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Case Document No. 1

European Roma Rights Centre (ERRC) v. Czech Republic
Complaint No. 190/2020

COMPLAINT

Registered at the Secretariat on 20 January 2020

Department of the European Social Charter
Directorate General Human Rights and Rule of Law
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COLLECTIVE COMPLAINT

European Roma Rights Centre v. the Czech Republic

For failure to collect data so as to address the overrepresentation of Romani children in State care

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Violations of Article 16, 17 and the equality principle of the European Social Charter

COMPLAINANT:

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I. PARTIES TO THE COMPLAINT

(a) The complainant organisation

1. The European Roma Rights Centre (*hereinafter* "the ERRC") is a Roma-led international public interest law non-governmental organisation aiming to combating antigypsyism in Europe, including by providing legal representation to victims of human rights violations. The ERRC has already submitted several collective complaints to the European Committee of Social Rights (*hereinafter* "the Committee") focusing mainly on discrimination, housing, and social protection.[1] The ERRC has consultative status with the Council of Europe and is thus entitled to submit collective complaints under Article 1(b) of the Additional Protocol of 1995.

2. Taking into account the above-mentioned information and the fact that the Czech Republic ratified the European Social Charter (1961) (*hereinafter* "the Charter") and accepted the obligations in Articles 16 and 17 of the Charter to which this complaint is related, the complainant organisation submits that **this complaint is admissible.**

3. The ERRC is supported in this collective complaint by Central European non-governmental organisation, Forum for Human Rights (*hereinafter* "FORUM"). FORUM works to ensure that human rights are respected, protected and fulfilled in accordance with relevant international human rights standards, using litigation and advocacy to promote human rights before national and international human rights bodies. FORUM provides support to domestic and international NGOs and conducts and supervises domestic and international litigation and advocacy activities. FORUM has cooperated with different non-governmental organisations and jointly submitted several collective complaints.

(b) The respondent State's European Social Charter obligations

4. This collective complaint has been lodged against the Czech Republic on the grounds of failure to discharge its obligations under Article 16 and 17 of the Charter: the right of families to their full development, and the rights of parents and children to social and economic protection. The ERRC as the complainant organisation claims that the Czech Republic failed in their duty to ensure the implementation of effective policies, notably data collection and assessment that would mitigate the disproportionately high number of Romani children and infants being institutionalised. Furthermore, the ERRC claims that the current situation amounts to indirect discrimination and results in violation of the non-discrimination clause set forth in the Preamble to the Charter.

5. The Czech Republic ratified the Charter on 3 November 1999, accepting 52 of the Charter's 72 paragraphs, **including Articles 16 and 17**. The Czech Republic ratified the Amending Protocol to the Charter on 17 November 1999. It signed the Revised Charter on 4 November 2000 but has not ratified it yet. The Czech Republic ratified the 1995 Additional Protocol providing for a system of collective complaints on 4 April 2012. Consequently, this complaint should be considered admissible.

[1] The list of cases is available online at: http://www.errc.org/strategic-litigation-european-social-charter.

II. OBLIGATIONS OF THE STATE PARTY

6. As early as 2006, the Czech Republic had sought to justify its failure to obtain reliable statistical data on the situation of Roma by claiming the protection of rights of ethnic minorities. According to the Czech Government, it was unlawful to collect ethnic data, making it impossible to collect more reliable statistical data about unemployment of Roma, and accordingly, legal obstacles prevented the Government from achieving full implementation of Art. 1(1) of the Charter. The Committee emphasised in reply that when a particular group is generally acknowledged to be actually or potentially discriminated, the authorities cannot stop their efforts due to a legal prohibition on collecting data about ethnicity. On the contrary, the State had an obligation in those circumstances to find alternative means of assessing the extent of the problem and progressing towards resolving it.[2] The Committee also recognised that when official sources of data are inadequate to assist in creating policies to fulfil social rights, estimates have to be taken into account to formulate such policies.[3]

7. Similarly, the Committee has asked Bulgaria to provide evidence on the steps the Government have taken to decrease the number of children dropping out of school and to show that those steps actually led to a decrease; this includes specifically producing data substantiating equality of access to education for all children from different ethnic backgrounds. Indeed, to fulfil its obligations and ensure regular attendance of children in schools under Art. 17(2) of the Revised Charter, Bulgaria was asked to provide a very specific set of data, concerning not only rate of primary education dropouts, but elaborated statistics of such dropouts specifically disaggregated on the basis of their ethnicity.[4]

