

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



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**Comments of the Government of Albania on the Fifth Opinion of the Advisory Committee on the
implementation of the Framework Convention for the Protection of National Minorities by Albania**

received on 16 October 2023

**COMMENTS OF THE ALBANIAN AUTHORITIES ON THE FIFTH OPINION ON
ALBANIA BY THE ADVISORY COOMITTEE ON THE FRAMEWORK CONVENTION
FOR THE PROTECTION OF NATIONAL MINORITIES**

The Government of the Republic of Albania welcomes the Fifth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities. The Opinion evaluates the Fifth Report submitted by the Republic of Albania in compliance with its commitments under the Framework Convention.

The Albanian institutions regard the reporting process pertaining to the implementation of the Framework Convention for the Protection of National Minorities, as well as their productive dialogues with the Advisory Committee, in addition to the insights and recommendations offered in the Committee's fourth Opinion on Albania, as effective means to ensure compliance with international obligations. They view these processes as opportunities to showcase progress made, acknowledge difficulties encountered, and confront the challenges involved in implementing the Framework Convention.

In the Section "Population Census", item 50:

b. Considering that:

-instruments for monitoring statistical production are provided for in the legislation for official statistics.

- INSTAT is obliged to collect, process, and publish data in full compliance with the principles of official statistics according to Articles 4 and 5 of Law no. 17/2018 "On official statistics".

- INSTAT has stated not only publicly, but also in the meeting with the representatives of the Advisory Committee, that the representatives of national minorities will be involved in the processes of the communication campaign and data collection, especially in the resident areas where the individuals of these communities have high intensity.

In the "Population Census" Section, item 51:

The same reasoning is valid also for the last sentence of point 51 "Persons belonging to national minorities should be involved in the evaluation of the census process".

In point 125 where it is stated: "*Greek minority representatives expressed concern about the content of some school textbooks which portrayed the Greek minority as having irredentist tendencies, even inciting hatred against the Greek minority...*" as well as for item 127 where it is stated: "*The Advisory Committee is concerned ... about the problematic portrayal of the Greek minority in some books*", we clarify that such information has never been referred to in MoES.

Based on the above, we would like to inform that the textbooks of pre-university education have been evaluated by teachers throughout Albania and there have been no remarks like those cited in the report.

We would also like to inform that it is the joint Albanian-Greek committee, that has agreed on common conclusions for the programs and textbooks of pre-university education of both countries on studies of the presentation of history, geography, culture, and economy in the textbooks of the Republic of Albania and the Republic of Greece.

In point 124, it should be emphasized that one of the main principles of the curriculum in the pre-university education system in the Republic of Albania is the inclusiveness. In the Curriculum Framework, which is the main curriculum document, it is emphasized that the curriculum must recognize, accept, respect, and respond to the needs, experiences, educational interests, and values of all groups of students, regardless of their background or characteristics. In fulfilment of this principle, all students (who are and are not national minorities) learn about the history, culture, and

traditions of national minorities in the subjects: History, Citizenship, Geography, Arts, etc. Also, all schools develop extracurricular activities or school projects, in which students are introduced to culture, art, traditions and customs of different minorities in Albania.

For point 153 where it is quoted: "*...they expressed regret for the removal of the Macedonian language from the department of Slavic and Balkan languages at the University of Tirana and were informed about the current, so far unsuccessful efforts to open a study program in the Macedonian language at the Faculty of Philology at the "Fan S. Noli" University in Korça*", we suggest that it should be clarified that based on Article 3 of Law no. 80/2015 "On higher education and scientific research in institutions of higher education in the Republic of Albania", institutions of higher education enjoy academic freedom, financial, organizational and personnel selection autonomy, in accordance with the legislation in force. Academic freedom is guaranteed through the right to organize teaching, research-scientific, innovation and creative activities; to design and develop study programs, to determine the fields of research-scientific activity, and to organize the process of promotion of academic personnel.

