



SIXTH OPINION ON
HUNGARY

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

Adopted on 15 October 2025

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1. Hungary maintains a strong commitment to supporting its 13 recognised national minorities (nationalities) through a solid legal framework and targeted policy measures, contributing to a generally respectful environment towards, and broad satisfaction among, these communities. This commitment is notably evident in the increased funding for national minority self-governments, which play a key role in implementing cultural initiatives and managing minority cultural and educational institutions. The scope of application of the Framework Convention, as applied by the Hungarian authorities, remains unchanged. The Advisory Committee stresses that this situation calls for more active dialogue with communities that have sought recognition and expressed interest in accessing rights under the Framework Convention.

2. While efforts to support minority cultures are commendable, the Advisory Committee observes that activities often focus on symbolic or folkloristic elements, resulting in a lack of public awareness about the presence and specific needs and interests of persons affiliating with national minorities. This is frequently attributed to a prevailing societal narrative that confines the expression of minority identities to the private sphere. More efforts are required to highlight the contributions of minority communities and persons affiliating with them as an integral part of Hungarian society. The Advisory Committee emphasises the important role of mainstream education and media in promoting and fostering mutual respect and intercultural dialogue.

Situation of persons belonging to the Roma minority

3. Roma continue to face significant structural challenges across various areas of life, including limited access to quality education, high unemployment, substandard housing, health disparities and persistent discrimination in both the public and private spheres. Although the authorities have adopted various policy measures aimed at promoting inclusion, these initiatives frequently remain insufficiently implemented, resulting in only limited tangible improvements on the ground. Antigypsyism is acknowledged as a factor contributing to the exclusion and segregation of Roma. However, combatting antigypsyism has not been treated as a distinct priority within the policy frameworks. The prevention and eradication of segregation of Roma pupils and students in education remains a systemic challenge across the country, and the Advisory Committee considers it a matter of a priority concern. Immediate and sustained action is needed to address these issues, reduce early school leaving, and ensure inclusive, quality education - particularly in segregated areas. In disadvantaged regions, stronger co-ordination between national and local policies is essential to provide lasting solutions to employment and housing challenges. Access to healthcare and social protection services likewise remains hindered by significant practical barriers, disproportionately affecting Roma women and children, whose needs and interests are often overlooked in mainstream policies. Addressing these complex challenges requires the development of robust, continuous, culturally-sensitive and gender-responsive channels of communication between relevant agencies, professionals and Roma communities.

Population census and data collection

4. The Advisory Committee noted issues regarding the methodology of the 2022 census, particularly concerns around the issue of anonymity. Moreover, concerns were raised about the proposed change to a register-based census in 2031, which could potentially affect the collection of data on ethnic, linguistic and religious affiliations. In this context, the Advisory Committee stresses the need to collect accurate and disaggregated equality data as a basis for the development of effective strategies to improve access to minority rights, enabling evidence-based policymaking and the measurement of progress. A dialogue is needed with representatives of national minorities ahead of the next census to ensure that the needs and interests of persons affiliating with national minorities are adequately addressed.

Anti-discrimination legal and institutional framework

5. The institutional framework for non-discrimination was reformed through a merger of the Equal Treatment Authority with the Office of the Commissioner for Fundamental Rights. The Advisory Committee notes that the current two-tier system is complex and poorly understood by the general public as well as by persons affiliating with national minorities. This complexity risks hampering their access to justice and impeding the achievement of full and effective equality for persons affiliating with national minorities, as it undermines a robust anti-discrimination framework with accessible and effective remedies.

Promotion of intercultural dialogue, mutual respect and understanding

6. Despite praiseworthy legal and policy safeguards for national minorities, and the notable support provided to people fleeing Ukraine following the Russian Federation's war of aggression, the Advisory Committee regrets that the overall number of measures promoting intercultural dialogue and mutual respect - essential to enhancing interaction between different communities and persons affiliating with them - remains limited. The Advisory Committee is particularly concerned with the worrying pattern of exclusionary rhetoric in public discourse, including by politicians and public figures, during the monitoring period, targeting several groups, including Roma. Such negative statements, especially when made by prominent political figures, are harmful to intercultural dialogue and mutual respect. Urgent and decisive measures are needed to promote intercultural dialogue and foster a spirit of tolerance and mutual respect. Effectively combating all forms of discrimination, hate crime and hate speech is essential to achieve this goal.

Language rights

7. While Hungary's solid legal framework supporting the use of minority languages in the public sphere is widely acknowledged, these rights are rarely exercised in practice. This is largely due to widespread fluency in Hungarian and assumptions about its universal use, especially amongst territorially dispersed minorities. The persistent shortage of qualified teachers and the limited public visibility of minority languages are key factors contributing to the declining interest in minority language education among younger generations.

Effective participation in public affairs and decision-making processes

8. There is limited co-operation between national and local minority self-governments, as well as challenges experienced by local minority self-governments in ensuring effective co-operation and synergies with local authorities. In addition, while the preferential quota and the institution of "nationality advocates" in the national parliament are generally welcomed by national minority representatives, the current system of their political representation in the national parliament is not satisfactory. The Advisory Committee considers that the current national minority voting system does not allow persons affiliating with national minorities, in particular numerically smaller ones, to enjoy full access to the right of effective participation in decision-making procedures and elected bodies. Therefore, there is a need to assess the system through full and effective consultation with national minority representatives.

PRIORITY RECOMMENDATIONS

9. The Advisory Committee proposes that the Committee of Ministers make the following recommendations with respect to the implementation of the Framework Convention by Hungary.

10. The authorities should take the following priority measures to improve further the implementation of the Framework Convention, along with the implementation of all recommendations contained in this Opinion:

Priority recommendations

- 1) The Advisory Committee urges the authorities to take all necessary measures to promote a spirit of tolerance, intercultural dialogue, mutual respect and understanding among all persons living on the territory of Hungary and to refrain from, and promptly and unequivocally condemn, all incidents of hate speech, in particular by political leaders and public figures (see paragraph 79, Article 6).
- 2) The Advisory Committee urges the authorities, in close co-operation with parents and Roma minority representatives including women, to put in place measures to end school segregation, by adopting a comprehensive desegregation policy with clear targets, sufficient resources, precise timetables and a monitoring mechanism for its implementation (see paragraph 133, Article 12).
- 3) The Advisory Committee reiterates its previous recommendations and calls upon the authorities, in consultation with those concerned, to consider the possibility of applying provisions of the Framework Convention to persons affiliating with communities currently not afforded the protection provided by the Act on the Rights of Nationalities, in particular with regard to their language and cultural rights. The authorities should consider applying a pragmatic approach, in close consultation with persons affiliating with communities interested in accessing minority rights on an article-by-article basis, as to which rights should be made available to whom, in order to ensure the most effective implementation of the Framework Convention (see paragraph 24, Article 3).
- 4) The Advisory Committee calls on the authorities to increase their efforts to raise awareness on the remedies and support structures available in cases of discrimination, in particular among persons affiliating with national minorities most exposed to such practices (see paragraph 46, Article 4).
- 5) The Advisory Committee calls on the authorities to ensure the effective implementation of the Hungarian National Social Inclusion Strategy 2030 at all levels and to strengthen Roma-related policies beyond the scope of poverty reduction through close co-operation with and enhanced co-ordination among all the relevant actors, including a diverse range of Roma representatives, especially at local level (see paragraph 56, Article 4).
- 6) The Advisory Committee calls on the authorities to enhance the capacity of law enforcement agencies to effectively identify and address hate crime by providing more targeted and practical training on the 2019 Hate Crime Protocol and to effectively prevent and combat ethnic profiling (see paragraph 90, Article 6).
- 7) The Advisory Committee reiterates its previous call on the authorities to develop a comprehensive plan to promote the use of minority languages in the public sphere, ensuring the effective participation of organisations representing persons belonging to national minorities (see paragraph 105, Article 10).
- 8) The Advisory Committee calls on the authorities to assess the current situation regarding the access of Roma to quality education and implement long-term sustainable measures, in co-operation with Roma representatives, schools, parents and students, to improve their access to such education (see paragraph 134, Article 12).
- 9) The Advisory Committee calls on the authorities to conduct a comprehensive assessment of the impact of employment-related measures under the Hungarian National Social Inclusion Strategy 2030 on the economic empowerment of Roma. Further efforts should be made to improve employment outcomes for Roma - particularly in the most disadvantaged regions - and to further strengthen targeted policies for Roma women and youth (see paragraph 160, Article 15).
- 10) The Advisory Committee reiterates its previous calls on the authorities to ensure that the right of Roma children not to be removed from their families for material reasons is effectively respected; to duly investigate the reasons for their disproportionate presence within the care system; to effectively remedy the situation; to ensure that the principle of the best interests of the child is

consistently upheld; and to provide support measures to families at risk of having their children removed with a view to improving their living conditions (see paragraph 169, Article 15).

Other recommendations

11. The authorities are invited to take account of the detailed observations and recommendations contained in the present Opinion of the Advisory Committee.

Follow-up to these recommendations

12. The Advisory Committee encourages the authorities to translate and publish the present Opinion into the official and minority languages and disseminate its findings and recommendations widely among all stakeholders.

13. Furthermore, the Advisory Committee encourages the authorities to organise a follow-up event after the publication of this sixth cycle Opinion to discuss and identify ways of implementing the recommendations made in this Opinion.

MONITORING PROCEDURE

Follow-up activities and awareness-raising related to the recommendations of the Fifth Opinion of the Advisory Committee

14. No round table to follow up on the recommendations of the Fifth Opinion of the Advisory Committee took place. The Opinion and Committee of Ministers Resolution were neither translated into Hungarian or national minority languages nor published on the respective government websites.¹

Preparation of the state report for the sixth cycle

15. The sixth state report was received on 31 August 2023, six months after the due date of 1 March 2023. Organisations representing and promoting the rights of persons belonging to national minorities were consulted in its preparation.² Some gender-related aspects of minority rights were addressed throughout the report, but not in a specific manner as requested in the outline of the sixth cycle state reports.³

Country visit and adoption of the Sixth Opinion

16. This sixth cycle Opinion on the implementation of the Framework Convention by Hungary 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 sixth state report, other written sources, as well as information obtained by the Advisory Committee from governmental and non-governmental sources during its visit to Budapest, Pécs, Alsószentmárton and Nyíregyháza from 2 to 6 December 2024.

17. The Advisory Committee expresses its gratitude to the authorities for their constructive 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 2 July 2025, was transmitted to the Hungarian authorities on 11 July 2025 for observations, according to Rule 37 of Resolution (2019)49. The Advisory Committee welcomes the observations received from the Hungarian authorities on 15 September 2025.

* * *

18. 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. The Advisory Committee assesses the situation in the light of the circumstances prevailing at the time of monitoring.

¹ Information on the Framework Convention and Hungary's sixth state report is, however, published on the [website of the Government](#).

² See [sixth state report](#), p. 6.

³ See [outline](#) for the sixth cycle reports, general guideline 7.

ARTICLE-BY-ARTICLE FINDINGS

Personal scope of application (Article 3)

19. The territorial and personal scope of application of the Framework Convention by Hungary has remained unchanged. As explained in detail in previous Opinions,⁴ the Hungarian authorities continue to apply the Framework Convention to 13 recognised national minorities (Armenians, Bulgarians, Croats, Germans, Greeks, Poles, Roma, Romanians, Rusyns, Serbs, Slovaks, Slovenes and Ukrainians), which are considered as “nationalities”⁵ within the scope of Act CLXXIX on the Rights of Nationalities (Act on the Rights of Nationalities).⁶ The Advisory Committee notes that the citizenship criterion has been maintained⁷ and that the procedure⁸ for recognising “nationalities” has not changed, despite its previous recommendations.⁹

20. The authorities informed the Advisory Committee that, during the monitoring period, Ciganos, Scythians and Vietnamese had expressed their wish for legal recognition under Act CLXXIX and submitted applications to this effect. While the application of the Ciganos failed because it lacked the required number of signatures, the application of the Scythians and Vietnamese was considered (in 2023 and 2024 respectively) but rejected by the Hungarian Parliament (in 2023 and 2025).¹⁰ In all these cases, the Hungarian Academy of Sciences, whose opinion is sought by the Hungarian Parliament before any vote on recognition, did not support the recognition of these communities. Regarding the Bunjevac community, which is not officially recognised as a national minority, the authorities stated that it receives support, including through the Bunjevac Tradition House in Bajaszentistván, which serves as a museum exhibition space of public interest.¹¹

21. During its visit, the Advisory Committee met with persons affiliating with the Bunjevac community, whose applications for legal recognition as a national minority were rejected in 2006 and 2011, respectively.¹² The representatives reiterated their concerns about the lack of recognition of their linguistic and cultural identity as being distinct from that of the Croats. They also expressed dissatisfaction with their continued classification by the authorities as part of the Croat minority, as well as the absence of targeted measures aimed at fostering the protection and preservation of their language, culture and identity, despite previous recommendations by the Advisory Committee.¹³ Additionally, the representatives of the Bunjevac community voiced frustration over their inability to access funds allocated to national minorities, as these are contingent on legal recognition, and argued that this hinders the expression of their identity, puts them at risk of assimilation and contributes to their marginalisation in society.

22. While referring to its extensive analysis of the scope of application in its Fifth Opinion¹⁴ and the cardinal importance of the right to free self-identification, as provided by Article 3 of the Framework Convention,¹⁵ the Advisory Committee reiterates that the Framework Convention was designed as a living instrument, to be implemented in diverse social, cultural and economic contexts and adjusted to changing situations. In order for it to be applied to a group of persons, they do not necessarily need to be formally recognised as a national minority, the term does not need to be defined, nor should they have a specific legal status. Furthermore, official recognition as a national minority or the granting of a

⁴ ACFC [Fourth Opinion on Hungary](#), paras. 16-19; ACFC [Fifth Opinion on Hungary](#), para. 31.

⁵ The Advisory Committee, when referring to a specific provision of Hungarian legislation, or when quoting directly from government sources will use the term “nationalities”. In all other contexts, in particular when generally referring to minority rights, it will use the terminology of the Framework Convention and refer to “national minorities” or persons affiliating with them.

⁶ Article 1 of the [Act on the Rights of Nationalities](#) defines “nationalities” as “ethnic groups resident in Hungary for at least one century, who are in a numerical minority amongst the population of the State, are distinguished from the rest of the population by their own language, culture and traditions and manifest a sense of cohesion that is aimed at the preservation of these and at the expression and protection of the interests of their historically established communities are considered national minorities”.

⁷ ACFC [Fourth Opinion on Hungary](#), para. 22; ACFC [Fifth Opinion on Hungary](#), para. 40.

⁸ Pursuant to Section 148 of the [Act on the Rights of Nationalities](#), if members of a non-recognised minority wish to “verify that they meet the relevant conditions” to have their minority recognised, a minimum of 1 000 Hungarian citizens, entitled to vote and be voted for in the elections for local government representatives and mayors and declaring themselves as affiliating with the national minority concerned, may send a request to the National Election Committee. The latter shall then seek the opinion of the President of the Hungarian Academy of Sciences, before the National Assembly votes on the request. No repeat application may be submitted within one year of the date of a rejection by the National Assembly.

⁹ ACFC [Fifth Opinion on Hungary](#), para. 32.

¹⁰ For an overview of the requests made for recognition, see Balázs Dobos (2024), [The question of recognising new minorities in Hungary](#), *Hungarian Journal of Legal Studies*, 65(4), pp. 432-453. See also the [decision](#) on the application of the Vietnamese (19 March 2025).

¹¹ See [sixth state report](#), p. 61.

¹² ACFC [Fifth Opinion on Hungary](#), paras. 33 and 39.

¹³ ACFC [Fifth Opinion on Hungary](#), para. 42.

¹⁴ ACFC [Fifth Opinion on Hungary](#), paras. 34-40.

¹⁵ ACFC [Thematic Commentary No. 4](#) (2016), 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, paras. 9-11. See also *Molla Sali v. Greece*, [GC], (Application no. [20452/14](#)), 19 December 2018.

specific status does neither constitute the beginning of the process of minority rights protection, nor is it essential for the application of the Framework Convention and its specific articles. Recognition as a national minority has a declaratory rather than a constitutive character. Access to minority rights should therefore not depend on formal recognition.¹⁶ The Advisory Committee has always welcomed a pragmatic approach that *de facto* broadens the scope of application of the Framework Convention. In this context, when examining the scope of application of the Framework Convention, the Advisory Committee has consistently encouraged 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 mutual understanding, where cultural diversity is viewed as a source of enrichment rather than division.¹⁷

23. In this light, the Advisory Committee considers that a flexible, open and constructive approach to the scope of application of the Framework Convention is necessary. In this context, establishing regular dialogue with persons having expressed an interest in the protection afforded by the Framework Convention is essential.

Recommendation

24. The Advisory Committee reiterates its previous recommendations and calls upon the authorities, in consultation with those concerned, to consider the possibility of applying provisions of the Framework Convention to persons affiliating with communities currently not afforded the protection provided by the Act on the Rights of Nationalities, in particular with regard to their language and cultural rights. The authorities should consider applying a pragmatic approach, in close consultation with persons affiliating with communities interested in accessing minority rights, on an article-by-article basis, as to which rights should be made available to whom in order to ensure the most effective implementation of the Framework Convention.

Population census (Article 3)

25. The census of population, households and dwellings was carried out in 2022, after a one-year delay due to the Covid-19 pandemic. According to the census results,¹⁸ of the 9 603 634 interviewees, 502 916 persons identified themselves as belonging to a recognised national minority, which is a decrease of almost 22% from the 2011 census, when this number was 644 524. The breakdown by national minority was as follows: Armenian (4 199), Bulgarian (6 109), Croat (21 824), German (142 551), Greek (6 178), Polish (7 398), Roma (209 909), Romanian (27 554); Rusyn (7 111), Serb (11 622), Slovak (29 881), Slovene (3 965) and Ukrainian (24 615).¹⁹ There was also a possibility to declare multiple affiliations. However, the relevant data has not been published and can be received upon request to the Central Statistical Office.

26. The total number of persons affiliating with six minorities (Bulgarian, Croat, German, Roma, Romanian and Slovak) decreased compared to the 2011 census data, while the number of persons affiliating with seven minorities increased (Greek, Armenian, Polish, Rusyn, Serb, Slovene and Ukrainian). The reasons for the change in numbers vary between different national minorities depending on their individual context, with interlocutors citing for instance an ageing population, a general reluctance to self-identify and emigration as factors leading to a decrease. In the particular case of Rusyns and Ukrainians, whose numbers have tripled, the increase was attributed to the arrival of persons fleeing the war of aggression by the Russian Federation against Ukraine.

27. The Deputy Commissioner for Fundamental Rights responsible for protecting the rights of nationalities living in Hungary ("the Deputy Commissioner") collaborated closely with the Central Statistical Office and the national self-governments of national minorities in the run-up to the 2022 census and was involved in several initiatives. These included participation in a series of regular consultations and contributing to the development of the government decree outlining the tasks related to the census. Furthermore, they played a key role in the "Let Us Become a Community" campaign, encouraging citizens to declare their national minority identities.²⁰ The Advisory Committee particularly commends the General Comment issued by the Deputy Commissioner as early as April 2020, which served as guidance for stakeholders in designing the census questions and collecting data. This General Comment strongly emphasised the need for protection of personal data and the guarantee of

¹⁶ ACFC [Thematic Commentary No. 4](#) (2016), para. 28. In this context, the Advisory Committee draws the attention of the authorities to the fact that establishing a closed list of national minorities falling under the protection of the Framework Convention is not consistent with the right to individual free self-identification.

¹⁷ ACFC [Thematic Commentary No. 4](#) (2016), para. 7.

¹⁸ Hungarian Central Statistical Office [Census 2022](#).

¹⁹ [Report on the Activities of the Commissioner for Fundamental Rights of Hungary and his Deputies 2023](#), p. 33.

²⁰ [Report on the Activities of the Commissioner for Fundamental Rights of Hungary and his Deputies 2023](#), p. 32.

anonymity, especially with regard to “nationality” questions, in order to encourage honest and voluntary responses and to dispel concerns about potential misuse of data.²¹ The Advisory Committee understands that some national minorities, such as Germans and Slovaks, also organised awareness-raising campaigns among persons affiliating with their respective minorities before the census.

28. The census was conducted online and manually by interviewers. In the census questionnaire, which was available in all 13 recognised national minority languages as well as several others such as Boyash and Vietnamese,²² the questions on “nationality”, “mother tongue”, and “language used by family and friends” were optional and allowed for multiple responses. As well as listing the 13 recognised minorities and their languages, the questionnaire also included an open-ended “other” option, allowing interviewees to declare a different ethnic affiliation. The authorities informed the Advisory Committee that, on a trial basis, these questions had been moved to earlier parts of the questionnaire to increase the likelihood of a response. Pursuant to final data, 86% of the population answered the voluntary questions on “nationality”.²³ However, most national minority representatives expressed the view that the number of “mother tongue” declarations, especially among the younger population, has decreased,²⁴ as the use of minority languages is declining among many minorities (see Articles 10 and 14).

29. Interlocutors of the Advisory Committee generally expressed satisfaction with the conduct of the 2022 census. However, minority representatives reported widespread concerns about a possible lack of anonymity, because, unlike in previous censuses, respondents were required to provide their personal details on the form. The authorities explained that this change was necessary due to a shift in data methodology. The authorities also stressed that the entry of personal data is not linked to the identity of interviewees, nor can individual responses be traced back to specific individuals, and that all data has been and will continue to be strictly processed and protected in accordance with relevant national and international data protection laws.²⁵ In this regard, the authorities outlined their plans to adopt a new - “register-based census” methodology - for the next census in 2031.

30. Some interlocutors questioned the data’s accuracy, arguing that the actual number of persons belonging to their communities is higher than reported in the census results. They cited a reluctance to publicly self-identify due to a past history of stigmatisation, a lack of sufficient national minority interviewers - especially in Roma-populated areas - as well as some interviewers skipping the optional minority affiliation question. The digital divide mostly affecting disadvantaged communities, as well as low digital literacy among older generations - who often rely on (grand)children for replies - were also reported as factors contributing to the omission of voluntary questions. The authorities themselves acknowledged that the data might not be accurate but nevertheless insisted that the geographical distribution and population density of minorities often indicates the extent of any issues that need to be addressed.

31. Noting the planned change to a register-based census as from 2031, the Advisory Committee considers it important that disaggregated data on ethnic, linguistic and religious affiliations continues to be collected. Whilst acknowledging the increased efforts made to enhance the efficiency of the 2022 census, as recommended in the Fifth Opinion,²⁶ the Advisory Committee notes that changes in methodology regarding the entry of personal details on census forms have raised concerns among national minorities and that the authorities failed to provide reassurances on the overall anonymity of the census. This may have negatively impacted the willingness of persons belonging to national minorities to exercise their right to free self-identification. The Advisory Committee considers that the authorities should carefully review the rules governing the census in the light of the principles of informed consent, anonymity and clear information as to the purposes of processing,²⁷ and confidentiality, as also recommended by the United Nations Economic Commission for Europe (UNECE) Recommendations for the 2020 Censuses,²⁸ especially in view of the plans for a new census

²¹ Deputy Commissioner for Fundamental Rights responsible for the protection of the rights of national minorities in Hungary (Deputy Commissioner), General Comment No. 2/2020 on the issues related to nationality law concerning the preparation and implementation of the 2021 census (full text in [Hungarian](#); summary in [English](#)). See also [Newsletter of the Deputy Commissioner issue 2022/3](#). [Note by the Secretariat: Several institutional documents of the Deputy Commissioner, which are cited in this Opinion, were publicly available on its website as of the adoption date of this Opinion on 15 October 2025].