8. The Committee has already acknowledged that collecting data disaggregated by ethnicity may be necessary or appropriate to achieve objectives of the Charter. It simultaneously identified several minimal standards on processing such sensitive data, whenever states are required to collect them. Firstly, the collection of ethnic data should not be unduly constraining, and states should promote voluntary self-identification. Secondly, such collection should be conducted with participation of and in cooperation with human rights monitoring bodies, as well as non-governmental groups experienced in working with such vulnerable groups, to avoid reluctance of vulnerable groups to disclose their ethnic identity. Finally, qualified staff must be deployed to ensure that data is processed confidentially.[5] In fact, the Committee has expressed concern over identifying vulnerable minorities as part of broad population censuses if those census exercises are not accompanied by safeguards, are performed under special security measures, or when the data collected from the census are not appropriately used to benefit the communities concerned.[6]

9. Apart from the Committee, the Parliamentary Assembly of the Council of Europe in its Resolution 2153 (2017) – Promoting the Inclusion of Roma and Travellers called on Member

[2] Conclusions XVIII-1 – Czech Republic – Article 1(1), XVIII-1/def/CZE/1/1/EN.
[3] ERRC v. Greece, European Committee of Social Rights Complaint No. 15/2003, Decision on the merits of 8 December 2004, para. 28.
[4] Conclusions 2005 – Bulgaria – Article 17(2), 2005/def/BGR/17/2/EN.
[5] COHRE v. Italy, European Committee of Social Rights Complaint No. 58/2009, Decision on the merits of 25 June 2010, para. 119.
[6] COHRE v. Italy, European Committee of Social Rights Complaint No. 58/2009, Decision on the merits of 25 June 2010, para. 126-131.

States – called on states to "*engage, in conformity with data protection requirements, in collecting the necessary data to enable programmes to promote the inclusion of Roma and Travelers to be appropriately designed and their impact to be effectively monitored*".[7]

10. The European Commission against Racism and Intolerance (ECRI) similarly recommended that in order to combat antigypsyism more effectively, states should collect statistical data on Roma, in particular in the fields of education, employment, housing and health, while ensuring respect for the principles of confidentiality, voluntary self-identification and informed consent.[8]

11. In his 2013 report following his visit to the Czech Republic, the Council of Europe Commissioner for Human Rights emphasised the importance of introducing a system for collecting ethnic data, with due respect for the principles of confidentiality, informed consent and the voluntary self-identification of persons as belonging to a particular group.[9]

12. In 2005, the Committee of Ministers of the Council of Europe issued Recommendation Rec(2005)5 to Member States on the Rights of Children Living in Residential Institutions. It recommended that relevant statistical data should be collected and analysed, and that states should support research for the purposes of efficient monitoring.[10]

13. When it comes to European Union law, the General Data Protection Regulation (GDPR)[11] does not prevent collecting and processing data on ethnicity, providing special safeguards. The GDPR only applies if the data collected allows a natural person to be identified directly or indirectly; statistics about the ethnicity of children in care facilities or foster care, for example, can be collected in such a way to avoid any individual child's Romani identity being recorded. According to of the EU Racial Equality Directive[12], States should adopt positive action to ensure that the principle of equal treatment is effectively implemented in practice.

14. The concept of indirect discrimination implies a necessity to produce statistics giving a picture of the extent and characteristics of racial discrimination, assessing the impact of policies, and facilitating possible legal proceedings.[13] Thus, where states are under an obligation to combat discrimination, including by prohibiting indirect discrimination,[14] and to secure rights under the Charter, collection and proper analysis of ethnic data is vital to

[7] Parliamentary Assembly of the Council of Europe, Resolution 2153 (2017) – Promoting the Inclusion of Roma and Travellers, para. 5.5.

[8] ECRI, General Policy Recommendation No. 13 on Combating Anti-Gypsyism and Discrimination against Roma, 24 June 2011, Recommendation 14.

[9] Commissioner for Human Rights, REPORT by Nils Muižnieks Commissioner for Human Rights of the Council of Europe Following his visit to the Czech Republic from 12 to 15 November 2012, 21 February 2013, para. 15.

