

Evaluation of the Roma Integration Phase III Programme

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ACRONYMS

AP	Action plan
ASPA	Albanian School of Public Administration
BiH	Bosnia and Herzegovina
CCIS	Chamber of Commerce and Industry of Serbia
CoE	Council of Europe
CSO	Civil society organization
DIO	Directorate of Internal Oversight
DoA	Description of the Action
ENS	European Network on Statelessness
EQ	Evaluation question
ERIAC	European Roma Institute for Arts and Culture
EU	European Union
HRA	Human Rights Approach
ICJ	International Court of Justice
IPA	Instrument for Pre-accession Assistance
NRCP	National Roma Contact Point
OECD/DAC	Organisation for Economic Co-operation and Development Assistance Committee
OSCE	Organization for Security and Co-operation in Europe
REDI	Roma Entrepreneurship Development Initiative
ReSPA	Regional School of Public Administration
RI	Roma Integration
RRB	Roma Responsive Budgeting
SAP	Strategic Action Plan
TIHEK	Human Rights and Equality Institution of Türkiye
ToR	Terms of reference
ToT	Training of Trainers
UNHCR	United Nations High Commissioner for Refugees
UNSCR	United Nations Security Council Resolution

EXECUTIVE SUMMARY

Background

CoE commissioned this evaluation to assess the achievements and challenges of the Roma Integration Phase III Programme to inform improvements in future initiatives in the field and ensure accountability for results. The evaluation reviewed implementation of the Programme in all seven Beneficiaries and almost the entire Programme time frame, from its start in May 2023 to November 2025.

The intervention: Aligning with the EU Strategic Framework on Roma Equality, Inclusion and Participation and the Poznan Declaration, the Roma Integration Phase III Joint Programme of the European Union and Council of Europe is implemented by the CoE Roma and Travellers Division from 1 May 2023 to 30 April 2026 with a total budget of €3,000,000 (90% funded by the EU and 10% by the Council of Europe). The Programme collaborates with the central governments of the seven Beneficiaries: Albania, Bosnia and Hercegovina, Kosovo*, Montenegro, North Macedonia, Serbia and Türkiye to improve Roma inclusion, addressing challenges such as housing, employment, civil registration, environmental transition, and combatting antigypsyism. The Programme provides policy advice, technical assistance, coordination, and pilot projects aimed at three key outcomes:

1. Reducing antigypsyism and reinforcing equality initiatives.
2. Enhancing the socio-economic status of Roma through effective public services and projects.
3. Boosting government capabilities to develop, fund, execute, and monitor Roma integration policies.

The evaluation: The objectives of the evaluation were to assess the Roma Integration Phase III Programme against four OECD/DAC evaluation criteria, namely relevance, effectiveness, efficiency, and sustainability. To this end the evaluation identified lessons learned and formulated recommendations that can be applied by the Council of Europe's Roma and Travellers Division as primary audience, as well as by the CoE Field and Programme Offices in the Beneficiaries and the Directorate of Programme Co-ordination as secondary audiences.

The evaluation included a human rights and gender perspective, incorporating human rights and gender-related questions in the evaluation matrix and utilizing the Council of Europe's *Human Rights Approach: Practical Guide for Co-operation Projects*. The evaluation team applied a triangulation of data collection methods, including i) document review; ii) semi-structured online and on-site interviews with 55 stakeholders and focus groups with 12 Roma members of Roma communities and 12 civil servants; and iii) two case studies: accreditation of a training curriculum on antigypsyism for civil servants in Montenegro and adoption of guidelines for Roma Responsive Budgeting by the Ministry of Finance of Albania.

Conclusions and recommendations

Relevance

The Programme demonstrated high relevance by addressing the priorities of both national governments and Roma communities. Whereas governments tended to prioritize institutional capacity and funding for policy implementation, Roma communities emphasized support in the areas of civil registration and legalization of housing and land ownership. The Programme supports the implementation of the Poznan Declaration and aligns closely with national strategies and the EU Roma Strategic Framework 2020–2030.

The Programme combined Roma-specific and mainstreaming approaches to Roma integration, albeit not in a systematic way. There was a greater overall emphasis on approaches designed specifically for Roma, with some variations by Beneficiary. Notwithstanding the expressed preferences of some stakeholders for one approach over the other, both approaches are relevant.