²² [The questionnaire – Census 2022](#) (see [English version](#)).

²³ [Census 2022: final data presented by HCSO – Census 2022](#)

²⁴ For instance, out of 142 551 persons who self-identified as German, only 28 473 of them declared German as “mother tongue”, while 66 491 of them indicated German as “language used by family and friends”.

²⁵ According to the authorities, this includes that individual data are kept strictly confidential and used exclusively for statistical purposes or for purposes mandated by applicable legislation.

²⁶ ACFC [Fifth Opinion on Hungary](#), paras. 45-54.

²⁷ ACFC [Thematic Commentary No. 4](#) (2016), paras. 18 and 66.

²⁸ UNECE (2015) Conference of European Statisticians, [Recommendations for the 2020 Censuses of Population and Housing](#), paras. 140-148.

methodology to be adopted in 2031. This could respond appropriately to perceived or potential erroneous interpretation and misuse of statistics.²⁹

32. Representatives of the Bunjevac community, on the other hand, argued that their data was again aggregated with Croats despite their explicit mention of “Bunjevac” under the “Other” option, although the authorities informed the Advisory Committee that there were 1 022 persons who self-identified as Bunjevci in the 2022 census. The number of persons self-identifying as Bunjevci is not available on the website of the Central Statistical Office but it can be received upon a request to this office.

33. The Advisory Committee reiterates its view that reliable information about the ethnic composition of the population is an essential condition for the implementation of effective policies and measures to protect minority rights, to contribute to the preservation, assertion and development of minority identities, and to address the needs and interests of persons belonging to national minorities, including intersectional aspects such as gender and age. Population statistics should be collected regularly and complemented with information gathered through independent qualitative and quantitative research,³⁰ particularly when concerns had been raised about results. Results should therefore be carefully analysed in consultation with minority representatives.³¹

34. The Advisory Committee also emphasises the key importance of census data, as the Act on the Rights of National Minorities ties the exercise of various minority rights, including the right to use the relevant minority language and to hold elections for the national minority self-governments, to the proportion and number of persons affiliating with national minorities registered during the census. In this context, the Advisory Committee notes the exchanges it had with several interlocutors on how the lack of accurate data on persons affiliating with national minorities, for example Roma, significantly impacts the quality of any strategic framework on access to minority rights and how the availability of such data is key to ensuring evidence-based policy making and the measurability of the actions taken. Against this background, the Advisory Committee considers that the comprehensive results of the census need to be analysed in close consultation with minority representatives. Such a joint analysis, combined with other disaggregated data collection, should serve as the basis for policy decisions regarding access to minority rights. In this respect, the Advisory Committee welcomes the in-depth research commissioned by the German National Minority Self-Government on demographic trends in their minority based on the census results in order to better understand their specific needs.³² The Advisory Committee considers that such research is warranted also for other national minorities.

Recommendations

35. The Advisory Committee asks the authorities to enter into a dialogue with the representatives of national minorities in advance of the 2031 census to discuss the most appropriate methodology and ensure the future census provides a safe and reliable space for persons affiliating with all national minorities.

36. The Advisory Committee asks the authorities to raise awareness of the need for reliable information for policy making and to collect additional disaggregated data, particularly in municipalities more densely populated by persons belonging to national minorities.

Anti-discrimination legal and institutional framework (Article 4)

37. The legal framework on promoting equality and combating discrimination remains covered by, *inter alia*, the Fundamental Law,³³ the Act on Equal Treatment and Promotion of Equal Opportunities (the Equal Treatment Act)³⁴ and the Civil Code.³⁵ As elaborated in the earlier Opinions of the Advisory Committee,³⁶ the Equal Treatment Act prohibits discrimination on the basis of an open-ended list of grounds that include national or ethnic origin, nationality, language and religion, which has since remained unchanged. Although neither multiple nor intersectional discrimination is explicitly defined by

²⁹ See UN Statistical Commission (2021), [Fundamental Principles of Official Statistics](#) (E/RES/2013/21) and [Principles Governing International Statistical Activities](#) and UNECE (2015) [Recommendations for the 2020 Censuses of Population and Housing](#), among others, good practices include establishing various communication channels (help desk function, user forum, social media, etc.) to report misuse and answer user requests for clarification.

³⁰ See ACFC [Thematic Commentary No. 3](#), The Language Rights of Persons Belonging to National Minorities under the Framework Convention, adopted on 24 May 2012, para. 19.

³¹ ACFC [Thematic Commentary No. 4](#) (2016), para. 18.

³² András Morauszki, Number and Composition of the German Minority in Hungary as Reflected in the 2022 Census Data Quick Report, 2025, available at <https://du.hu/aktuelles/volkszählung/analyse-der-daten-der-volkszaehlung-2022>.

³³ Article XV of the [Fundamental Law of Hungary](#).

³⁴ Article 8 of the [Act CXXV of 2003 on equal treatment and the promotion of equal opportunities](#).

³⁵ Section 2:43 of the [Act V of 2013 on the Civil Code](#).

³⁶ ACFC [Fourth Opinion on Hungary](#), para. 37; ACFC [Fifth Opinion on Hungary](#), para. 55.

law, the Advisory Committee understands that there have been cases, mostly concerning Roma women, where these forms of discrimination have been identified and subsequently sanctioned.³⁷

38. The institutional framework for non-discrimination changed considerably during the monitoring period. The Equal Treatment Authority (ETA), which had been functioning since February 2005 as the designated equality body for combating discrimination in all sectors and on all grounds, was abolished as a stand-alone institution and merged with the Office of the Commissioner for Fundamental Rights (CFR), which has been the national human rights institution (NHRI) in Hungary since 1 January 2021.³⁸ As a result, the Directorate General for Equal Treatment was set up as a separate unit³⁹ under the CFR in order to perform the tasks under the Equal Treatment Act. It now combines the functions of ombudsperson,⁴⁰ the NHRI and equality body of Hungary. The authorities informed the Advisory Committee that the institutional changes aimed to safeguard fundamental rights by unifying responsibilities under a single institutional framework. They strongly contested claims by interlocutors of the Advisory Committee and external reports⁴¹ that the merger had been ineffective, insisting that the process had been “seamless”.

39. Several interlocutors informed the Advisory Committee that this reform had not been preceded by any consultation, either with the institutions concerned or with other interested parties or at public level, and was done through an accelerated parliamentary procedure during the ongoing “state of danger”.⁴² The legal amendments concerning the merger, as well as the process itself, have been the subject of extensive analysis and recommendations by other international bodies, including the Council of Europe’s Commissioner for Human Rights,⁴³ the European Commission for Democracy through Law (Venice Commission)⁴⁴ and the European Commission against Racism and Intolerance (ECRI).⁴⁵ During the same period, the Global Alliance of National Human Rights Institutions (GANHRI) first highlighted in June 2021, among other things, that “[...] the CFR has not effectively engaged on and publicly addressed all human rights issues, including in relation to vulnerable groups such as ethnic minorities [...]”,⁴⁶ which ultimately led to the CFR being downgraded from A to B status as a national human rights institution in March 2022 for lack of functional independence.⁴⁷

40. The CFR can engage in two distinct types of proceedings, each with different procedures and outcomes. Complaints under the Equal Treatment Act follow an administrative process with clear deadlines, allowing for binding sanctions and judicial review. Conversely, proceedings under the CFR Act lack set timelines and do not result in binding decisions. Complainants may choose which procedure to pursue (either under the Equal Treatment Act or the CFR Act). If no preference is indicated, or if both laws are cited, the CFR applies the Equal Treatment Act.⁴⁸ In cases concerning the rights of persons affiliating with national minorities, the CFR relies on the recommendation of the Deputy Commissioner, whose mandate has remained unchanged.

41. According to the information received from the CFR, there were 994 complaints received by the ETA in 2020. Its successor, the ETDG, dealt with 462 cases in 2021, 463 in 2022, 490 in 2023, and 449 in 2024, including cases carried over from previous years, which is a significant decrease compared to the period before the merger. The figures reported by civil society organisations for the same period are slightly different: while the number of cases for 2020 is the same (994), it falls to 351, 355 and 368

³⁷ See EELN Report (2024), [Country report non-discrimination – Hungary](#), pp. 20-21 and EELN Report (2024), [Country report gender equality](#) – Hungary, pp. 15-16.

³⁸ For the mandate, structure and competences of the CFR, see ACFC [Fourth Opinion on Hungary](#), paras. 42-45.

³⁹ During the visit of the Advisory Committee, the ETDG had almost the same number of staff as at the time of the merger (nine case lawyers), and to the best of the Advisory Committee’s knowledge, no director or deputy director has yet been appointed to lead this strand of the CFR’s work - the General Secretary of the CFR fulfils the functions of this post.

⁴⁰ The Commissioner is elected by the Parliament and has two elected deputies: Deputy Commissioner for Fundamental Rights responsible for the protection of the rights of nationalities living in Hungary and Deputy Commissioner for Fundamental Rights responsible for the Rights of Future Generations. In 2020, the Independent Police Complaints Board was also merged into the CFR.

⁴¹ Information collected during the visit. See also [ECRI’s Sixth Report on Hungary](#) (2023), para. 5

⁴² See [ECRI’s Sixth Report on Hungary](#) (2023), para. 31; EELN Report (2024), [Country report non-discrimination – Hungary](#), p. 94; Hungarian Helsinki Committee and Hätter Society (2024), [The Last Piece of the Puzzle? Assessing the Performance of Hungary’s National Human Rights Institution](#), pp. 20-21. The Advisory Committee notes that the “state of danger” was first declared during the Covid-19 pandemic (and then due to the war of aggression against Ukraine by the Russian Federation) and has been prolonged since then. This allows the Hungarian Government to issue decrees and override laws without the regular parliamentary procedures. See Bloomberg (4 November 2024), [Hungarian Parliament Votes to Extend Orban’s Rule by Decree for 6 Months - Bloomberg](#).

⁴³ Council of Europe (CoE), Commissioner for Human Rights (20 November 2020), [Commissioner urges Hungary’s Parliament to postpone the vote on draft bills that, if adopted, will have far-reaching adverse effects on human rights in the country](#).

⁴⁴ Council of Europe (CoE), Venice Commission, [Opinion](#) on the amendments to the Act on Equal Treatment and Promotion of Equal Opportunities and to the Act on the Commissioner for Fundamental Rights as adopted by the Hungarian parliament in December 2020, adopted on 15-16 October 2021, Opinion No.1051/2021, CDL-AD(2021)034.

⁴⁵ [ECRI’s Sixth Report on Hungary](#) (2023), paras.1-7.

⁴⁶ GANHRI Sub-Committee on Accreditation Report – [June 2021](#), p. 13.

⁴⁷ GANHRI Status Accreditation Chart – [April 2022](#).

⁴⁸ EELN Report (2024), [Country report non-discrimination – Hungary](#), p. 105.

in 2021-2023, respectively.⁴⁹ This disparity can largely be attributed to the differences in case management and statistical systems, which make it impossible to compare data before and after the merger of the ETA, as the representatives of the CFR also pointed out. In this context, the lack of a user-friendly database facilitating the breakdown of cases (and their outcomes) by protected characteristic under the Equal Treatment Act, which was available prior to the merger, was a recurring issue that interlocutors brought to the attention of the Advisory Committee during its visit.⁵⁰ Nevertheless, the Advisory Committee was informed by the CFR that most of the equal treatment complaints are related to disability, motherhood and pregnancy.

42. During the monitoring period, the Deputy Commissioner received an average of 400 complaints from persons belonging to national minorities and their organisations per year. The number of complaints handled by the Deputy Commissioner in 2021 was 391, 315 in 2022 and 253 in 2024,⁵¹ the vast majority of which related to Roma, as also illustrated under different articles of this Opinion. For instance, in 2023, of the 325 complaints and *ex officio* cases (cases initiated by the Deputy Commissioner) handled, 224 concerned Roma, 12 Germans, eight Ukrainians, five Croats, three Serbs, two Romanians, two Slovenes, two Rusyns, two Poles, two Bulgarians, one Greek, one Armenian, while 58 complaints concerned several or all of the 13 national minorities.⁵² These cases were primarily in the areas of education, housing, hate speech and hate crimes and the rights of national minority self-governments. The Advisory Committee's interlocutors have expressed their satisfaction with the reliable and constructive dialogue they have with the Deputy Commissioner's Office and praised its genuine efforts to protect and promote their rights.

43. The Deputy Commissioner has continued to play a proactive role in proposing concrete measures to address certain systemic problems through other operational instruments, in particular its so-called "General Comments", on issues such as cultural autonomy (see Articles 5 and 9), the inclusion of Roma history in school curricula and teaching materials (see Article 12), the educational segregation of the Roma children (see Article 12) and the investigation of hate demonstrations (see Article 6),⁵³ which the Advisory Committee commends. However, the Advisory Committee understands that the financial and human resources available to the Deputy Commissioner, whose budget is earmarked in the general budget of the CFR, are limited, with nine staff members currently working on cases related to minority rights. The limited resources have a particularly negative impact on the Deputy Commissioner's ability to carry out field visits, which are essential to identify systematic problems faced by persons belonging to national minorities.

44. The Advisory Committee reiterates that full and effective equality of persons belonging to national minorities requires a functioning anti-discrimination framework with institutions that have competencies to effectively support victims in achieving legal remedy. The Advisory Committee is concerned about the current two-tier system of remedies available to victims of discrimination, as well as the procedures for allocation of cases between the ETDG and the Deputy Commissioner, which are cumbersome and seemingly opaque for the general public,⁵⁴ particularly in view of the lack of a common case-law database accessible to both the ETDG and the Deputy Commissioner, that would facilitate the handling and review of cases under these two available systems. The Advisory Committee considers that this system undermines the efforts made in the past to provide equal protection to victims of discrimination. Furthermore, during its exchanges with minority interlocutors, the Advisory Committee observed that they have a limited awareness of the discretionary power of victims to choose the mode of proceedings (under the Equal Treatment Act or the CFR Act) and related modalities, which does not create a level playing field, as evidenced by the decreasing number of cases at the ETDG since the merger.

45. The Advisory Committee also reiterates that equality bodies should be able to proactively exercise all their functions and competences with a real impact and should be provided with sufficient staff and funds to do so.⁵⁵ Regional outreach initiatives by the equality bodies to ensure greater visibility and regular presence among communities exposed to discrimination and intolerance throughout the country are particularly important. The Advisory Committee further underlines the importance of awareness-

⁴⁹ See also Hungarian Helsinki Committee and Hátter Society (2024), [The Last Piece of the Puzzle? Assessing the Performance of Hungary's National Human Rights Institution](#), pp. 25-26; Minority Rights Group (2022), [Jelentés: Az egyenlőségbe vetett bizalom megerősítése: A romák igazságszolgáltatáshoz való hozzáféréseinek fejlesztése Magyarországon és Szerbiában](#) (Strengthening trust in equality: Improving access to justice for Roma in Hungary and Serbia), pp. 17-19.

⁵⁰ See also the submission by the Working Group Against Hate Crimes in Hungary to the Advisory Committee on 28 October 2024.

⁵¹ [Newsletter of the Deputy Commissioner](#) issues [2021/4](#), [2023/1](#) and [2024/4](#).

⁵² Deputy Commissioner for Human Rights, [Info sheet](#) (2023). Roma made nearly 69% of the cases in 2023. See [Report on the Activities of the Commissioner for Fundamental Rights of Hungary and his Deputies, 2023](#), p. 30.

⁵³ Available in [Reports and General Comments - NJBH-EN - AJBH](#).

⁵⁴ See similar considerations based on interviews with staff of the ETDG, in Hungarian Helsinki Committee and Hátter Society (2024), [The Last Piece of the Puzzle? Assessing the Performance of Hungary's National Human Rights Institution](#), p. 28.

⁵⁵ See European Commission against Racism and Intolerance (2017), [ECRI General Policy Recommendation No. 2: Equality bodies to combat racism and intolerance at national level](#), paras. 12 and 28.

raising among persons belonging to minorities in general, and amongst those minorities most exposed to discrimination, such as the Roma, on the legal remedies available to individuals experiencing discrimination. In this regard, while the Advisory Committee welcomes the opening of six regional CFR offices⁵⁶ in 2022, it regrets that no information campaign has yet been organised for the general public to explain the extent of the changes in the anti-discrimination institutional framework and what this means in practice. Such awareness-raising measures, which should include easily accessible online services, are imperative to make the legal and institutional anti-discrimination framework more accessible for persons affiliating with minorities, especially those in a vulnerable situation who are reluctant to approach these bodies or are in need of legal assistance to address their respective concerns. The Advisory Committee considers that such efforts could also help to overcome the apparent mistrust among some parts of the population, including persons belonging to national minorities as well as civil society organisations, towards the recent changes and the perception that this reorganisation of the institutional framework has significantly reduced the level of protection against discrimination in Hungary.⁵⁷

Recommendations

46. The Advisory Committee calls on the authorities to increase their efforts to raise awareness on the remedies and support structures available in cases of discrimination, in particular among persons affiliating with national minorities most exposed to such practices. Promotion of the remedies available, such as through a publicly accessible comprehensive case law database and guidance notes on procedure and outreach, should be made available to the wider public and to those who would seek remedies before these bodies, including in minority languages.

47. The Advisory Committee strongly encourages the authorities to provide the Deputy Commissioner for Fundamental Rights responsible for the protection of the rights of nationalities living in Hungary and the Directorate General for Equal Treatment with sufficient financial and human resources to enable them to carry out their mandates efficiently. Effective channels of communication between these two bodies should be developed for the efficient handling of cases of discrimination.

Promotion of effective equality for Roma (Article 4)

48. The Hungarian authorities have continued to make significant efforts to improve the effective equality and inclusion of Roma through its Hungarian National Social Inclusion Strategies (HNSISs). The Advisory Committee notes that social inclusion is broadly defined in Hungarian policy-making as a process focused primarily on poverty reduction and that the HNSIS is therefore not a Roma-specific strategy but rather highlights the situation of the Roma while also taking into account other groups experiencing poverty. According to data published by the Hungarian Central Statistics Office (HCSO), in 2023, the share of people at risk of poverty or social exclusion among the Roma population was 58.3%, compared to 19.1% for the non-Roma population.⁵⁸ In 2021, it was 66.6% compared to 17.1%.⁵⁹

49. The evaluation of the HNSIS (2014-2020) was carried out in 2021.⁶⁰ While the report noted improvements in the strategy's key indicators (income poverty, material deprivation and low work intensity), it expressed doubts about the achievement of the social inclusion objectives, particularly in some key areas, such as education and housing. Shortcomings in local involvement and in monitoring that lacked clear outcome indicators were also highlighted. The Advisory Committee notes that in 2019 the Ministry of the Interior became the national authority in charge of Roma social inclusion while all the other 12 minorities remain under the umbrella of the Prime Minister's Office (having previously been under the now abolished Ministry of Human Capacities). Several Roma interlocutors implied that this decision had not been discussed with them nor its consequences properly assessed. In their view, it was perceived by many in the community as treating Roma as a 'security' issue rather than an 'equality, diversity and inclusion' issue. The Advisory Committee reiterates that mainstreaming of equality in the implementation of policy measures is of paramount importance in the realisation of the fundamental rights of Roma.

⁵⁶ In Győr, Szeged, Debrecen, Székesfehérvár, Miskolc and Pécs. Based on the information provided by the CFR, 151 of the cases of those lodged before the Regional Offices in 2022 and 143 in 2023 were registered as cases subject to the procedure under the Equal Treatment Act. Nevertheless, several interlocutors informed the Advisory Committee during its visit about the impact of the end of the ETA's network of equal treatment consultants, which was available in 19 counties across the country, and about how effective it had been in providing support and legal assistance to victims of discrimination.

⁵⁷ EELN (13 October 2021), [Flash report - The Sub-Committee on Accreditation of the Global Alliance of National Human Rights Institutions recommends that Hungary's Ombudsman be downgraded to B status due to lack of functional independence](#).

⁵⁸ Hungarian Statistical Office (KSH) [5.1.1.2. People at risk of poverty or social exclusion by sex, age, educational attainment level, income quintile, most frequent activity status, household type \(EU2030 target\)](#).

⁵⁹ See [sixth state report](#), p. 58.

⁶⁰ Kopint-Tárki Institute for Economic Research (2020), [Evaluation of the implementation of the Hungarian National Social Inclusion Strategy](#) (Executive Summary in English). This report was shared with the former Ministry for Innovation and Technology that oversaw the implementation of the HNSIS after being drawn up.

50. The latest HNSIS 2030, covering the period 2021-2030,⁶¹ was adopted in August 2021, together with the first Action Plan for its implementation (2021-2024).⁶² This new strategy builds on the previously identified nine areas of intervention, including education, employment, healthcare, housing, and Roma identity and community building.⁶³ The main objective remains to reduce poverty and to narrow the gap between the Roma and non-Roma population in terms of key indicators of poverty and social mobility.⁶⁴ The document also integrates the national sub-strategies that are key to social inclusion, such as the “Be Better for Children”⁶⁵ strategy and the “Catching-up Settlements (FETE)”⁶⁶ programme (see Article 15), covering the 300 most disadvantaged settlements in the country, which is designed to support the social inclusion of people living in these settlements and is a priority area of action. Particular emphasis is placed on interventions at regional and municipal level. The Advisory Committee notes positively the prominence given to Roma children and youth, mental health and climate change in these strategies.

51. According to the 2022 Civil Society Monitoring Report on the quality of the “National Strategy for the Equality, Inclusion and Participation of Roma (2020-2030)”⁶⁷, about 150 organisations joined initial consultations, with around 40 providing feedback on the draft. While the National Roma Contact Point⁶⁸ claimed that many of these suggestions had been taken on board, several Roma organisations raised concerns about the diversity of views expressed⁶⁹ and the representativeness of those consulted, although the Roma Platform, the Roma Co-ordination Council and the Roma National Self-Government were included.⁷⁰ In addition, it was reported that the consultation period was extremely short⁷¹ and that the guidelines were unclear, making it difficult to provide meaningful input, leading many Roma interlocutors to feel that the whole process was not truly participatory. Strengthening the transparency and inclusiveness of co-operation with all relevant stakeholders is imperative to ensure the broadest possible participation by the Roma.