[10] Committee of Ministers, Recommendation Rec(2005)5 of the Committee of Ministers to Member States on the Rights of Children Living in Residential Institutions, 16 March 2005.

[11] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), 4 May 2016.

[12] Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Article 5.

[13] Patrick Simon, ECRI, "'Ethnic' statistics and data protection in the Council of Europe countries". Study Report, Strasbourg, 2007, p. 69.

[14] ERRC v. Italy, European Committee of Social Rights Complaint No. 27/2004, Decision on the merits of 7 December 2005, para. 20.

ensure proper assessment of the problem and to effectively combat, suppress, and provide redress for persons subjected to indirect discrimination.

15. Even though the Czech Republic has not ratified the Revised Charter, the European Committee has clarified that it pays particular attention to the situation of disadvantaged and vulnerable groups, and any restrictions on a particular right must not be interpreted in such a way as to impede the effective exercise of the right. The Committee has noted that the non-discrimination principle compels such an approach.[15] In addition, the Committee has relied on the jurisprudence of the European Court of Human Rights[16] as well as UN standards on equality and non-discrimination.[17]

16. Similarly, the Committee of Ministers, overseeing the implementation of judgments delivered by the European Court of Human Rights, has also confirmed the importance of ethnic data collection in order to implement the Court's judgments and prevent discrimination against Roma, notably in the case of *Horváth and Kiss v. Hungary*,[18] by stressing the importance of data collection and repeatedly calling on Hungary to provide statistical evidence on the diminution of the number of Roma children in special schools.[19]

17. Data collection and assessment are a vital part of monitoring compliance with human rights and the prohibition on discrimination. The UN 2030 Agenda for Sustainable Development states that quality, accessible, timely, and reliable disaggregated data are needed to help with the measurement of progress and to ensure that no one is left behind. It states that data are key to decision-making and mentions data on ethnicity as one of the vital components of the follow-up and review processes for monitoring the implementation of the Agenda in the coming years.[20] Moreover, the UN Special Rapporteur on Extreme Poverty and Human Rights has argued that the European Commission should start infringement proceedings if an EU Member State misinterprets the EU data protection legislation as not permitting data collection on the basis of racial and ethnic origin.[21] Recent research at EU level suggests that the most effective and economically viable way of assessing the impact and enforcement of anti-discrimination law and policy is to collect and analyse straightforward racial and ethnic origin data in the national census, surveys and administrative registries.[22] Under the International Covenant on Economic, Social and Cultural Rights related to non-discrimination, states are expected use appropriate

[15] European Roma and Travelers Forum (ERTF) v. the Czech Republic, European Committee of Social Rights Complaint No. 104/2014, Decision on the merits of 17 May 2016, para. 112.

[16] See, e.g., ERTF v. the Czech Republic, European Committee of Social Rights Complaint No. 104/2014, Decision on the merits of 17 May 2016, para. 95, when referring to the European Court of Human Rights jurisprudence on indirect discrimination.

[17] ERTF v. the Czech Republic, paras.18-20.

[18] Horvath and Kiss v Hungary, judgment of 29 January 2013.

[19] See: Notes and Decisions by the Committee of Ministers, 1348th meeting, 4-6 June 2019, available at: http://hudoc.exec.coe.int/eng?i=004-10905.

[20] Resolution of the General Assembly of the United Nations no. A/RES/70/1, adopted on 25 September 2015, para. 74.

[21] United Nations, End-of-mission statement on Romania, by Professor Philip Alston, United Nations Human Rights Council Special Rapporteur on extreme poverty and human rights, available at: https://www.ohchr.org/en/newsevents/pages/displaynews.aspx?newsid=16737&langid=e%252523sthash.42v5aeft.dpuf.