Although the foundational Poznan Declaration lacks gender objectives, the Programme successfully implemented a gender mainstreaming strategy that ensured balanced participation in training and produced essential gender-disaggregated data. Moreover, the Programme also integrated the four principles of the CoE's Human Rights

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 (1999) and the ICJ Opinion on the Kosovo Declaration of Independence.

Approach – participation and inclusion; equality and non-discrimination; accountability, and transparency and access to information – throughout all three outcome areas.

Recommendations:

- 1) **Mainstreaming Roma integration (Medium):** Considering the increasing relevance of mainstreaming approaches to Roma integration (particularly at European level), the CoE should step up support to the Beneficiaries for linking general policy frameworks to Roma integration goals.
- 2) **Gender analysis (Medium):** The design of future Programme interventions should be preceded by systematic gender analysis along key objectives in the areas of antigypsyism, civil registration, education, employment, health, and housing. The introduction of gender markers could build a consistent understanding on gender mainstreaming and respective intervention outcomes.

Effectiveness

The Programme was effective in producing high-quality outputs, including new Roma national strategies and action plans, development of training curricula, and delivery of training, as well as providing direct legal support to hundreds of Roma individuals. The Programme also produced some longer-term or systemic outcomes in each of the three outcome areas to different degrees in the various Beneficiaries. While successes have been documented at the policy-formulation level, such as RRB in Albania, training on antigypsyism for civil servants in Montenegro, and legislation on social housing in North Macedonia, the transition to practical implementation and the enforcement of legislation remains uncertain. All three outcome areas have formulated goals which related to long-term and complex policy processes and substantial changes in attitude and behaviour of stakeholders and target groups that go beyond a three-year project cycle, challenging a systematic follow-up. In view of limited resources, the Programme could have benefitted from a stronger focus on selective policy processes based on a prior analysis of the initial situation, with clear, realistic, and Beneficiary-specific goals formulated in accordance with the time frame available within the project (visibly documented in a way that is comprehensible to donors and external stakeholders). With a more precise, Beneficiary-specific description of baselines/starting points of certain policy process or target group capacities and corresponding goal settings, Programme achievements would have been more visible. Much of the work undertaken in the framework of the RI Phase III Programme builds on previous phases of the Roma Integration Programme, as well as of the ROMACTED Programme.

Recommendations:

- 3) **Digital monitoring tool (High):** The CoE should consider hosting the platform for the coming three to four years until fully introduced and governments established routine, with the medium-term plan to hand over and nationalize the platform. National statistics offices should be utilized.
- 4) **Strategic programme design (High):** Future programme interventions of the Roma and Travellers Division should formulate realistic objectives, taking into account the available resources and implementation time frame and considering the specific contexts and challenges of the respective Beneficiaries. Focus should be directed to a limited number of targeted policy processes that have been initiated or followed by the Programme. Here, consideration should be given to a balance between processes for which an already existing basic political will is evident (sustainability orientation) and processes for which this requires CoE leverage and advocacy more prominently (needs orientation).
- 5) **Measuring effectiveness of capacity building (High):** In order to ascertain longer-term effectiveness and to lay the groundwork for impact evaluation, CoE should develop a unified approach to project design which ensures that future interventions incorporate follow-up on and monitoring of the outcomes of capacity-building and training components more systematically to measure not only knowledge gains, but also changes in attitude and practice. Time and resource intensity need to be adequately considered when planning and budgeting for capacity-building interventions.
- 6) **Beneficiary-specific approaches (Medium):** Future projects by the Roma and Travellers Division should consider introducing logical frameworks at Beneficiary level as a starting point, with specific objectives to contribute to progress on the overall impact the Roma Integration Programme aims for in the region with an eye to establishing clear pathways, considering Beneficiary-specific contexts and challenges.
- 7) **Inclusion of the local level (Medium):** Future programme interventions by the Roma and Travellers Division should link work on central-level policies with support for the development of related policies at local level in a synergistic approach taking into account that local authorities are well positioned to understand and address

the challenges in their communities. Such links create a system of accountability for monitoring local progress and ensuring that inclusion efforts are not sidelined.

