens society as a whole, and must thus be resolutely opposed and prevented. In order to address hate crime in a comprehensive manner, criminal codes must contain appropriate provisions that criminalise hate speech, threats and violence based on ethnic grounds as well as public incitement to violence and hatred.”¹¹¹

113. The Advisory Committee welcomes the inclusion in the Criminal Code of language and nationality as new prohibited grounds for discrimination and incitement to hatred and violence. However, the Advisory Committee regrets the lack of statistics on racist hate speech incidents, which is due to the protection of data policy regarding statistics in Portugal, which prevents their dissemination when the total number of convictions is under four. The Advisory Committee is also concerned about the increasing number of incidents of racist hate speech and discriminatory remarks, including in the media and by some politicians. It is worrying that most hate crime investigations have been dismissed.¹¹² The Covid-19 pandemic also provided a context for increased scapegoating and stigmatisation of migrants and ethnic minorities, including Roma, who are disproportionately targets of hatred discourse. The Advisory Committee therefore believes that antigypsyism as a specific form of racism is a structural problem in Portugal.

¹⁰⁵ The [kNOwHATE project](#), implemented between 1 March 2022 and 31 August 2024, is co-ordinated by Lisbon University Institute.

¹⁰⁶ See the [fifth state report](#), p. 7.

¹⁰⁷ Amnesty International, [The State of the World's Human Rights](#) (entry on Portugal), April 2025, p. 304.

¹⁰⁸ See information provided by Amnesty International, 9 June 2025.

¹⁰⁹ Committee on the Elimination of Racial Discrimination (CERD), [Concluding observations on the combined eighteenth and nineteenth periodic reports of Portugal](#), 24 May 2023, para. 21.

¹¹⁰ See [ECRI Report on Portugal \(sixth monitoring cycle\)](#), adopted on 18 March 2025 and published on 18 June 2025, paras. 41-42.

¹¹¹ ACFC [Thematic Commentary No. 4](#) (2016), para. 56.

¹¹² Amnesty International, [The State of the World's Human Rights](#) (entry on Portugal), April 2025, p. 54.

114. The Advisory Committee calls on the authorities to effectively investigate and, as appropriate, prosecute and punish all forms of racist hate speech and hate crimes, including those committed by political figures, directed towards persons belonging to minority communities, including against Roma, Muslims and Afro-descendants.

115. The Advisory Committee strongly encourages the authorities to take all necessary measures to include antigypsyism explicitly as a specific form of racism in the Criminal Code.

116. The Advisory Committee encourages the authorities to ensure that racist hate speech and hate crimes are reported, identified and recorded, including through the establishment of an official, comprehensive disaggregated data collection system.

Policing and respect for human rights (Article 6)

117. The Ministry of Home Affairs, including the Inspectorate-General of Home Affairs (IGAI), National Republican Guard (GNR) and Public Security Police (PSP), continues to provide training on human rights, equality and non-discrimination. Since 2021, the IGAI conducts multidisciplinary sessions under the Plan for the Prevention of Discriminatory Practices in the Security Forces and Services (PPMDFSS), involving judges and psychologists, to address legal and emotional impacts of discrimination.¹¹³ This initiative led to Parliamentary Resolution no. 76/2024, urging continued support and funding for the PPMDFSS. Both the GNR and PSP conduct training to combat stereotypes and promote equality.¹¹⁴

118. Furthermore, as part of its special community policing programmes, the GNR created a “Migrant Support Programme” to promote the rights of migrants and foster equality. The programme encourages

¹¹³ [Plan for the Prevention of Discriminatory Practices in the Security Forces and Services](#), 2021. It covers actions in five areas: Recruitment; Training; Interaction between members of Security Forces and Services (SFS) and other citizens, and with other SFS members, including on social networks; Promotion of the SFS image and communication; and Preventive and monitoring mechanisms. In 2024, 12 training sessions were held and attended by 298 members of the security forces, 66 from the PSP and 232 from the GNR. Each event lasted for an average of three hours. See additional information provided by the authorities, 15 April 2025. For other information concerning IGAI training to GNR and PSP for 2021, 2022 and 2023, see the [fifth state report](#), p. 36.

¹¹⁴ GNR has a total of 290 courses in its course catalogue. All of them include a lecture related to human rights, fundamental rights and gender equality or include a curricular unit related to human rights and fundamental rights. For further information, see the [fifth state report](#), pp. 32-33.

collaboration among social partners to enhance security and protect citizens’ rights. The GNR also offers a course on “Criminal Prevention Community Policing and Human Rights”, which prepares police officers to perform these duties. The course includes a “Human Rights and Citizenship” module, taught by experts on issues like racism, xenophobia and intolerance, hate crimes and hate speech.¹¹⁵

119. The PSP permanently promotes crime prevention actions targeting different groups of especially vulnerable victims. To improve police action in diverse communities, the PSP created the programme *Juntos por Todos* (Together for All) to prevent conflicts in vulnerable multicultural communities, either by delivering training to police officers or by organising awareness-raising initiatives for young people in these communities.¹¹⁶ Since 2018, approximately 800 police officers have been trained on policing diversity.¹¹⁷

120. In 2024, a study¹¹⁸ reported on instances of racial discrimination and ethnic and racial profiling in Portuguese police intervention. According to this study, which was based on numerous IGAI reports from the archive of the association *SOS Racismo*, a Roma person is 43 times and a black person 21 times more likely to be killed by the police. There is an over-representation of these groups in the total number of victims, as well as in the total number of incidents, offences, assaults and shootings.

121. During its visit, the Advisory Committee was informed about instances of misbehaviour of police officers dealing with Roma families in situations of forced nomadism, such as attempts to systematically expel them for “illegally camping” on municipal land, destruction of furniture or tents, as well as the intimidation of women and children. The Advisory Committee also learnt of cases of complaints by individuals on behalf of these Roma families that were filed with the Ministry of Justice, but which never received any answer.

122. The Advisory Committee considers that “racial motivation must be considered an aggravating circumstance of any offence and law enforcement agents should be appropriately trained to ensure that racially or ethnically

¹¹⁵ See the [fifth state report](#), pp. 32-33.

¹¹⁶ See “[Together for all](#)”.

¹¹⁷ See the [fifth state report](#), p. 33.

¹¹⁸ *Esquerda*, [Estudo confirma discriminação racial na intervenção da polícia portuguesa](#), 18 March 2024. The study “Beyond Loss: Race, Displacement and the Political” was prepared by the anthropologist Ana Rita Alves. See also the article published in *Público*, [Ciganos têm 43 vezes mais probabilidade de ser mortos pela polícia, negros 21 vezes mais](#), 18 March

motivated attacks and discrimination are identified and recorded, as well as duly investigated and punished through targeted, specialised and prompt action.”¹¹⁹ In addition, the Advisory Committee shares ECRI’s view that the adoption of protocols and procedures with the aim of assisting law enforcement agencies in effective and consistent processing of hate incidents and hate crimes should be combined with the development of related training programmes for all relevant law enforcement officials and other criminal justice professionals.¹²⁰ In this context, due account should also be taken of the Recommendation CM/Rec(2024)4 of the Committee of Ministers of the Council of Europe on combating hate crime.¹²¹

123. Despite the large number of training sessions provided by the IGAI, the GNR and the PSP, the Advisory Committee is deeply concerned about information indicating the persistence of racially motivated violence, ill-treatment of persons belonging to minorities and racial profiling by police officers, in particular of Roma and immigrants, notably of African descent. It is also concerned by reports of Roma families in situations of forced nomadism being subject to police misbehaviour or intimidation.

124. The Advisory Committee strongly encourages the authorities to take steps to prevent racial discrimination and effectively address all reported instances of racism, discriminatory policing, police violence and intimidation. Training sessions by the Inspectorate General of Home Affairs, the National Republican Guard and the Public Security Police should be regularly evaluated for their impact on the work of law enforcement professionals, with the participation of persons affiliating with communities most affected by such practices.

Minority media and broadcasting (Article 9)

125. The Regulatory Authority for the Media (ERC)¹²² is tasked with the promotion of cultural pluralism and the diversity of expression and actively monitors nation-wide public and private audio-visual media. However, it lacks the necessary resources to monitor regional and local audio-visual media.¹²³ As to print media, no active monitoring takes place, but complaints are accepted by the ERC. Social media is within the mandate of the ERC if the website or other exchange platform operates under the responsibility of an enterprise within the ERC’s mandate. A study carried out in 2023 by the ERC on plurality and diversity in prime-time daily news on major television channels revealed persistent challenges, such as the marginal presence of persons with disabilities, migrants, and (persons affiliating with) ethnic, religious, linguistic and cultural minorities in news services.¹²⁴

126. The Ministry of Parliamentary Affairs recently launched the National Media Literacy Plan 2025-2029 which promotes territorial and social cohesion and targets children and youth at risk, elderly people, migrant communities and individuals with specific educational needs. One of its strategic axes is the decentralisation, as well as inclusion of audiences and territories, with special attention to the needs of vulnerable groups.¹²⁵

127. The #PortugalMediaLab Structure operates under the Ministry for Parliamentary Affairs and aims to co-ordinate and monitor public policies in the media sector, including those aimed at promoting diversity, inclusion and representation within Portugal’s media system. This includes supporting the design and implementation of the Action Plan for the Media,¹²⁶ which outlines a broad strategy to promote sustainability, independence and pluralism in the media

2024.

¹¹⁹ ACFC [Thematic Commentary No. 4](#) (2016), para. 56.

¹²⁰ See [ECRI Report on Portugal \(sixth monitoring cycle\)](#), para. 97.

¹²¹ [Recommendation CM/Rec\(2024\)4 of the Committee of Ministers to member States on combating hate crime](#), adopted on 7 May 2024.

¹²² [Law no. 53/2005](#) of 8 November 2005 on the Statutes of the Regulatory Authority for the Media, notably Article 7.

¹²³ The ERC regulation mission comprises all legal persons pursuing mass media activities, within the jurisdiction of the Portuguese state, which include press agencies, newspapers, radio and television operators or all natural or legal persons who make publicly available an edited coherent framework of contents, on a regular basis, through electronic communications networks. Any citizen or legal person may file a complaint regarding behaviour liable to be deemed as an infringement of any legal or regulatory provisions that apply to mass media activities. This procedure is entirely free of charge. Within the framework of its powers and responsibilities, ERC may also act on its own initiative. See the [ERC](#) website.

¹²⁴ See additional information provided by the authorities, 28 May 2025.

¹²⁵ See additional information provided by the authorities, 28 May 2025.