For the above, the opening or closing of study programs, i.e. also those related to the languages of national minorities, is within the competence of higher education institutions, which justify the decision regarding these programs depending on the demand that have for such study programs (over the years) and academic and infrastructural capacities. MoES can not interfere in the policy-making of higher education institutions, because this would be considered as disrespecting academic freedom, but MoES supports and encourages initiatives for the opening of such programs in the conditions when the standards for providing a quality service are met for students.

The report Point 6 mentions that the action plan for Roma and Egyptians is separate, and that "*...separate data is needed to address the needs of the two minorities*". It is important to clarify that the plan for the years 2021-2025 is a continuation of the 2016-2020 plan and is monitored by the Ministry of Health and Social Protection, through the collection of data in the Romalb system, where it is reported with separate data only for the Roma and only for the Egyptians.

Also, we would like to underline that schools affected by segregation where Roma and Egyptian students study are in the attention of all central and local educational institutions and work is being done to implement the decision of the European Court of Human Rights, as well as for a plan of measures not only for the prevention and avoidance of segregation, but also for the involvement of mediators, for the regular attendance of Roma and Egyptian students at school and the increase of their results, for the implementation of special after-school programs with Roma students and Egyptians for their after-school support for completing assignments and preparing lessons, for awareness campaigns with the Roma and Egyptian minorities about

education and their rights, as well as for equipping schools with teaching laboratories, etc.

In relation to point 4, "Free self-identification", which refers to article 7 of law no. 96/2017 "On the protection of national minorities in the Republic of Albania", which stipulates that: "The criteria, documentation, as well as the relevant procedures for the collection of data provided for in point 1, of this article, are approved by decision of the Council of Ministers , with the proposal of the minister responsible for internal affairs.".

In the aforementioned law, the fact is expressly provided that: "to guarantee the rights of national minorities, public institutions at the central and local level collect data related to the identification of persons belonging to national minorities, based on the right of self-identification of these persons and in the Civil Status documentation, in accordance with point 2, article 6, of this law and with the legislation for the protection of personal data. So, the legislator has provided for the necessary support in an official documentation of the self-declaration of the entities that claim to serve the respective national minorities.

The right to self-identification does not simply mean a right for an individual to arbitrarily choose to belong to a national minority. Individual subjective choice is inextricably linked to the corresponding objective criterion of the person's identity. This part of the provision of the law is intended to ensure that the enjoyment of the freedom to choose will not be impaired." In this context, we emphasize that the individual right to self-identify as part of a minority is related to the objective criteria of the person's identity, based on the evidentiary documentation that law no. 96/2017, in item no. 1, of Article 7 defines the proof documentation of Civil Status.

In relation to Point 9 "Language rights", and Point 112 "Use of minority languages in the public sphere", which refers to article 15 of the law "On the protection of national minorities in the Republic of Albania", which stipulates that the legal authorization draft decision "On the way of using the language of national minorities in the relations between persons belonging to national minorities and local self-government bodies", it is evident that the project aims to ensure the use of the language of national minorities formally recognized by law no. 96/2017 "On the protection of national minorities in the Republic of Albania", in the relations between citizens belonging to the minority and local self-government units, in addition to the use of the Albanian language.

We would like to emphasize that the law has provided that persons belonging to national minorities, who traditionally live in that country or make up more than 20 percent of the total number of the population of this unit, can apply to the state authority responsible for the use of the language and the type of local self-government creates the conditions for the use of the minority language in relations between persons belonging to minorities and these bodies. Currently, work is being done on the new legal act aimed at ensuring access to minority rights.

We would also like to inform that it is predicted that the projects will be approved within 2024.