- 8) **Networking and collaboration (Low):** Future programmes should (continue to) prioritize and fund regional mechanisms to facilitate shared learning collaboration, making use of CoE's Programme Offices in the region. Among possible mechanisms, consideration could be given to supporting a network of National Roma Contact Points for the purposes of capacity building, sharing experiences, and facilitating replication of successful pilots across Beneficiaries.
- 9) **Scaling-up media work (Low):** In future programmes the Roma and Travellers Division should (continue to) build on the RI Phase III Programme and further scale up work with media as a target group to aim for citizens' awareness on discrimination and stereotyping of Roma. Linkages to other CoE interventions should be sought.

Efficiency

The Programme's implementation was challenged by an overly ambitious design disproportionate to its available budget and staffing. By revising key targets downward and deleting resource-intensive activities, the Programme successfully realigned with its resources. However, findings also indicate that the Programme reached the limit of resource optimization. In order to stay on track with targets, the Programme was forced into strategic trade-offs, reducing the scale to potentially less impactful modalities like online training. These constraints signify a limit to "doing more with less". While targets were largely met or exceeded, the results remain fragile because the long-term institutional changes intended require more time and investment.

Recommendations:

- 10) **Staffing (Medium):** Future regional interventions by the Roma and Travellers Division should ensure a dedicated Project Officer for each Beneficiary, even on a part-time basis, to maintain a consistent presence and navigate local political dynamics.

Sustainability

The likelihood of outcomes continuing is high where they have been legally or structurally embedded, such as the institutionalization of Roma Responsive Budgeting in Albania and the Anti-Discrimination Taskforce in Kosovo. Civil registration and legalization of informal settlements will continue to be problem areas in the Beneficiaries, with new cases constantly emerging. This requires a stronger focus on appropriate policy and legislative processes which will also have to be systematically implemented. As these are long-term processes, case-based support will continue to be necessary in the foreseeable future. However, interventions with a financial volume such as the RI Programme can cover only a certain percentage of the objective demand. Therefore, to sustainably secure case-based support it is necessary to address and advocate with Beneficiary governments as duty bearers and also to continue to raise international donor awareness of the need to finance such support. Financial sustainability remains the primary threat, as most initiatives are still heavily dependent on international donor funding because domestic funding commitments continue to be limited to a small number of initiatives.

1. INTRODUCTION

1.1. Context and description of the intervention

Context: Recent years have seen significant advancements in the development of European and national policies aimed at integrating Roma communities. A landmark event was the adoption of the Poznan Declaration by Western Balkans governments in July 2019 as part of the Berlin Process, where leaders committed to achieving concrete goals for Roma integration in six key areas by the time they join the European Union (EU) (see Regional Cooperation Council 2019). The *EU Roma Strategic Framework for Equality, Inclusion, and Participation* (European Commission 2020), supports these efforts with a comprehensive approach. Recognizing the necessity of both top-down (policies and strategies) and bottom-up (local implementation) approaches, the Council of Europe (CoE) and the EU have emphasized the vital role local governments play in actualizing these initiatives. The Council of Europe's (2020b) *Strategic Action Plan for Roma and Traveller Inclusion* further reinforces this perspective.

Description of the intervention: The Roma Integration Phase III Joint Programme of the European Union and Council of Europe is implemented by the CoE Roma and Travellers Division from 1 May 2023 to 30 April 2026 with a total budget of €3,000,000 (90% funded by the EU and 10% by the Council of Europe).

The Programme collaborates with central governments to improve Roma inclusion in the seven Beneficiaries:¹ Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia and Türkiye. It aligns with the EU Roma Strategic Framework and the Poznan Declaration, employing the CoE's principles of human rights in policy work. The Programme aims at three key outcomes to foster greater inclusion, equality and participation of Roma in the Western Balkans and Türkiye:

1. Reducing antigypsyism and reinforcing equality initiatives.
2. Enhancing the socio-economic status of Roma through effective public services and projects.
3. Boosting government capabilities to develop, fund, execute, and monitor Roma integration policies.

The Programme's approach integrates central-level policy reforms, custom expert technical support, and enhanced institutional collaboration. Programme activities involve improving the skills of public servants through diverse educational formats, focusing on key areas like employment, civil registration, housing, and addressing antigypsyism. Activities also include systematic monitoring and evaluation efforts. The Programme also promotes inclusivity by ensuring that Roma concerns are reflected in central-level budgets and policymaking. Moreover, the Programme incorporates a strong emphasis on regional collaboration, direct engagement with Roma communities, and awareness campaigns to fight discrimination.