52. The current HNSIS 2030 has been criticised for being fragmented and lacking a systematic and horizontal approach, clear timeframes and measurable indicators of success.⁷² The Advisory Committee is particularly concerned that most measures do not specify sources of funding, which renders it difficult to assess the financing available for Roma inclusion initiatives. The majority of the allocated budget primarily supports project-based activities, often through tenders, the allocation of which does not always reflect the diversity of civil society organisations.⁷³ According to interlocutors, as with previous iterations of the HNSIS, this project-based approach fails to ensure long-term sustainability and results in fragmented and ineffective social inclusion efforts.⁷⁴ These issues need to be addressed in the second HNSIS Action Plan, which is to be finalised in 2025.

53. With regard to the principle of full and effective equality, the Advisory Committee regrets that Roma continue to be discriminated against in almost all areas of life. As also acknowledged by the authorities, Roma remain the “poorest of the poor” in society,⁷⁵ facing stigma and numerous socio-economic

⁶¹ [Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030](#) (available in Hungarian only). EU Framework for National Roma Integration Strategies underpins this document.

⁶² [1619/2021. \(IX. 3.\) Korm. határozat - Nemzeti Jogszabálytár](#) (available in Hungarian only). The authorities informed the Advisory Committee that there has not yet been an evaluation of the First Action Plan.

⁶³ These intervention areas are as follows: 1. Birth and childhood; 2. Public education, vocational training, higher education - from nursery to university; 3. Youth affairs, childbearing, family formation, lifestyle; 4. Employment, work, adult education, social economy; 5. Territorial inequalities, urban development - housing and energy poverty - environmental awareness and protection; 6. Physical and mental health, health care; 7. Roma identity, community building, awareness raising, rights enforcement; 8. Institutional framework, national and Carpathian Basin partnership; 9. Monitoring and follow-up of the Strategy.

⁶⁴ [Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030](#), pp. 5-6. The key HNSIS 2030 indicator is the ratio of people in social and material deprivation, with a goal to reduce it by 10% among households with children, especially Roma families, by 2030.

⁶⁵ [Be Better for Children! National Strategy 2007-2032](#) (available in Hungarian only).

⁶⁶ [Felzárkózó települések program](#). A flagship project of the Hungarian authorities, FETE covers the 300 most disadvantaged settlements in the country, selected on the basis of poverty indicators, and is home to 298 000 people, mostly Roma families.

⁶⁷ See [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#)

⁶⁸ The Deputy State Secretariat for Social Inclusion of the Ministry of Interior is the National Roma Contact Point.

⁶⁹ Rác Béla (17 December 2024), [Beszélhetünk itt roma egyenjogúságról?](#) (Can we talk about Roma equality here?).

⁷⁰ Referring to the possible political interests of some of the local, as well as the national minority Roma self-governments, several Roma interlocutors expressed to the Advisory Committee their concerns about inclusiveness of these bodies and their motivation to level up and empower Roma communities. See also Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 15.

⁷¹ The Ministry of Interior launched the consultation on the Strategy on 7 December 2020 with a deadline for submissions on 5 January 2021, coinciding with the holiday period. See Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 12.

⁷² See also [ECRI's Sixth Report on Hungary](#) (2023), para. 73.

⁷³ Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 40.

⁷⁴ Kopint-Tárki Institute for Economic Research (2020), [Evaluation of the implementation of the Hungarian National Social Inclusion Strategy](#) (Executive Summary in English), p. 7.

⁷⁵ Although the official Roma population is 209 909 based on 2022 census, it is estimated to be much higher, with some research suggesting a figure of 876 000. See Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 8.

barriers that severely limit their access to rights (see Article 15). In the 2023 EU Barometer, the highest level of perceived discrimination was reported against the Roma, at 74%.⁷⁶ Experiences of discrimination in employment doubled in recent years, 26% in 2021 compared to 13% in 2016.⁷⁷ A significant pattern of discrimination is observed in education and segregation remains a matter of grave concern (see Article 12). In this respect, the Advisory Committee is concerned that while the HNSIS 2030 acknowledges that antigypsyism contributes to Roma exclusion and segregation, it does not define combating antigypsyism as a policy objective.⁷⁸

54. The Advisory Committee reaffirms its view that in order to achieve full and effective equality, states parties to the Framework Convention need to undertake special measures to overcome structural disadvantages between persons affiliating with minorities and the majority in all spheres of life. These must be developed and implemented in close consultation with those affected and their design must take due account of the specific conditions of the persons concerned.⁷⁹

55. Despite the general lack of disaggregated equality data across the country, the collection of which was also strongly opposed by the authorities during the visit, the Advisory Committee understands that the Hungarian Central Statistics Office includes a question on Roma identity in major household surveys (e.g. EU-SILC, Labour survey) which allows for a breakdown of key social indicators by Roma/non-Roma status.⁸⁰ Similarly, administrative data is, at times, collected on the basis of third party identification (TPI), as used in schools to identify Roma pupils⁸¹ in order to combat segregation (see Article 12). In this context, the Advisory Committee stresses the need for the regular collection of reliable and disaggregated equality data, including intersectional aspects such as gender and age, as a basis for targeted and result-oriented policies. Such relevant data can be gathered through research carried out by or in co-operation with persons affiliating with the Roma and other national minorities, and should meet human rights and data protection standards, notably the principles of informed consent, anonymity and the disclosure of the purposes of processing.⁸² This is particularly important as the Advisory Committee also notes the persistent issues in areas of employment, healthcare and housing and in those programmes targeted at the specific socio-economic circumstances of Roma (see Article 15).

Recommendations

56. The Advisory Committee calls on the authorities to ensure the effective implementation of the Hungarian National Social Inclusion Strategy 2030 at all levels and to strengthen Roma-related policies beyond the scope of poverty reduction through close co-operation with and enhanced co-ordination among all the relevant actors, including a diverse range of Roma representatives, especially at local level. The authorities should also conduct an annual or biannual impact assessment of the Strategy to identify the implementation gaps at the local level.

57. The Advisory Committee strongly encourages the authorities to collect equality data relating to persons belonging to the Roma minority, and especially in the areas of education, housing, employment and healthcare, in line with international standards on data protection, with a view to monitoring the progress of the implementation of the Hungarian National Social Inclusion Strategy 2030 at national, regional and local levels.

Preservation and promotion of minority cultures and languages (Article 5)

58. The Fundamental Law of Hungary⁸³ guarantees national minorities the right to nurture their cultures, further reinforced by the Act on the Rights of Nationalities, which emphasises the importance of “cultural autonomy as the independent operation of nationality institutions through self-governance”.⁸⁴ The state report provides detailed information on the different strands of activities available for the preservation and development of national minority cultures.⁸⁵ These include museums and houses of tradition, library services, as well as digital publications, cultural events on national minorities and “nationality theatres”.

⁷⁶ Discrimination in the European Union, Special Barometer 535, [Hungary](#) (13 April - 28 April 2023).

⁷⁷ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 46.

⁷⁸ See [sixth state report](#), p. 48; European Commission (2023), [Commission Staff Working Document, Accompanying the document, Assessment report of the member States' national Roma strategic frameworks, \(COM\(2023\) 7 final\)](#), p.81.

⁷⁹ ACFC [Thematic Commentary No. 4](#) (2016), para. 65.

⁸⁰ See [sixth state report](#), p. 83 and European Commission (2023), [Commission Staff Working Document, Accompanying the document, Assessment report of the member States' national Roma strategic frameworks, \(COM\(2023\) 7 final\)](#), p. 87.

⁸¹ For further detail, see Vera Messing & András L. Pap (2024). Cacophony in conceptualizing and operationalizing ethnicity: the case of Roma in Hungary, *Ethnic and Racial Studies*, 47(9), pp. 1920-1940; Lilla Farkas (2017), [Analysis and Comparative Review of Equality Data Collection Practices in the European Union: Data Collection in the Field of Ethnicity](#), p. 35.

⁸² ACFC [Thematic Commentary No. 4](#) (2016), paras. 18 and 66.

⁸³ [Fundamental Law of Hungary](#), Section XXIX (1).

⁸⁴ [The Act on the Rights of Nationalities](#), Section 2(3) and 17(b).

⁸⁵ See [sixth state report](#), pp. 60-82.

59. The Advisory Committee welcomes the continued efforts of the authorities to maintain the level of funding for cultural activities following its recommendation in the Fifth Opinion,⁸⁶ including through a significant increase in the budget allocated to national minority self-governments. These bodies play an important role in the implementation of minority cultural activities and also maintain cultural institutions,⁸⁷ including so-called “nationality-basis institutions”⁸⁸ (of which there are seven) and other 70 culture-related organisations.⁸⁹ According to the information provided by the authorities, the overall budget allocated to national minorities increased to HUF 23 billion in 2024, which was six times higher than the allocation of 2011 (HUF 3.5 billion).⁹⁰ An established feature of the Hungarian system for the financing of culture is the contribution from the central budget to the “cultural tasks” of the local governments.⁹¹ Furthermore, the minority self-governments at the local level (municipal or regional) also receive “task-based” funding which complements the “operating” support they normally receive.⁹² There are also calls for proposals for one-off projects available for civil society organisations.

60. During the Advisory Committee’s visit, most interlocutors⁹³ expressed satisfaction about funding for the promotion of national minority cultures. In an exchange with the representatives of the local minority self-governments in Pécs, interlocutors mentioned in particular the importance of the task-based system for ensuring the variety as well as sustainability of their cultural activities, which seem to focus on folkloristic aspects, such as traditional music, dance and gastronomy. The Advisory Committee understands that these activities rarely involve interaction between different national minorities. It therefore takes positive note of the activities to develop intercultural awareness among communities, such as the “Gastronomical Festival of Nationalities” launched by the State Secretariat for Church and Nationality in 2021 or initiatives at the local level, such as the Pécs City Roma Community Award (János Bogdán Award)⁹⁴ introduced in 2023. Despite these generally favourable conditions for cultural activities, many interlocutors shared their concerns about the preservation of their languages, which are already in decline, and the very low interest of young people in using them (see Article 14).

61. The authorities informed the Advisory Committee that efforts have been made to promote Roma culture in line with the HNSIS 2030. For example, the University of Pécs hosts several students annually for internships to familiarise them with Roma culture. There is also an annual call for proposals supporting Roma cultural programmes, with a budget of HUF 280.6 million (€702 000) in 2024. The Hungarian Institute for Culture also carried out projects for the preservation of Roma culture.⁹⁵ However, Roma interlocutors raised concerns about inadequate subsidies (approximately €2.5 million), which they consider disproportionate to both their population size and needs. They also highlighted challenges

⁸⁶ ACFC [Fifth Opinion on Hungary](#), para. 72.

⁸⁷ As already expressed in earlier Opinions, the Advisory Committee recalls that the Hungarian legislation provides national minority self-governments with funding to maintain their own educational and cultural institutions. It must however be mentioned that the proportion of institutions among national minorities varies and it is especially striking that the Roma, by far the largest national minority in the country, maintain very few institutions. For an overview of the role of the minority self-governments in ensuring cultural autonomy of national minorities and the impact of these institutions on linguistic, cultural and educational rights, see Balázs Dobos (2023), “Cultural Autonomy, Safe Haven or Window-Dressing? Institutions Maintained by Minority Self-Governments in Hungary”, in David J. Smith et al. (eds), *Realising Linguistic, Cultural and Educational Rights through Non-Territorial Autonomy*, pp. 155-170.

⁸⁸ Act on museums, public libraries and public culture, Section 37/A (8). See [sixth state report](#), p. 61.

⁸⁹ Under the Act on the Central Budget, the nationality self-governments are also entitled to subsidies for the maintenance of national minority self-government institutions established for the performance of their public tasks as defined in Sections 117 to 119 and 121 to 122 of the Act on the Rights of Nationalities. Within this framework, the subsidies finance the maintenance costs of the institutions established in order to, among others, implement activities related to cultural autonomy, and preserve and transmit traditions and community culture in the “mother tongue”. This amounted to HUF 2.864 billion (€7.151 million) in 2021 and 2022 and HUF 3.771 billion (€9.416 million) in 2023. See [Eight Periodical Report of Hungary](#) to the Committee of Experts of the European Charter for Regional or Minority Languages (COMEX)(2024), p. 130. The exchange rate on 25 June 2025 is €1 = HUF 401.18 (European Central Bank).

⁹⁰ Approximately €57.5 million in 2024 (compared to €9.5 million in 2011). This includes the funding of national minority self-governments and infrastructure.

⁹¹ This appears in the central budget in a separate chapter (Assistance to Local Governments). In 2021, it was HUF 35 billion (€8.739 million), and for 2022, HUF 35.3 billion (€8.814 million) was earmarked. Beyond subsidising projects, including cultural institutions, each local government receives general cultural normative assistance and according to the Advisory Committee’s interlocutors, the majority of municipalities spend more on culture than the “per capita” central redistribution, which has a symbolic role only. See *Compendium of Cultural Policies and Trends (2021)*, [Country Profile Hungary](#), p. 27.

⁹² The operating support for municipal and regional self-governments of national minorities were HUF 958 million (€2.3 million) in 2020, HUF 982 million (€2.4 million) in 2021 and 2022. The “task-based” subsidies, on the other hand, were HUF 1.187 billion (€2.96 million) for 2021, 2022 and 2023. See [Eight Periodical Report of Hungary](#) to the Committee of Experts of the European Charter for Regional or Minority Languages (COMEX)(2024), p. 131 and [sixth state report](#), p. 203.

⁹³ For example, the German National Minority Self-Government mentioned that it had received a generous amount in 2024 (around €35 million), including for its work on culture and language.

⁹⁴ This award recognises individuals and communities, both Roma and non-Roma, for their efforts in combating social exclusion, discrimination, and racism in Pécs, as well as for exemplary contributions to improving Roma community life.

⁹⁵ See [sixth state report](#), pp. 92 and 142. The Hungarian Institute for Culture also ran the Roma inclusion programme between 2019-2020 implementing 35 projects in 80 municipalities to promote community-building through the tools of heritage conservation and the exploration of values.

related to task-based local funding, the minimal Roma presence in language measures (see Article 14), and the absence of a national Roma Museum (or other nationality-basis institutions) in the country.

62. The Advisory Committee notes that museums and houses of tradition remain important venues for showcasing minority cultures in Hungary. While most national minority interlocutors appreciated the opportunity to maintain such institutions, some highlighted insufficient funding and the absence of the 13 national minority languages in general museum settings, such as the lack of museum audio-guides in minority languages. According to the state report, the Hungarian Open-Air Museum of Ethnography has expanded its display space for national minority artifacts since 2022.⁹⁶ Additionally, it has digitised its collections, allowing searches by national minority. Other open-air village museums also showcase the cultural heritage of national minorities, including the *Sóstó* Open-Air Village Museum, affiliated with the *Jósa András* Museum in Nyíregyháza, that features Roma buildings among its exhibits.

63. Recognising the important role of museums, in 2023, the Deputy Commissioner initiated an investigation into their role in promoting the cultural rights of national minorities. This included a survey of 111 museums nationwide and site visits over a period of two years.⁹⁷ Key findings highlighted, among others, the lack of minority language expertise among staff, challenges in documenting and presenting minority cultural content, insufficient funding and the impact of limited community involvement.⁹⁸

64. 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.⁹⁹ In addition, it is important that mainstream cultural institutions that are not dedicated to the respective national minority (e.g. museums, media and cultural centres, cinemas) more regularly include the cultures of locally present national minorities in their work (e.g. museum collections) and use the respective minority languages (e.g. on websites, in explanatory texts and audio-guides of museums).

65. Recognising the authorities' efforts relating to the protection and promotion of the cultures of persons belonging to the numerically smaller minorities, the Advisory Committee considers that more attention to their needs and interests is required. In this respect, the Advisory Committee reiterates the preamble of the Framework Convention which states that "a pluralistic and genuinely democratic society should not only respect the ethnic, cultural, linguistic and religious identity of each person belonging to a national minority, but also create appropriate conditions enabling them to express, preserve and develop this identity". The Advisory Committee highlights that "[t]his may often require targeted efforts by the authorities to revitalise essential elements of the minority culture, without which the expression of some aspects of that identity may not be possible."¹⁰⁰ The Advisory Committee also points out the importance of active support to protect and develop the cultures and languages of numerically smaller national minorities, with a view to ensuring that persons belonging to these minorities are able to preserve and develop their cultural identities, as numerically small and dispersed minorities may rely much more on governmental support than numerically larger and well represented minorities.¹⁰¹

66. The Advisory Committee welcomes the efforts and availability of support schemes aimed at promoting and preserving national minority cultures. However, it emphasises the crucial role of local minority communities in the development of cultural activities, including those related to museums and houses of tradition. Such engagement can lead to more relevant and contemporary programming and exhibitions while also helping to bridge generational gaps and enhance cultural transmission. Furthermore, the inclusion of national minority cultures beyond their folkloristic aspects, broadens the wider intercultural understanding among the general population as well as further highlighting their contribution to Hungarian history and society. In this context, the Advisory Committee considers that including national minority cultures more fully in the activities of mainstream cultural institutions, and using minority languages in those institutions, could have a positive impact on the quantity, sustainability, economic base and reach of cultural activities related to national minorities. It would also promote intercultural understanding with a view to increasing the appreciation of national minorities in society at large and making them more visible as an integral and valued part of society (see Article 6).

⁹⁶ See [sixth state report](#), p. 60

⁹⁷ [A muzeális intézmények szerepe és lehetőségei a hazai nemzetiségi közösségek kulturális jogainak érvényesítésében](#) (The Role and Opportunities of Museums in the Enforcement of National and Ethnic Minority Cultural Rights) (2024). See also the [Newsletter of the Deputy Commissioner](#) issue [2024/4](#).

⁹⁸ See Deputy Commissioner, General Comment No. 2/2025 on the enforcement of nationality cultural rights in the museum system. (summary available in [English](#)).

⁹⁹ ACFC [Thematic Commentary No. 3](#) (2012), para. 25.

¹⁰⁰ ACFC [Thematic Commentary No. 4](#) (2016), para. 67.

¹⁰¹ ACFC [Thematic Commentary No. 4](#) (2016), para. 67.

Recommendation

67. The Advisory Committee encourages the authorities to continue to provide sustained support for cultural activities of persons affiliating with national minorities, and, in close consultation with them, to support existing cultural institutions. This should include long-term sustainable funding for the collection, preservation and publication of cultural works, including in minority languages, with a view to preserving national minority cultures, but also raising awareness of these cultures among the general population. The authorities are also invited to support national minority cultures beyond their folkloristic aspects and to recognise their wider contribution as an integral part of Hungarian history and society. This should include contemporary expressions of minority cultures, including perspectives from women and youth.

Promotion of intercultural dialogue, mutual respect and understanding (Article 6)

68. The authorities report on some measures taken to promote intercultural dialogue in society, including in education (see Article 12).¹⁰² In addition, the state report¹⁰³ mentions several measures to develop Roma culture (see Article 5) in line with HNSIS 2030 (see Article 4), as well as the role played by the main public media through their programmes designed to showcase minority cultures, increase minority language use and promote social integration (see Article 9). Otherwise, the authorities refer mainly to the “General Comments” of the Deputy Commissioner and the recommendations made therein,¹⁰⁴ such as the inclusion of Roma history in school curricula and educational materials, the role of Roma Holocaust education in shaping public attitudes, the enforcement of national cultural autonomy in the field of public media services and domestic cinematography and film production, as well as measures taken in response to the vandalism of the Roma Holocaust Memorial in Budapest.¹⁰⁵ However, the state report mentions neither any specific measures to implement the recommendations of the Deputy Commissioner nor any specific activities in this regard. The Advisory Committee is not aware of any other information to this effect.

69. Most representatives of national minorities have acknowledged a generally respectful relationship between the majority population and well-established traditional national minorities. The authorities' efforts to promote minority cultures, support education in minority languages and enhance minority representation in parliament, as well as the support they give to national minority self-governments (see Article 15), were widely recognised by the interlocutors of the Advisory Committee. The Deputy Commissioner's continuous dialogue with national minority self-governments and persons affiliating with national minorities is also appreciated by interlocutors.

70. Nevertheless, while representatives of minorities acknowledge these positive aspects, they also emphasise the lack of awareness among the general public regarding national minorities and their specific needs and interests (see Article 12). This is often attributed to the fact that, despite the existing legal and policy framework supporting national minorities, the prevailing discourse and attitude confines the expression of national minority identities largely to private spheres.

71. The Advisory Committee was informed by interlocutors of a notable increase in hate speech, with many politicians and public officials engaging in offensive and defamatory language against national minorities and persons affiliating with them.¹⁰⁶

72. Although the Roma are also part of the country's recognised national minorities, they do not enjoy the same level of positive attitudes and continue to be stigmatised in many areas of life (see Article 4). The rhetoric that portrays them mainly as a burden on the country remains widespread. Reports of hate speech, bullying and verbal harassment have been manifested in other instances, mostly by political figures¹⁰⁷ and high-ranking officials,¹⁰⁸ as well as on social media, including during the Covid-19 pandemic, through narratives that blamed Roma for exacerbating the spread of the pandemic.¹⁰⁹

¹⁰² See [sixth state report](#), p. 86.

¹⁰³ See [sixth state report](#), p. 63.

¹⁰⁴ See [sixth state report](#), pp. 23-28, 38-39.

¹⁰⁵ See Deputy Commissioner, [General Comment No. 6/2020](#) on the measures related to damaging the Roma Holocaust Memorial in Budapest and the need for stepping up against incidents motivated by hatred.

¹⁰⁶ See, for example, [Racism in Hungary: top ex-judge claims national IQ level lowered by Indian origins of the Roma - European Roma Rights Centre](#), Deputy Commissioner, [General Comment No. 2/2024](#) on the legal environment and social impact of hate demonstrations. Alongside legislative and law enforcement proposals, the need for ongoing dialogue between relevant bodies was emphasised. See also *Országgyűlés Napló* (official parliamentary diary, available only in Hungarian) from 19 May 2025, speech by Liliána Grexa, Ukrainian Nationality Advocate in the National Assembly of Hungary, available at <https://www.parlament.hu/documents/d/guest/ny250519>, pp. 21788-21790.

¹⁰⁷ See EU FRA European Union (EU), Agency for Fundamental Rights (FRA) (2021), Franet National Contribution to the Fundamental Rights Report 2021, [Hungary](#), p. 22.

¹⁰⁸ European Roma Rights Centre (ERRC) (16 September 2024), [Racism in Hungary: top ex-judge claims national IQ level lowered by Indian origins of the Roma](#)

¹⁰⁹ See EU FRA (2022), Franet National Contribution to the Fundamental Rights Report 2022, [Hungary](#), p. 19; National Democratic Institute for International Affairs (2021), [The Impact of COVID-19 on Hungary's Roma Communities](#), p. 6.