Regarding the Point 20 “on providing social, legal and financial support” and the Point 54 which provides that: *“Free legal aid was introduced with the law on legal aid of June 2018... However they regretted that persons belonging to Roma and Egyptian minorities had not been included as specific beneficiary categories of the law, whereas there were other specific groups in such a category and as they had been for the Law “on Social housing” which results in a low number of these individuals benefitting from secondary legal aid as they are not aware that they have access to such rights or feel unable to exercise them. They stated, however, that more awareness raising among groups and persons in situations of vulnerability and adequate funding is needed to ensure that this law to work in practice”*, we clarify that:

Law no. 111/2017, “On legal aid guaranteed by the state” Aid (Law on Legal Aid) foresees a comprehensive system about Article 12 and 15 of the 5th opinion of the Advisory Committee for Albanian on the Framework Convention for the Protection of National Minorities.

The law on free legal aid does not categorize Roma and Egyptians as beneficiaries of its rights, but they are treated as beneficiaries of the provision of primary legal aid services according to the category to which they belong according to law no. 111/2017, “On legal aid guaranteed by the state”.

Article 11, provides for special categories of beneficiaries of legal aid, legal aid is offered to the following persons, regardless of their income and wealth:

- a. victims of domestic violence.
- b. sexually abused victims and victims of human trafficking, at any stage of the criminal proceedings.
- c. minor victims and minors in conflict with the law, at any stage of the criminal proceedings.
- d. children who live in social care institutions.
- e. children under guardianship, who seek to initiate a process without the approval of their legal guardian or against their legal guardian.
- f. to persons who benefit from disability payments, in accordance with the legislation in force on assistance and social services, including persons who benefit from the status of the blind.
- g. persons who are subject to involuntary treatment in mental health service institutions, according to the provisions of the legislation in force on mental health.
- h. persons who undergo voluntary treatment in mental health service institutions for serious mental illnesses.
- i. persons who are requested to remove or limit the ability to act, at any stage of this process.

- j. persons, whose capacity to act has been removed or limited, who seek to start a process against their legal guardian, for regaining the capacity to act, without the approval of the legal guardian; persons who are beneficiaries of social protection schemes.
- k. persons whose rights have been violated through an action or inaction that constitutes discrimination, based on the decision of the competent body, according to the legislation in force on protection against discrimination.

Article 12, beneficiaries of legal aid with insufficient income and assets:

- a. The right to benefit from legal aid is available to anyone who proves that they have insufficient income and assets to cover the costs of counselling, representation and/or defence in criminal cases, in administrative cases and in civil cases.
- b. The income of a person, who lives in a family, is considered insufficient, according to the meaning of point 1, of this article, if the total income of all family members, divided by the number of family members, are lower than 50 percent of the minimum monthly salary determined according to the legislation in force.
- c. The income of a person, who does not live in a family, is considered insufficient, according to the meaning of point 1, of this article, if it is lower than the level of the minimum monthly salary determined according to the legislation in force.
- d. If a person, who lives in a family, requests secondary legal assistance for a case against another member of the same family, the rule provided in point 2, of this article, will not be applied. In this case, the income of this person is considered insufficient, according to point 1, of this article, if it is lower than the level of the minimum salary determined according to the legislation in force.
- e. A person's wealth is considered insufficient, according to point 1, of this article, if its total value does not exceed the value of 36 minimum monthly wages according to the legislation in force.

I. Primary Legal Aid:

- a. Through Primary Legal Aid Service Centre- 18 Primary Legal Aid Centres, functional. In the end of July 2023 will be functional 20 Primary Legal Aid Centres, all over the country. 12 of them financed by the state budget and 8 from UNDP.

Various workshops have been conducted throughout the first quarter of 2023, and moreover, an access to justice map is being developed as a tool to inform the citizens on the Free Legal Aid centres across the country, as a measure to address communication in the framework of the implementation of the new judicial map.

In order to guarantee access to justice, has been thought that there was a need for 1 Primary Legal Aid Service Centre to be functional in the premises of the courts which are closed actually, to inform all individuals who seek information on the procedures and institutions where should be directed to solve their problems judicially and extra judicially.