1.2. Purpose, objective and scope of the evaluation

Purpose: Under the current framework contract 2024/AO/33 with the Directorate of Internal Oversight (DIO) for the provision of evaluation-related services, the Roma and Travellers Division contracted the consultants to carry out the external evaluation of the Roma Integration Phase III Programme as the programme is coming to an end. This evaluation was carried out between 29 October 2025 to 28 February 2026.

The Terms of Reference (ToR) state that the evaluation has the following purpose: To assess the Programme's achievements and challenges in order to inform improvements in future initiatives in the field and ensure accountability for results.

Objective: The objectives of the evaluation as stipulated by the ToR were to assess the Roma Integration Phase III Programme against four OECD/DAC evaluation criteria, namely relevance, effectiveness, efficiency, and sustainability. To this end the evaluation identified lessons learned and formulated recommendations that can be applied by the CoE's Roma and Travellers Division as primary audience, as well as by CoE Field and Programme Offices in the Beneficiaries and the Directorate of Programme Co-ordination as secondary audiences. The main evaluation questions are outlined below.

¹ Beneficiaries are those countries and regions receiving assistance by the Council of Europe through technical cooperation projects or programmes to support standard setting and monitoring of CoE standards in the fields of human rights, democracy, and the rule of law.

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 (1999) and the ICJ Opinion on the Kosovo Declaration of Independence.

Relevance:

- 1) To what extent did Roma Integration Phase III meet the priorities and needs of national governments and Roma communities, and adapt to emerging needs challenges (e.g., post-COVID-19 recovery, green and digital transitions)?
- 2) How effectively did the Programme engage stakeholders—including government counterparts, Roma focal points, and civil society—to ensure ownership and active participation in achieving results?
- 3) To what extent are the Programme's objectives consistent with and relevant to broader regional policy frameworks and commitments, including alignment with the EU Roma Strategic Framework 2020–2030, support for national Roma integration strategies and Poznan Declaration targets, and relevance to the EU enlargement process (including Chapter 23 on fundamental rights) and other international obligations of the Beneficiaries?
- 4) How is the principle of gender equality and participation of women reflected in the implementation of the Roma Integration Phase III Programme?
- 5) How is the CoE Human Rights Approach applied in the implementation of the Roma Integration Phase III Programme?

Effectiveness:

- 6) Achievement of outcomes: To what extent have the intended outcomes and outputs of Roma Integration Phase III been achieved or are likely to be achieved by the end of the Programme, particularly in recognising and combating antigypsyism, improving socio-economic inclusion in key sectors (e.g. employment, housing, civil registration), and strengthening institutional capacities to design, implement, and monitor Roma inclusion policies?
- 7) Management and coordination: How effective are the Programme's implementation arrangements, including the project management structure, coordination between the Council of Europe, the European Commission, and Beneficiary authorities, and the contribution of any supporting partners or consultants to overall effectiveness?

Efficiency:

- 8) Cost-effectiveness: Were Programme resources used optimally to achieve the outputs and outcomes, including instances where targets were overachieved with a limited budget? Examine whether the staffing, budget, and activities were proportional to the results achieved. Could similar results have been achieved with fewer resources or in a shorter time frame, or would additional investment have led to significantly better outcomes?

Sustainability:

- 9) To what extent are the results of Roma Integration Phase III likely to continue after the Programme ends, considering whether the achieved practices have been institutionalized, domestic funds committed, and Roma inclusion targets integrated into regular government plans and policies?

Scope: The evaluation reviewed implementation of the Programme in all seven Beneficiaries and almost the entire Programme time frame, from its start in May 2023 to November 2025.

1.3. Evaluation methodology

Overall approach: The evaluation was utilization-focused and retrospective in reviewing achievements and lessons learned. At the same time, the evaluation was also forward-looking, providing actionable recommendations for the Roma and Travellers Division for the development of future programmes. The evaluation questions were grouped around the OECD/DAC evaluation criteria. In line with the ToR, the evaluation focused on the criteria of relevance, efficiency, effectiveness and sustainability (see Annexes 7 and 8). The evaluation methodology utilized qualitative and quantitative data. Furthermore, it followed the Council of Europe [Code of Conduct for Evaluation](#).

Human rights and gender perspective: The evaluation matrix incorporates questions related to human rights and gender. The Council of Europe's (2020a) *Human Rights Approach: Practical Guide for Co-operation Projects* was utilized. Interviews and the online survey reflect the diversity of stakeholders including women and men.