¹²⁶ See the Action Plan for the Media ([Plano de Ação para a Comunicação Social](#)).

landscape. Its mission also encompasses inclusive strategies, such as enhancing media literacy and combating disinformation. In 2024, the #PortugalMediaLab Structure promoted activities on hate speech on social media, and fact-checkers have contributed to deconstructing misinformation and stereotypical images of Roma.¹²⁷ The public service broadcasting organisation for Portugal (*Rádio e Televisão de Portugal* - RTP) has been ranked second in Europe for gender parity in the Diversity Index of European Broadcasters.¹²⁸

128. Despite progress, a report titled *Sociocultural Diversity in the Media 2020-2023*¹²⁹ by the Portuguese Regulatory Entity for Social Communication (ERC) on plurality and diversity in prime-time daily news on major television channels in 2023 revealed persistent challenges. These include the marginal presence of citizens with disabilities, migrants, and ethnic, religious, linguistic and cultural minorities in news services; residual prominence of actors related to minority social groups; predominance of male national protagonists, especially in positions of power and visibility. Positive initiatives to tackle persisting challenges faced by Roma include the work of fact-checkers who have contributed to deconstructing misinformation and stereotypical images about this community. The authorities have confirmed to the Advisory Committee their unwavering commitment to developing and improving public policies for the media that effectively combat all forms of discrimination in the national media ecosystem.

129. The CICDR has undertaken various initiatives and training aimed at combating hate speech and has issued a recommendation on the “non-reference principle” especially directed at the media outlets, with the goal of raising awareness about the importance of refraining from referencing racial and ethnic origin, colour, nationality, descent, place of origin and documental status when it concerns illegal facts

¹²⁷ “7 Days with the Media” is promoted annually by the [Informal Group on Media Literacy](#) to which #PortugalMediaLab is a partner. Additionally, an annual award (*Prémio de Jornalismo - Direitos Humanos e integração*), jointly promoted by #PortugalMediaLab and the National Commission for UNESCO, recognises the work of media professionals in advancing human rights and fundamental freedoms. It honours outstanding work across various formats, audiovisual, radio and print, and includes a special prize for regional and local media. In the 2024 edition, the jury awarded an honourable mention to an infographic piece focusing on Roma, available at [Da Índia a Portugal. A longa viagem dos povos ciganos | Cinco séculos de portugueses ciganos | Público](#).

¹²⁸ See article in [Journalism.co.uk](#), [European broadcasters must address on-screen diversity | Media news](#), 2023.

¹²⁹ See [Sociocultural Diversity in the Media 2020-2023](#), June 2025 (in Portuguese).

or the potential proliferation of stereotypes that could fuel hate speech and racial discrimination. The recommendation is available online¹³⁰ and has been sent to media outlets whenever the CICDR becomes aware of such references. In 2021, Facebook-META partnered with the CICDR to conduct an online workshop on “Addressing Online Harm”, tailored for associations of migrants, refugees and Roma communities. The workshop aimed to strategically introduce digital behaviour tools developed by Facebook-META for identifying and combating hate speech on their platform.¹³¹

130. Some examples of projects are financed under the FAPE, such as the Beira Serra Association's *A Par e Passo* project, which promoted a monthly radio programme *Mitos ou Verdades* (Myths or Truths) on *Rádio Cova da Beira*, with the aim of deconstructing myths and combating stereotypes and prejudices associated with Roma communities. There are no print or broadcast media in Caló or the Romani language in Portugal. Mirandese appears in some articles of the regional weekly newspapers *Jornal Nordeste* and *Mensageiro de Bragança*,¹³² as well as in national Portugal TV programmes.¹³³

131. Roma interlocutors of the Advisory Committee expressed concerns about the persistent antigypsyism in society, notably in the media (including social media) where negative portrayals of Roma dominate. They consider that ethnic diversity, particularly regarding the Roma communities, is still neglected in Portuguese media, which has also been acknowledged by the Ministry of Parliamentary Affairs. According to them, the portrayal of Roma is often biased, with a tendency to associate them with negative situations or social problems, thus perpetuating stereotypes and prejudices. There is also an increase in news coverage about the Roma communities, as well as immigrants, driven in part by political discourse.¹³⁴ In 2023, a content analysis of the news disseminated by the main Portuguese media (written press, TV, radio) and of the comments on this news was conducted. The results reveal racist hegemonic perspectives towards Roma and show that media platforms are often used to perpetuate stereotypes, fuel

¹³⁰ CICDR, [Recommendation for Adherence to the Non-Reference Principle of Racial, Ethnic, Colour, Nationality, Ancestry, Place of Origin, and Documental Status by CICDR](#) (available in Portuguese).

¹³¹ See the [fifth state report](#), p. 40.

¹³² *Jornal Nordeste* and *Mensageiro de Bragança*.

¹³³ RTP, [Mirandês. A segunda língua de Portugal tornou-se oficial há 25 anos](#), 17 September 2023.

¹³⁴ Additional information provided by the authorities, 16 June 2025.

prejudices and incite hatred against Roma.¹³⁵ Furthermore, hate speech against Roma and other individuals in vulnerable situations has increased during the monitoring cycle, a trend exacerbated by stereotypes propagated during the Covid-19 pandemic and amplified on social media, as confirmed by AIMA.¹³⁶

132. The Advisory Committee reiterates that, “[i]n order for public service broadcasting to reflect the cultural and linguistic diversity existing within society, it must guarantee an adequate presence of persons belonging to minorities and their languages. This entails granting support to the media and programmes for, by, and about national minorities in minority and majority languages, as well as in bi- or multilingual formats. Minority interests and concerns should also be mainstreamed into regular broadcasts rather than singled out in occasional programmes and mainstream media should engage in broader political discourse of interest to persons belonging to minorities.”¹³⁷ The abundance of information and media available in today’s digital media environment does not lessen the existing state obligations to facilitate the production and dissemination of content by and for national minorities.¹³⁸ Furthermore, the Advisory Committee highlights that “it is important for the formation of an open and pluralist media environment that issues of concern to minority communities generally are given weight in the broader public media debate and that persons belonging to such minorities are portrayed as integral members of society”.¹³⁹

133. The Advisory Committee welcomes the work of the #PortugalMediaLab Structure and its Action Plan for the Media. In particular, the Advisory Committee appreciates its commitment to conducting a more in-depth study on diversity in the media, combating hate speech and preventing discriminatory practices and their impact on Roma, as well as its effort to avoid stereotyping by upholding the professional code of ethics, which requires the rejection of discriminatory treatment. It also believes that further measures are needed to promote diversity in society and secure better access for persons affiliating with minority communities to

¹³⁵ Olga Magano and Tânia D’Oliveira, [Antigypsyism in Portugal: Expressions of Hate and Racism in Social Networks](#), 12 September 2023. See also European Roma Rights Centre, [The Fight for Fair Roma Representation: Racist Content as a Human Rights Issue](#), 14 May 2024.

¹³⁶ See additional information provided by the authorities, 2 April 2025.

¹³⁷ ACFC [Thematic Commentary No. 3](#) (2012), para. 41.

¹³⁸ OSCE High Commissioner on National Minorities, [Tallinn Guidelines on National Minorities and the Media in the Digital Age](#), February 2019, para. 7.

¹³⁹ ACFC [Thematic Commentary No. 4](#) (2016), para. 63.

media outlets. The Advisory Committee specifically considers that issues pertaining to the Roma need to be sufficiently included in the mainstream media. In this context, the Advisory Committee considers it vital for media professionals and journalists to receive adequate training on inclusive journalism to improve their awareness of and sensitivity towards the specific and contemporary needs and interests of individuals affiliating with diverse communities, including by actively involving persons affiliating with Roma communities in the preparation and presentation of both mainstream programmes and programmes on, about and for Roma. The monthly radio programme *Mitos ou Verdades* (Myths or Truths) is a good example of a project to fight stereotypes that needs to be further extended to other regional or local media. The Advisory Committee also sees the need for the ERC to get resources to monitor regional and local audio-visual media.

134. The Advisory Committee encourages the authorities to increase the support for the creation of content for radio and television, as well as online and print media focusing on Roma, in close consultation and co-operation with persons affiliating with Roma communities, especially women and youth. Roma-related issues are to be included in public and private mainstream media to promote inclusivity and representation. Ongoing training needs to be provided to journalists to ensure the production of such media content. Media outlets are encouraged to explore ways to employ Roma in the production of media content and provide for adequate training to this effect.

135. The Advisory Committee encourages the authorities to intensify their efforts to ensure that media regulatory bodies investigate and take measures to prevent all manifestations of racism and racist hate speech, including by imposing deterrent fines and other administrative sanctions.

Effective access to quality education (Article 12)

136. The right to inclusive education is guaranteed in Portugal, school enrolment is compulsory for all children and young persons aged from 6 to 18, and the education system has to find educational responses that ensure the participation and success of all students.¹⁴⁰ Admission policies ensure diversity and equity in the distribution of students. In certain areas, cultural mediators are provided in schools, thus facilitating communication between the Roma communities and persons affiliating with them, schools and families. The Decree Law no. 55/2018 grants schools up to 25% curricular

¹⁴⁰ [Decree Law no. 54/2018](#).

autonomy¹⁴¹ to help students achieve the competencies outlined in the Student Profile for Compulsory Education. These laws apply to all education levels, including distance learning. Portugal also participated in the INSCHOOL Project (2022–2024), supporting inclusive education and institutional reform.¹⁴² At national level, the Directorate-General for Education (DGE) published two online educational guides, one on promoting the inclusion and the educational success of the Roma communities in 2019,¹⁴³ and the other on promoting the inclusion and the educational success of the Roma communities in preschool education in 2021.¹⁴⁴ In March 2023, the CICDR, ACM and DGE released a guide to help schools prevent and combat racial discrimination.¹⁴⁵

137. In order *inter alia* to prohibit school segregation, the Ministry of Education publishes the School Profile of Roma Communities every two years. This profile is based on information collected from school heads and contains data on school attendance, school achievement, dropout, completion and access to support measures.¹⁴⁶ The School Profile of Roma Communities for the 2020/2021 school year found that there were 18 808 Roma pupils and students enrolled in public schools (8 933 girls and 9 875 boys), from pre-school to secondary education.¹⁴⁷

¹⁴¹ See [Reports on Curricular Autonomy and Flexibility \(AFC\)](#), essentially centred on the monitoring of schools.

¹⁴² The joint European Union-Council of Europe [INSCHOOL](#) initiative was co-ordinated by the Ministry of Education and the ACM. See the [fifth state report](#), p. 47, as well as additional information provided by the authorities, 22 May 2025.

¹⁴³ See the [Guide for Promoting the Inclusion and the Educational Success of the Roma Communities](#) with tools for teachers and youth officers for working with Roma students, in formal and non-formal contexts. See the [fifth state report](#), p. 50.