Specifically, the Ministry of Justice, at the beginning of 2023, planned the opening of 6 Primary Legal Aid Service Centres, in the cities of Tropoja, Mat, Pukë, Kurbin, Kavajë and Përmet, which are the cities where the first instance courts are closed with the implementation of the judicial map. Actually, the Primary Centres in Tropoja, Përmet, Mat, Pukë are opened. Meanwhile actions are taken in closing the procedures in the end July 2023, for opening the Primary Legal Centres in Kurbin and Kavajë.

- b. NGOs providing primary legal aid (*15 NGO-s operating in Tirana, Vlora, Berat, Elbasan, Shkoder for 2022-2024*). Albanian legislation provides the provision of a state budget for Non-Profit Organizations. In 2023 2 NGOs won to get the funding from the state budget, out of 9 NGOs that applied.
- c. Legal clinics at the higher education institutions providing legal aid (*12 Legal Clinics operating in Tirana, Durres, Shkoder*). Contrary to what is provided for Non-Profit Organizations, the Legislation does not provide the provision of a state budget by for Legal Clinics.

II. Information/awareness activities developed:

- a. During 2020 are developed 60 joint meetings/awareness activities between legal aid service providers/representatives of local/central level institutions and independent institutions, from the total of the above activities, 1 activity was developed only with representatives of the Roma and Egyptian community;
- b. During 2021 125 joint meetings/awareness activities were organised between legal aid service providers/representatives of local/central level institutions and independent institutions, from the total of the above activities, 15 activities were organised only with representatives of the Roma and Egyptian community;
- c. During 2022 286 joint meetings/awareness activities we conducted between legal aid service providers/representatives of local/central level institutions and independent institutions for 2022, from the total of the above activities, 16 activities were only with representatives of the Roma and Egyptian community;
- d. During 2023 there were 98 joint meetings/awareness activities organised between legal aid service providers/representatives of local/central level institutions and independent institutions from the period January-June 2023.

III. Secondary Legal Aid (representation by an advocate in a court procedure).

Secondary legal aid is provided by advocates included in the list approved by the National Chamber of Advocates upon the request (according to the form) of the person entitled to receive secondary legal aid. The request has to be addressed to the competent court. The court has to decide within 5 days from the date of receipt of the request, when the request has been submitted.

Exemption from payment of court fees and court costs, according to law and exemption from the obligation to prepay the fee for the enforcement of the execution order.

Free Legal Aid is administered by the Directorate of Free Legal Aid, which, in addition to other competences and functional tasks, collects and reports monthly and annual statistical data. The publication of the statistical data is done on the official website of the institution.

<https://ndihmajuridike.gov.al/>

b. Presentation of data in comparative form from 2020 - June 2023.