73. While the authorities have maintained a longstanding, uncompromising stance on migration in general, the Advisory Committee welcomes the commendable support provided - particularly at the local level - to those fleeing Ukraine following the Russian Federation's war of aggression since February 2022. This included a comprehensive online information portal¹¹⁰ for new arrivals. The opening of the first Hungarian-Ukrainian bilingual primary and secondary school in Budapest in 2024 is also a very welcome development, which will facilitate the integration of refugee children from Ukraine.¹¹¹ The arrival of refugees from Ukraine was also met with an exemplary display of civic solidarity among the population, and led to the development of numerous projects by civil society organisations.¹¹² According to a survey¹¹³ on solidarity and attitudes to Ukrainian refugees in Hungary, around 40% of the population have been involved in acts of solidarity. The same survey revealed that while 69% of respondents stated they would take in anyone fleeing Ukraine, regardless of their ethnic background, for at least the duration of the war, notable differences emerged among different groups. Ukrainian Hungarians were the only group that a majority of respondents (59%) would accept beyond the war, whereas this figure dropped to around 30% for Ukrainian Roma and those of African and Asian descent who had fled Russian Federation's war of aggression against Ukraine. In addition, during the monitoring visit, the authorities stated that they would favour admitting "refugees of Christian European origin", such as Ukrainians, citing concerns about "cultural cohesion".¹¹⁴

74. The Advisory Committee was informed about incidents¹¹⁵ of differential treatment of refugees, particularly Roma,¹¹⁶ including those who are stateless or at risk of statelessness, fleeing the war of aggression in Ukraine. Documented cases¹¹⁷ highlight instances of discriminatory practices, particularly during the reception process. Among others, a 2022 report by Romaversitas, based on 161 interviews with Roma families who fled from Ukraine, underscored widespread ethnic discrimination, including segregated housing, education and healthcare.¹¹⁸ In addition, a government decree in 2024¹¹⁹ defined the scope of assistance to these refugees,¹²⁰ limiting it according to the strict eligibility criteria and to those with Ukrainian citizenship only. Some interlocutors mentioned that this has particularly exacerbated the vulnerability of the Hungarian-speaking Roma who fled from Ukraine.¹²¹

75. The Advisory Committee recalls that Article 6 of the Framework Convention explicitly applies to all persons living on the territory of states parties.¹²² Its protection includes effective measures to promote mutual respect, understanding and co-operation among all persons irrespective of their ethnic, cultural, linguistic or religious identities. The Advisory Committee has consistently underlined the need for a broad application of Article 6. The lack of respect for, or ill-treatment of migrants, asylum seekers, refugees and/or other individuals who are, for whatever reason, considered to be different from the majority population, may contribute to a general environment of fear. This may impel persons belonging to minorities refrain from seeking the active enjoyment of their rights.¹²³ In this respect, the Advisory

¹¹⁰ See [Safe in Hungary](#).

¹¹¹ Euronews (18 September 2024), [Inside Europe's only Ukrainian-Hungarian school for refugee children | Euronews](#).

¹¹² Among others, the project run by the Civil College Foundation (*Civil Kollégium Alapítvány*) between 2022 and 2023 (i.e. [What will happen to the Ukrainian refugee children in Hungarian public education](#)) was mentioned as a good example.

¹¹³ Ildikó Zakariás, Margit Feischmidt, Márton Gerő, András Morauszki, Eszter Neumann, Violetta Zentai and Csilla Zsigmond (2022), [Solidarity with the displaced people from Ukraine: Attitudes and practices examined through a population survey](#), Centre for Social Sciences.

¹¹⁴ See similar observations in UN Human Rights Council (2025), Report of the Special Rapporteur on freedom of religion or belief, following her visit to Hungary from 7 to 17 October 2024, A/HRC/58/49/Add.1, para. 72.

¹¹⁵ UN News (22 March 2022), [UNHCR chief condemns 'discrimination, violence and racism' against some fleeing Ukraine](#). According to these reports, 10-20% of such people are stateless or at risk of statelessness. Concerns were also raised around the fate of Roma caught between Czechia and Hungary, in particular in relation to the uncertainty of their Hungarian citizenship. See EU FRA (2023), Franet National Contribution to the Fundamental Rights Report 2023, [Hungary](#), pp. 26-27.

¹¹⁶ Several of these refugees had dual Ukrainian-Hungarian citizenship, rendering them ineligible for refugee status under Hungarian law. See Civil Liberties Union for Europe (2025), *The Liberties Rule of Law Report 2025*, p. 467.

¹¹⁷ European Roma Rights Centre (ERRC) (2023), [Roma Rights Under Siege: Monitoring Reports from One Year of War in Ukraine](#), pp. 15-17; EurActiv (2022), [Faced with discrimination, Ukrainian Roma refugees are going home](#).

¹¹⁸ Romaversitas (2022), [The Situation of Transcarpathian Romani Families Fleeing from Ukraine to Hungary](#), pp 43-47. See also EU FRA (2023), Franet National Contribution to the Fundamental Rights Report 2023, [Hungary](#), p. 20; UNHCR (2024), *Socio-economic insights survey 2024: Hungary*, p. 21.

¹¹⁹ In August 2024, a government decree was issued stating that only refugees from "administrative units of Ukraine directly affected by military operations" are entitled to housing support. Transcarpathia is not one of these administrative units, and most Roma refugees in Hungary come from that region and are often the poorest and most vulnerable. See ERRC (23 August 2024), [Hungary: Day One of Orbán's latest decree sees 120 Romani refugees cast onto the streets](#).

¹²⁰ According to the information provided by the authorities, the Hungarian Charity Service of the Order of Malta, which also runs several projects for these refugees, provides shelter for temporary protection, are beneficiaries under this decree (up to 950 to 1 000 persons per month). [MMIA PLUSZ Integration Support Programme](#) is one of the organisations which aims to provide housing, social, administrative, logistical and labour market support to refugees from third countries (with a budget of HUF 1 486 438 703, amounted to € 3 696 773).

¹²¹ See Szabad Europa (12 February 2025), [Kárpátaljai menekültek nyertek pert a kérelmüket elutasító magyar állam ellen](#) (Transcarpathian refugees win lawsuit against Hungarian state that rejected their application).

¹²² [Explanatory Report](#) to the Framework Convention for the Protection of National Minorities, para. 48.

¹²³ ACFC [Thematic Commentary No. 4](#) (2016), para. 52.

Committee reiterates that openness and tolerance in society can only be genuine if they are not limited to certain predefined groups but embrace everyone.¹²⁴

76. The Advisory Committee also emphasises that Article 6 of the Framework Convention calls for proactive efforts to foster a climate of mutual respect, understanding and co-operation among all persons in society, where persons belonging to national minorities are recognised as an integral and valued part of a diverse society. It reiterates the preamble of the Framework Convention which states that “the creation of a climate of tolerance and dialogue is necessary to enable cultural diversity to be a source and a factor, not of division, but of enrichment for each society”. This principle should be reflected and fostered through legislation and policies, ensuring that all national minority languages and cultures are visibly and audibly present in the public domain.¹²⁵ Such representation fosters awareness of society’s diverse character and reinforces the sense of belonging for all individuals.

77. As also emphasised in its Fifth Opinion,¹²⁶ the Advisory Committee is deeply concerned by the persistent lack of a clear and decisive political commitment to fostering diversity and inclusion in the country. Despite praiseworthy legal and policy safeguards for national minorities, the Advisory Committee regrets that the overall number of measures promoting intercultural dialogue and mutual respect - essential for enhancing interaction between different communities and persons affiliating with them - remains limited. In this regard, the Advisory Committee recalls that raising awareness among the majority population about national minorities and the diverse individuals affiliating with them is of utmost importance. This requires sustained efforts in education, culture, and the media. The latter, in particular, plays a crucial role in either promoting the social inclusion of persons affiliating with minorities or reinforcing negative stereotypes about ethnic and cultural differences. Additionally, inclusive public discourse, particularly in politics, plays a crucial role in supporting this process.

78. The Advisory Committee is concerned with the worrying pattern of exclusionary rhetoric, in particular against Roma, migrants, Jews, and Muslims, that persisted in public discourse and political narratives during the monitoring period.¹²⁷ The use of discriminatory and offensive language by politicians ultimately weakens the state and its institutions. Politicians should actively strive to promote cohesion, tolerance and coexistence based on mutual respect and understanding. Any hate discourse by politicians or other public figures must be immediately and strongly condemned by senior government officials to ensure that a clear message is sent to the public that this is not acceptable. The Advisory Committee emphasises that mainstream political parties must refrain from and counter hostile rhetoric; ignoring it or aligning their discourse with exclusionary narratives normalises intolerance, severely harming societal integration and undermining the management of diversity through minority rights as an integral part of human rights.

Recommendation

79. The Advisory Committee urges the authorities to take all necessary measures to promote a spirit of tolerance, intercultural dialogue, mutual respect and understanding among all persons living on the territory of Hungary and to refrain from, and promptly and unequivocally condemn, all incidents of hate speech, in particular by political leaders and public figures. This includes disseminating inclusive information to the general public about the significance of intercultural dialogue and the unique contributions of minority communities and persons affiliating with them as integral parts of Hungarian society.

Protection from hate crime (Article 6)

80. The criminal legislation pertaining to hate speech and hate crime has remained unchanged.¹²⁸ According to Hungary’s contribution to the OSCE-ODIHR hate crime database,¹²⁹ which is compiled by the Ministry of Interior, the Prosecutor’s Office and the Criminal Police Department of the National Police Headquarters as part of general crime statistics, the police recorded 65 hate crime incidents in 2023; 58 in 2022; 38 in 2021 and 100 in 2020. These cases primarily concerned threats, physical assault, attacks against property and violation of public order. Article 332 of the Criminal Code (incitement to hatred and violence against a community) appears to be the main remedy against the use of hate speech in the public sphere. When hate speech does not meet the criminal threshold, the provisions of the Civil Code (Article 2:54, para. 5 on hate speech against a community) can also be applied.

¹²⁴ ACFC [Thematic Commentary No. 4](#) (2016), para. 54.

¹²⁵ ACFC [Thematic Commentary No. 4](#) (2016), para. 61.

¹²⁶ ACFC [Fifth Opinion on Hungary](#), para. 85.

¹²⁷ See also, United Nations (UN), Human Rights Council (2021), Report of the Working Group on the Universal Periodic Review: [Hungary](#), 21 December 2021, A/HRC/49/8; [ECRI’s Sixth Report on Hungary](#) (2023), paras. 40-46; Discrimination in the European Union, Special Barometer 535, [Hungary](#) (13 April - 28 April 2023).

¹²⁸ See [sixth state report](#), p. 28; ACFC [Fifth Opinion on Hungary](#), para. 88.

¹²⁹ OSCE-ODIHR, Hate Crime Reporting: [Hungary](#).

81. In its last report, ECRI underlined several shortcomings in the Criminal Code, in particular in the application of Article 332 for the effective prosecution and sanctioning of hate speech.¹³⁰ The ECRI report also underlined the need for racist motivation to be explicitly mentioned as an aggravating circumstance for all offences, as recommended in the previous Opinions of the Advisory Committee.¹³¹ In this context, the Advisory Committee notes the role of ECRI, which has a specific mandate and expertise to address issues related to protection against hate crime, and “whose monitoring work and reports are central to the systematic interpretation of the Framework Convention in an evolving society”.¹³² The Advisory Committee therefore refers to ECRI’s recent findings and recommendations.¹³³ The Advisory Committee also encourages the authorities to draw inspiration from the relevant Council of Europe Committee of Ministers’ recommendations that offer guidance on combating hate speech and hate crime.¹³⁴

82. According to a survey published in 2024, the majority of people (58%) who identify as Jewish feel that antisemitism has increased in Hungary over the last five years and 94% of them declared that they have experienced antisemitism in their daily life.¹³⁵ There were also reports of demonstrations on the so-called “Day of Honour” of the Second World War, with the display of authoritarian symbols, causing dismay among the Jewish population.¹³⁶ In this regard, the Advisory Committee notes with concern that, despite Hungary’s zero tolerance policy towards antisemitism, a large proportion of these incidents go unreported. This was also indicated by the above-mentioned survey, which revealed that only 24% of those who had experienced harassment had reported their case to the police or a supervisory authority while only 11% had reported discrimination.

83. Several studies and surveys suggest that Roma continue to be the targets of hate-motivated harassment and violence. While the results of the EU Fundamental Rights Agency (FRA) survey¹³⁷ indicate a slight decrease in hate-motivated harassment compared to the earlier survey (13% of respondents in 2021 compared to 18% in the 2016 survey), the persistent trend of high levels of under-reporting of these incidents is worrying. Overall, most Roma victims of hate-motivated violence (96%) did not report the most recent incident to any authority in 2021.¹³⁸

84. Interlocutors of the Advisory Committee have expressed concerns about certain practices against Roma committed by extremist groups in recent years, which have created a sense of intimidation among this minority. The Advisory Committee was informed that extremist groups have been mobilised by a far-right party and its supporters to organise a number of rallies across the country,¹³⁹ usually against so-called “gypsy criminality”.¹⁴⁰ Furthermore, the Advisory Committee was informed by its interlocutors that these extremist groups also carry out arbitrary patrols in Roma settlements, mimicking the activities of law enforcement bodies and related crime prevention tasks in order to intimidate and exert control over the Roma population. The Hungarian Civil Liberties Union (TASZ) has been actively monitoring these instances since 2021, documenting around 60 such instances a year, which are particularly feared by Roma. Only in very rare cases do the police initiate criminal proceedings as a result of such instances.¹⁴¹ Addressing these arbitrary patrols, as well as rallies and demonstrations, through proper legal procedures could enhance safety and build trust in the police among the Roma population. In this regard, the Advisory Committee highlights that in 2024, the Deputy Commissioner issued a “General Comment” on this phenomenon, stating that “[...] any public action that could arouse fear and anxiety

¹³⁰ [ECRI’s Sixth Report on Hungary](#) (2023), para. 53.

¹³¹ ACFC [Fourth Opinion on Hungary](#), paras. 98 and 103. See also ACFC [Thematic Commentary No. 4](#) (2016), para. 56. The Advisory Committee notes that in 2021, the European Commission initiated [infringement proceedings](#) against Hungary for lack of such a provision in the Criminal Code on account of incompatibility with Council Framework Decision 2008/913/JHA on combating racism and xenophobia. These proceedings are still pending.

¹³² ACFC [Thematic Commentary No. 4](#) (2016), para. 58.

¹³³ [ECRI’s Sixth Report on Hungary](#) (2023), paras. 53, 64 and 65.

¹³⁴ Recommendation [CM/Rec\(2024\)4](#) of the Committee of Ministers to member States on combating hate crime; Recommendation [CM/Rec\(2022\)161](#) of the Committee of Ministers to member States on combating hate speech.

¹³⁵ EU FRA (2024), [Jewish People’s Experiences and Perceptions of Antisemitism – Country Sheet Hungary](#). The survey average for worry about harassment is 53%, while it is 44% about violent attacks.

¹³⁶ European Jewish Congress (10 February 2025), [Thousands of neo-Nazis march in Budapest in the so-called “Day of Honour” - European Jewish Congress](#); see also See Deputy Commissioner, [General Comment No. 2/2023](#) on the possibilities and limitations of the application of the law regarding action against the use of banned authoritarian symbols.

¹³⁷ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 22.

¹³⁸ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 31. This was also 95% in 2016.

¹³⁹ Submission by the Working Group Against Hate Crimes in Hungary to the Advisory Committee on 28 October 2024, shortly before the 2022 elections, the far-right party Mi Hazánk (Our Homeland) signed a formal co-operation agreement with the Magyar Önvédelmi Mozgalom (Hungarian Self-Defence Movement), a far-right association, one of the successor organisations of the Hungarian Guard that was banned in 2009.

¹⁴⁰ Submissions by the European Roma Rights Centre (ERRC) and the Working Group Against Hate Crimes in Hungary to the Advisory Committee on 28 October 2024.

¹⁴¹ Submission by the Working Group Against Hate Crimes to the Advisory Committee on 28 October 2024.

in members of minority communities because of their origin, shall be considered unacceptable” and “called for several recommendations to be made to the relevant authorities”.¹⁴²

85. The representatives of Roma and other interlocutors reported on accounts¹⁴³ of discriminatory policing practices, including ethnic profiling, against Roma and shared their views of the already low levels of trust in law enforcement bodies among this community. The EU FRA survey published in 2021¹⁴⁴ revealed that the proportion of Roma who had been stopped by the police (22%) was much higher than that among the general population (10%). The Advisory Committee is concerned at the prevalence of these incidents and the lack of information on any action taken in response¹⁴⁵ by the Commissioner for Fundamental Rights, who is entrusted with the investigation of alleged cases of discrimination and misconduct by the police. It therefore underlines that, as concluded by the European Court of Human Rights (ECtHR), the perception by police officers of persons belonging to a particular community as “criminals” and the ensuing practice of racial profiling can result in “institutionalised racism”.¹⁴⁶ The Advisory Committee also recalls the standards established by the ECtHR in the recent cases of *Wa Baile v. Switzerland* and *Basu v. Germany* and recalls that states should effectively investigate allegations of racial or ethnic profiling during identity checks or any other action implemented routinely by law enforcement representatives.¹⁴⁷

86. The authorities informed the Advisory Committee about numerous measures¹⁴⁸ taken at different levels, involving different governmental and non-governmental actors, where the general priority has been building the capacity of law enforcement authorities to prevent and combat hate speech and hate crimes, in particular through the effective implementation of the 2019 Hate Crime Protocol,¹⁴⁹ which is binding for all police forces. Among others, in May 2022, police officers participated in a one-day training course organised by the National Police Headquarters (ORFK), which was dedicated to the police’s handling of hate crime offences. A training course titled “Anti-Semitism and Hate Crime” has become mandatory in the Ministry of Interior’s Law Enforcement Training System and by April 2022, had been completed by 15 043 professional staff members. Reports indicate that training sessions on hate crimes were also organised for criminal justice actors other than police officers, in particular prosecutors and judges.¹⁵⁰ Numerous initiatives also seek to tackle hate speech on social media. For instance, the Internet Hotline Service, run by the National Media and Communications Authority (Media Authority), provides a platform for reporting “illegal and harmful content,” such as “online harassment, racism, and xenophobia.”¹⁵¹ The Advisory Committee notes these capacity-building efforts with satisfaction and welcomes the ongoing work, in co-operation with the Deputy Commissioner, to provide blended-learning training courses on hate crimes for professionals working in the criminal justice and victim support systems.¹⁵²

87. Despite these positive steps, many of the Advisory Committee’s interlocutors expressed the view that the overall impact of measures to prevent and combat acts of hostility and violence needs to be assessed. Furthermore, the effectiveness of the measures has not been checked against the experiences of the target groups, such as the Roma. The minority interlocutors did not mention any such initiative either. The Advisory Committee underlines that understanding the extent to which these measures have been reflected in the experiences of persons affiliating with national minorities is of paramount importance for any further action tailored to their specific needs and interests. The Advisory Committee therefore considers that further measures are needed to ensure a more comprehensive and holistic approach to tackle these phenomena in practice, including through effective consultation with persons affiliating with national minorities.

¹⁴² See Deputy Commissioner, [General Comment No. 2/2024](#) on the legal environment and social impact of hate demonstrations. Alongside legislative and law enforcement proposals, the need for ongoing dialogue between relevant bodies was emphasised.

¹⁴³ See, among others, European Roma Rights Centre (ERRC) (2022), [Brutal and Bigoted: Policing Roma in the EU](#), pp. 27-36; Kazarján, A and Kirs, E. (2021), [Discrimination Against Roma People In The Hungarian Criminal Justice System](#).

¹⁴⁴ EU FRA (2021), [Your rights matter: Police stops, Fundamental Rights Survey](#), p. 8.

¹⁴⁵ The Advisory Committee was unable to obtain information on the number of cases pending before the CFR or on any other initiatives taken by the CFR to effectively address these incidents.

¹⁴⁶ See [Lingurar v Romania](#) (no. 48474/14), 16 April 2019.

¹⁴⁷ See [Wa Baile v. Switzerland](#), (nos. 43868/18 et 25883/21), 20 February 2024; [Basu v. Germany](#), (no. 215/19), 18 October 2022.

¹⁴⁸ See [sixth state report](#), pp. 28-39.

¹⁴⁹ See ORFK Instruction No. 30/2019 (adopted on 18 July 2019). The Protocol includes a set of bias indicators to aid in identifying hate crimes and enhances the institutional structure of the Hate Crime Special Network (established in 2012) by mandating the designation of “mentors” in each local police unit.

¹⁵⁰ See Polgári, E. and Buzsáki, R. (2023), Hungary, [The crucial role of intersectional and victim-centred approaches to confronting bias-motivated violence](#), p. 197. (Counter Hate Research Project).

¹⁵¹ [ECRI’s Sixth Report on Hungary](#) (2023), para. 52.

¹⁵² This work is within the framework of a project funded by the European Union [Counter Hate Research Project](#). As part of this project, a special workshop was organised in 2024 by the Deputy Commissioner and the Working Group on Hate Crime, which brought together judges, prosecutors, police officers, lawyers, the high-ranking officials of the Ministry of Justice, the Victim Support Centre, the National Institute of Criminology and NGOs to share their professional experiences and to summarise the current challenges in this field. See [the Deputy Commissioner news](#) (2024).

88. The Advisory Committee also emphasises that it is an obligation of states parties to undertake appropriate measures to protect persons who may be subject to threats or acts of hostility or violence as a result of their ethnic, cultural, linguistic or religious identities and affiliations. States have an obligation to take all necessary preventive measures, as well as to ensure that cases of alleged hate crime and criminal hate speech are effectively investigated. The Advisory Committee believes that, especially in view of a group of judgments¹⁵³ of the ECtHR against Hungary concerning the authorities' failure to effectively investigate possible racial motives behind violent incidents, further efforts are needed to expand and improve the provision of targeted and practical training for members of the relevant law enforcement agencies to better understand and recognise the dynamics of hate crime.¹⁵⁴

89. The Advisory Committee finally underlines that beyond the individual harm caused to persons subjected to ethnic profiling, such practices tend to stigmatise the groups of persons targeted in the eyes of the general public, generating feelings of humiliation, injustice and resentment amongst these communities, and undermining trust in the police. Crucially, persons affiliating with national minorities who lack confidence in the police due to such practices will be particularly reluctant to turn to the latter in cases where they have been victims of hostility and violence, meaning that such crimes may go unreported and unpunished. In the Advisory Committee's view, targeted, continuous and mandatory training of all staff on the prevention of ethnic profiling, based on international standards,¹⁵⁵ is an essential preventive measure. In addition, initiatives to enhance dialogue between persons belonging to national minorities and the relevant authorities, such as the establishment by the police¹⁵⁶ of a permanent forum or communication channel through which communities and civil society organisations can report credible concerns about acts of violence or other activities that may threaten human dignity, could yield positive results in building trust between the police and communities.

Recommendation

90. The Advisory Committee calls on the authorities to enhance the capacity of law enforcement agencies to effectively identify and address hate crime by providing more targeted and practical training on the 2019 Hate Crime Protocol and to effectively prevent and combat ethnic profiling. Concerted action should be taken to enhance closer co-operation and institutionalise a continuous dialogue between the police and persons affiliating with all national minorities, as well as to deter under-reporting.