[22] FARKAS, Lilla. Analysis and Comparative Review of Equality Data Collection Practices in the European Union: Data Collection in the Field of Ethnicity. Luxembourg: Publications Office of the European Union, 2017 ISBN 978-92-79-66084-9 doi:10.2838/447194, p. 45.

benchmarks and indicators when monitoring, as well as implementing national policies or strategies that take into account data disaggregated by ethnicity.[23]

18. The UN has also urged all states regularly to assess the situation of individuals and groups of individuals who are victims of racial discrimination through collection and analysis of reliable statistical data. Such assessment requires not only monitoring of the situation of disadvantaged individuals, but also the development and evaluation of policies for the purpose of preventing such discrimination.[24] The collection of disaggregated data is essential to tackle indirect discrimination specifically.[25] Data collection should be overseen by a specific mandate, with a view to assessing levels of discrimination and implementing adequate policies.[26]

19. The Committee has also recalled that when sufficient safeguards against abuse are achieved, proper ethnic data collection and assessment become an indispensable source for the formulation of rational policies.[27] In order to adopt effective anti-discriminatory strategies, states must: (a) be able to identify vulnerable individuals who are experiencing discrimination; (b) map characteristics and situations of such vulnerable individuals in order to provide effective policies to combat discrimination; and (c) allow victims to use ethnic data to file anti-discrimination actions and seek redress in civil proceedings.[28] Without such data collection and assessment, the Czech Republic cannot properly ensure that the rights set forth in the Charter are in fact being respected for the minorities within its jurisdiction, especially for the Czech Republic's historically disadvantaged Romani communities.

III. THE SITUATION IN THE CZECH REPUBLIC

20. Roma are among most disadvantaged and vulnerable groups in Europe, including in the Czech Republic. This fact has already been accepted, among others, by the Committee (see, e.g., European Roma and Travellers Forum (ERTF) v. the Czech Republic, 2016) and the European Court of Human Rights (see, e.g. D.H. and Others v the Czech Republic, 2007). As described above, one needs to have available data in order to monitor and assess the laws, policies and practices and their potential discriminatory effect.

21. The failure to collect disaggregated data means a state cannot properly address its policies to the benefit of disadvantaged communities. Such lack of targeted policies significantly impacts these communities' enjoyment of rights set forth in the Charter. It is most significantly apparent when it comes to Romani children taken from their families into state care. The ERRC has established that there are no unified procedures in the Czech Republic for monitoring the ethnicity of children in care, which is often assessed only informally and

[23]UN CESCR, General comment no. 20. Non-discrimination in economic, social and cultural rights (art. 2, para. 2, of the International Covenant on Economic, Social and Cultural Rights), 2 July 2009, para. 41.

[24] World Conference against Racism, Racial Discrimination, Xenophobia and Related Intolerance, 2001 Durban Declaration, para. 92.

[25] Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, A/70/335, 20 August 2015, para. 34.

[26] Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, A/70/335, 20 August 2015, para. 85.

[27] ERRC v. Italy, European Committee of Social Rights Complaint No. 27/2004, Decision on the merits of 7 December 2005, para. 23.

[28] RINGELHEIM, J. Processing Data on Racial or Ethnic Origin for Antidiscrimination Policies: How to Reconcile the Promotion of Equality with the Right to Privacy? *Jean Monnet Working Paper.* 2006, 8, p. 11-14.

lacking a clear methodology.[29] From the scarce available data, the ERRC has established that, in the Czech Republic, approximately 3% of children under the age of three are Roma, but they make up over 30% of children in state care[30]. According to the Czech Ombudsperson, over 20% of children under three years of age in state care were institutionalized for "social", i.e. economic, reasons (131 out of 600 cases studied).[31] According to ECRI's estimates in 2009, the percentage of Romani children in institutional care was between 20% and 80% of the total.[32] At the same time, the arguments declaring prohibition of collecting ethnic data are inconsistent with actual practice of the Czech authorities. The Institute of Health Information and Statistics of the Czech Republic in fact collects data not only about the number of institutionalised infants, but also about their ethnicity and about the proportion of Roma children among those institutionalised.[33] Not only is the position of the Czech Republic as regards collection of ethnic data inconsistent, it is also unforeseeable. The methodology of the data collection that takes place is unclear, the practice is not transparent or easily accessible, and the purpose of such collection is unclear because of a lack of clear standards.