¹⁴⁴ See the [Guide for Promoting the Inclusion and the Educational Success of the Roma Communities in Preschool Education](#), which is an educational guide created with guidelines and good practices for the inclusion of Roma children into preschool education.

¹⁴⁵ The [Guide to Preventing and Combating Racial Discrimination in Schools](#) encourages education professionals to become more aware and active in preventing and combatting racial and ethnic discrimination in schools. It has been disseminated in sessions held in schools. In June 2023, a webinar was conducted to present the Guide, which was attended by 320 education professionals. See the [fifth state report](#), p. 32.

¹⁴⁶ See about the [School Profile of Roma Communities](#) in the [fifth state report](#), p. 45. The profile is produced by the Directorate-General for Education and Science Statistics (DGEEC).

¹⁴⁷ The data for the 2018/2019 school year showed about 25 140 Roma students (11 995 girls and 13 145 boys).

138. The Educational Territories of Priority Intervention (TEIP) Programme promotes educational inclusion in schools located in disadvantaged areas which include children and young people at risk of social exclusion. In July 2023, the fourth TEIP was launched covering 165 school clusters (about 20% of Portugal's school clusters) in socio-economically disadvantaged areas, many of which have Roma pupils. The programme aims to improve educational outcomes, reduce absenteeism and early school leaving, and to encourage collaboration between schools, families and the community. Schools participating in the programme are required to develop three-year improvement plans with specific objectives, which are monitored and supported by the Ministry of Education.¹⁴⁸ TEIP school clusters also run specific projects to support socially diverse contexts as tools for inclusion and improved learning, such as the “Learning Communities – Include-Ed” project implemented in Portugal since 2020.

139. The *Escolhas* Programme focuses on children and young people in vulnerable situations, including Roma. With the aim to promote equal access to opportunities and strengthen social cohesion, prevent early school leaving and support personal, social and academic development of participants, *Escolhas* Programme's projects implement non-formal education activities with educational support, development of social and digital skills, parental counselling, awareness-raising, mediation, psychosocial support, participation in public life, intercultural dialogue and other cultural aspects. While not targeting Roma students and their families specifically, some projects almost exclusively benefit Roma communities,¹⁴⁹ including, for example, local initiatives that seek to promote access to education of Roma.¹⁵⁰

¹⁴⁸ See about the [TEIP Programme](#) (Educational Territories of Priority Intervention) in the [fifth state report](#), p. 45. See also [Reports on Priority Intervention Educational Areas Programme \(TEIP\)](#).

¹⁴⁹ For more details, see the [Escolhas Programme](#) and the [fifth state report](#), p. 46.

¹⁵⁰ The Platform of Socio-Educational and Cultural Animators (PASEC), a youth association, promoted the *Eurobairro.E6G* project in Vila Nova de Famalicão, financed by the *Escolhas* programme, aims to combat the phenomena of extreme youth exclusion, illiteracy and marginality in the context of a social neighbourhood and seeks to enhance academic success and increase the levels of social participation of the young people involved. This project, which reaches more than 205 children and young people, has enabled the development of a network of approximately 52 schools, which have implemented measures to promote inclusion through participation, commitment, and equal dialogue among various stakeholders in educational communities. See

140. Portugal has specific programmes to improve access to quality education for Roma pupils and students, notably two national scholarship programmes: *ROMA Educa* (the programme supports students in the third cycle of basic education and secondary education)¹⁵¹ and *OPRE* (which is the first public affirmative action policy aimed at supporting Roma students in higher education). As of the fifth edition of *ROMA Educa* (2023-2024), 210 scholarships were awarded to 104 Roma girls and 106 boys.¹⁵² The sixth edition of the *ROMA Educa* programme, which ran until 30 September 2025, awarded 210 scholarships to support the attendance and continuity in the 3rd cycle of basic education and secondary education of students from Roma communities, in the 2024-2025 school year. The *OPRE* Programme awarded 236 scholarships in the academic years between 2016-2017 and 2022-2023, supporting a total of 89 individuals. By the end of *OPRE*'s sixth edition (2021-2022), 31 students had completed undergraduate studies, five postgraduate studies and four post-secondary technical education in various fields such as law, sociology, communication, physiotherapy and social work.¹⁵³

141. At local level, in Évora, the municipality promotes, under its PLICC, preschool attendance for Roma children and seeks to raise parents' awareness of the importance of pre-schooling and counter some of the prejudices that may exist within Roma communities regarding pre-school education. Under the PLICC, school mediators were hired at local level, namely in Torres Vedras, Seixal and Almada (see also Alentejo 2030 and Algarve 2030 under Article 6). Furthermore, in Braga, in 2023, the Selection Committee of the 1st Edition of the Open Social Innovation Programme selected the project *AGIR – 0 a 100* to carry out an assessment within Roma communities and proposed to intervene with 73 Roma students, 55 of whom were in the 1st and 2nd cycles. Reducing school absenteeism and promoting the educational success of beneficiaries were the

[Histórias ciganas, Entidades envolvidas.](#)

¹⁵¹ *ROMA Educa* is implemented by the ACM, now AIMA, in co-operation with the Ministry of Education.

¹⁵² In the first edition of *ROMA Educa* (2019-2020), 49 scholarships were granted (13 girls and 36 boys). In the second edition (2020-2021), the number of scholarships awarded increased to 120 (62 girls and 58 boys), and remained 120 in the third edition (2021-2022; 56 girls and 64 boys) and in the fourth edition (2022-2023; 64 girls and 56 boys). See the [fifth state report](#), p. 51.

¹⁵³ The [Operational Programme for the Promotion of Education \(OPRE\)](#) has been funded by the ACM and co-managed by *Letras Nómadas* Roma association. See the [fifth state report](#), p. 52. During the ninth edition of *OPRE* (2024-2025), 34 grants were awarded.

main project objectives, which involved children, parents and teachers.¹⁵⁴

142. During its visit, the Advisory Committee visited a primary school in Porto. This school is a clear example of spatial segregation due to the high concentration of Roma pupils from the neighbourhood where the school is located. The national legislation does not allow the collection of statistical data disaggregated by ethnicity of Portuguese residents; therefore, schools only have informal and approximate numbers based on their own experience with Roma pupils and students. But in practice, principals and teachers are well aware of the number of Roma children attending their school. In this school, 86 of 108 children are affiliated with the Roma community, whilst others were largely from migrant communities. As a result of free parental choice, many non-Roma pupils have been withdrawn.

143. A study¹⁵⁵ published in 2024 highlights that the number of Roma students in secondary education remains very low (less than 3%), but their number is slightly increasing. The study concluded that there is a need for a comprehensive understanding of the perceptions of teachers and principals on educational (under)achievement, absenteeism and school inclusion of Roma students. This research also showed persistent misrepresentations and stereotypes in relation to the educational trajectories of Roma students, especially in assigning primary causes of the limited presence of these students to factors relating to the students' family or intrinsic issues, rarely indicating institutional factors or those linked to their teaching practices. There is a need to advocate for more interaction with pupils and parents to raise awareness about the benefits of secondary school education.

144. During the monitoring visit, the Advisory Committee was informed that early marriages (see Article 4) remain a significant factor in school dropout rates among Roma students, girls in particular. Some Roma view formal education

¹⁵⁴ An impact assessment was carried out measuring the indicators "school grades and attendance (justified and unjustified absences)", using questionnaires and interviews. The project was financed up to a maximum of €35 000 for its implementation over a period of one year. Braga, [Projecto 'Agir – 0 aos 100' foi o vencedor da 1ª edição do Programa de Inovação Social Aberta](#), 30 November 2023.

¹⁵⁵ See Pedro Caetano, Maria Manuela Mendes, Sara Pinheiro, Susana Mourão, Pedro Candeias, Olga Magano, [Teachers' perspectives on determinants of educational \(under\)achievement of Cigano/Roma students in Portugal](#), Intercultural Education 35(5), 2024. The study, funded by the Foundation for Science and Technology, is based on data collected via an online survey with the sample of 819 teachers, school principals and deputy principals and other senior management staff in schools of Portugal's metropolitan areas.

as a potential threat to the preservation of their culture. High dropout rates are particularly noticeable at the upper secondary level. Schools may not always be prepared to address cultural differences, which can result in Roma children being “institutionalised”. As explained by the authorities, this may include temporary measures, among others, placement in residential care, with the sole purpose of removing the child from a situation of danger. The Advisory Committee learnt during its visit that absenteeism is common due to a lack of prioritisation of education within some Roma families. As the authorities have explained to the Advisory Committee, to comply with compulsory schooling and promote social inclusion, and once other measures to promote school integration have been exhausted, an Integrated Programme for Education and Training (PIEF)¹⁵⁶ may be adopted. According to the authorities, this is an exceptional measure applicable to young people aged between 15 and 18 who are at risk and/or in danger of social exclusion.

145. The Advisory Committee reiterates that “ensuring access of all persons belonging to national minorities to quality education [as enshrined in Article 12(3) of the Framework Convention] means that states need to act resolutely to, *inter alia*, ensure that all children are duly enrolled in schools and to monitor school attainments, including absenteeism and drop-out rates, literacy, completion of studies, grades, gender disparities, access to higher educational levels and subsequently access to employment.”¹⁵⁷

146. Generally speaking, a number of measures have been implemented to improve access to education. The Advisory Committee welcomes the efforts of the authorities to address the educational challenges faced by Roma pupils and students through the School Profile of Roma Communities and the TEIP Programme. However, the Advisory Committee notes that challenges persist, particularly high dropout rates at the upper secondary level, early marriages and the perception within some Roma communities that formal education threatens the preservation of their culture. The placement of Roma children in what is usually referred to as “special education classes” (arrangements described by the authorities as temporary measures designed to address similar educational needs among students), as well as

¹⁵⁶ This PIEF programme operates within the scope of various training offers, constituting a socio-educational and training measure for inclusion, of a temporary and exceptional nature (Article 9 of Decree-Law no. 55/2018 of 6 July 2018).

¹⁵⁷ ACFC [Thematic Commentary No. 1](#) on education, adopted on 31 May 2024, revising and replacing Thematic Commentary No. 1 on Education (2006), para. 50.

absenteeism, affecting girls and boys equally, and illiteracy, remain significant issues. The Advisory Committee is concerned about the withdrawal of non-Roma pupils from schools with a majority Roma population driven by stereotypical perceptions and the organisational issues such as a school district not being defined by the address of the child.