Minority language media (Article 9)

91. The legal framework¹⁵⁷ for the provision of public television and radio broadcasts in the languages of national minorities has remained unchanged. Pursuant to the Act on the Central Budget, the national minority self-governments are entitled to funding for their tasks related to national minority media.¹⁵⁸

92. As noted in previous Opinions,¹⁵⁹ the Advisory Committee observes that Hungarian public radio MR4, which is specifically dedicated to national minorities, remains the primary media platform for minorities. It broadcasts 24/7 in the languages of all 13 recognised national minorities, providing news on cultural events, traditional and religious holidays, as well as updates from their national minority self-governments. Kossuth Radio is another public station that features minority content, while further programmes on minorities are available on the Duna and Duna World TV channels. In the state report, the authorities informed the Advisory Committee of a wide range of programmes for, or about, national minorities in these media outlets, varying in length and time slots for different communities.¹⁶⁰ These programmes also include Hungarian-language broadcasts, such as *Egy hazában (In a Shared Homeland)*, which covers various topics on the life, culture, language, folk traditions and gastronomy of

¹⁵³ See the Balázs case group (Balázs v Hungary, no. 15529/12, 20.10.2015; M.F. v Hungary, no. 45855/12, 31.10.2017; R.B. v. Hungary, no. 64602/12, 12.4.2016; Király and Dömötör v Hungary (no. 10851/13, 17.1.2017), is currently under standard supervision before the Committee of Ministers of the Council of Europe. See the [status](#) of execution.

¹⁵⁴ See ECRI (2024), [Conclusions on the implementation of the recommendations in respect of Hungary subject to interim follow-up](#).

¹⁵⁵ See UN CERD [General Recommendation No. 36](#) on preventing and combating racial profiling by law enforcement officials.

¹⁵⁶ See similar considerations in the Deputy Commissioner's [General Comment No. 2/2024](#) on the legal environment and social impact of hate demonstrations.

¹⁵⁷ See further in ACFC [Fifth Opinion on Hungary](#), paras. 101-102.

¹⁵⁸ Based on the additional information provided by the authorities on 10 January 2025, this support, which primarily targets print or online newspapers, is integrated into the budget of the respective national-level self-governments and for the year 2024, it was as follows (with approximate € equivalents): Bulgarians (HUF 106.2 million/€265 000); Greeks (HUF 94.9 million/€238 000); Croats (HUF 263.6 million/€660 000); Polish (HUF 121.3 million/€304 000); Germans (HUF 457.4 million/€1.14 million); Armenians (HUF 76.4 million/€191 000); Romanians (HUF 192.6 million/€482 000); Rusyns (HUF 91.3 million/€228 000); Serbs (HUF 162.4 million/€406 000); Slovaks (HUF 236.6 million/€590 000); Slovenes (HUF 131.1 million/€328 000); Ukrainians (HUF 107.4 million/€269 000) and Roma (HUF 483.2 million/€1.2 million).

¹⁵⁹ ACFC [Fourth Opinion on Hungary](#), paras. 110-116; ACFC [Fifth Opinion on Hungary](#), para. 103.

¹⁶⁰ See [sixth state report](#), pp. 96-110 and pp. 266-273. The Annex to the state report also includes the breakdown of the programme time dedicated to national minorities in other radio and television stations across the country.

national minorities, as well as *Jelenlét (Presence)*, which focuses on social inclusion, combating stereotypes, and raising awareness about the Roma minority. All television programmes are available through online platforms for 60 days after being broadcast.

93. In its Fifth Opinion, the Advisory Committee called on the authorities to implement the Deputy Commissioner's recommendations outlined in General Comment No. 3/2018 regarding minority-language media.¹⁶¹ Specifically, it called for the adoption of a comprehensive strategy and the establishment of an institutional dialogue between the public broadcaster and national minority representatives. However, the Advisory Committee understands that persistent shortcomings remain. In response, the Deputy Commissioner issued another General Comment in 2021,¹⁶² addressing accessibility challenges following the discontinuation of digital radio broadcasting in September 2020. With these programmes largely limited to online platforms and lower-quality AM frequencies instead of FM, the Deputy Commissioner urged public service media to improve the technical quality and accessibility of minority public radio on terrestrial platforms, ensuring equal access for persons affiliating with minority communities.

94. During the Advisory Committee's visit, representatives of national minorities expressed concerns about access to these minority media outlets, aligning with the Deputy Commissioner's observations. Some interlocutors also emphasised the need for more user-friendly broadcast schedules, as programmes often air early in the morning or on weekday afternoons. Although most persons affiliating with national minorities actively use online technologies, such as social media, to expand media outreach within their communities, the Advisory Committee observes disparities in the media landscape. While some, like the German minority, have diverse resources, including podcasts, others, such as the Roma and numerically smaller minority communities, have a more limited media presence, particularly in print media. In some cases, such as the Croat and Serb communities, minorities also benefit from co-operation agreements between Hungarian public service providers and their counterparts in Croatia and Serbia, respectively, for the broadcasting of television programmes.¹⁶³

95. Minority interlocutors highlighted an insufficient presence of persons affiliating with national minorities among mainstream media staff. The Advisory Committee understands that the Public Service Media Academy offers scholarships and internships, allowing young minority media professionals to gain hands-on experience in content production within public service media.¹⁶⁴ Despite these positive initiatives, the Advisory Committee was informed by some interlocutors that public service editors often dictate the content of minority language broadcasts. In this context, the Advisory Committee stresses that an active and diverse media scene, including in minority languages, may considerably influence the sense of belonging and participation of persons belonging to national minorities. "In order for public service broadcasting to reflect the cultural and linguistic diversity within society, it must guarantee an adequate presence of persons belonging to national minorities and their languages [...]."¹⁶⁵ The Advisory Committee considers that special attention should also be paid to the needs of persons belonging to the numerically smaller minorities in public broadcasting.

96. Moreover, the Advisory Committee is concerned by the reported indications that information on issues pertaining to national minorities and persons belonging to them is largely absent in the mainstream media. It reminds the authorities 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"¹⁶⁶ (see Article 6). Minority interests and concerns should be included in regular broadcasts in mainstream media, rather than singled out in occasional programmes. In this respect, the Advisory Committee considers that the recently launched *Csukás Radio for Kids (Csukás István Meserádió)*, which is part of the public media portfolio and reportedly includes culturally relevant content on national minorities, is a promising step towards raising awareness of these communities. It also highlights the importance of age-appropriate children's programmes in preserving minority languages and identities and encourages the authorities to support the development of similar content for children affiliating with all minorities.

97. Finally, the Advisory Committee welcomes the continued provision of media content in national minority languages by the Hungarian public broadcaster. However, it notes the ongoing lack of dialogue between national minority representatives and public service media management. Additionally,

¹⁶¹ ACFC [Fifth Opinion on Hungary](#), paras. 104 and 108.

¹⁶² See Deputy Commissioner, [General Comment 2/2021](#) on the current situation of the accessibility of nationality public service radio broadcasts (full text in [Hungarian](#)).

¹⁶³ See [sixth state report](#), pp. 98-99.

¹⁶⁴ See additional information provided by the state authorities on 10 January 2025 and [sixth state report](#), p. 63.

¹⁶⁵ ACFC [Thematic Commentary No. 3](#) (2012), para. 41.

¹⁶⁶ ACFC [Thematic Commentary No. 4](#) (2016), para. 63.

although the authorities conduct regular reviews of minority representation in news programmes,¹⁶⁷ no independent quantitative and qualitative needs assessment has been carried out across public and private, national and local media in minority languages, as recommended in the Advisory Committee's Fifth Opinion.¹⁶⁸ In this context, the Advisory Committee considers that care should be taken to produce high quality media content, including in minority languages, that is attractive to wider audiences, and to ensure that this is broadcast at convenient times¹⁶⁹ and widely available on demand while also being fully accessible. The level of demand for such content would need to be established in close consultation with persons affiliating with national minorities. Furthermore, it is vital that all media professionals and journalists obtain appropriate training to increase their awareness of, and sensitivity towards, the specific and contemporary needs and interests of all persons belonging to minorities living in Hungary, including through the active involvement of persons belonging to national minorities in the preparation and presentation of both mainstream and minority (language) programmes that will cover content from various genres, such as local and national news, entertainment and culture, and address different generations, including children and youth.

Recommendations

98. The Advisory Committee strongly encourages the authorities to commission an independent assessment of the accessibility of minority language media and the representation of national minorities in public broadcasting, while ensuring the right to free speech and media independence. Based on this evaluation, appropriate measures should be taken in the media to enhance general awareness of national minorities as an integral part of Hungarian society.

99. The Advisory Committee encourages the authorities to actively support the presence of persons belonging to national minorities, including numerically smaller minorities, and of their languages and cultures, in the mainstream public media, notably by considerably increasing the quality and quantity of programmes adapted to their needs and interests, as well as by increasing the content produced by and for them. Furthermore, adequate training opportunities should be provided for media professionals and journalists to enhance their awareness of and sensitivity towards the specific and evolving needs and interests of persons affiliating with all national minorities, including through their active involvement in the preparation and presentation of media programmes.

Use of minority languages in contacts with the administrative and judicial authorities (Article 10)

100. The Advisory Committee has previously noted the comprehensive legal framework guaranteeing the use of national minority languages in contact with the authorities, in judicial proceedings as well as in the operation of national minority self-governments, which remained unchanged during the reporting period.¹⁷⁰ According to the state report,¹⁷¹ between January 2017 and April 2022, minority languages were used 8 911 times in administrative proceedings across Hungary: German (3 765 cases), Ukrainian (1 806), Romanian (1 339), Serbian (696), Romani (Lovari) (384), Rusyn (381), Croatian (270), Slovenian (153), Greek (51), Bulgarian (36), Slovak (13), Polish (10), Boyash (six) and Armenian (one). The increase in requests for the use of Ukrainian can be attributed to the arrival of large numbers of refugees from Ukraine after the start of the war of aggression by the Russian Federation in 2022. The authorities also informed the Advisory Committee that in the municipality of Méhkerék in Békés County, the majority of requests are made orally in Romanian as more than 70% of the population belongs to the Romanian national minority, but the administration functions in Hungarian.¹⁷²

101. As regards the use of minority languages in the operation of local national minority self-governments, the Advisory Committee notes that they were not used at all in seven counties while for the other 12 counties and Budapest, the breakdown was as follows: German (10 government offices), Ukrainian (two), Romanian (three), Serbian (six), Romani (Lovari) (four), Rusyn (two), Croatian (seven), Slovenian (one), Greek (three), Bulgarian (three), Slovak (seven), Polish (three), and Boyash (three) and Armenian (one).¹⁷³

102. While the possibility to use minority languages in administrative proceedings has significantly increased since the Advisory Committee's earlier findings,¹⁷⁴ interlocutors indicated that, in practice, persons affiliating with national minorities rarely exercise this right. This is largely because most of the persons in question are fluent in Hungarian, making administrative procedures in that language more

¹⁶⁷ See [sixth state report](#), pp. 102-105.

¹⁶⁸ ACFC [Fifth Opinion on Hungary](#), para. 109.

¹⁶⁹ ACFC [Thematic Commentary No. 3](#) (2012), para. 41.

¹⁷⁰ ACFC [Fourth Opinion on Hungary](#), paras. 122-124; ACFC [Fifth Opinion on Hungary](#), para. 110.

¹⁷¹ See [sixth state report](#), pp. 112-113.

¹⁷² See [sixth state report](#), p. 113.

¹⁷³ Borsod-Abaúj- Zemplén, Fejér, Hajdú-Bihar, Heves, Jász-Nagykun-Szolnok, Szabolcs-Szatmár-Bereg, Veszprém. See [sixth state report](#), p. 113.

¹⁷⁴ ACFC [Fifth Opinion on Hungary](#), para. 110, where this number was 56 during that monitoring period.

convenient. Some noted that in territorially dispersed communities, Hungarian is assumed to be universally spoken, with interpretation left to fellow community members when needed. Several interlocutors also highlighted that the low use of minority languages reflects linguistic assimilation, leading to their absence from the public sphere and confinement to private settings, as also noted in the Advisory Committee's Fifth Opinion.¹⁷⁵ Furthermore, the Advisory Committee was informed that opportunities to use minority languages are largely artificial, limited to the education system (see Article 14) rather than naturally integrated into daily life.

103. The Advisory Committee recalls that "language rights are effective only if they can be fully enjoyed in the public sphere. In assessing demand and existing needs, states should also take into account the specific local situation. 'Need' in this context does not imply the inability of persons belonging to national minorities to speak the official language and their consequent dependence on services in their minority language. A threat to the functionality of the minority language as a communication tool in a given region is sufficient to constitute a 'need' in terms of Article 10(2) of the Framework Convention. Protective arrangements must be in place to maintain services in the minority language, even if these are not widely used, as it may otherwise disappear from the public sphere.

104. The authorities therefore have to support and actively encourage measures creating an environment that is conducive to the use of minority languages, including languages spoken by numerically smaller minorities, through the allocation of necessary financial and human resources".¹⁷⁶ The Advisory Committee commends the authorities' solid legal framework but regrets that, despite the recommendation in its Fifth Opinion, the authorities have not developed a comprehensive plan to promote the use of minority languages in the public sphere, with the effective participation of organisations representing persons belonging to national minorities.

Recommendation

105. The Advisory Committee reiterates its previous call on the authorities to develop a comprehensive plan to promote the use of minority languages in the public sphere, ensuring the effective participation of organisations representing persons belonging to national minorities. Measures should encourage speakers to use minority languages in contacts with administrative authorities, especially at local level.

Use of personal names and display of signs and topographical indications in minority languages (Article 11)

106. The Advisory Committee notes that there have been no changes in the legal framework concerning the use of personal names in minority languages, which allows for their use and recognition in official documents and registers.¹⁷⁷ Representatives of national minorities, including their self-governments, generally expressed satisfaction with legal safeguards but noted challenges in enforcement. They highlighted the limited knowledge of civil registrars and officials regarding the application of the law, as demonstrated by a complaint filed by a person from a German national minority concerning the registration of her birth certificate and identity card before the Deputy Commissioner.¹⁷⁸ Technical issues also arise with characters and diacritical marks not found in the Hungarian alphabet, leading to bureaucratic obstacles. As a result, many interlocutors have called for a standardised procedure, applied uniformly by all official bodies, to ensure efficient and user-friendly civil registration in minority languages.¹⁷⁹ The Advisory Committee considers that such measures could reverse the general trend towards the "Magyarisation" of personal names, as already noted in its Fifth Opinion.¹⁸⁰

107. In 2021, the Deputy Commissioner issued a comprehensive general comment on the use of personal names in national minority languages, primarily analysing the associated challenges.¹⁸¹ Key issues highlighted included persistent shortcomings in civil registry practices, the need for updates in compiling, modifying and accessing the registers of approved minority first names (in close co-operation with national minority self-governments), and the technical and professional requirements for proper name registration in minority languages, including the training of registry officials.

¹⁷⁵ ACFC [Fifth Opinion on Hungary](#), para. 112.

¹⁷⁶ ACFC [Thematic Commentary No. 3](#) (2012), paras. 51, 56 and 58.

¹⁷⁷ ACFC [Fifth Opinion on Hungary](#), para. 114. The Advisory Committee however notes that since 2023, it became possible to use a person's name in the minority language in his/her passport. See [sixth state report](#), p. 124.

¹⁷⁸ Deputy Commissioner (2023), Joint report no. 899/2023 on the *ex officio* entry of nationality surnames and forenames in the birth certificate (available in [Hungarian](#)); [Newsletter of the Deputy Commissioner](#) issue 2023/3.

¹⁷⁹ For example, the Advisory Committee notes that Ukrainian names include a gendered patronymic (e.g., Oleksandrovych, Oleksandrivna), where it is not always registered accordingly, leading many parents to forgo using names in their language.

¹⁸⁰ ACFC [Fifth Opinion on Hungary](#), para. 116.

¹⁸¹ Deputy Commissioner (2021), General Comment No. 3/2021 (full text available in [Hungarian](#); summary in [English](#)).

108. The Advisory Committee notes that despite a solid legal framework for bilingual signs,¹⁸² its practical implementation remains limited. National minority representatives noted that such signs are possible if requested by local minority self-governments, as seen in Pécs with Croatian and Hungarian signage. However, these requests remain rare in practice due to bureaucratic hurdles and a lack of awareness about this possibility amongst persons affiliating with national minorities.

109. In 2021, the Deputy Commissioner also issued a comprehensive general comment on the use of community names in national minority languages to address ongoing shortcomings.¹⁸³ Recommendations included financial incentives for local governments to incorporate minority languages in public spaces, names of streets, signs and transportation, raising awareness among decision-makers, by actively involving minority communities in the naming process, and ensuring the unification of registers of official geographical names in minority languages.

110. The Advisory Committee reiterates that “[t]he right to use one’s personal name in a minority language is a core linguistic right of persons belonging to national minorities, linked closely to personal identity and dignity”.¹⁸⁴ The Advisory Committee also recalls that topographical indications in minority languages contribute to the maintenance of the local linguistic and cultural heritage and raise awareness of local national minorities, conveying the message that a given territory is shared in harmony by different ethnic groups.¹⁸⁵

111. Therefore, the Advisory Committee considers that displaying more signs and topographical indications in minority languages would constitute an affirmation of the long-standing presence of national minorities in Hungary as an integral part of the society. This would also contribute to the maintenance of the local linguistic and cultural heritage and raise awareness of national minorities locally. In this context, the Advisory Committee, whilst welcoming the existing legal framework, regrets that minority communities do not often make use of the possibilities available to them and therefore calls for the promotion of the use of personal and community names in national minority languages and for further measures to enhance the visibility of these languages.

Recommendation

112. The Advisory Committee strongly encourages the authorities to fully implement the legal framework with regard to the use of personal and community names in national minority languages without further delay by raising awareness among, and providing training for, local officials.

Intercultural education and knowledge about national minorities (Article 12)

113. The authorities introduced a new Public Education Strategy (2021-2030) in 2020, which identified “improving the education of Hungarians living abroad and the nationalities in Hungary” as one of its five key strategic pillars.¹⁸⁶ The 2020 National Core Curriculum (NCC) emphasises fostering national and European identity, patriotism, active citizenship, democracy and the preservation of national minority cultures.¹⁸⁷ It also contains the principles of education for students belonging to national minorities.¹⁸⁸ While there is no dedicated subject on intercultural education, related themes - such as children’s rights, democracy and citizenship - are integrated across the curriculum.

114. The Advisory Committee notes that “Homeland and Ethnographic Studies (*hon-és népismeret*)”¹⁸⁹ is a compulsory, one-year subject within history and civic education, typically taught in grades 5 or 6. Offered one hour per week, it covers local history, folk traditions, traditional lifestyles, holidays and key Hungarian historical figures. The subject aims to foster national identity and appreciation of Hungary’s cultural heritage, and promote understanding of the country’s cultural diversity, including its national minorities and their traditions and histories.

115. Many national minority representatives expressed concerns that, despite the availability of the subject “Homeland and Ethnographic Studies”, its implementation remains insufficient. They noted that while teaching about minorities is encouraged, its emphasis varies across schools, often depending on the regional or local composition of the student population and the initiative of individual teachers. In

¹⁸² See ACFC [Fourth Opinion on Hungary](#), para. 129; ACFC [Fifth Opinion on Hungary](#), para. 117. In municipalities where, according to the most recent census, persons belonging to national minorities represent at least 10% of the inhabitants, bilingual signs are to be displayed if the local national minority self-government so requests.

¹⁸³ Deputy Commissioner (2021), General Comment No. 4/2021 (full text available in [Hungarian](#); summary in [English](#)).

¹⁸⁴ ACFC [Thematic Commentary No. 3](#) (2012), para. 61.

¹⁸⁵ ACFC [Thematic Commentary No. 3](#) (2012), para. 67.

¹⁸⁶ Eurydice (2024), National Education Systems – Hungary, [2.1. Fundamental principles and national policies](#); Public Education Strategy 2021-2030 ([Köznevelési stratégia 2021-2030](#)).

¹⁸⁷ See the National Core Curriculum (available only in [Hungarian](#)).

¹⁸⁸ See [sixth state report](#), p. 86.

¹⁸⁹ See also [Útmutató a hon- és népismeret tantárgy tanításához: 2020-ban kiadott Nemzeti alaptanterv és kerettantervek alapján](#) (Guidance on national and ethnic studies for the 2020 edition of the National Curriculum and framework curricula). The interlocutors the Advisory Committee met mostly referred to this subject as “Knowledge about your nationality”.

some schools - particularly in more homogeneous areas - minority-related content is often only superficially addressed. As a result, national minorities are often either absent or inadequately represented in educational content and textbooks, contributing to a broader lack of societal awareness about them (see Article 6). Additional concerns were raised by interlocutors regarding the portrayal of certain historical events in school textbooks and the representation of national minorities in these narratives. Several interlocutors noted that different historical perspectives within minority communities can, at times, put them at odds with the dominant national narrative. For example, a person may be portrayed as an "enemy" in school history books but ascribed a "hero" status within historic narratives particular to a national minority community.

116. Persons affiliating with the Roma expressed regret over the limited reference to Roma history and culture in school curricula and textbooks, despite the formal inclusion of these topics (including the Roma Holocaust) in the general secondary school curriculum since 2013. The Advisory Committee notes that while the HNSIS 2030 includes awareness-raising measures aimed at young people to promote Roma culture and history, its implementation is widely seen as inadequate and lacking clear targets.¹⁹⁰ Interlocutors further emphasised their wish for Roma history and culture to be presented in a positive light - for example, through children's fairy tales that foster pride, joy and a stronger sense of belonging within the broader society. In this respect, the Deputy Commissioner also underscored the importance of the effective inclusion of Roma history in school curricula and teaching materials¹⁹¹ and called for the implementation of the Council of Europe's Committee of Ministers' Recommendation (2020)2 on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials, which the Advisory Committee also endorses.¹⁹²

117. The Advisory Committee reiterates that "curricula and educational materials must aim to value diversity, nurture respect for difference, and seek to develop analytical and critical thinking skills and that they 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 [...]".¹⁹³ The Advisory Committee further underlines that "curricula and educational materials should also take into account the diversity within minority communities" with a view to avoiding "the perpetuation of negative stereotypes, [...] while combating prejudice, superficial or oversimplified images and folklorisation of minorities and persons who affiliate with them."¹⁹⁴ Furthermore, the Advisory Committee underlines "the need for multiple perspectives in history teaching, to reflect appreciation of and encourage critical reflection on different perspectives, grounded in methodologically rigorous and independent historiography. Practice has shown however that history teaching may be an increasingly fraught, contested and challenging aspect of education."¹⁹⁵ "The Advisory Committee therefore pays close attention to how these events are taught and how persons belonging to national minorities feature within these histories."¹⁹⁶ In this sense, and with the aim of fostering a shared civic identity, states should engage with different competing historical narratives and debunk such narratives that are based on fraudulent sources or claims. Multiperspectivity as an approach should also be included in educational materials and be part of teachers' pre- and in-service training.¹⁹⁷

118. The Advisory Committee acknowledges the authorities' efforts in promoting knowledge of national minorities. However, it regrets that educational materials about Hungary's national minorities and persons affiliating with them remain largely sporadic and insufficient. Teachers are also neither systematically prepared to teach about national minorities nor well informed about minority rights. Given the increasing global emphasis on the need to teach respect for diversity, the Advisory Committee is of the view that all pupils and students in Hungary, regardless of where they live and how dispersed the national minorities may be, should have an adequate knowledge about all of Hungary's national minorities. Furthermore, the Advisory Committee recalls that age-appropriate teaching about the histories of national minorities should be included at all levels of the education system.¹⁹⁸ Quality history education is essential for fostering a democratic culture. In this respect, the Advisory Committee strongly encourages the authorities to join in the work of the Council of Europe Observatory on History

¹⁹⁰ Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 55.