22. The ERRC has identified a number of reasons for the over-representation of Romani children in care in the Czech Republic, including lack of proper preventive services, Romani poverty and related socio-economic factors, and lack of access to justice.[34] In the absence of the collection of data disaggregated by ethnicity, state authorities cannot develop effective methods to assess thoroughly the reasons for the over-representation of Romani children in state care, nor can they adopt and implement sufficient policies to address that over-representation. Consequently, the Czech Republic is not capable reversing the disproportionate impact of its care system on Romani children and families.[35]

23. The need for data is also apparent in other state policies addressing children and families, for example in the sphere of the juvenile justice.[36] Moreover, it has also already been established by the UN Committee on Rights of the Child that in order to identify and combat

[29] European Roma Rights Centre. Life Sentence – Romani Children in State Care in the Czech Republic. 2011, p. 24. Available online: http://www.errc.org/uploads/upload_en/file/life-sentence-romani-children-in-state-care-in-the-czech-republic-20-june-2011.pdf.

[30] European Roma Rights Centre. Life Sentence – Romani Children in State Care in the Czech Republic. 2011, p. 24. Available online: http://www.errc.org/uploads/upload_en/file/life-sentence-romani-children-in-state-care-in-the-czech-republic-20-june-2011.pdf.

[31] Czech Ombudsperson. Report from Systematic Visits – Healthcare Institutions Providing Care to Endangered Children under Three Years of Age. 2013, p. 17. Available online: http://www.vterinapote.cz/static/useruploads/files/ombudsman01.pdf.

[32] CRI(2009)30 ECRI Report on the Czech Republic (fourth monitoring cycle), Strasbourg, September 2009, para. 144

[33] The content and availability of these data has been already elaborated on in an earlier collective complaint registered with the ECSR on 3 October 2017 No. 157/2017 ERRC and MDAC v. the Czech Republic, and the data were made available to the FORUM, which elaborated on the depth of the data on institutionalized Roma children in para. 10 of the registered complaint: https://rm.coe.int/complaint-157-2017-european-roma-rights-centre-mental-disability-advoc/1680761626.

[34] European Roma Rights Centre. Life Sentence – Romani Children in State Care in the Czech Republic. 2011, p. 27-32. Available online: http://www.errc.org/uploads/upload_en/file/life-sentence-romani-children-in-state-care-in-the-czech-republic-20-june-2011.pdf.

[35] European Roma Rights Centre. Dis-Interest of the Child. Romani Children in the Hungarian Child Protection System. 2007, p. 32. Available online: http://www.errc.org/uploads/upload_en/file/02/8F/m0000028F.pdf.

[36] UN CRC, General Comment No. 10. Children's Rights in Juvenile Justice. CRC/C/GC/10, 2007, para. 99.

discrimination, whether direct or indirect, statistical data need to be available.[37] Similarly, the UN CRC has asked the Czech Republic not only to strengthen its mechanism for integrating and analysing systematically disaggregated data on all children under 18 years of age, but also to focus specifically on vulnerable children, including those belonging to ethnic minorities. Additionally, the UN CRC specifically indicated that the Czech Republic should establish a clear method for identifying Roma in its data collection to facilitate the clarity and effectiveness of policymaking.[38]

24. In its 2011 and 2015 Conclusions, the Committee noted that the number of children placed in institutional care in the Czech Republic was high. The Committee also noted that Romani children are disproportionately represented among children in state institutions.[39]

25. In 2015, the UN Committee on the Elimination of Racial Discrimination noted with concern that "*Roma children are disproportionately represented in institutional care settings*" and recommended that the Czech Republic take "*all measures necessary to reduce the number of Roma children in institutional care, including by providing financial and social support to families facing economic hardship and alternative care options for those without parental care.*"[40]

26. In their 2011 Concluding observations on the Czech Republic, the UN CRC noted that: "*There is a lack of preventive services and admission criteria for placement into institutional care, which results in large numbers of children, especially children with disabilities and/or of Roma origin, being placed in care outside their home, particularly in institutional care, and that in the majority of such cases, the material and financial situation of the family has been the main basis for such removal.*"[41]

27. Similarly, the European Court of Human Rights established, in a judgment condemning the Czech Republic, that before children are taken into public care and parents deprived of their parental rights, the authorities must firstly consider other, less radical measures, for example monitoring and advice on family conditions.[42] The Court moreover condemned the placement of children into care based solely on material conditions.[43] Without data on such policies and their effect on children, it cannot be said that Czech Republic is adequately tackling discrimination against Romani children.