147. The Advisory Committee welcomes the *ROMA Educa* and *OPRE* scholarship programmes as a demonstration of the authorities' strong commitment to support Roma students, but there is a need for extending such support to more Roma students throughout their education, at all levels. Moreover, although the promotion of preschool attendance for Roma children by some municipalities (like Évora) is a positive step, the Advisory Committee observed the need for more such initiatives nationwide. Despite many positive measures, the Advisory Committee remains concerned about the lack of preparation in some schools to address cultural differences of Roma pupils and students, which perpetuate stereotypes, lower the value of education and contribute to the concerns of some parents that their children would lose Roma culture in education. All such institutional and organisational, as well as personal factors, need to be addressed systematically, by equipping schools to support those students and their parents effectively. The Advisory Committee emphasises the need for sustained efforts to eliminate structural barriers to full educational inclusion of Roma pupils and students, at all levels of education, emphasising the importance of inclusive education policies and targeted awareness campaigns to tackle absenteeism and promote school attendance and completion of education.

148. The Advisory Committee calls on the authorities to intensify their efforts in promoting inclusive and quality education for Roma children at all stages, ensuring effective participation of their families. The authorities should resolutely address absenteeism and spatial segregation, provide the funding required for further improvement of educational outcomes and take measures to increase the proportion of young Roma completing higher education.

Intercultural education and teaching of Roma history and culture (Article 12)

149. Portuguese schools have up to 25% curricular autonomy and flexibility, which the Advisory Committee has recommended could be used *inter alia* to promote Roma history and culture.¹⁵⁸ Several education experts from the Roma communities collaborate with schools to help teachers in their work with students by

¹⁵⁸ See the [Fourth Opinion on Portugal](#), paras. 98-99.

sharing their knowledge. Moreover, the TEIP Programme has enabled schools to have additional resources, to work in networks and develop new ways of working with children and families in vulnerable situations. Considering their autonomy, schools can create new subjects that are integrated into the student's curriculum. According to monitoring carried out by the central education authorities, schools with a higher number of Roma pupils promote specific offers for these children and organise various activities aimed at promoting Roma culture. Many schools also offer teaching of the Portuguese language for migrants, often on a voluntary basis and also for families, as the Advisory Committee learnt during its visit.

150. The National Strategy for Citizenship Education (ENEC)¹⁵⁹ introduced the curricular domain "Citizenship and Development" in all levels of education (from pre-school to upper secondary), as it is considered to be the school's responsibility to provide all pupils and students with education that promotes active citizenship education, as well as fairer and more inclusive societies. Interculturalism, promoting cultural and religious diversity, is among the six compulsory priorities defined in ENEC. As part of "Citizenship Education", the area "Education for Interculturality" aims to encourage students to learn about the concepts of identity and belonging, cultures, pluralism and cultural diversity, including through projects.¹⁶⁰

151. In 2022, the DGE delivered training on "Teaching of History, Human Rights and Minorities in the classroom" with a focus on Roma communities, and organised two training

¹⁵⁹ See the [National Strategy for Citizenship Education](#) (ENEC), launched in 2017 in partnership between the Secretary of State for Citizenship and Equality and the Secretary of State for Education.

¹⁶⁰ For instance, the *Agitana-te – E9G* project in Ovar, with the activity *Mãcheia de Chaborrilhos*, organises skills training sessions for children attending the first cycle. The themes focus on education for interculturality and the promotion of tolerance and mutual respect and reflect on the human differences, show films such as *Ciganinho Chico* and *Selhelo Calim – I am Gypsy* and include a joint reflection on the Roma communities and associated myths. The *BORBA2i - Integrate and Include - E9G* project in Borba runs the "Animated Playground" activity and provides a space for socialisation and non-formal learning. The *Caminhos – E9G* project in Viseu runs the *Puxa pela Cabeça* activity during the summer holidays, which aims to promote weekly short sessions that allow children and young people to consolidate some of the school learnings, adapted to each level of education, through exercises, worksheets, educational games, training and reinforcement of reading and writing, mental arithmetic, among others. See additional information provided by the authorities, 2

courses for teachers: one on "Inclusiveness and interculturality as critical dimensions of Roma children and young people", and another on "ENICC and Cultural Heritage and Education: Education and culture in schools".¹⁶¹ In 2024, the DGE hosted a seminar as part of the Council of Europe Observatory of History Teaching in Europe (OHTE) and a training course "Roma Culture, History, and Education in the Portuguese Context" took place in Figueira da Foz, highlighting *inter alia* teaching of Roma history.

152. All pupils and students who follow the Portuguese curriculum learn about the persecution of the Roma and other groups by the Nazis and their collaborators and the genocide of Roma in the 9th grade as part of history, whereas in the upper secondary education, this topic is addressed in *History A* and in the *History B* optional subjects.¹⁶² Projects, such as *Reflexo – Imagens Positivas*¹⁶³ and the *Kit Pedagógico Romano Atmo (Alma Cigana)*,¹⁶⁴ were developed during the fourth monitoring cycle. However, the project *Reflexo*, for example, has not been widely used in public schools. In addition, the Pedagogical kit *Romano Atmo* for schools to train teachers and students from Roma and non-Roma communities about Roma history and culture is not easily accessible online.

153. Several projects have been financed under the PAAC and the FAPE that seek to increase awareness of Roma history and culture, such as

April 2025.

¹⁶¹ Both training sessions were attended by 15 pre-school, primary and secondary education teachers.

¹⁶² In the 12th year of the scientific-humanistic course in Languages and Humanities and in the scientific-humanistic course in Socio-Economic Sciences, respectively. See additional information provided by the authorities, 22 May 2025.

¹⁶³ The FAPE funded project [Reflexo – Imagens Positivas](#) was produced between February 2018 and July 2019 by *Coolabora* Social Intervention based in Covilhã. It promoted non-discrimination in education by fostering closer ties between Roma communities and schools and contributing to a clearer image of how Roma children and young people view school and how the educational community can integrate the specificities of Roma culture. See also the [fifth state report](#), p. 41.

¹⁶⁴ The FAPE funded project *Kit Pedagógico Romano Atmo (Alma Cigana or Roma Soul)*, produced by AMUCIP in 2016, includes a set of interactive materials, accompanied by an interactive CD, divided into four pillars: "Stories of the Roma people" living in Europe, which includes traditional "Roma tales"; "Romanon" (Romanó-Caló) language which raises awareness of the language; "Roma dance" which presents the choreography of a "Rumba"; and "Curiosities" which is a part relating to clothing, traditions and food (traditional dishes), Roma tarot, celebrations of National Roma Day, among other

A História do Ciganinho Chico by Bruno Gonçalves, a Roma author. The latter led to the creation of a play, promoted by the Sílabo Dinâmica Association, performed in several schools, involving the participation of Roma and non-Roma pupils. A project which included the creation of two videos by the *Letras Nômadás* association aims to raise awareness of Roma history and culture.¹⁶⁵

154. From 2021 to March 2025, 208 training sessions on “Roma History and Culture” had been delivered by the ACM/AIMA.¹⁶⁶ The ACM workshop on “Roma History and Culture” for CICDR staff was organised in November 2022 to raise awareness among national authorities towards the need to take measures to fight anti-Roma prejudice and stereotypes and address antigypsyism across different areas.¹⁶⁷ In 2022, the Portuguese Institute for Sport and Youth (IPDJ) organised an awareness training session on Roma history and culture for its employees. In the context of non-formal education, some projects funded by the *Escolhas* Programme have also sought to improve knowledge and awareness of culture and history of Roma communities among school staff.¹⁶⁸

155. The Schools Library Network offers, through the *Todos Juntos Podemos Ler* initiative, educational resources (textbooks, literature and media) and activities for teachers, children and youth, which contribute to the increase of knowledge of the history and culture of the Roma communities and their valuable collective and individual contributions to Portuguese society, while avoiding prejudices and stereotypes.¹⁶⁹ The initiative focuses on developing educational projects promoting literacy practices and skills for

interesting facts.

¹⁶⁵ *Letras Nômadás, Capacitar o Associativismo* [video 1](#) and [video 2](#), PAAC 2023-2024.

¹⁶⁶ This was for 18 659 hours in total; 4 352 participants had been covered, 3 226 of whom were women and 1 126 men. The training sessions were aimed at schools and public institutions. See additional information provided by the authorities, 2 April 2025.

¹⁶⁷ See the [fifth state report](#), pp. 11 and 31.

¹⁶⁸ For instance, in the 2023/2026 *Escolhas* Programme, the training project *Quero Ser Mais – E9G* designed for both teaching and non-teaching staff to promote a more inclusive school environment is currently underway in Covilhã. The training addresses “Interculturality in Education” and aims to reflect on how intercultural learning, as a transformative process of our own practices, can be enhanced in a school context. See additional information provided by the authorities, 2 April 2025.

¹⁶⁹ In the 2021/2022 and 2022/2023 academic years, school libraries reported to SLN projects and activities about Roma communities, involving more than 1 500 children and young people and shared titles of films, songs and books read together, whose protagonists are Roma. Most of these activities took place as part of the biannual SLN inclusive learning project, [Todos Juntos Podemos Ler](#) (All Together We Can Read).

everyone, involving children and young people who require additional learning support and/or those who, due to various circumstances, have difficulties with reading, writing and speaking.

156. The National Plan for Cinema (PNC) supports the work of teachers in the education of school audiences, allowing them to acquire the basic tools for understanding cinematographic and audiovisual works, and valuing cinema as an art. The PNC published resources about two short films by Portuguese filmmaker Leonor Teles - *Rhoma Acans* and *Balada de Um Batráquio* (Ballad of a Batrachian) - that include pedagogical suggestions to help Portuguese teachers work with students on Roma issues.¹⁷⁰

157. The Network of Schools for Intercultural Education, created in partnership between AIMA, the DGE and the Aga Khan Foundation Portugal, is made up of 66 school groups which foster inclusion and respect for diversity. It aims to promote access, integration and educational success for all children and young people from pre-school to secondary education, as well as to develop respect for differences and the establishment of positive relationships of interaction and rapprochement between students from different cultures and other members of the educational community.¹⁷¹

158. As explained by Roma interlocutors of the Advisory Committee, despite information provided about the Roma genocide, Roma history and culture are not sufficiently covered in the school curriculum, both in areas with Roma communities and across Portugal. Pupils and students thus learn hardly anything about Portugal's Roma communities. Apart from cultural activities provided by Roma activists, interlocutors also claimed that teachers frequently ignore the specific needs and interests of Roma students.

159. The Advisory Committee emphasises that Article 12(1) of the Framework Convention “seeks to promote knowledge of the culture, history, language and religion of both national minorities and the majority population in an intercultural perspective.”¹⁷² Importantly, the “intercultural element of education is firmly situated in the Advisory Committee’s discussion of the integration of society as a whole,

¹⁷⁰ See information about the [short films](#) on PNC website and the [fifth state report](#), p. 42. Between 2021 and 2023, these films were showed in 426 movie screenings in Portuguese schools, with a total viewership of 11 405 people. Both films are accessible on a film streaming platform for schools.