¹⁹¹ Deputy Commissioner, General Comment 3/2020 on the professional and effective inclusion of Roma history in school curricula and teaching materials (full text in [Hungarian](#), summary in [English](#)).

¹⁹² [Recommendation CM/Rec\(2020\)2](#) of the Committee of Ministers to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials.

¹⁹³ ACFC [Thematic Commentary No. 1 \(2024\)](#) on education under the Framework Convention for the Protection of National minorities, adopted on 31 May 2024, revising and replacing Thematic Commentary No. 1 (2006), para. 25.

¹⁹⁴ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 26.

¹⁹⁵ ACFC [Thematic Commentary No. 4 \(2016\)](#), para. 34.

¹⁹⁶ ACFC [Thematic Commentary No. 4 \(2016\)](#), para. 35.

¹⁹⁷ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 36.

¹⁹⁸ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 38.

Teaching in Europe, which provides data through general and thematic reports, offers a platform for knowledge exchange and factual discussion, and promotes the sharing of good practices and successful models on history teaching.¹⁹⁹

Recommendation

119. The Advisory Committee strongly encourages the authorities to ensure that information about minority cultures, traditions, histories, religions and languages, including about numerically smaller minorities and persons affiliating with them, and about their integral and valued role in Hungary's diverse society, is included in school curricula, in educational materials and in accompanying teacher training. The authorities should also ensure that educational materials and teacher training adopt a multiperspective approach to history teaching. All teachers should receive systematic and practical training in human rights, including minority rights, in order to effectively and sustainably promote intercultural education within the school environment.

Equal access to education - Roma (Article 12)

120. The Public Education Strategy (2021-2030) identifies "equitable education tailored to individual needs" as a strategic objective. This is aimed at "reducing low educational attainment, early school leaving, integration and catching up".²⁰⁰ The HNSIS 2030 similarly has a dedicated chapter on education, which includes measures to overcome inequalities and ensure inclusive school environments. According to the authorities, progress has been made to enhance the educational inclusion of Roma children across all age groups through a range of initiatives, including "Sure Start" Children Houses, the "Bari Shej" programme for Roma girls, the "Roma College Network", the "Arany János" and the "Second Chance" programmes.²⁰¹ These efforts include offering scholarships to students in secondary and vocational education²⁰² and providing free meals for kindergarten children and free transportation for primary school pupils from remote areas.

121. Despite the measures taken, significant educational gaps remain between the Roma and the general population. The enrolment rate in early childhood education (for children aged three up to the start of compulsory schooling at age six) declined to 59% in 2021, down from 71% in 2016, while the rate for the general population stood at 93%.²⁰³ Although the number of pupils not completing compulsory education has decreased nationwide since the implementation of early warning prevention measures in 2016, it remains disproportionately high among the Roma, at 60.8%, compared to 9.3% among the non-Roma population.²⁰⁴ The Advisory Committee notes that absenteeism is a concern, and that strict penalties for non-attendance disproportionately affect Roma families, including the withdrawal of family allowances, further hindering their access to education. In this respect, the Deputy Commissioner underlined that sanctioning Roma families by cutting income support creates a contradictory system that penalises those already facing severe financial hardship.²⁰⁵

122. Several interlocutors also mentioned the continuing negative impact of the lowering of the compulsory school age from 18 to 16 on the educational attainment, which has led to Roma youth being channeled into low-skilled jobs offered as part of the public works scheme (see Article 15) rather than remaining in education, thus reinforcing the cycle of poverty among Roma. The EU FRA survey suggests that only 41% of Roma aged 20 to 24 have attained at least upper secondary education, compared to 86% of their peers in the general population.²⁰⁶ While the authorities informed the Advisory Committee that there is no data collection on the number of Roma children in Hungary or on their level of education (see also Article 4), the state report indicates that 0,5% of Roma aged 15 to 64 years had completed higher education in 2021 (compared to 26.2 % of the non-Roma population).²⁰⁷

123. The Covid-19 pandemic also impeded progress in educational inclusion.²⁰⁸ Limited access to digital devices and reliable internet connections have deepened existing inequalities, making it

¹⁹⁹ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 41. See also Resolution [CM/Res\(2020\)34](#) of the Committee of Ministers confirming the establishment of the Council of Europe Enlarged Partial Agreement on the Observatory on History Teaching in Europe and [The Observatory on History Teaching in Europe - Observatory on History Teaching in Europe](#).

²⁰⁰ Eurydice (2024), National Education Systems – Hungary, [2.1. Fundamental principles and national policies](#); Public Education Strategy 2021-2030 ([Köznevelési stratégia 2021-2030](#)), p. 26.

²⁰¹ See [sixth state report](#), pp. 130; 134-140; 181-182.

²⁰² Under the so-called Roma Nationality Scholarship programme, each year, 25 talented Roma students with excellent school performance receive a monthly scholarship of HUF 30 000 (€75).

²⁰³ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 37.

²⁰⁴ European Commission (2024), Education and Training Monitor 2024, [Hungary](#), p. 11.

²⁰⁵ Deputy Commissioner (2022), [General Comment No. 2/2022](#) on the examination of infringement procedures and other sanctions for school absence.

²⁰⁶ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 38.

²⁰⁷ See [sixth state report](#), p. 55.

²⁰⁸ See also Deputy Commissioner (2020), [General Comment No. 4/2020](#) on the effects of the coronavirus pandemic on nationality communities.

challenging for Roma pupils and students to participate in online education on an equal footing. The withdrawal of social assistance tied to school attendance has further jeopardised the ability of affected Roma to meet their basic needs.²⁰⁹ After-school education centres (*tanoda*) have demonstrated their vital role in improving Roma pupils' access to education, particularly by helping to close the digital literacy gap.²¹⁰ The Advisory Committee considers these *tanoda* models examples of good practice. During its visit to a *tanoda* in Alsószentmárton, which operates in both the Hungarian and Romani languages, the Advisory Committee observed firsthand the positive impact these centres have on both Roma pupils and the wider Roma community, including on the preservation of the Romani language and the learning outcomes of the pupils.

124. School segregation remains a sensitive and systemic issue. The Advisory Committee recalls that the segregation of Roma children in schools, their disproportionate placement in institutions for pupils with special educational needs, and other challenges they face have been closely monitored in its previous Opinions.²¹¹ These issues have also been highlighted by the ECtHR in two landmark judgments against Hungary²¹² whose execution remains pending. The Advisory Committee called upon the authorities to take specific measures to address the identified shortcomings. Although the state report lacks detailed information on this matter, the Advisory Committee understands that the authorities have introduced a wide range of measures aimed at eliminating segregation and promoting inclusive education throughout the country. These include the establishment of anti-segregation working groups in every school district, the development of equal opportunities action plans, regular reviews of school catchment area boundaries to ensure a balanced distribution of pupils, an early school leaving prevention system and several other instruments. The Advisory Committee notes that the most recent measure for desegregation is Act XCII of 2023 on anti-discrimination measures in the field of public education, which entered into force on 1 January 2024. According to this law, the budget support granted to the maintainers of public education institutions is reduced to 90% if the proportion of disadvantaged pupils is more than 20% or in subsequent years more than 15% lower than the municipality or district average.²¹³ The HSIS 2030 also recognises segregation as a major problem and encourages the implementation of desegregation measures. However, it lacks defined baselines and measurable targets for achieving these goals.²¹⁴ In this respect, some interlocutors of the Advisory Committee noted that the effectiveness of desegregation measures could be significantly improved by ensuring the inclusion of all relevant local stakeholders in drafting local desegregation and anti-segregation action plans, as well as by fostering greater clarity and transparency in communication at all levels, which seem to have also been confirmed by the evaluation report of the earlier HSIS.²¹⁵

125. The Advisory Committee deplores the fact that, despite the measures introduced, segregation remains widespread. Data shows that 44% of Roma children (aged 6-15) attend a school where all or most of the other children are Roma, although this represents a decrease compared to 2016 when this rate was 60%.²¹⁶ Complaints about segregation accounted for two thirds of those received by the Deputy Commissioner concerning education in 2023²¹⁷ and 2024.²¹⁸ Most interlocutors of the Advisory Committee, as well as researchers, link segregation with multiple factors, including "white flight", where non-Roma parents invoke the "free choice of school policy"²¹⁹ as a way of transferring their children from schools with a high number of Roma pupils to others situated further away. Some interlocutors also argue that inconsistent enforcement of catchment area rules further allows parental and school discretion, leading to selective admissions and increased segregation. This trend is also confirmed by the findings of the Institute of Economics of the Centre for Economic and Regional Studies which published indicators on public education and concluded that segregation has been growing in the country, mostly because disadvantaged students usually go to different schools than their less disadvantaged counterparts.²²⁰

²⁰⁹ European Roma Rights Center (ERRC) (2020), [Roma rights in the time of Covid](#), p. 17.

²¹⁰ [ECRI's Sixth Report on Hungary](#) (2023), para. 79.

²¹¹ See ACFC [Fourth Opinion on Hungary](#), paras. 55-56, 132-148; ACFC [Fifth Opinion on Hungary](#), paras. 123-130, 135.

²¹² [Horváth and Kiss v. Hungary](#) (no. 11146/11), 29 January 2013; [Szolcsán v. Hungary](#) (no. 24408/16), 30 March 2023.

²¹³ Secretariat of the Committee of Ministers of the Council of Europe, [DH-DD\(2024\)79](#), Communication from Hungary concerning the case of Szolcsán v. Hungary, [Action Plan](#) (24/01/2024).

²¹⁴ European Commission (2023), Commission Staff Working Document, Accompanying the document, Assessment report of the member States' national Roma strategic frameworks, {COM(2023) 7 final}, p. 84.

²¹⁵ Kopint-Tárki Institute for Economic Research (2020), [Evaluation of the implementation of the Hungarian National Social Inclusion Strategy](#) (Executive Summary in English), p. 3.

²¹⁶ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 40.

²¹⁷ Commissioner for Fundamental Rights (2024), [Beszámoló az alapvető jogok biztosának és felyetteseinek tevékenységéről 2023](#) (Report on the activities of the Commissioner for Fundamental Rights and his Deputies, 2023), p. 187.

²¹⁸ [Report on the activities of the Commissioner for Fundamental Rights and his Deputies \(2024\)](#), pp. 150 and 156-158.

²¹⁹ Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), [Feasibility study on desegregation and inclusion policies and practices in the field of education for Roma and Traveller children](#), CDADI(2024)19rev, pp. 28-29.

²²⁰ EU FRA (2021), Franet National Contribution to the Fundamental Rights Report 2021, [Hungary](#), p. 23.

126. Another factor is the disproportionate placement of Roma children in schools for special education needs, which was also addressed in the *Horváth and Kiss v. Hungary*²²¹ judgment of the ECtHR (still pending execution). Recent comprehensive research²²² has revealed that professionals often recommend segregated special education for Roma children not because of actual special needs, but due to their perceived “cultural deficits” and socio-economic disadvantages, viewing segregation as the lesser harm for children they believe are destined to fail in the mainstream system. Researchers also found that rather than acknowledging broader structural factors, these decisions effectively shift the responsibility for addressing systemic issues onto the Roma parents. The Advisory Committee notes positively that, following a 2020 court ruling by the Debrecen Appeal Court,²²³ the authorities must monitor whether Roma children are disproportionately classified as having special needs in Heves County for the next five years. While the Ministry has collected and published ethnic perception-based data since 2021, it argued that this is the first effort of its kind, and that nationwide expansion requires prior analysis of the current data.²²⁴

127. Cases of school segregation have been brought before national courts. Following the 2019 landmark ruling to award damages for the segregation of Roma and non-Roma pupils at a primary school in Gyöngyöspata, the Supreme Court (*Kúria*) upheld this decision,²²⁵ rejecting the authorities’ proposal to provide compensation through special tuition or courses instead of monetary payment. This led to a public outcry from some political figures (see Article 6).²²⁶ However, shortly after this ruling, a legislative amendment was introduced in 2020 to prohibit future claims for financial compensation in cases of discrimination by educational institutions. In this context, the Deputy Commissioner issued a general comment in 2021 on the education and training of Roma children in Gyöngyöspata.²²⁷ The Deputy Commissioner also investigated complaints of segregation and issued decisions, including one in January 2025 which permanently closed the kindergartens in the city of Kalocsa on grounds of segregation and redrew district boundaries to promote inclusion.²²⁸

128. During the monitoring visit, many interlocutors raised concerns about the growing number of church-run schools and their role in deepening segregation.²²⁹ Although they receive equal state funding,²³⁰ these schools benefit from additional church resources. As better-funded church schools now make up about 20% of all schools and over 33% of secondary schools, and as more schools shift to private or church control, particularly in remote areas, public schools are left under-resourced and increasingly segregated, with a growing concentration of Roma children.²³¹ And in some cases, church-run schools, while providing quality education, predominantly enroll Roma pupils without fostering genuine inclusion, as also observed by the Advisory Committee at the *Sója Miklós* Greek Catholic Primary School and Nursery next to Huszár settlement in Nyíregyháza. In this particular case, several

²²¹ This judgment concerned two Roma applicants claiming that their placement in a remedial school with a limited curriculum amounted to ethnic discrimination, that the schooling assessments were culturally biased, their parents could not exercise their participatory rights, and they had been stigmatised in consequence. In 2013, the ECtHR found that the Hungarian state failed to offer “the necessary guarantees stemming from the positive obligations of the State to undo a history of racial segregation in special schools.” For the latest status of the execution of this judgement, see Committee of Ministers of the Council of Europe, CM/Del/Dec(2024)1492/H46-17, [1492nd meeting \(12-14 March 2024\)](#) (DH) - H46-17 Horváth and Kiss / Szolcsán v. Hungary (Applications Nos. [11146/11](#) and [24408/16](#)). The Advisory Committee notes that in 2016, the European Commission launched infringement proceedings against Hungary for the segregation of Romani children in schools. There is no publicly available information on the status of the European Commission’s investigation.

²²² Adél Kegye and Ágnes Kende (2024), [Segregation in Special Education](#), Rosa Parks Foundation.

²²³ Debrecen Regional Court of Appeal, no. Pf.I.20.214/2020/10, 24.9.2020.

²²⁴ See Committee of Ministers of the Council of Europe, CM/Del/Dec(2024)1492/H46-17, [1492nd meeting \(12-14 March 2024\)](#) (DH) - H46-17 Horváth and Kiss / Szolcsán v. Hungary (nos. [11146/11](#) and [24408/16](#)).

²²⁵ *Kúria*, Decision No. Pfv.IV.21.556/2019/22, 12.5.2020. *Kúria* also issued a [communiqué](#) rejecting the idea of in-kind compensation (which is a legal remedy only available upon the agreement of the parties).

²²⁶ [ECRI’s Sixth Report on Hungary](#) (2023), para. 42.

²²⁷ See Deputy Commissioner, [General Comment No. 5/2021](#) on the situation of education and training of Roma children in Gyöngyöspata. The Advisory Committee notes that the Deputy Commissioner has been so engaged in the segregation issue and published other General Comments (i.e. [No. 3/2023](#); [1/2024](#) and [3/2024](#)) to identify the general and specific social and educational policy factors contributing to segregation at various school levels. These comments analyse relevant court judgments, professional and legal standards, and propose policy and integration measures aimed at addressing this systemic problem.

²²⁸ European Roma Rights Center (ERRC) (14 February 2025), [End of Segregation of Roma in Kindergartens in Kalocsa, Hungary After Community Legal Action](#).

²²⁹ Eszter Neumann (2024), [How churches make education policy: the churchification of Hungarian education and the social question under religious populism](#), *Religion, State and Society*, 53(2), pp. 97-116.

²³⁰ According to the Budget Act, the nationality self-governments, churches, other private organisations and local governments get subsidies from the central state budget to operate educational institutions. This subsidy is the average wage-based subsidy. The amount of the subsidy depends on the number of children/students. When calculating the number of children/students: special educational needs students with mild intellectual disability, physical development disturbances or speech disorder shall be considered as two; children/students with sensory or physical disturbances, moderate intellectual disability or autism spectrum disturbances, and with multiple disabilities shall be considered as three children/students. See further details European Agency for Special Needs and Inclusive Education (2023), [Country System Mapping Country Report: Hungary](#).

²³¹ See similar considerations in the [Statement](#) by the UN Special Rapporteur on the right to education, on her visit to Hungary, 10-21 March 2025.

Roma parents reported having no choice but to send their children to the nearby school after bus service to the public school in the town centre was discontinued.²³²

129. There are also reports of bullying and violence against Roma pupils in schools. In this regard, the Advisory Committee is concerned about the presence of security guards on premises of schools as a result of a legislative change in 2020 and considers that “a purely security approach would result in further stigmatisation of pupils and students from difficult backgrounds and low-income families, already living in disadvantaged regions, as is the case of Roma.”²³³ The Advisory Committee reiterates that segregation in education “adversely impacts the integration of society as a whole by maintaining divisions between individuals and communities.”²³⁴ “Segregation in education [...] is a form of discrimination that prevents equal access to education, and in particular to quality education for all. Segregated educational institutions tend to provide low-quality education and to have higher drop-out rates and worse academic outcomes. This has knock-on effects concerning access to employment, healthcare, housing and participation in the social, cultural and public life of a country. In the Advisory Committee’s view, segregation affecting Roma [...] and other communities in a socio-economically disadvantaged situation can have a particularly stigmatising effect. Reinforcing cycles of exclusion and marginalisation in society and further contributing to antigypsyism and other forms of racism, segregation both results from and perpetuates the social exclusion of those affected by it and must be comprehensively tackled – even in situations where, for various reasons, it has been chosen by persons belonging to these minorities.”²³⁵

130. The Advisory Committee also underlines that, “regardless of the manifold reasons for segregation, authorities have a positive obligation to adopt a comprehensive approach to end educational segregation, including situations that lead to it, such as housing or spatial segregation as well as racist bullying in schools” with the provision of concrete measures to eliminate it.²³⁶ An effective way to address this is by fostering an education environment that not only ensures equal access to rights but also is respectful and appreciative of diversity within the school population. Lastly, the Advisory Committee recalls that in cases where authorities refer to the “voluntary” nature of segregation and view it as a matter of parental choice or minority “demand”, no waiver of the right not to be subjected to racial discrimination can be accepted and further recalls the importance of the justiciability of the right to education in line with the case law of the ECtHR.²³⁷

131. The Advisory Committee finally reiterates that “[e]nsuring access of all persons belonging to national minorities to quality education 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.”²³⁸

132. While the authorities have introduced measures to improve equal access to education for Roma, particularly regarding systemic segregation, the Advisory Committee regrets the lack of a comprehensive assessment of these persistent issues and the absence of targeted measures to improve Roma children’s educational attainment. Many Roma children still grow up with limited interaction with non-Roma peers, reinforcing social divisions. Given the low levels of educational completion which reduces the prospects of access to the labour market (see Article 15), it is essential to closely monitor attendance, drop-out rates, educational outcomes, including among different schools, and post-school pathways such as higher education, apprenticeships, or employment. To achieve this, the Advisory Committee stresses the importance of collecting accurate, regularly updated disaggregated data (see Article 4). It also acknowledges that segregation is a complex, multifaceted issue, requiring time, sustainable funding and trust-building with minority communities, particularly involving Roma children and parents. While desegregation remains the ultimate goal, continuous and well-monitored efforts are needed to ensure inclusive and high-quality education for all.

Recommendations

133. The Advisory Committee urges the authorities, in close co-operation with parents and Roma minority representatives including women, to put in place measures to end school segregation, by adopting a comprehensive desegregation policy with clear targets, sufficient

²³² The case was dealt with by the Deputy Commissioner, who concluded that there had been a violation of the right to equal treatment of Roma children. See also Deputy Commissioner, General Comment No. 4/2024 on concerns for equal treatment violations due to the lack of local public transport and school bus (full text available in [Hungarian](#); summary in [English](#)).

²³³ [ECRI’s Sixth Report on Hungary](#) (2023), para. 12.

²³⁴ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 20.

²³⁵ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 59.

²³⁶ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 63.

²³⁷ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 61.

²³⁸ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 50.

resources, precise timetables and a monitoring mechanism for its implementation. Educators working with Roma pupils and students should be trained and supported to improve attendance rates and educational outcomes and prevent dropouts, including by promoting the value of education.

134. The Advisory Committee calls on the authorities to assess the current situation regarding the access of Roma to quality education and implement long-term sustainable measures, in co-operation with Roma representatives, schools, parents and students, to improve their access to such education. Measures should be adopted to set up a gender disaggregated data collection system and monitor the school attainments and educational outcomes of Roma pupils and students, with particular attention to Roma girls, to ensure their equal access to education at all levels and their equal educational outcomes. This should be done in consultation with Roma representatives, including young people and women, and a broader range of stakeholders, including education professionals who directly work with them.

Teaching in and of minority languages (Article 14)

135. The Advisory Committee notes that the Fundamental Law, the Act on the Rights of Nationalities and the Act on Public Education continue to provide solid legal framework on the right of persons belonging to national minorities to education in their minority languages. As stated in the previous Opinions,²³⁹ Hungary maintains a well-developed system of minority language education structured around three models: i) “nationality schools”, where all subjects (except Hungarian) are taught in the minority language; ii) “bilingual schools”, where the minority language is used in over 50% of the lessons, covering at least three subjects; iii) “minority language teaching”, where the minority language is taught as a subject within mainstream schools. As a general rule, a minimum of eight pupils is required before “nationality school” education can be provided. If there are fewer than eight pupils, then the so-called “supplementary language training” can also be provided.