28. Moreover, when implementing policies designed to promote and achieve objectives of the Charter, state parties must: (i) act within a reasonable time-frame, (ii) achieve measurable progress, and (iii) provide financing consistent with the maximum use of available resources.[44] To ensure that progress is measurable, data that indicate the success or failure or a particular policy must be available. Where such data are not collected properly, the progress of the Czech Republic cannot be measured, which significantly impairs its ability to

[37] UN CRC, Concluding Observations: Hungary, CRC/C/HUN/CO/2, 17 March 2006, paras. 15-16.
[38] UN CRC, Concluding Observations: Czech Republic, CRC/C/CZE/CO/3-4, 4 August 2011, para. 21.
[39] Conclusions XX-4 - Czech Republic - Article 17, XX-4/def/CZE/17/EN, 04 December 2015.
[40] UN CERD, Concluding Observations: Czech Republic, CERD/C/CZE/CO/10-11, 31 March 2014, paras. 19-20.
[41] UN CRC, Concluding Observations: Czech Republic, CRC/C/CZE/CO/3-4, 4 August 2011, para. 45.
[42] ECtHR, Walla and Wallová v. the Czech Republic, App. No. 23848/04, Judgment of 26 October 2006, paras. 74-75.
[43] ECtHR, Walla and Wallová v. the Czech Republic, App. No. 23848/04, Judgment of 26 October 2006, paras. 73.
[44] AIAE v. France, European Committee of Social Rights Complaint No. 13/2002, Decision on the merits of 4 November 2003, § 53.

ensure that policies are in fact effective and appropriate and do not reinforce the system of indirect discrimination.

29. Additionally, states have to be particularly mindful of the impact that their policies have on groups with heightened vulnerabilities, particularly, in line with Article 16, on the families of such vulnerable persons.[45] In the context of providing protection for families, Article 16 requires not only legal guarantees as such, but also practical safeguards, which include collection and analysis of reliable data, which need to be provided to the Committee to provide a comprehensive description of measures adopted.[46]

30. Under the Charter the obligation to collect data and the adoption of targeted measures on the basis of the data touches on many areas covered by Art. 16, such as the protection of women from violence, or the provision of family mediation services.[47] Similarly, the obligation applies when protecting families from actions that lead to the separation of children from their families, preventing their full development under the Charter. Accordingly, the Respondent State has violated Article 16 of the Charter in conjunction with the principle of non-discrimination by failing to collect and analyse data that would allow it to implement such policies which would prevent the severity of interference with family life of Roma people. Accordingly, it failed to secure full development of the family under Art. 16 of the Charter as such and did not merely fail to secure rights of children to social and economic protection under Art. 17.

IV. CONCLUSION

31. The Czech Republic is obliged under the Charter to fully ensure the protection of children and families who come into contact with the care system, including protecting them from discrimination. The Czech Republic has an obligation to implement these rights in a practical and effective way that provides measurable progress with the maximum possible use of available resources. For such purposes, it is necessary to monitor and assess the impact of policies affecting children to ensure that the best interests of children, including Romani children, are a primary consideration. In the absence of such monitoring, the system of public care for children in the Czech Republic remains significantly harmful for children and discriminatory against Romani children in particular.

32. *For these reasons*, the European Roma Rights Centre, jointly with Forum for Human Rights, ask the European Committee of Social Rights to find:

- a violation of Article 16 of the European Social Charter;

- a violation of Article 17 of the European Social Charter;

- a violation of Article 16 of the European Social Charter read in conjunction with the principle of non-discrimination as enshrined in the Preamble to the Charter.

- a violation of Article 17 of the European Social Charter read in conjunction with the principle of non-discrimination as enshrined in the Preamble to the Charter.

[45] FIDH v. Belgium, European Committee of Social Rights Complaint No. 75/2011, Decision on the merits of 18 March 2013, § 185.

[46] Conclusions XIX-4 – Netherlands Antilles - Article 16, XIX-4/def/NLDANT/16//EN, 09 December 2011.

[47] Conclusions 2011 – Italy – Article 16, 2011/def/ITA/16//EN, 09 December 2011.

Brussels and Prague, 17 January 2020

Dorde Jovanovic
President

EUROPEAN ROMA RIGHTS CENTRE

Maroš Matiaško
Chair

FORUM FOR HUMAN RIGHTS