¹⁷¹ See additional information provided by the authorities, 2 April 2025.

¹⁷² [Explanatory Report to the Framework Convention for the Protection of National Minorities](#), para. 71.

understood as involving all persons in society.”¹⁷³ In this context, the Advisory Committee has underlined that “[a]dequate information on the composition of society, including national and other minorities, must form part of the public curriculum and of textbooks and education materials used in all schools throughout the territories of states parties, not only to promote intercultural understanding and respect among all students, but also to raise the prestige and self-awareness of persons belonging to numerically smaller or disadvantaged groups.”¹⁷⁴ Furthermore, “[g]eneral principles, such as the importance of teacher training, the key role played by history teaching in fostering integration and critical thinking, and the knowledge of cultures, histories and religions of the minorities and of the majority, have also been underlined. All these issues should be discussed and decided through effective consultation and participation reflecting a diversity within minorities”,¹⁷⁵ and on a regular basis so as to ensure that the diversity of cultures and identities is adequately reflected as it itself changes, and that respect and intercultural communication are promoted.

160. The Advisory Committee generally welcomes efforts made by the authorities to promote Roma history and culture among Roma children and takes positive note of the Roma-related work of the PNC and of the SLN. It, however, considers that to effectively address the stereotypes and negative perceptions of Roma and Roma communities, it is important for Roma history and culture to be integrated in the main school curriculum for all students. Although making a valuable contribution, the projects funded by the PAAC and the FAPE are often short-term. In addition, the Advisory Committee regrets that valuable materials about Roma culture and history are not disseminated more widely in all Portuguese schools. The essence of Roma culture and history is therefore not widely known by the general population because initiatives promoting Roma culture and history are conducted with specific audiences and at very particular times, without the aim of widespread dissemination among the Portuguese public.

161. The Advisory Committee calls on the authorities to include information about Roma culture and history as a mandatory part of the national public-school curricula, with due regard to the identity and historical presence of Roma in Portugal and their valuable contribution to its diverse society.

¹⁷³ ACFC [Thematic Commentary No. 1](#) (2024), para. 18.

¹⁷⁴ ACFC [Thematic Commentary No. 4](#) (2016), para. 59.

¹⁷⁵ ACFC [Thematic Commentary No. 1](#) (2024), para. 18.

Pedagogical materials and teacher training (Article 12)

162. In Portugal, the design and preparation of teaching materials must comply with the certification assessment criteria¹⁷⁶ and be in line with the “Essential Learning” and other reference curriculum documents for each subject. Textbooks and other materials should promote education for citizenship without discrimination and must not be used for ideological, political, or religious propaganda. In line with Portugal's international obligations and national strategic plans, the DGE develops teacher training courses and workshops, including on Roma history, Holocaust education with a session on Roma genocide.¹⁷⁷ Additionally, training on Roma history and culture is provided within various projects.¹⁷⁸

163. Despite these initiatives, interlocutors of the Advisory Committee, including those affiliating with Roma communities as well as educational professionals, shared their dissatisfaction that pupils and students learn very little, if anything at all, about Roma culture, identities and history. Transmission of such knowledge depends on individual teachers and often on the presence of a Roma mediator willing and able to provide this input. This means that not even all Roma, let alone all pupils and students in Portugal, learn anything about the Roma communities and

¹⁷⁶ Scientific-pedagogical teams evaluate textbooks based on criteria emphasising respect for values, rights and duties in the Constitution (Article 11 of Law no. 47/2006 and Legislative Order no. 4947-B-2019). They also make sure that textbooks combat stereotypes and value diversity, interculturalism and multiperspectivism, along with gender equality.

¹⁷⁷ This includes two training courses every year on teaching the Holocaust, aimed at teachers at all levels of education and in all subjects, which include one session dedicated to the history of the Roma and the Roma genocide. Furthermore, the digital newsletter *Noesis* publishes resources from the Council of Europe and the International Holocaust Remembrance Alliance (IHRA) on the Roma. At the end of 2024, the DGE translated the IHRA Recommendations for Teaching and Learning about the Persecution and Genocide of the Roma during the Nazi Era. See the [fifth state report](#), pp. 42-44.

¹⁷⁸ As part of the INSCHOOL project, a 25-hour training course entitled “Roma Culture, History, and Education in the Portuguese Context” took place in Figueira da Foz in 2024. The 27 participants are now trainers in different teachers’ training centres and committed to disseminating the training course in their local context. The Project *B! EQUAL* in Braga offered intercultural training to educational staff, enhancing their understanding of the Roma culture and equipping them with tools to better support Roma students. Furthermore, A *Rodar* project in Amadora provided school staff training on Roma culture, customs, and cultural norms to promote intercultural dialogue and awareness. See the [fifth state report](#), p. 44.

persons affiliating with them, including on their contributions to Portuguese society.

164. Representatives of the Mirandese community informed the Advisory Committee that there is no official curriculum for the education of teachers of Mirandese. Mirandese is taught from pre-school to secondary school but still only as an optional, extra-curricular course, which could explain why, in secondary schools, so few students are enrolled in the course. It is only taught for one hour a week, and, in general, there is a lack of suitable materials, as well as a lack of support for teacher training. At the University of Coimbra, two courses (50 hours each) prepare students to work with Mirandese. Three teachers taught Mirandese in the district of Miranda do Douro in the school year 2024-2025.

165. The Advisory Committee reiterates that “curricula and educational materials are important tools to enable individuals to acquire the knowledge and competences needed to participate actively in democratic societies. To do so, these materials must aim to value diversity, nurture respect for difference, and seek to develop analytical and critical thinking skills. Curricula and educational materials are therefore key to raising awareness of national minorities and persons belonging to them. The absence of national minorities from curricula and educational materials contributes to their invisibilisation in public life, especially in situations where they are numerically smaller and issues facing them do not occupy much space in societal discourse.”¹⁷⁹ “For education to produce optimal outcomes, curricula, together with educational materials and continuous teacher training, should promote minority rights as an integral part of international human rights and respect for diversity as core values.”¹⁸⁰

166. The Advisory Committee welcomes the measures taken by the DGE to provide teacher training on Roma issues but is concerned about the lack of knowledge about Roma culture and history available systematically in all curricula, for all pupils and students in Portugal. There is also a need for mandatory intercultural training to be provided so that teachers are better equipped to address the changing and growing diversity in Portugal, as well as existing inter-cultural differences. The Advisory Committee also highlights that including the teaching of Roma history in school curricula and teaching materials contributes to the implementation of the Council of Europe recommendation CM/Rec(2020)2.¹⁸¹ It

¹⁷⁹ ACFC [Thematic Commentary No. 1](#) (2024), para. 25.

¹⁸⁰ ACFC [Thematic Commentary No. 1](#) (2024), Executive Summary.

¹⁸¹ [Recommendation CM/Rec\(2020\)2 of the](#)

considers that continuous attention by the authorities is required to ensure the preservation of the Mirandese language and culture, including by ensuring a sufficient number of skilled teachers, teacher training and the development of quality teaching materials.

167. The Advisory Committee calls on the authorities to further invest in teacher training, including mandatory training on intercultural awareness, and to develop educational materials that contain information about the history and culture of Roma communities, including their individual and collective contribution to Portuguese society. The content of these materials is to be developed with the participation of persons affiliating with Roma communities.

168. The Advisory Committee strongly encourages the authorities to ensure systematic training for teachers of Mirandese language and culture, include information about Mirandese in educational materials to be used across Portugal, and introduce Mirandese as a curricular subject at the Miranda do Douro school.

Effective participation in public affairs and decision-making processes (Article 15)

169. Effective participation of Roma in public affairs remains very low. Until the elections in May 2025, there were only a few Roma representatives in the government, including the Deputy Minister for Regional Development. One Roma man who used to work for the ACM Support Unit to Roma Communities now works for AIMA Department for Promoting the Integration and Inclusion of Roma Communities and contributes as an educator on Romani culture, traditions and identity at training sessions for various professionals. A Roma woman who also used to work for the ACM Support Unit to Roma Communities now works in the training unit at the Directorate-General for Food and Veterinary Products (DGAV). At municipal level, several local authorities have employed Roma as public servants, notably in Torres Vedras and Elvas. Since 2024, only a few Roma intercultural municipal mediators still work in and are paid by municipalities (see Article 6). Furthermore, several Portuguese Roma participated in training sessions of the Council of Europe “Roma Political Schools” programme, which seeks to empower Roma activists to participate in politics and political affairs in general. A Roma woman is now an advisor of a political party in the National Assembly.

170. Several representatives of Roma associations consider that significant efforts have

[Committee of Ministers to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials](#), adopted by the Committee of Ministers on 1 July 2020.

been made to ensure that they now have a voice, rather than have others speaking on their behalf. This is, however, not the case throughout Portugal. The Advisory Committee heard from its interlocutors that only a few Roma associations exist in places like Braga and around Porto. Roma interlocutors told the Advisory Committee that they feel excluded from effective consultations and less informed concerning ENICC implementation and financial mechanisms to support it. They also reported that some municipalities do not consider Roma issues among their priorities. Many Roma associations are also inactive due to a lack of resources, poor representation, inexperience and a lack of motivation.¹⁸²

171. Before AIMA replaced the ACM on 29 October 2023 and took over the general responsibility for Roma-related policies, the protocol established between the ACM and the *Letras Nómadas* association stated that the ROMED programme was aimed at persons affiliating with Roma communities.¹⁸³ Considering the beneficiaries, the *Letras Nómadas* association, through the ROMED team, organised a session with Roma individuals to encourage them to join the programme so that a Roma Community Action Group could be reactivated.¹⁸⁴ Thus, participation of some Roma in the Community Action Groups was mainly linked to gaining knowledge on the ROMED methodology, gaining technical capacity to present proposals for action to local organisations and being able to act as a liaison between local Roma communities and local authorities.¹⁸⁵

172. With the conclusion of ENICC at the end of 2023, the Advisory Group of Roma Communities (CONCIG), which had several permanent and non-permanent members and where Roma associations used to elect eight representatives, was dissolved. Until 2023, the CONCIG ensured that Roma were represented and could actively participate in ENICC monitoring and any other integration policy measure targeting Roma

communities. Since then, Portugal has not created a new national consultative body specifically for persons affiliating with Roma communities. All Roma interlocutors that the Advisory Committee met during its visit now expect the adoption of the new strategy and the re-establishment of the CONCIG or a similar consultation body.¹⁸⁶

173. At present, there is no specific registration system for Roma associations within AIMA. Roma associations listed on the AIMA website are consulted. Roma associations can also interact with AIMA, for example by participating in general consultations or applying for funding. However, unlike under the ENICC 2013-2022, there is now no formal mechanism specifically for Roma associations to effectively participate in the design, monitoring and evaluation of national policies.