136. The Advisory Committee notes that the legislation also allows the national minority self-governments to maintain public education institutions and that, of the 13 national minorities recognised by law, 11, with the exception of the Armenians and the Rusyns, maintain such institutions. Those which run educational institutions receive special support and can claim the average wage subsidy for a lower-than-average number of pupils (eight instead of 12) and, like church-run schools, they are also entitled to additional operating subsidies per pupil. According to representatives of national minorities, financial framework for operating “nationality schools” is sufficient, although some of them mentioned the delays experienced in the conclusion of public education contracts during the latest five-year contractual period (2022-2026).²⁴⁰ The Deputy Commissioner also investigated the matter and called for, among others, timely consultations with national minority representatives before finalising such contracts to assess specific funding needs.²⁴¹

137. According to the state report,²⁴² “minority language teaching”²⁴³ remains the most prevalent form of national minority education, involving 45% of all minority pupils. However, participation in these programmes declined by 4% in 2022 (the most recent year for which data is available). In contrast, “bilingual schools” have gained popularity, with a quarter of minority pupils enrolled. Among national minority languages, German remained in highest demand, accounting for 83% of pupils participating in national minority language education in 2022, followed by Slovak (7%), Croatian (4%), and Romanian (2%). The share of students learning Boyash and Romani has steadily declined, reaching just 1%. Supplementary training programmes were also offered by the Bulgarian, Greek and Polish nationality self-governments, involving about 500 pupils. In 2022, 18 108 children belonging to the Bulgarian, Croat, German, Greek, Romanian, Rusyn, Serb, Slovak and Slovene minorities studied in 386 “nationality kindergartens”, 56 408 children belonging to Bulgarian, Croat, German, Greek, Polish, Romanian, Rusyn, Serb, Slovak, Slovene and Ukrainian minorities in 512 “primary nationality schools” and 3 871 children belonging to Bulgarian, Croat, German, Romanian, Serb, Slovak and Slovene minorities in 28 secondary “nationality schools”.²⁴⁴ There are two “mother tongue” primary schools

²³⁹ ACFC [Fourth Opinion on Hungary](#), paras. 149-150; ACFC [Fifth Opinion on Hungary](#), para. 142.

²⁴⁰ In certain justified cases, national minority self-governments and other non-state maintainers of national minority public education institutions may receive additional supplementary support under a public education contract. At present, five national minority self-governments and two public foundations receive an additional HUF 1.3 billion (approximately €3.32 million) per year for the operation of the national minority public education institutions they maintain. See Public Education Strategy 2021-2030 ([Köznevelési stratégia 2021-2030](#)), p. 77.

²⁴¹ See also Commissioner for Fundamental Rights and Deputy Commissioner for the Protection of Nationalities Living in Hungary (2022), Joint report in case No. A JB-1268/2022 on the assessment of the support of national minority public education institutions maintained by national minority self-governments under public education contracts, (Summary in [English](#), available in [Hungarian](#)).

²⁴² See [sixth state report](#), pp. 147-149.

²⁴³ The Advisory Committee notes that in the schools that have opted for the introduction of “minority language teaching”, the time frame for such teaching is five hours per week in schools where Croatian, German, Romanian, Serbian, Slovak and Slovenian languages are taught, and four hours for other languages, while it is three hours for Romani and Boyash.

²⁴⁴ The state report provides a breakdown of pupils according to models of education. See [sixth state report](#), pp. 244-255.

teaching in Romani/Boyash, four bilingual nursery/preschools (Romani-Hungarian/Boyash-Hungarian) and in 17 primary and secondary schools Romani/Boyash are being taught.²⁴⁵

138. While the Advisory Committee's interlocutors expressed their overall satisfaction with the existing framework for teaching in and of minority languages, they voiced concerns about a declining interest among younger generations in learning minority languages, as well as a lack of motivation and possibilities to use these languages outside of school settings. The Advisory Committee also met with several teachers from schools attended by students belonging to national minorities. These interlocutors reported a high level of satisfaction with regard to school environment and the quality of pedagogical facilities. The Advisory Committee was pleased to observe this firsthand during its visit to a Hungarian-Croatian bilingual school in Pécs. The apparent superior facilities of these schools also make them attractive to families with no minority affiliation as well as for Croatian pupils living across the border. In the view of the Advisory Committee, educational establishments like these bilingual schools are not only important for the teaching of or in the minority language under Article 14 of the Framework Convention but are also a good example of the provision of intercultural education, as they provide a learning space where students interact constructively with each other and thus contribute to societal integration²⁴⁶ in line with Article 12 of the Framework Convention.

139. The Advisory Committee's interlocutors further highlighted persistent challenges, most notably, the shortage of qualified teachers in minority languages, especially for certain science subjects. The Advisory Committee understands that the shortage of teachers is currently a general problem in the country, which has a negative impact on the general population and is particularly severe in remote areas, where over 40% of schools report a lack of qualified teachers, up from one-third in 2018.²⁴⁷

140. As elaborated in the state report,²⁴⁸ the authorities continue to adopt measures in this area, such as the "nationality teacher programme"²⁴⁹ and in-service training (CRP training), which are supported by the National Minority Pedagogical Education Centre. The Advisory Committee also welcomes the scholarship programme within the framework of the nationality teacher programme, which is further supported with wage supplement for "nationality teachers"²⁵⁰ and the provision of free textbooks for students "attending nationality education".²⁵¹ However, continuing shortages have led some schools to employ underqualified personnel at times, risking undermining the quality of education or to hire staff from "kin-states". This challenge is further compounded for smaller, more territorially dispersed minorities, such as the Armenians, where finding qualified teachers has been particularly difficult.

141. The Advisory Committee was further informed about the stark disparities in how minority language and culture are integrated into the curricula of "nationality schools". While some institutions demonstrate strong implementation, others offer only limited or largely symbolic content. In this regard, unequal access to educational resources - such as textbooks in minority languages and digital learning tools - remains an issue. While most textbooks in national minority languages are domestically produced in Hungary, some materials are from "kin-states".

142. The Advisory Committee reaffirms its view that one of the purposes of minority language education is to "maintain or inculcate a degree of fluency and literacy that enables the learner to use the language both in public and private life and to pass it on to the next generation".²⁵² It also underlines the importance of the continuity of the offer of minority language education, from preschool through to university and adult/continuing education. Moreover, it is essential that the authorities do not take a purely passive approach but actively stimulate the demand, which need to be regularly monitored, for education in a minority language through "awareness-raising among parents and young people, and the promotion of existing possibilities for minority language teaching."²⁵³ Minority language education also requires qualified teachers and in-service training, both of which warrant systemic support from the authorities. In this connection, the Advisory Committee also notes that "[t]he lack of a sufficient supply of educational materials negatively impacts the quality of the education offered to minority children and adds barriers to the interest pupils, students and parents may have when deciding whether to choose minority language education."²⁵⁴ Finally, the Advisory Committee underlines that the learning of a minority language should always promote the perception of belonging to the civic community and of

²⁴⁵ Additional information provided by the authorities on 10 January 2025.

²⁴⁶ ACFC [Thematic Commentary No. 1 \(2024\)](#), paras. 17-18.

²⁴⁷ See the [Statement](#) by the UN Special Rapporteur on the right to education, on her visit to Hungary, 10-21 March 2025; European Commission (2024), Education and Training Monitor 2024, [Hungary](#), p. 10.

²⁴⁸ See [sixth state report](#), pp. 146-155 and 178-181.

²⁴⁹ This programme aims to increase the number of young people choosing to become a "nationality teacher" as a career and to raise the quality of "nationality teacher training", to make language training more effective.

²⁵⁰ See [sixth state report](#), pp. 191-193.

²⁵¹ See [sixth state report](#), p. 22.

²⁵² ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 87.

²⁵³ ACFC [Thematic Commentary No. 3 \(2012\)](#), para. 71; ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 108.

²⁵⁴ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 116.

minorities as an integral part of the society they live in. In this vein, states bear the responsibility to produce good-quality teaching and learning materials in consultation with persons affiliating with minorities and to regularly update them.²⁵⁵

143. The Advisory Committee welcomes the considerable efforts by the authorities to support the teaching in and of minority languages. It however notes that significant disparities exist in terms of different minority communities' access to such education. A key concern is the lack of robust mechanisms to assess the educational outcomes of the existing provision, which hampers the ability to track progress or to respond effectively to linguistic needs. Specific minority needs and interests are not regularly assessed and high-quality domestically produced educational materials are not ensured for all persons affiliating with each minority. The provision and promotion of such education among national minorities requires regular assessment of demand, adequate resources and continuous efforts to address the persistent shortage of qualified teachers, which requires systematic investment in teacher training and relevant pedagogical resources.

Recommendation

144. The Advisory Committee strongly encourages the authorities to continue to support the provision of minority language education for persons affiliating with national minorities. The authorities should collaborate with persons affiliating with national minorities, national minority self-governments, educational institutions and municipalities to assess the demand for such education as well as the actual minority needs and interests, and to ensure that its organisation is feasible and attractive for pupils/students and families. Furthermore, additional resources should be allocated to the production of high-quality and up to date educational materials, including for digital learning, and to improving the availability and training of teachers. The authorities should introduce measures to raise awareness of and incentivise the learning of minority languages, including the Romani and Boyash languages, when demand exists.

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

145. The political participation of national minorities has been previously discussed by the Advisory Committee.²⁵⁶ The Advisory Committee notes that the national minority voting system is in place for general elections, where national minority self-governments have the responsibility to draw up the electoral lists, separately for each minority, and that there also exists the institution of "nationality advocates" in the national parliament.²⁵⁷ Currently, one member of parliament, belonging to the German national minority, was elected in 2022 elections - which is the second instance following the 2018 elections and since the introduction of this rule in 2014. The remaining 12 national minorities, except the Roma, are represented by "nationality advocates". The Roma Minority Self-Government did not submit an electoral list by the required deadline ahead of the 2022 elections.²⁵⁸

146. Furthermore, national minorities may establish minority self-governments at the local, regional (or county) and national levels through direct elections. Whilst the legal framework has largely remained unchanged, amendments to the Act on the Rights of Nationalities in 2023 introduced several important modifications.²⁵⁹ Pursuant to these amendments, the general election of local national minority self-government representatives must be called if, according to the most recent census, there are at least 25 residents of a given area identified as belonging to a national minority. Furthermore, it is no longer

²⁵⁵ ACFC [Thematic Commentary No. 1 \(2024\)](#), para. 118.

²⁵⁶ ACFC [Fifth Opinion on Hungary](#), paras. 146-154. See also the [Fundamental Law of Hungary](#) (Section The State, The National Assembly, Article 2 (2)) and the [Act on the Election of the Members of the National Assembly](#) (Sections 9, 12).

²⁵⁷ In the national parliament, 106 seats are contested in single-member constituencies and filled under a one-round system, while 93 seats are allocated under a nationwide proportional system among lists which have cleared the 5% threshold. Those who identify as members of one of the 13 recognised national minorities may pre-register as "national minority voters". For each election cycle, national minority self-governments draw up a closed candidate list ("national minority list"). On election day, registered "national minority voters" cannot vote for political party lists like other voters, but can only vote (or abstain from voting) for candidates on the national minority list drawn up for the minority they affiliate with. The national minority lists benefit from a "preferential quota" (i.e. being exempted from the 5% threshold applicable to political party lists, one single preferential mandate can be obtained from each national minority list provided that the list gets one quarter of the votes that would be required for a mandate from a political party list. Should a minority list not reach the number of votes required to win a seat, the most successful candidate on that list still enters the parliament as a "nationality advocate" who does not have the right to vote, but is entitled to access documents, participate in parliamentary work in committees and the chamber, to take the floor and propose amendments. The nationality advocates liaise with the chairpersons of the country-level self-governments, who are standing invitees, with consultation rights, to the meetings of the Parliamentary Committee of Nationalities in Hungary.

²⁵⁸ See Balázs Dobos (2024), *The Parliamentary representation of minorities in Hungary – Recent Developments*, Chapter 12, *European Yearbook of Minority Issues*, 21(1), pp. 288-312; Péter Kállai (11 March 2022), [How to Lose \(the Almost\) Guaranteed Representation – Recent Developments concerning Roma Parliamentary Representation in Hungary](#), ECMI Minorities Blog.

²⁵⁹ Kecskés Tamás (31 October 2023), [A nemzetiségek jogairól szóló törvény 2023. évi átfogó módosításáról](#) (Comprehensive amendment of the Law on the Rights of Nationalities in 2023). See also Article 56 of [the Law CLXXIX of 2011](#) as amended.

necessary for a municipality which already had a minority self-government in place to reach 25 individuals of a given minority; now, 20 individuals are sufficient.²⁶⁰

147. During the monitoring visit, several interlocutors highlighted the limited co-operation between national and local minority self-governments. Some interlocutors also underlined the difficulties reported in the context of the right of local minority self-governments to give their opinion and consent to the measures taken by the local authorities, for example, relating to appointments to public education institutions.²⁶¹ The Advisory Committee emphasises the crucial role that municipalities play in ensuring the inclusion of minorities as the key actors at the forefront of identifying the gaps in addressing the exact needs and interests of these minorities. Establishing effective channels of co-operation between national and local minority self-governments as well as between local authorities and local minority self-governments and creating synergies between these actors are essential.

148. While the preferential quota and the institution of “nationality advocates” in the national parliament are generally welcomed by national minority representatives, some have nevertheless raised concerns. For instance, given their numerically smaller population, most national minorities can only theoretically elect a member of parliament, as in practice most of them are not large enough to meet the preferential quota. Additionally, some researchers have argued that since minority voter registration is based solely on self-identification without any further requirements, the system is open to potential abuse - referred to as “ethno-business”²⁶² - where individuals from the majority population may influence minority elections. This, in turn, could enable those in power to manipulate the system for their own benefit.²⁶³ In this regard, several interlocutors also pointed out that the current system of drawing up electoral lists by national minority self-governments undermines political competition and presupposes that national minorities are politically homogeneous entities.²⁶⁴ This hinders effective participation, by preventing full expression of the wide diversity of views, needs and interests found among persons affiliating with an individual national minority.

149. The Advisory Committee notes that the system of political representation in the national parliament has also been subject to a judgement before the ECtHR in 2022 in *Bakirdzi and E.C. v. Hungary*²⁶⁵ following the application lodged by persons affiliating with the Greek and Armenian national minorities. Among others, the ECtHR underlined that “the system that was put in place limited the opportunity of national minority voters to enhance their political effectiveness as a group and threatened to reduce, rather than enhance, diversity and the participation of minorities in political decision-making”²⁶⁶ and found a violation of Article 3 of Protocol No. 1 (right to vote) in conjunction with Article 14 (prohibition of discrimination). The Advisory Committee notes that the judgement is still pending execution.²⁶⁷

150. The Advisory Committee reiterates that “[r]epresentation and participation of persons belonging to national minorities in elected bodies [...] is an essential but not sufficient condition for effective participation. Their inclusion in elected bodies at different levels largely depends on the constitutional traditions and guarantees provided for by electoral legislation. The choice and modalities of the electoral system often has a direct impact on the effectiveness of minority participation in decision-making.”²⁶⁸ In this regard, the Advisory Committee has noted that “when electoral laws provide for a threshold requirement, its potentially negative impact on the participation of national minorities in the electoral process needs to be duly taken into account.”²⁶⁹ The Advisory Committee also considers that “[c]onstitutional guarantees for the representation of persons belonging to national minorities in elected bodies need to be coupled with effective implementing legislation and accompanying measures within

²⁶⁰ Furthermore, irrespective of the number of individuals identifying with a minority, an election must be called in any municipality where, as of 1 December of the year preceding the general election, a national minority public education institution, a national minority vocational training institution, or a public education institution offering national minority education was in operation.

²⁶¹ See, for example, Joint Report of the Deputy Commissioner (2023) concerning the case [AJB-1627/2023](#).

²⁶² Balázs Dobos (2023), “Cultural Autonomy, Safe Haven or Window-Dressing? Institutions Maintained by Minority Self-Governments in Hungary”, in David J. Smith et al. (eds.), *Realising Linguistic, Cultural and Educational Rights through Non-Territorial Autonomy*, pp. 155-170, at p. 156, see also footnote 1.

²⁶³ Péter Kállai and Aliz Nagy (2019), *Parliamentary Representation of Nationalities and Kin-minorities – Hungary’s Biased Electoral System*. *European Yearbook of Minority Issues*, 17(1), pp. 171-189.

²⁶⁴ See similar, Elisabeth Sándor-Szalay and Balázs Kiss (2022), *An Odd Solution – Comments on the Margins of a Recent Debate on National Minority Suffrage: ECtHR judgement in Case Bakirdzi and E.C. v. Hungary*, *Pécs Journal of International and European Law - 2022/II*, p. 68.

²⁶⁵ *Bakirdzi and E.C. v. Hungary* (nos. [49636/14](#) and [65678/14](#)), 10 November 2022.

²⁶⁶ *Bakirdzi and E.C. v. Hungary*, § 73. It is recalled that the ECtHR found a violation on account of the total effect of the combination of three aspects of the legislation (§ 74): i. the votes of minority voters in this system are highly susceptible to dilution (§§ 57-59); ii. the option to vote solely for a closed minority list does not constitute a genuine choice, as required by the principles of free elections (§§ 61, 65, 72); iii. the limitation on selecting between different political ideas, parties, or candidates also raises concerns about the right to secrecy of the ballot (§ 72).

²⁶⁷ For the state of play of the execution, which is currently under enhanced supervision before the Committee of Ministers of the Council of Europe, see [CM/Notes/1521/H46-16](#) and [CM/Del/Dec\(2025\)1521/H46-16](#).

²⁶⁸ ACFC [Thematic Commentary No. 2](#), *The effective participation of persons belonging to national minorities in cultural, social and economic life and in public affairs*, adopted on 27 February 2008, para. 72.

²⁶⁹ ACFC [Thematic Commentary No. 2](#) (2008), para. 82.

reasonable time” to ensure the effective participation of persons belonging to national minorities and that these persons “participate or are consulted in the process of drafting such legislation and monitoring its implementation.”²⁷⁰

151. The Advisory Committee regrets that, despite its previous recommendation,²⁷¹ there is no evidence of regular and adequate evaluation of the legislative framework for the parliamentary representation of national minorities or of the effective participation by minority representatives in such processes to ensure the framework meets their current needs and interests. Consultations with stakeholders are also needed to identify and address potential shortcomings in the current minority voting system. The Advisory Committee considers that while, in principle, the national minority voting system currently in place could be to the benefit of persons belonging to national minorities, the practice shows that not all such persons have an effective opportunity to win parliamentary seats. In this respect, the Advisory Committee underlines that the right to political participation for persons belonging to national minorities should be practical and effective. Moreover, parliamentary representation should not be seen as the exclusive means of implementing Article 15 of the Framework Convention.²⁷² Although the institution of “nationality advocates” in the national parliament is a welcome measure to promote minority participation, consultations with stakeholders are needed to identify and address potential shortcomings in the current minority voting system and ensure that it does not discriminate against numerically smaller minorities.

152. In this regard, the Advisory Committee is of the view that the current system of political participation needs to be assessed and solutions found that encompass all 13 national minorities on an equal basis. The Advisory Committee heard divergent views on the possible avenues to address this issue, including those views advocating plural voting arrangements,²⁷³ but understands that there is no consensus among national minorities. This increases the need for effective consultations on possible solutions.

Recommendation

153. The Advisory Committee strongly encourages the authorities to promptly address the shortcomings in the current system of parliamentary representation for national minorities, through full and effective consultation with their representatives, in line with the standards provided by the Framework Convention. Any approach taken should consider the need to respect equal opportunities and diversity within national minorities and any future measure should be implemented through effective and inclusive consultation.

Effective access to employment – Roma (Article 15)

154. Although the national policy framework related to Roma, HNSIS 2030 (see Article 4), provides for various measures to promote their employment, including those related to vocational training, job assistance and non-discrimination, the Roma population remains significantly underrepresented in the labour market. The authorities informed the Advisory Committee that the employment rate among Roma has shown an upward trend in recent years, rising from 40.1% in 2015 to 48.7% in 2023.²⁷⁴ However, other data indicate that 36% of Roma youth (aged 16-24) are neither employed nor in education or training, compared to 12% in the general population.²⁷⁵

155. According to the state report,²⁷⁶ factors such as low levels of education, leaving school early, spatial segregation and in particular the low employment rate among Roma women - 44% compared to 81% among Roma men (aged 15-64)²⁷⁷ - continue to impact employment outcomes. The Advisory Committee takes positive note of the emphasis on the gender employment gap in the HNSIS 2030 and, in this regard, welcomes special programmes primarily targeting Roma women, such as the “Women Are the Chance” project, through which 1 073 individuals had obtained vocational qualifications - mainly to work as social carers and nurses - by the end of 2023.²⁷⁸

²⁷⁰ ACFC [Thematic Commentary No. 2](#) (2008), para. 83.

²⁷¹ ACFC [Fifth Opinion on Hungary](#), para. 153.

²⁷² ACFC [Thematic Commentary No. 2](#) (2008), para. 87.

²⁷³ Venice Commission (2002), [Code of Good Practice in Electoral Matters: Guidelines and Explanatory Report](#), para. 23.

²⁷⁴ Additional data from the EU FRA Survey indicates that 62% of Roma aged 20-64 are in paid employment, compared to 75% of the general population, reflecting an increase from 49% in the previous survey conducted in 2016. See EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 43.

²⁷⁵ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 45.

²⁷⁶ See [sixth state report](#), p. 49. The state report also mentions that in the period between 2017 and April 2022, the share of jobseekers self-identifying as belonging to a national minority was around 4-5%. The largest numbers were represented by jobseekers belonging to the Roma, German, Romanian and Croat national minorities, whereas the fewest persons affected were among the Armenian, Slovene and Greek national minorities. See [sixth state report](#), p. 258.

²⁷⁷ See EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 44.

²⁷⁸ See [sixth state report](#), p. 85.

156. Despite these seemingly positive trends, many interlocutors, including from the Roma minority, highlighted the disproportionate participation of Roma in public works schemes, which is also attributed as a factor in the reported increase in Roma employment rates.²⁷⁹ Managed by municipalities and often involving local minority self-governments, these schemes heavily rely on Roma labour without offering sustainable paths out of poverty. Around 20% of public works scheme participants are Roma,²⁸⁰ primarily engaged in low-skilled jobs requiring no qualifications like street sweeping. While such schemes may slightly reduce long-term unemployment, they seldom give access to the primary labour market, as they do not encourage job seeking in more employment-rich regions and have a low training content.²⁸¹ Consequently, as research indicates,²⁸² public work schemes risk fostering a cycle of dependency, where Roma repeatedly engage in these schemes without acquiring new skills or receiving meaningful support to transition into stable, skilled employment. This perpetuates reliance on welfare and reinforces socio-economic exclusion, rather than promoting genuine integration into the labour market.

157. The Advisory Committee also received reports highlighting how the public works schemes reinforce local power hierarchies and deepen the vulnerability of Roma. Tied to social allowances,²⁸³ these schemes grant local authorities discretion in implementation, which has allegedly been used to intimidate, or secure political support - including through the provision of necessities like firewood. This lack of transparency and accountability entrenches dependency, undermines the empowerment of Roma and restricts their participation in local decision-making.