The year 2020	The year 2021	The year 2022	January-June 2023
7 (seven) primary legal aid service centers in Tirana; Durrës; Fier; Lezhe; Lushnje; Pogradec; Gjirokastra;	<i>10 (ten) primary legal aid service centers (Tirana, Durres, Lushnje, Fier, Vlora, Pogradec, Gjirokastër, Lezhë, Shkodër and Dibër).</i>	<i>14 primary legal aid service centers (Tirana, Durres, Elbasan, Lushnje, Berat, Fier, Vlora, Pogradec, Gjirokastër, Lezhë, Shkodër, Dibër, Kukës and Korçë).</i>	<i>18 primary legal aid service centers (Tirana, Durres, Elbasan, Lushnje, Berat, Fier, Vlora, Pogradec, Gjirokastër, Lezhë, Shkodër, Dibër, Kukës, Korçë of Tropoja, Mat, Pukë, Kurbin, Kavajë and Përmet).</i>
6 (six) Legal Clinics near HEIs operating in Tirana; and Vlora.	11 (eleven) cooperation agreements related to Law Clinics near HEIs.	12 (twelve) cooperation agreements related to Law Clinics near HEIs.	12 (twelve) cooperation agreements related to Law Clinics near HEIs.
12 (twelve) authorized non-profit organizations operating in Tirana; Durrës; Elbasan; Berat; Shkodër;	12 (twelve) non-profit organizations authorized by the Minister of Justice in September 2020 (2-year authorization according to VKM no. 55/2019).	15 (fifteen) non-profit organizations authorized by the Minister of Justice in September 2022 (3 organizations more than in September 2020 authorization specialized in the field of victims of domestic violence, minors, refugees, etc)	15 (fifteen) non-profit organizations authorized by the Minister of Justice in September 2022 (3 organizations more than in September 2020 authorization specialized in the field of victims of domestic violence, minors, refugees, etc). 2 (two) NGOs wins to get the funding from the state budget, out of 9 NGOs that applied.
Primary legal aid: 4191 cases of which 71 are Roma and Egyptians Secondary legal aid: 181 decisions.	Primary legal aid: 8153 cases of which 325 are Roma and Egyptians. Secondary legal aid: 849 decisions.	Primary legal aid: 7616 cases of which 314 are Roma and Egyptians. Secondary legal aid: 812 decisions.	Primary legal aid: 1854 cases of which 214 are Roma and Egyptians. Secondary legal aid: 410 decisions.

<p>Developed 60 joint meetings/awareness activities between legal aid service providers/representatives of local/central level institutions and independent institutions.</p> <p>From the total of the above activities, 1 activity was developed only with representatives of the Roma and Egyptian community.</p>	<p>Developed 125 joint meetings/awareness activities between legal aid service providers/representatives of local/central level institutions and independent institutions.</p> <p>From the total of the above activities, 15 activities were developed only with representatives of the Roma and Egyptian community.</p>	<p>Developed 286 joint meetings/awareness activities between legal aid service providers/representatives of local/central level institutions and independent institutions for 2022.</p> <p>From the total of the above activities, 16 activities were developed only with representatives of the Roma and Egyptian community.</p>	<p>Developed 98 joint meetings/awareness activities between legal aid service providers/representatives of local/central level institutions and independent institutions from the period January-June 2023.</p>
<p>Planned budget 45,500,000. Budget spent 17,139,586. Plan grants 7,791,927. Actual grants 2,512,908.</p> <p>The number of judicial decisions liquidated with the object of secondary legal aid during the year 2020, 81 decisions. Secondary legal aid (payment of lawyers, experts and court fees) with a total value of ALL 2.459.113</p>	<p>Planned budget 66,200,000. Budget spent 29,702,483. Grant plan 15,253,893. Actual grants 12,668,853.</p> <p>The number of judicial decisions liquidated with the object of secondary legal aid during the year 2021, 143 decisions. Secondary legal aid (payment of lawyers, experts and court fees) with a total value of ALL 5,188,929</p>	<p>Planned budget 66,200,000. Budget spent 29,702,483. Grant plan 15,253,893. Actual grants 12,668,853.</p> <p>Expenses fund for court decisions: During the year 2022, in total, the financial obligations with the object of "secondary legal aid and exemption from fees and expenses" were repaid for 289 court decisions at a cost of ALL 9,895,440.</p>	<p>Planned budget 92.050.00 Budget spent 22.304.801 Grant plan 12.305.047 Actual grants 9.863.041 Expenses fund for court decisions: During the January - June 2023, the financial obligations with the object of "secondary legal aid and exemption from fees and expenses" were repaid for 174 court decisions at a cost of ALL 6.139.500</p>

1. Regarding Point 61 of the European Commission/Opinion on National Minorities, which provides that: *"Civil Society and Roma representatives inform the Advisory Committee of a new troubling development which was contributing to this situation "on fictive marriages..." as well as in relation to Point 63 that: "The authorities should take an active role in investigating and addressing the impact of fictive marriage in particular on women and children belonging to national minorities, including through providing the necessary social, legal and financial support to them, ensure that the*

marriage law is properly enforced in a non-discriminatory way, and raise awareness of the risks of this process among persons belonging to the national minority" we clarify that:

The Ministry of Justice, based on the studies and the progress report of the European Commission for Albania 2022 that addresses the practice of child marriage, has undertaken the initiative to draft the Cross-cutting Strategy of Juvenile Justice 2022-2026 which was approved by decision no. 892 dated 27.12.2022 of the Council of Ministers. The strategy with a broad and long-term vision envisages measures and activities related to the review of the legal basis for issues such as: statelessness and children, prevention of early marriages, children - victims of bad parenting/ abandoned children, non-fulfilment of obligations food from parents, including those living abroad, non-execution of court decisions that violate the rights of the child.

The main causes of fictive marriages are as results from gender inequality, poverty and social exclusion. This troubling problem has also been addressed for solution in the National Agenda on the Rights of the Children, the National Strategy for Gender Equality 2021-2030 and its Action Plan, as well as in the framework of Objective II.1.1 of the Cross-cutting Strategy of Juvenile Justice 2022-2026, where it is foreseen a series of measures for their prevention and harmonization of the Family Code with other laws.

2. Regarding Point 92, which provides “...that no data is systematically collected on the prevalence of hate crime and Albania has not reported periodically on the number of hate crimes recorded by the police to the Office for Democratic Institutions and Human Rights (ODIHR)”, we clarify that:

Also, Ministry of Justice, in accordance with the respective articles 265, 266 of the Criminal Code, as amended, collects statistical data on an annual basis from the courts of general jurisdiction regarding to the number of criminal offenses and the number of convicted persons. These statistical data are published on the official website of the Ministry of Justice at the electronic address: <https://www.drejtesia.gov.al/statistika/>.

The National Action Plan (NAP) for Equality, Inclusion, Participation 2021-2025 contains measurable indicators in the fields of employment and professional training, inclusive education, primary education; access to health and social protection, social housing and access to justice.

Also, in the context of the Poznan Declaration, non-discrimination and anti-gypsyism are a component of the 2021-2025 NAP parallel to strengthening of monitoring mechanisms. To this aim the monitoring of the indicators in the Roma-Alb electronic system in national level has continued regularly, with data provided from the central and local government.

The national legal framework includes legislation and sub-legal act related to rights, equality and participation for both Roma and Egyptians. The Ministry of Health and Social Protection

has monitored the situation through the Rom-Alb system. Over 200 focal points for R/E have been trained at the central and local level from January-March 2023, in order to build capacities for reporting progress on implementation.

In the EU integration process, on April 20, 2022, the Fifth Albania-EU Policy Dialogue Seminar on the inclusion of Roma and Egyptian national minorities was organized in Tirana. The Policy Dialogue Seminar resulted in operational conclusions and final measures and recommendations to be implemented in the 2022-2024 timeframe.

The Eu-Albania Policy Seminar Dialogue Recommendations 2022-2024 have been consulted with representatives of central and local government, representatives of the civil society and international organizations. Policy Areas covered education, antigypsyism, employment and vocational training, access to health, social care, housing, civil registration and returnees. Regarding the implementation of the Recommendations,

Law No. 1022, dated 4.2.2010 "On protection from discrimination" (as amended) regulates the implementation and respect of the principle of equality and non-discrimination in relation to race, ethnicity, colour, language, citizenship, political, religious or philosophical beliefs, economic, educational situation or social, gender, gender identity, sexual orientation, sexual characteristics, living with HIV/AIDS, pregnancy, parental affiliation, parental responsibility, age, family or marital status, marital status, residence, health status, genetic predisposition, appearance, disability, belonging to a certain group or any other ground.

The National Action Plan (NAP) for Equality, Inclusion and Participation of Roma and Egyptians 2021-2025 (approved by CM Decision No. 701, dated 18.11.2021) includes a policy area for access and health and social services.