174. At local level, persons affiliating with Roma communities were involved in drawing up the local plans for the integration of the Roma communities (PLICC). The PLICC project, funded from the European Social Fund and managed by Portugal, promoted focus group meetings with individuals belonging to local Roma communities to give them a voice on issues they considered most relevant. Those meetings aimed to promote measures in the PLICCs that would address their concerns, make local plans known to Roma and promote their participation in the processes envisaged within the PLICCs.¹⁸⁷ The PLICC project also sought to raise awareness in the majority of society about the reality and obstacles experienced and felt by Roma, thus deconstructing the existing stereotypes regarding Roma communities and making all their diversity visible. The second edition of the PLICC project ran between February 2021 and April 2023 in 15 municipalities.¹⁸⁸ In October 2021, the *Dosta!*

¹⁸² According to the authorities, there are Roma associations spread all over the country and in different regions: Alentejo (four); Centro (six); Lisboa e Vale do Tejo (ten); Norte (five) and Madeira Island (one) to which AIMA disseminates programmes and initiatives via its email contacts.

¹⁸³ The first meeting of Roma mediators and facilitators in Portugal was organised under the PAAC 2022 by the *Letras Nómadas* association, based in Figueira da Foz, and attended by 30 participants. See additional information provided by the authorities, 2 April 2025.

¹⁸⁴ For information related to Roma Community Action Groups, see the [Fourth Opinion on Portugal](#), para. 130.

¹⁸⁵ See the [fifth state report](#) p. 54. In 2025, the ROMED programme was resumed in partnership with the Roma association *Letras Nómadas*, which covers 11 municipalities.

¹⁸⁶ During the drafting process of the new national strategy for the integration of Roma communities at the end of 2023, several thematic consultation groups were set up, namely in the areas of discrimination and equality; education; employment; housing; justice, security and rights; civic participation and health. At least two Roma took part in each group. Two other consultation groups were organised, one with the participation of Roma university students and the other with representatives of Roma associations. Furthermore, whenever they feel it is appropriate, Roma associations can request hearings and meetings with the members of the government responsible for a particular area, such as education or housing, and also with public administration institutions with competence in the area of Roma inclusion. Additional information provided by the authorities, 2 April 2025.

¹⁸⁷ See the [fifth state report](#), p. 53.

¹⁸⁸ In the second edition of the PLICC project, the

prize from the Congress of Local and Regional Authorities of the Council of Europe was awarded to the Municipality of Torres Vedras for its PLICC, which fosters opportunities for active participation and integration. Since 2024, some PLICCs have been still active, funded by their respective municipalities. Some of them are monitored by AIMA and its Roma support team, while others are autonomous.

175. The Advisory Committee reiterates that “consultation of persons belonging to national minorities is particularly important in countries where there are no arrangements to enable participation of persons belonging to national minorities in parliament and other elected bodies.” Still, “[c]onsultation alone does not, however, constitute a sufficient mechanism for ensuring effective participation of persons belonging to national minorities.” “It is important to ensure that consultative bodies have a clear legal status, that the obligation to consult them is entrenched in law and that their involvement in decision-making processes is of a regular and permanent nature.”¹⁸⁹ The Advisory Committee also reiterates that, “[w]hile *ad hoc* consultations can be useful to address a particular issue, State Parties are encouraged to establish regular consultative mechanisms and bodies with a view to institutionalising dialogue between the governments and minority representatives” who need to reflect also intra-minority diversity. “Consultative mechanisms with persons belonging to national minorities should not exclude, where appropriate, parallel consultation with independent experts” as “expertise is a useful complement to the consultation procedure.”¹⁹⁰

176. The Advisory Committee considers that in Portugal, the participation of persons belonging to the Roma communities in public affairs faces many obstacles and cannot be seen as effective. There are some cases of civil servants affiliating with Roma, but no measures directed specifically to the recruitment of Roma exist. The authorities do not see a need to establish a more formalised way to involve representatives of Roma at a

municipalities of Almada, Évora, Estremoz, Figueira da Foz, Matosinhos, Oeiras, Seixal, Tomar and Torres Vedras strengthened the PLICC monitoring platforms already drawn up and being implemented, while the following six municipalities created their new PLICCs: Alfândega da Fé, Carrazeda de Ansiães, Entroncamento, Marinha Grande, Santarém and Serpa. See [Seis novos Programas Locais para Integração de Ciganos com apoio de Fundos UE](#) (available in Portuguese), 15 July 2020.

¹⁸⁹ ACFC [Thematic Commentary No. 2](#) on The Effective Participation of Persons Belonging to National Minorities in Cultural, Social and Economic Life and in Public Affairs, adopted on 5 May 2008, paras. 106-107.

¹⁹⁰ ACFC [Thematic Commentary No. 2](#) (2008), paras. 113-114.

national level. This is particularly notable after the ENICC ended. Regarding the placement of the Department for the Promotion of Integration and Inclusion of Roma Communities under the umbrella of AIMA, the Advisory Committee considers this problematic because AIMA is already overwhelmed dealing with an increasing number of migrants and asylum seekers. Furthermore, as Portuguese Roma are citizens of Portugal, it would be more appropriate to dedicate a structure supporting their inclusion in society within the government, rather than within the AIMA. Such a structure also requires adequate funds, competent staff, including individuals affiliating with Roma communities, and defined functions.

177. At municipal level, there is a need to increase the number of municipalities with PLICCs and able to maintain a stronger dialogue with local Roma representatives about Roma needs and interests. The Advisory Committee observes that some obstacles continue to restrict effective participation of Roma in consultation processes, including the lack of explicit and formalised requirements as to what constitutes effective consultation and at what stage of the decision-making process consultation is to take place. Overall, the Advisory Committee was informed by some Roma representatives that they lack capacity and are in a weak position during negotiations, without the possibility of influencing public authorities. This is exacerbated by a lack of information and insufficient time to prepare for consultations. Some Roma associations are not (fully) aware that they must be registered with the AIMA to participate in consultations.

178. The Advisory Committee welcomes the efforts made under the PLICC project, which promoted Roma participation at the local level, as well as the positive outcomes from the CONCIG and the ROMED programme, which helped facilitate dialogue between Roma communities and authorities at all levels. These initiatives contributed to strengthening the role of Roma in policy making on inclusion. However, the Advisory Committee is concerned that, following the end of the ENICC in 2023, the CONCIG was dissolved, and no new national consultative body replaced it. The Advisory Committee stresses the importance of establishing a permanent consultation body that would not depend on a national Roma inclusion strategy. The absence of a formal consultation mechanism and issues regarding the registration process for Roma associations with AIMA further limit Roma participation in decision-making at the national level.

179. The Advisory Committee calls on the authorities to ensure effective participation of Roma in public affairs, including through the creation of a dedicated structure for promoting

inclusion of persons affiliating with Roma communities within the government, outside of the Agency for Integration, Migration and Asylum, in order to separate Portuguese Roma-related issues from migration and asylum-related issues and ensure more attention to be paid to specific Roma needs and interests, including those of Roma women and youth. Such a mechanism requires sufficient and sustainable funding, trained members of staff, including individuals affiliating with Roma communities, and a clearly defined remit.

180. The Advisory Committee calls on the authorities to establish a permanent national consultative structure for persons affiliating with Roma communities from across Portugal, taking into account diversity within those communities, especially the participation of women and youth. This structure should operate independently from a national Roma inclusion strategy and provide a consistent platform for participation of Roma in policy making. The authorities should also promote Roma representation in political and administrative bodies, ensuring their effective participation in decision-making at all levels.

181. The Advisory Committee encourages the authorities to create a formal registration system for Roma associations within the Agency for Integration, Migration and Asylum as long as this agency is responsible for Roma issues, enabling transparent and accessible engagement in national decision-making processes. A dedicated and more wide-spread information campaign should be carried out so that Roma associations from across Portugal are informed about the significance of their registration with the Agency for Integration, Migration and Asylum.

Effective participation in socio-economic life – access to employment (Article 15)

182. The Labour Code, the General Law on Public Employment and Law no. 3/2011 regarding protection against discrimination regulate the area of work and employment and self-employment, including sanctions.¹⁹¹ Public policies in the fields of labour ensure protection of citizens in vulnerable situations and foster social inclusion. These policies have evolved over time and are structured across various areas based on principles of social justice and promotion of a fair labour market. Access to policy measures is determined by the criterion of need rather than personal characteristics such as ethnicity, although it is observed that the need may be more prevalent in certain population groups. Among the policy measures implemented within the responsibilities of the Ministry of Labour, Solidarity and Social Security (MTSSS) concerning social inclusion and poverty reduction, particular emphasis is given to the Social Integration Income (RSI), as well as employment support and vocational training measures for disadvantaged groups, which benefit Roma individuals in need.

¹⁹¹ See the [fifth state report](#), p. 20. These incentives include Sustainable Employment Commitment (*Compromisso Emprego Sustentável*), offering financial incentives for permanent hiring; ATIVAR.PT incentive (*Incentivo ATIVAR.PT*), supporting both permanent and fixed-term employment with mandatory training; and the ATIVAR.PT employment award (*Prémio ao Emprego ATIVAR.PT*), awarding bonuses to employers who offer open-ended contracts following traineeships.

183. However, the access of Roma to the labour market remains a concern. The FRA notes that 81% of Roma in Portugal face discrimination when looking for a job. The discrepancy between men (38%) and women (31%) is also clear regarding paid work¹⁹². According to the results of the INE ICOT survey,¹⁹³ the Roma population had a lower proportion of representation in the labour market (61.3%, compared to 70.8% of the total population), positioning itself mainly in the first quintile of the income distribution (72.6% of Roma have the lowest income).

184. Portugal's Public Employment Service (IEFP), as the ENICC partner, delivered training for its staff on working in culturally diverse contexts, with a focus on Roma communities.¹⁹⁴ However, the IEFP applies a principle of non-discrimination which means that it does not create Roma specific employment programmes. Roma have access to the same job support measures and training as any other vulnerable jobseeker. The IEFP implements this approach through a Personal Employment Plan (PEP) for each person seeking employment. The PEP is a tailored set of steps prepared jointly by the individual and their IEFP advisor, aimed at facilitating (re)integration into the labour market. It may include training in social skills or specific technical competencies and can be revised throughout the process to ensure alignment with the individual's needs and to promote sustainable employment. Local employment services have shown satisfactory results in supporting the inclusion of Roma in the labour market, particularly through direct job placements and hiring support. When Roma are looking for a job or re-entering the labour market and are registered with the employment centre in their area of residence, they can receive assistance from professionals to draw up a PEP, tailored to their needs. Active labour market measures are also in place.¹⁹⁵

185. AIMA promotes "Roma Women's Speech Circles", in collaboration with AMUCIP, which aims to debate the situation and the role of Roma women in different areas, particularly in employment. This has enabled sharing

¹⁹² European Union Agency for Fundamental Rights (FRA), [Roma in 10 European Countries - Main results, 2022](#).