158. The Advisory Committee reiterates that “[i]n order to promote effective integration of persons belonging to disadvantaged minority groups in socio-economic life, comprehensive and long-term strategies should be designed and 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.”²⁸⁴ The Advisory Committee further recalls that “[p]ersons belonging to national minorities often live in regions at a distance from political and economic centres of activity. Hence, they can be confronted with more difficult socio-economic situations than the majority population. State Parties should take specific measures to increase the opportunities for persons belonging to national minorities living in peripheral and/or economically depressed areas [...] to participate in socio-economic life.”²⁸⁵

159. Despite observing progress in improving employment rates, the Advisory Committee remains deeply concerned about the overall employment situation of the Roma, particularly their heavy reliance on public work schemes, which contributes to their hidden unemployment in the long term. More innovative measures are needed to promote inclusivity in the labour market. These might include, among others, employer incentives, public-private partnerships and positive action.²⁸⁶ In this context, the Advisory Committee welcomes incentives that encourage companies to employ Roma through public procurement, as well as the programmes introduced following the 2020 reform of the vocational education and training (VET) system.²⁸⁷ These programmes included “Dobbantó” and “Műhelyiskola” models, which target Roma and offer flexible learning pathways. They aim to help students who have dropped out of upper secondary education to acquire basic or partial competences through training and apprenticeships. Nevertheless, the Advisory Committee regrets that the available data do not include a breakdown of Roma beneficiaries of these measures, nor is there a comprehensive assessment of their overall impact on the economic empowerment of Roma. Furthermore, while scholarships dedicated to increasing Roma representation in the police workforce exist, no applications have been received from 2019 to 2024.²⁸⁸ In this respect, the Advisory Committee recalls that equal opportunities for employment must be ensured in both the private and the public sectors. Therefore, addressing systemic barriers, including the limited access to higher education, should remain a priority in order to break the vicious cycle of economic disempowerment.

²⁷⁹ See also Roma Civil Monitor (2022), [Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Hungary](#), p. 20.

²⁸⁰ See [sixth state report](#), p. 50.

²⁸¹ OECD (2021), [OECD Economic Surveys: Hungary](#), p. 60.

²⁸² Sára Hungler and Ágnes Kende (2021), [Diverting Welfare Paths: Ethnicisation of Unemployment and Public Work in Hungary](#), *Políticas laborais e justiça redistributiva*, 35.

²⁸³ Under the current system, both unemployment measures and family allowance are merit-based, with people being entitled to benefits if they co-operate with the employment office and participate in public work schemes. Moreover, due to the low level of social welfare subsidies and public work wages, reportedly, beneficiaries cannot maintain dignified living conditions.

²⁸⁴ ACFC [Thematic Commentary No. 2](#) (2008), para. 49.

²⁸⁵ ACFC [Thematic Commentary No. 2](#) (2008), para. 42.

²⁸⁶ [OSCE HCNM Recommendations on effective Participation of National Minorities in Social and Economic Life & Explanatory Note](#), October 2023, Recommendation 20, p. 52.

²⁸⁷ See additional information provided by the state authorities on 10 January 2025.

²⁸⁸ See [sixth state report](#), p. 53.

Recommendation

160. The Advisory Committee calls on the authorities to conduct a comprehensive assessment of the impact of employment-related measures under the Hungarian National Social Inclusion Strategy 2030 on the economic empowerment of Roma. Further efforts should be made to improve employment outcomes for Roma - particularly in the most disadvantaged regions - and to further strengthen targeted policies for Roma women and youth. These measures should be developed in close co-operation with persons affiliating with the Roma minority and independent experts, supported by adequate resources, and regularly monitored and evaluated.

Effective access to adequate housing – Roma (Article 15)

161. The authorities informed the Advisory Committee that in the area of housing, the HNSIS 2030 has a wide range of goals,²⁸⁹ including eliminating segregated neighbourhoods where possible, and renovating housing and providing facilities in areas where desegregation is not feasible. In this context, the “Catching-Up Settlements (FETE)” programme,²⁹⁰ launched in 2019 to support the 300 most disadvantaged settlements that are home to 298 000 people, mostly Roma - is considered the most significant initiative for achieving these goals. According to the authorities, the programme had been implemented in 238 villages by 2024, with full coverage expected by 2025. Among other measures, since 2020, Hungary’s Directorate-General for Social Inclusion has partnered with the Hungarian Charity Service of the Order of Malta to improve access to social housing in these settlements,²⁹¹ which suffer from poor infrastructure and a lack of qualified professionals. Since 2023, the FETE programme has relied on EU funds. In addition, several complex slum upgrading programmes, such as the “Supporting Co-operation for Convergence” project, have delivered infrastructure improvements, including social housing construction, in 119 segregated areas across 97 settlements, benefiting nearly 30 000 people.²⁹² However, the Advisory Committee regrets that overall information provided by the authorities on the current state of Roma housing is limited and lacks concrete data on how many Roma families and individuals have actually benefited from these programmes.²⁹³

162. Despite some progress by the authorities²⁹⁴ in improving Roma access to adequate housing, the overall situation remains a persistent challenge. Roma continue to live predominantly in Roma-only settlements or segregated urban areas, reinforcing spatial and social segregation. Although the proportion of Roma living in housing deprivation decreased from 63% in 2016 to 37% in 2021 (compared to 24% in the general population),²⁹⁵ inadequate living conditions continue to severely hamper access to essential public services. As observed by the Advisory Committee in the Huszár settlement near Nyíregyháza, overcrowding remains a chronic problem. Despite some improvements,²⁹⁶ the EU FRA survey suggests that 91% of Roma still live in households lacking the minimum number of rooms, compared to just 20% in the general population.²⁹⁷

163. Discrimination against Roma in the housing market is also prevalent, as manifested in a case where the Commissioner for Fundamental Rights found a landlord’s treatment of a tenant’s Roma wife as discrimination by association.²⁹⁸ Although a moratorium on evictions was introduced at the start of the Covid-19 pandemic, reports of forced evictions emerged already before the pandemic ended, putting many Roma families at risk of homelessness.²⁹⁹ The 2022 annual report³⁰⁰ by the Deputy Commissioner also noted numerous housing-related complaints from Roma individuals, particularly regarding the shortage and poor conditions of social housing. Complaints included rent and utility debt, evictions, denial of rental contracts and social housing, and limited access to water and electricity. Poor

²⁸⁹ Among others, these include ensuring access to basic services and infrastructure, expanding phone and internet connectivity, addressing energy and transport poverty, preventing evictions, promoting the effective use of social inclusion tools available to local governments, as well as preventing the formation of segregated areas and supporting housing mobility and desegregation.

²⁹⁰ Catching-Up Settlements Programme (FETE) [Felzárkózó települések program](#).

²⁹¹ A variety of measures is used depending on local conditions: social assistance, early childhood development and health care services, education and training activities, work socialisation and skills development, housing interventions/measures, crime prevention, reduction of drug use, victim assistance, and necessary infrastructural investments.

²⁹² See [sixth state report](#), pp. 41 and 85. The Advisory Committee was also informed that 275 new dwellings were built and 349 were renovated, affecting 3 477 disadvantaged people, under the so-called “Complex Programmes”.

²⁹³ See similar considerations, European Committee on Social Rights (ECSR) (2024), [Hungary, Conclusions 2023](#), p. 13.

²⁹⁴ See [sixth state report](#), pp. 40-42 and 59.

²⁹⁵ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 52.

²⁹⁶ See [sixth state report](#), p. 59.

²⁹⁷ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 54. This is based on the [Eurostat definition of overcrowding](#).

²⁹⁸ EELN (17 July 2023), [Flash Report](#) – Discrimination by association in the housing market. See also [Decision EBF-AJBH-28/2022](#) of the Commissioner for Fundamental Rights (available in Hungarian only).

²⁹⁹ European Roma Rights Centre (ERRC) (7 October 2020), [Forced evictions of Roma mark the end of the Covid-19 moratorium](#); ERRC (12 May 2021), [80 Roma face eviction after local government receives €1.4 million in EU funds to renovate properties](#). The Advisory Committee notes that according to official information, the moratorium on evictions ended in summer 2022.

³⁰⁰ Commissioner for Fundamental Rights (2023), [Beszámoló az alapvető jogok biztosának és felyetteseinek tevékenységéről 2022](#) (Report on the activities of the Commissioner for Fundamental Rights and his Deputies, 2022), pp. 154-155.

insulation and high utility bills further increased their vulnerability and the risk of eviction. Roma interlocutors informed the Advisory Committee that these problems continue to affect Roma to a large extent and remain systemic issues with regard to housing.

164. Roma interlocutors mentioned to the Advisory Committee that housing policies often focus on improving living conditions within segregated areas, rather than adopting a holistic approach that addresses segregation itself through targeted measures to eliminate it. During its visit to Huszár settlement near Nyíregyháza, residents expressed disappointment with the rehabilitation project, citing poor-quality work in both the residential areas and public spaces such as the playground and parks. They claimed that these became unusable within a few months, undermining the authorities' commitment to the minority. Furthermore, in their view, the location of the settlement contributed to their segregation from the wider population and isolation in areas such as employment and education. It was also brought to the attention of the Advisory Committee that new amendments to the Fundamental Law of Hungary³⁰¹ entered into force in July 2025. These amendments empower local authorities to adopt local regulations aimed at protecting their "fundamental right to self-identity" in the name of preserving local identity, including the authority to determine who may or may not move into a municipality. Several civil society organisations³⁰² have expressed concern about the potential discriminatory effects of this legislation, particularly on persons affiliating with the Roma minority. While the Advisory Committee takes note of this development, it considers it premature to assess its impact and implications before the manner in which the legislation will be applied becomes clear.

165. 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 and Travellers, 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".³⁰³

166. The Advisory Committee remains concerned that, despite the recommendation made in its Fifth Opinion,³⁰⁴ holistic and sustainable measures to improve Roma access to housing are still lacking. This shortfall sometimes results in educational segregation (see Article 12). While the authorities have made some commendable efforts, significant challenges persist. These challenges must be addressed through an integrated approach which offers adequate housing solutions, improves infrastructure and prevents the deepening of socio-economic disparities and poverty. In this context, the active involvement of municipalities, who play a pivotal role in housing for Roma, in the design and implementation of housing policies, as well as their collaboration with Roma local self-governments and the Roma themselves, is essential. The Advisory Committee considers that expanding social housing and prioritising desegregation measures are crucial, as explained in the relevant Council of Europe recommendations that offer guidance on these issues.³⁰⁵

167. Finally, several interlocutors, including from the Roma minority, raised concerns about the overrepresentation of Roma children in child protection services - an issue previously highlighted by the Advisory Committee in its Fifth Opinion.³⁰⁶ As the Advisory Committee's interlocutors explained,³⁰⁷ these separations continue to occur largely as a result of material factors, such as inadequate housing and poverty, despite the Child Protection Act prohibiting the removal under these grounds. The authorities, however, cited reasons such as "neglect, endangerment, and parental unsuitability," as a basis for removal, even though the Budapest Regional Court found evidence of discrimination against Roma children in state care in 2021.³⁰⁸

168. While acknowledging that decisions are taken on the basis of the "best interests of the child", the Advisory Committee stresses the need for improved co-operation between child protection services and Roma parents to prevent errors caused by misunderstanding, stereotyping or discrimination. Child

³⁰¹ Bill No. [T/11152/8](#), The Fifteenth Amendment to the Fundamental Law of Hungary, as adopted by the Parliament of Hungary on 14 April 2025 (unofficial [English translation](#)), Article 6. This amendment, titled "Law on the Protection of Local Identity," was supplemented by the implementing regulation - Government Decree 240/2025 (VII. 31.) - on the rules governing the application of this Law. The Decree entered into force on 1 August 2025.

³⁰² European Roma Rights Center (ERRC) (29 September 2025), [Apartheid by stealth: ERRC condemns Hungarian law on the 'protection of local identity' as discriminatory](#); see also Council of Europe (CoE), Venice Commission, Opinion on the compatibility with international human rights standards of the fifteenth amendment to the Fundamental Law of Hungary, adopted on 13 October 2025, [Opinion CDL-AD\(2025\)043](#), paras. 72-76.

³⁰³ ACFC [Thematic Commentary No. 2](#) (2008), para. 57.

³⁰⁴ ACFC [Fifth Opinion on Hungary](#), paras. 184-185.

³⁰⁵ Recommendation [Rec \(2005\)4](#) of the Committee of Ministers on improving the housing conditions of Roma and Travellers in Europe; Recommendation [CM/Rec\(2024\)1](#) of the Committee of Ministers on equality of Roma and Traveller women and girls.

³⁰⁶ ACFC [Fifth Opinion on Hungary](#), para. 183.

³⁰⁷ Submissions by the European Roma Rights Centre (ERRC) and the Working Group Against Hate Crimes in Hungary to the Advisory Committee on 28 October 2024.

³⁰⁸ EELN (2 August 2023), [Flash Report, Hungary - Curia judgment on discrimination in the child protection system](#) For comparable cases, see also EU FRA, Franet National Contribution to the Fundamental Rights Report 2021, [Hungary](#), pp. 24-25.

protection services need more awareness on national minority cultures and traditions to be able to take any decisions in a culturally sensitive manner.³⁰⁹ Moreover, material hardships like poverty and poor housing cannot be resolved by families alone and require an integrated approach, including, for example, comprehensive support to improve Roma families' living conditions and parenting capacity through social and other targeted measures.

Recommendations

169. The Advisory Committee reiterates its previous calls on the authorities to ensure that the right of Roma children not to be removed from their families for material reasons is effectively respected; to duly investigate the reasons for their disproportionate presence within the care system; to effectively remedy the situation; to ensure that the principle of the best interests of the child is consistently upheld; and to provide support measures to families at risk of having their children removed with a view to improving their living conditions.

170. The Advisory Committee strongly encourages the authorities to improve the housing conditions of persons belonging to the Roma minority. This should include upgrading existing infrastructure and ensuring access to essential services, such as drinking water and electricity. Housing policies should also be integrated with broader desegregation measures, including targeted employment initiatives and efforts to facilitate the social inclusion of Roma. Particular attention should be paid to people in a vulnerable situation, especially families with young children and older people.

Effective access to healthcare – Roma (Article 15)

171. The authorities reported on several measures introduced to overcome territorial inequalities in health provision and to offer specialised outpatient care in rural areas. These include the implementation of medical screening tests using mobile buses throughout the country, mainly in areas inhabited by Roma, which led to the testing of 42 000 people, as well as a drug abuse prevention and treatment programme targeting segregated settlements between 2019 and 2022.³¹⁰ Nevertheless, the health indicators for the Roma population are significantly lower than those found among the majority population: on average, Roma women live nine years less than women in the general population, and Roma men live 6.4 years less than men in the general population.³¹¹

172. There is no data collected on the health situation of persons belonging to the Roma minority due to the restrictions in the relevant legislation.³¹² While the HNSIS 2030 acknowledges systemic challenges in the healthcare system - such as underfunding and a decline in healthcare professionals like midwives - it fails to address their disproportionate impact on the Roma minority, and it frames health issues as not fundamentally Roma-specific but mostly poverty-related, with most of the risks Roma face defined as arising from poor housing conditions, lack of access to safe drinking water and unequal access to healthcare.³¹³ However, the HNSIS 2030 lacks timelines and success indicators to measure progress in improving the health of the Roma.³¹⁴

173. The most pressing healthcare issues among Roma in Hungary continue to be limited access to safe drinking water and sanitation, particularly in segregated areas; limited social security coverage, with some interlocutors emphasising the impact of the revision of the Social Security Act in 2021, which runs the risks of excluding a great number of Roma from state healthcare;³¹⁵ limited capacity and accessibility of services in areas with a high share of Roma populations; harmful behaviour such as smoking and drug use; and discriminatory practices against Roma in hospitals. The Advisory Committee is particularly concerned about the reports of widespread discrimination against Roma women in access to reproductive rights,³¹⁶ with accounts of individuals facing neglect, verbal abuse, segregation in

³⁰⁹ [PACE Resolution 2232 \(2018\)](#) *Striking a balance between the best interest of the child and the need to keep families together*, adopted by the Parliamentary Assembly of the Council of Europe on 28 June 2018, paras. 5.2., 5.5, 5.6 and subparagraphs 5.6.3, 5.6.5 and 5.6.9.

³¹⁰ Bringing Screening Tests Close to Home Programme. See [sixth state report](#), pp. 42-44.

³¹¹ EU FRA (2022), [Roma in 10 European countries – Main results](#), p. 48.

³¹² Act XLVII of 1997 on the processing and protection of health and related personal data. See [sixth state report](#), p. 42.

³¹³ [Magyar Nemzeti Társadalmi Felzárkózási Stratégia 2030](#) (available in Hungarian only), pp. 129-131.

³¹⁴ European Commission (2023), Commission Staff Working Document, Accompanying the document, Assessment report of the member States' national Roma strategic frameworks, {COM(2023) 7 final}, p. 85.

³¹⁵ In the Hungarian system, those who are unemployed but are not entitled to either unemployment benefits or other forms of social allowance must pay a certain amount of contribution (a tax) to the national healthcare. Often, this monthly contribution represents a significant financial outlay which is difficult to afford for Roma families and hence, many of them have built up significant debts. Due to the revision in the Act, people who have accumulated a certain amount of unpaid taxes, have been excluded from free healthcare as of 12 February 2021. This does not include emergency healthcare. See also [ECRI's Sixth Report on Hungary](#) (2023), para. 85.

³¹⁶ Submission by the EMMA Association to the Advisory Committee on 22 October 2024 and by the European Roma Rights Centre (ERRC) on 28 October 2024. See also European Parliament (2024), [Obstetric and gynaecological violence in the EU - Prevalence, legal frameworks and educational guidelines for prevention and elimination](#); European Roma Rights Centre (ERRC) (2020), [Reproductive Rights of Romani Women in Hungary](#), Cause of Action Series.

maternity care and denial³¹⁷ of certain health care services. The Hungarian Supreme Court also ruled on a case brought by Roma mothers against a hospital in Miskolc, finding both direct and indirect discrimination and ordering a fine of HUF 2 000 000 (€5 600).³¹⁸ The Advisory Committee was also informed of the barriers faced by Roma refugee women from Ukraine³¹⁹ in accessing health services, including discrimination and a lack of trauma-informed care. However, according to the Advisory Committee's interlocutors, Roma women lack awareness of the available mechanisms and rarely use them to protect their rights in healthcare. They seldom file complaints against these incidents, nor do they pursue legal action.

174. The Advisory Committee has concerns about the overall healthcare situation of the Roma. It recognises the connection of this issue with social and economic factors, notably housing, education and employment. It is further concerned by the lack of effective and non-discriminatory access to healthcare, including sexual and reproductive health services for Roma women and girls. The establishment of more trustworthy channels of communication between health professionals and Roma women, and the empowerment of Roma women through appropriate counselling services, are essential to achieve this. Finally, the Advisory Committee reiterates that persons belonging to national minorities face particular difficulties in their access to healthcare, which is a key element of participation in socio-economic life,³²⁰ and notes these difficulties may be exacerbated by persons exposed to intersectional discrimination, such as based on gender and minority affiliations.

Recommendation

175. The Advisory Committee asks the authorities to ensure effective access to healthcare services for persons belonging to the Roma minority, including reproductive healthcare services. They should also provide training to healthcare professionals in applying a gender-specific and culturally sensitive approach to providing healthcare for persons from marginalised minorities. The authorities should also invest in the medical infrastructure and services in areas where persons belonging to these minorities reside. Adequate attention should be paid to gender-based healthcare outcomes.

Cross-border contacts and bilateral co-operation (Articles 17 and 18)

176. The authorities informed the Advisory Committee on various activities and projects undertaken by both civil society organisations and national minority self-governments.³²¹ These initiatives, especially in the fields of art, culture, community building, education and youth empowerment, underscore the close ties between national minorities in Hungary and neighbouring and other states. During their exchanges with the Advisory Committee, representatives of the Bulgarian and Slovak minorities expressed their satisfaction with the recent opening of their cultural and educational centres in Budapest, noting that these developments were the result of bilateral agreements.

177. The six joint committees on minorities (JCMs), which are intergovernmental, cross-border bodies established to safeguard the rights of national minorities, have continued to operate for the Croat, Romanian, Serb, Slovak, Slovene and Ukrainian minorities. Although their activities were suspended during the Covid-19 pandemic, sessions gradually resumed, resulting in several recommendations, some of which have been incorporated into Hungarian government decisions. Since the Fifth Opinion, however, no meetings have been held concerning the Romanian, Serb and Ukrainian minorities, while the Croat, Slovak and Slovene committees last convened in April 2025, April 2024, and September 2024, respectively. The Standing Subcommittee of the Hungarian-German Cultural Joint Committee has also continued its activities.

178. The Advisory Committee welcomes Hungary's efforts of bilateral co-operation and sees a further opportunity to promote relations with neighbouring countries. In this context, the Advisory Committee recalls the principles enshrined in the OSCE HCNM Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations, according to which "[i]n dealing with issues concerning the protection of persons belonging to national minorities, States should be guided by the rules and the principles established in international human rights documents, including those multilateral instruments and mechanisms which have been created specifically to support the implementation of standards and commitments relating to minorities".³²² The Advisory Committee further recalls the view of the 2001

³¹⁷ European Roma Rights Center (ERRC) (10 April 2024), [Legal Action Against Church-Run Hospital Denying Abortion Services for Roma in Hungary](#). Several interlocutors expressed that these incidents mostly take place in church run hospitals.

³¹⁸ Hungarian Supreme Court (Kúria), Pfv.IV.20.677/2019/8, judgment of 20 May 2020 (available in [Hungarian](#)); European Roma Rights Centre (ERRC) (31 August 2020), [Romani mothers win hospital discrimination case in Hungarian Supreme Court](#).

³¹⁹ EMMA (2024), "And Then We Reached the Border: There were a Million Women!" [Experiences of Roma Refugee Women from Ukraine with Sexual and Reproductive Healthcare in Hungary](#).

³²⁰ [ACFC Thematic Commentary No. 2](#) (2008), para. 61.

³²¹ See [sixth state report](#), pp. 214-231.

³²² See OSCE High Commissioner on National Minorities (2008), [Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations](#), Recommendation 17.

Council of Europe Venice Commission report, stating that “[t]he effectiveness of the treaty approach could be undermined, if these treaties were not interpreted and implemented in good faith in the light of the principle of good neighbourly relations between States”.³²³

179. The Advisory Committee emphasises that the protection of national minority rights is a primary responsibility of the state in which national minorities live. The protection afforded and support given to persons affiliating with certain national minorities should not be dependent on the conditions of bilateral relations with another state. Furthermore, the Advisory Committee reiterates that the conclusion of bilateral agreements can serve to strengthen minority protection and contribute positively to the development of cross-border relations. Such co-operation can effectively complement the protection measures the country takes at the national level and support the development of infrastructure of national minorities, particularly in areas such as education (Article 14).

180. In this context, the Advisory Committee commends the constructive dialogue established by the Hungarian authorities with national minorities, and where relevant, their “kin-states”, across various aspects of life, including culture and education. Nonetheless, more regular meetings of the JCMs could be beneficial to strengthen further dialogue between neighbouring states, including with minorities not currently represented by a JCM.

Recommendation

181. The Advisory Committee encourages the authorities to pursue good relations with all neighbouring countries, including through continued efforts to convene the joint committees on minorities on a regular basis.

³²³ Council of Europe Venice Commission, [Report on the Preferential Treatment of National Minorities by their Kin-State](#) (2001), p. 22.

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, among other languages, in Hungarian, Armenian, Bulgarian, Croatian, German, Greek, Romanian, Polish, Serbian, Slovakian, Slovenian, Romani and Ukrainian.

This opinion contains the evaluation of the Advisory Committee following its 6th country visit to Hungary.

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