Ensuring quality, equal and non-discriminatory health care for all Roma and Egyptian women, men, girls and boys is a priority of the Ministry of Health, continuously addressed through specific measures aimed at improving access to health for vulnerable groups. As part of the Community Health Care program, vaccination, mammographic examinations and other preventive services are offered through access to services near the residence for special categories, especially for the Roma and Egyptian minorities.

Universal Health Coverage for Roma and Egyptians as part of the entire population remains a priority. Integrated social-health standards are adopted at the local level for all groups in need with a focus on health mediators to facilitate access to health services.

Increasing access to quality health services for all children and parents of vulnerable and marginalized groups, and especially for pregnant women, mothers and infants is closely linked to the awareness of Roma and Egyptians. Services for this community are also provided by mobile medical teams. Children aged 0-18 years benefit from all preventive or health care services within the Basic Package of Primary Health Care, regardless of their residence or social and economic status, including vaccination. The improved infrastructure of 340 health centers/hospitals and polyclinics in urban and rural areas guarantees better access of Roma and Egyptians by providing services close to the Roma and Egyptian community.

The Social Fund is a mechanism for financing social services that operates in accordance with Law No. 121/2016 "On social care services in the Republic of Albania" for financial support for local self-government units, for existing and new social care services. During the three-year

period 2019-2022, 539 million Lek were financed for 40 social care services: of these there are 27 social services at the municipality level and 13 specialized services in 6 districts for 10,744 beneficiaries.

Economic assistance benefits increased during 2022, doubling for 15,000 families with 3 or more children and for 5,700 families with up to two children, doubling for 5,200 families with up to 2 children. The average number of beneficiary families is about 64,000 families in the economic assistance scheme, while there are 2,700 families belonging to the Roma and Egyptian community.

Policies for vulnerable groups address inclusive employment. The Roma and Egyptian minorities are targeted through employment promotion measures in Law No. 19 "On Employment Promotion". The National Strategy for Employment and Skills aims to promote good employment opportunities through effective labor market policies; providing quality vocational education and training for young people and adults and promoting social inclusion and territorial cohesion.

The National Employment and Skills Agency (AKPA) implements a number of programs such as job placement, employment promotion programs and vocational training for unemployed jobseekers with a special focus on vulnerable groups. National minorities such as Roma and Egyptians are one of the beneficiary groups

NAES implements a package of employment promotion programs such as:

- One year work placement program
- Professional practice
- Public works programs in the community
- Self-employment programs
- Employment programs for the unemployed due to COVID 19

Vulnerable groups are supported for priority labour market participation with wage subsidies, compulsory insurance, reasonable accommodation for persons with disabilities (PWD), coverage of transport costs to the workplace, coverage of costs for kindergartens and nurseries for mothers with children under 6 years old as well as training fees. During the year 2022, there are 5% participants in these programs from the Roma and Egyptian community. Roma and Egyptians can participate free of charge in Vocational Training (VET) courses in 10 Public VETs. 3% of participants in 2022 belong to the Roma and Egyptian community.

In terms of social housing, the PKV for Equality, Inclusion, Participation of R/E includes measures for social housing. National Social Housing Strategy 2016-2025 and Law No. 22/2018 "On social housing" also emphasizes the principle of non-discrimination for housing for social groups in need of housing. Social housing for Roma and Egyptians is set at a minimum quota of 5% for R/E in Law no. 22/2018 "On social housing". Based on the law no. 22/2018, 6 housing programs are implemented, specifically a) social housing program for rent; b) the program for improving the conditions of existing housing, up to a new construction; c) low-cost housing program; ç) the program for the development of the area for residential

purposes; d) temporary housing program; dh) programs for specialized housing. The data shows that about 12% of the beneficiaries of all social housing programs are from the Roma and Egyptian community.