¹⁹³ National Statistics Institute, [Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#) (ICOT), 2023.

¹⁹⁴ Within the scope of the Qualification measure for trainers and technicians based on the Pedagogical Training Framework Continuous Training Course "Professional Training in a Context of Cultural Diversity: Specificities of Working with Roma People". See the [fifth state report](#), p. 54.

¹⁹⁵ See the [fifth state report](#), pp. 54-55.

experiences and sought to empower women.¹⁹⁶ In November 2024, Roma women in Seixal municipality published a book about their employment activities, such as the patchwork classes organised in AMUCIP, which were supported by AIMA and the PAAC funding.¹⁹⁷ However, due to the lack of long-term sustainable funding, Roma women active in AMUCIP are struggling to continue with these activities.¹⁹⁸ The “ObCig Integrative Companies Award” was launched in 2023 aiming to award business companies employing five or more Roma with an important role in the labour inclusion of Roma in order to inspire other employers to promote cultural diversity, combat ethnic discrimination and full inclusion of Roma in Portugal.

186. A number of challenges affecting access to employment by persons affiliating with Roma communities persist. There is inconsistent and insufficient action within the business sector to effectively address the frequent instances of prejudice and discrimination. A particular concern was raised regarding youth employment, but efforts are hindered by ongoing discrimination, the precarious nature of job offers - which often fail to present themselves as more attractive alternatives to social benefits - and, in some cases, by their overlap with informal economic activities. Current training offers also fail to fully respond both to the specific training needs of Roma and to the evolving demands of the labour market. Gender-based disparities in access to employment and training opportunities persist, further exacerbating inequalities. Finally, interlocutors of the Advisory Committee identified shortage of intercultural municipal mediators, particularly those working with the Roma communities, where a mediator is considered a vital tool for fostering mutual understanding and inclusion (see Article 6).

187. The Advisory Committee reiterates that “[p]ersons belonging to certain minority groups, among others the Roma [...], often face more significant difficulties than others in accessing the labour market, education and training, housing, health care and social protection. Difficulties in the various sectors are often connected and mutually reinforcing and they can lead to a spiral

¹⁹⁶ In 2024, three meetings of the Roma Women’s Speech Circles took place, and in 2025, nine meetings are planned.

¹⁹⁷ Seixal municipality, AMUCIP, AIMA, [Todos juntas podemos criar caminhos para o futuro](#), November 2024, presented in Seixal municipality on 3 January 2025.

¹⁹⁸ They also shared with the Advisory Committee during its visit that many Roma women face discrimination in accessing employment when a job post is “suddenly filled” when the hiring employer

of exclusion from socio-economic participation. Women belonging to these groups are often particularly vulnerable to poverty and social exclusion.”¹⁹⁹ The Advisory Committee thus stresses that in order to promote full inclusion of persons affiliating with national minorities in socio-economic life and their effective participation “comprehensive and long-term strategies should be designed and [effectively] implemented. [...] Adequate resources need to be provided in a timely manner at all levels of operation, especially locally. Furthermore, the implementation of such policies should be carefully monitored and their impact evaluated, in close co-operation with representatives of the minorities concerned, with a view to adapting and strengthening them over time. Effective coordination of measures undertaken by the various bodies involved should be a key concern.”²⁰⁰

188. The Advisory Committee acknowledges that local services have achieved some results in their efforts to include persons affiliating with Roma communities in the labour market. It welcomes the active labour market measures which promote job placements and support permanent employment. The assistance of professionals to draw up a personal employment plan (PPE), as well as the efforts made by the IEFP in training for staff working with Roma are also welcomed. However, the IEFP need to be more effective, to revise its training and design specific employment programmes for Roma to better meet their needs and interests of the labour market. The Advisory Committee notes several persistent challenges in access to employment, which, despite modest progress, still prevent Roma from full participation in the labour market. Roma, including women, continue to face discrimination in employment more compared to the general population. Gender disparities in employment are a concern, with fewer Roma women in paid work than men. A key area for improvement is ensuring that the business sector addresses prejudice against (employing) Roma. The Advisory Committee is of the view that the creation of incentives for self-employment, as well as provisional positive discrimination measures, would help solving the employment situation of persons affiliating with Roma communities. It is particularly worrying for the Advisory Committee that Roma women still need to hide their identity when responding to job offers.

discover that a Roma woman is applying.

¹⁹⁹ ACFC [Thematic Commentary No. 2](#) (2008), para. 47.

²⁰⁰ ACFC [Thematic Commentary No. 2](#) (2008), para. 49.

189. The Advisory Committee strongly encourages the authorities to adopt and implement incentives for self-employment and the granting of additional support for the hiring of Roma, particularly women and youth. The authorities should consider introducing affirmative measures and develop specific employment programmes for Roma.

Effective participation in socio-economic life – access to health care (Article 15)

190. During its monitoring visit, the Advisory Committee was informed that, in general, access to healthcare appears to be equally available to Roma. According to the results of the 2023 INE ICOT Survey,²⁰¹ Roma generally rated their health as very good or good (62.0%), although with a higher proportion of chronic diseases (38.1%, compared to 31.9% in the total population). However, Roma nomadic families, as they are forced to relocate frequently, face difficulties in maintaining consistent medical care. Particularly vulnerable are children with physical disabilities where the disruptions caused by frequent moves hinder their access to continuous treatment. The mental health dimension has been neglected in the ENICC implementation although the Advisory Committee has learnt that it is much required. Furthermore, several Roma interlocutors reported of instances in some hospitals labelling patients as “Roma”, which could lead to stigmatisation and discriminatory practices.

191. In response to the existing gap regarding the health of the Roma population, the board of the Intercultural Roma Association (INCIG)²⁰² stressed that Roma live on average 16 years less than the population in general, highlighting the urgency for action in this area as it reflects not just limited access to healthcare but also the interconnected issues of poor housing and socio-economic challenges that particularly affect the Roma.²⁰³ Their health continues to be concern, especially due to the difficulties in accessing healthcare services, exacerbated by the socio-economic conditions many Roma face.

192. Among examples of good practices regarding Roma inclusion in the health sector, the Local Health Unit of São José has a Roma intercultural mediator in its team that is supported

by a diversity and inclusion committee.²⁰⁴ A brochure produced by *Coolabora* with the aim of supporting health professionals to better communicate with Roma in the context of care and improving public service was financed under the FAPE in 2023-2024. Some other examples of good practice exist but they are very often limited in duration. The Carnide Parish Council implemented a health promotion project called *Sastipen*, aimed at improving access to and awareness of health issues within Roma communities.²⁰⁵ Unfortunately, the project was discontinued due to the lack of funding. Additionally, the INCIG carried out activities that included purchasing medications and personal hygiene kits.²⁰⁶

193. The Advisory Committee reiterates that “persons belonging to certain national minorities face particular difficulties in their access to health care, a situation which results from different factors, such as discrimination, poverty, geographical isolation, cultural differences or language obstacles. Difficulties in accessing health care have a negative impact on the participation of persons belonging to national minorities in socio-economic life.”²⁰⁷ Furthermore, the Advisory Committee reaffirms that “ethnic profiling” is discriminatory, and therefore not in line with Article 6(2) of the Framework Convention.

194. The Advisory Committee welcomes the fact that healthcare services are accessible to Roma on an equal footing to the general population. Nevertheless, it remains concerned about persistent practical barriers, including the difficulties nomadic families face in maintaining continuity of care, the disruption of therapy for children with disabilities, and reports of stigmatisation in healthcare settings. It also notes that the lower average life expectancy among Roma reflects broader structural inequalities, particularly in housing and socio-economic conditions. Roma health supportive projects are usually too short. The reported discriminatory practice of some hospitals labelling patients as “Roma” is concerning and needs to be analysed and adequately addressed. The good practice of having a Roma intercultural mediator at the Local Health Unit of São José could be extended and implemented in the National Health Service.

²⁰¹ National Statistics Institute, [Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#) (ICOT), 2023.

²⁰² INCIG was founded on 27 June 2022 and is located in the parish of Carnide in Lisbon. The board of INCIG has a Roma president.

²⁰³ European Union Agency for Fundamental Rights (FRA), [Roma in 10 European Countries – Main](#)

[Results](#), 2022.

²⁰⁴ [ULS de São José – Unidade Local de Saúde de São José](#).

²⁰⁵ The *Sastipen* project is financially supported by AIMA and the Carnide Parish Council.

²⁰⁶ The project lasted a year, with a total cost of €8 500. Part of this amount was allocated to the INCIG intercultural mediator and INCIG official accountant, while the remainder of the work was carried out by volunteers.

²⁰⁷ ACFC [Thematic Commentary No. 2](#) (2008), para. 61.

195. The Advisory Committee calls on the authorities to take measures to address practical barriers to healthcare for persons affiliating with Roma communities, in particular by ensuring effective access to and continuity of care for nomadic families, especially those facing forced nomadism, and by preventing any practices that could lead to the discrimination and stigmatisation of Roma patients within the healthcare system.

196. The Advisory Committee encourages the authorities to extend the presence of Roma intercultural mediators to facilitate access of Roma to medical care and to ensure that public health services are both accessible and culturally and gender sensitive to the specific needs of the Roma.

Effective participation in socio-economic life – access to housing (Article 15)

197. Portugal's public housing policy is based on the principle of universality in access to adequate housing, so there are no community-specific housing solutions. The government nevertheless recognises that individuals from certain groups encounter greater difficulties in securing housing and therefore require targeted support measures. In May 2018, the Council of Ministers adopted a resolution, which introduced the New Generation of Housing Policies to ensure consistency across several areas of governmental action, notably with strategies that respond to the specific needs of most vulnerable groups, such as the ENICC.²⁰⁸

198. The main public housing initiative, *1º Direito* – Support Programme for Access to Housing,²⁰⁹ aims to eliminate undignified housing conditions through the development of Local Housing Strategies (LHE), drafted by municipalities.²¹⁰ Such LHEs assess local housing needs and conditions. They can incorporate tailored solutions for Roma living in precarious or improvised dwellings. Municipalities manage around 90% of the public housing and the authorities indicate that, considering the great autonomy of municipalities in this area, this is a guarantee that the housing solutions they promote are the most suitable for their residents.²¹¹ In 2025, 298 out of 308 municipalities have developed LHEs. The implementation of the European Union Recovery

and Resilience Plan, along with the legislative package *Mais Habitação* (More Housing), further reinforces these public policy efforts.²¹²

199. According to Amnesty International, in October 2023, the government admitted that there were 86 000 families with housing needs, triple the number recorded in 2018.²¹³ Based on the results of the INE ICOT survey, 9.2% of people live in overcrowded housing, affecting nearly 20% of families who are at risk of poverty. Around a third of residents (33.8%) belong to households of four or more people, with an above average proportion of people in this category self-identifying as Roma (53%). Regarding the occupancy status of dwellings, the INE ICOT shows that 70.8% of people own their dwelling, compared to 17.7% who rent it. However, the proportion changes by ethnic affiliation. Among people who identify as Roma, renters dominate (50.5%). Internet access in dwellings across the population is 91.8% compared to 74.2% for those individuals self-identifying as Roma, the lowest proportion of any group. Furthermore, the Roma are the only group with a below-average reported ability to keep their house adequately heated during winter (46.8% compared to 72% for the total population). People of Roma ethnicity favour more close spaces, such as a neighbourhood (57.7%), a town or city (63.2%) or a region where they live (66.3%), and in sociability relationships they stand out with higher proportions of friends from the same social class (79.8%) and who live in the same neighbourhood or area (53.1%).²¹⁴

200. However, according to Roma interlocutors, public housing policies do not adequately reflect the actual living conditions of Roma across Portugal, many of whom reside in improvised shelters. The LHEs are seen as a potential means to improve housing conditions, but progress remains barely visible, particularly in the south. Moreover, the exclusion of Roma from certain municipal strategies poses a serious concern. The lack of clear roles and the overlapping responsibilities among the Institute for Housing and Urban Rehabilitation, the central government and municipalities further exacerbates these challenges.²¹⁵ Rehousing

²⁰⁸ See the [Council of Ministers Resolution no. 50-A/2018](#) of 2 May 2018 and the [fifth state report](#), p. 14.

²⁰⁹ [Decree Law no. 37/2018](#) of 4 May 2018.

²¹⁰ The LHE is drafted according to the geographic circumstances of each municipality and the social, cultural, economic and demographic characteristics of the respective population, without making any type of discrimination related to those characteristics.

²¹¹ See additional information provided by the authorities, 15 April 2025.

²¹² See the [fifth state report](#), p. 14, as well as additional information provided by the authorities, 15 April 2025.

²¹³ See [Amnesty International report on Portugal](#), 24 April 2024.

²¹⁴ See [Specific results concerning the Roma population of the Survey on Living Conditions, Origins and Trajectories of the Resident Population in Portugal](#), published by the National Statistics Institute on 24 June 2024.

²¹⁵ As the Advisory Committee heard during its visit, in Beja, the municipality called on the state authorities to help them with urgently needed housing for nomadic Roma living in most precarious conditions, while the

efforts have also been criticised for relocating families far from their original neighbourhoods, severing ties with family, community support networks and places of employment.²¹⁶ Social housing itself is frequently characterised by poor quality, overcrowding and ghettoisation, which serve to deepen the stigmatisation of the Roma. There have also been reports of evictions, carried out without prior social intervention or the provision of suitable alternative accommodation. Discrimination continues to hinder access to the private housing market, even in cases where Roma individuals have a stable income and resources. Several interlocutors of the Advisory Committee reported that the majority of Roma (67%) feel that they do not enjoy equal opportunities compared to non-Roma.

201. In the region of Alentejo, nomadic Roma families are unable to access social housing due to their inability to prove residency within municipal boundaries, as they are repeatedly expelled. These families live under “tarpaulins” without access to water, electricity or healthcare. In Évora, Roma families face a situation of forced nomadism, often relocating due to persistent discrimination and a lack of places to settle legally. Although children are registered in school, their frequent movement and subsequent school absence leads to interventions by social services, including the removal of children from their parents. The absence of a permanent address also prevents families from accessing school-related financial support and bars them from reapplying for such funding for a period of two years. The *Bairro das Pedreiras* settlement in Beja illustrates the impact of such policies. Constructed in 2006 by the Beja municipality, it was originally designed to accommodate 50 homes and 244 individuals. However, the population has since grown significantly, and the available housing has proven inadequate in both size and number. As a result, many families, including new ones who arrived later, have extended the original structures or constructed makeshift shelters, shacks and tents. As of March 2025, there are 107 shacks in the area. The neighbourhood remains segregated from Beja city and lacks access to basic services such as water,²¹⁷ electricity and sanitation.

202. In Porto, there are 444 social housing units for Roma dispersed throughout the city. In the city of Porto, spatial segregation is no longer implemented. In Vila Nova de Famalicão, most of

state authorities explained that the housing policies are a municipal responsibility and essentially led by municipalities.

²¹⁶ This was observed in the case of Bairro da Torre in Loures.

²¹⁷ In Beja, there is only one water tap available for the Roma communities who do not live in residential

the Roma live in two poor and segregated neighbourhoods: *Urbanização das Bétulas* and *Acampamento de Meães*. Urbanisation of Bétulas was an architectural project developed in 2010,²¹⁸ with a view to building a set of 30 dwellings at controlled costs where the Famalicão City Council relocated 30 Roma families who used to live in tents, on a plot of land located in the parish of Calendário.²¹⁹ *Acampamento de Meães* is a private camp, owned by a Roma individual, where people live in poor conditions in houses. They pay a football club to have access to water and can only use electricity illegally. In January 2021, the Famalicão City Council made the municipality's legal services available to the Roma community of Meães to help find a legal solution to the land problem. Although the families claimed ownership of the land, they did not have a deed for justification. At the time of the Advisory Committee's visit, the situation was still unsolved and even their youth initiatives, such as the running a community centre and organising activities for children and youth, received no support. In the city of Braga, a group of Roma families lives in situations of insecurity, precariousness and unhealthy conditions, to which BragaHabit has tried to respond through various housing support schemes.²²⁰

203. The Advisory Committee reiterates that “[s]ubstandard housing conditions, often coupled with the physical/spatial separation of persons belonging to certain national minorities, in particular Roma [...], considerably affect their ability to participate in socio-economic life and can result in their further poverty, marginalisation and social exclusion. This is frequently made more acute by the lack of legal provisions securing their residency rights and by their vulnerability to forced evictions”.²²¹ “States parties must take effective measures to put an end to discriminatory practices which lead to segregation and marginalisation of persons belonging to certain national minorities. Particular attention should be paid to ensuring full respect for the human rights of persons belonging to national minorities in housing matters.”²²² Moreover, states parties “should

housing.

²¹⁸ [Famalicão: Urbanização das Bétulas distinguida - Correio do Minho](#), December 2010.

²¹⁹ See [Empreendimento de 30 fogos na Urbanização das Bétulas - empreendimento de 30 fogos na Urbanização das Bétulas - IHRU](#) (available in Portuguese).

²²⁰ BragaHabit, [Entrevista da BragaHabit ao Observatório de Comunidades Ciganas](#), 30 December 2022.

²²¹ ACFC [Thematic Commentary No. 2](#) (2008), para. 57.

²²² ACFC [Thematic Commentary No. 2](#) (2008),

develop comprehensive sectoral policies to address problems of substandard housing and lack of access to basic infrastructure, which affect persons belonging to certain minorities[, and ...] promote their equal access to adequate housing, in particular by improved access to subsidised housing.”²²³

204. The Advisory Committee welcomes the steps taken by the Portuguese authorities to develop a housing policy framework based on universality, including the adoption of the New Generation of Housing Policies and the *1º Direito* programme, as well as the widespread implementation of LHEs. However, the Advisory Committee notes that many Roma families continue to live in precarious and improvised houses and that universal housing policies often fail to address their specific needs. Discrimination in the private housing market, inadequate conditions in social housing and reports of evictions without prior intervention remain serious concerns. Furthermore, the exclusion of Roma from some municipal strategies, weak institutional co-ordination and rehousing practices that isolate families from their communities undermine progress. The Advisory Committee also expresses concern about the persistent housing shortage and a lack of disaggregated data on access to adequate housing. The Advisory Committee considers that some diversification is needed from the authorities at all levels to cater for different needs such as support for rental and social housing for those who have permanent difficulties to access adequate housing or for people with needs of a more transitory nature.

205. The Advisory Committee considers that the situation of Roma families in general, and particularly those in a situation of forced nomadism, is marked by extreme socio-environmental precariousness and intersectional discrimination. The families who are nomadic in the central Alentejo region (Évora, Montemor-o-Novo, Vendas Novas, Estremoz, Arraiolos, Mourão, among others) are in a state of forced nomadism because the municipal councils, in co-ordination with the GNR, systematically expel families for “illegally camping” on municipal land. The situation of these families is characterised by extreme poverty and territorial/racial exclusion. They cannot access social housing because they are unable to prove residence in municipal areas, as they are constantly expelled. These families live under tarpaulins, not even in proper tents. This not only means they lack access to basic public services (water, electricity, healthcare) but also severely complicates their relationship with

institutions (such as schools) that could support upward social mobility.²²⁴

para. 58.

²²³ ACFC [Thematic Commentary No. 2](#) (2008), para. 59.

²²⁴ Agostina Del Valle Nievas, [Nomadic Bodies: From Their Intermittent Invisibility to Their Permanent Persistence - The Story of a Nomadic Cigano/Roma Family in Its Transit through Montemor-o-Novo, Portugal in \(Post\)Pandemic Times](#), *Social Sciences*, 12(4), 2023.

206. The Advisory Committee urges the authorities to address the issues relating to Roma families living in a situation of forced nomadism by providing suitable housing, social and educational assistance and intercultural mediation. For this to be effective and functional, it should be designed in co-operation with relevant stakeholders, including individuals living in a situation of forced nomadism, representatives of Roma associations and other human rights civil society organisations helping those families and individuals and experts on social housing.

207. The Advisory Committee asks the authorities to ensure that local housing strategies explicitly address the housing needs of Roma, including those experiencing forced nomadism or living in substandard housing conditions, as well as ensure the participation of Roma representatives, including women and youth, in the design, implementation and monitoring of the strategies. The authorities should adopt measures to improve the living conditions of the Roma communities through access to essential services and infrastructure, and to combat discrimination in the housing market.

The Advisory Committee on the Framework Convention for the Protection of National Minorities is an independent body that assists the Committee of Ministers of the Council of Europe in evaluating the adequacy of the measures taken by the Parties to the Framework Convention to give effect to the principles set out therein.

The Framework Convention for the Protection of National Minorities, adopted by the Committee of Ministers of the Council of Europe on 10 November 1994 and entered into force on 1 February 1998, sets out principles to be respected as well as goals to be achieved by the states, in order to ensure the protection of national minorities. The text of the Framework Convention is available in English and French, as well as in other languages, such as Portuguese and Romani.

This opinion contains the evaluation of the Advisory Committee following its 5th country visit to Portugal.

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