Rationale for the selection of data sources: The selection of data sources centred on ensuring the triangulation of evidence within the relatively short time frame and the budget available for the evaluation. In consultation with the Programme team, the evaluators took a decision not to undertake a survey due to concerns about expected low response rates, which would have undermined the reliability of the findings. In its place, two targeted case studies were incorporated to provide deep insights into best practices and their potential for replication. Multiple

methods were applied to capture a diversity of perspectives from government officials, civil society, and Roma community members. This approach was vital to overcome the absence of robust central-level statistical data in many Beneficiaries, cross-referencing official Programme documentation with qualitative stakeholder assessments.

Data collection: The evaluation team applied a triangulation of data collection methods, including i) document review; ii) semi-structured interviews and focus groups; and iii) case studies. All methods of data collection were agreed with the client.

Document review: The document review included Programme-specific documentation, CoE and Beneficiary background documents and documents related to the Poznan Declaration. A list of key documents is provided in Annex 6.

Semi-structured interviews and focus groups: On-site stakeholder interviews and focus groups took place in Albania and Montenegro between 8 and 12 December 2025 and in North Macedonia on 20, 22, and 27 January 2026. Complementary online interviews and one focus group were carried out throughout December 2025 and January 2026. Of the 54 persons interviewed, thirty-one (57%) were women and 23 (43%) were men. The 24 participants in the focus groups organized in the framework of the evaluation consisted of 14 women (58%) and 10 men (42%). See Annex 5 for details on interviews and focus groups.

Case studies: Following discussion between the Roma Integration Phase III Strasbourg team and the consultants, two case studies were selected: accreditation of a training curriculum on antigypsyism for civil servants in Montenegro and adoption of guidelines for Roma Responsive Budgeting by the Ministry of Finance of Albania. The two case studies were identified as the greatest Programme impacts in fulfilment of Poznan Declaration commitments. Understood as best practices for learning and replication, the case studies were approached with a critical eye in the evaluation in order to assess validity in other contexts. Although presented in separate reports submitted with the main evaluation report, the case study findings fed into the overall analysis of the Programme.

Analysis: The data analysis process included an examination of the intervention's underlying logic and the identification of recurring themes from qualitative interviews and focus groups. Additionally, the team performed a content analysis by comparing official Programme documentation with stakeholder perspectives.

Limitations: The evaluation design reflects the relatively short time frame and the budget available for the evaluation. The extensive scope stipulated in the ToR to include all Beneficiaries constrained a more in-depth analysis at individual Beneficiary level.

Challenges encountered during the evaluation: Overall, the evaluation process went smoothly. The focus group with civil servants in Albania did not take place in person as originally envisaged due to a misunderstanding with a Beneficiary institution. The focus group was ultimately held online. Two stakeholders in Kosovo slated for online interview were not available but provided written responses to questions provided by the evaluators. Two expert interviews were not carried out as originally envisaged: An expert from Bosnia and Herzegovina did not respond to repeated communications from the Roma Integration Phase III Team, while an expert from Türkiye did not receive supervisory permission to participate in the interview. The Roma Integration Phase III Team provided consistent support throughout the evaluation process in establishing contacts with Programme stakeholders, as well as in handling the above-mentioned challenges in the course of the evaluation.

Post-evaluation updates: Since the conclusion of the data collection phase, the Programme team reported several additional milestones reached after November 2025. While these achievements fall outside the formal scope of the evaluation, they are included in this report as footnotes in order to provide a more current picture of Programme momentum.

2. FINDINGS

2.1. Relevance

EQ 1: To what extent did Roma Integration Phase III meet the priorities and needs of national governments and Roma communities, and adapt to emerging needs and challenges (e.g., post-COVID-19 recovery, green and digital transitions)?

Sub-question: Which priorities and needs did national governments and Roma communities identify?

Key finding: Whereas needs commonly identified by Beneficiary governments clustered around institutional capacity, Roma communities emphasized support in relation to civil registration and the legalization of housing and land ownership.

Interviewed representatives of Beneficiary governments tended to identify needs related to institutional capacity for developing, monitoring, and reporting on implementation of national Roma strategic frameworks and the associated national action plans. Other common themes among stakeholders in this category were securing sufficient funding and data on the housing situation of Roma.

Interviewees and focus group participants from Roma communities emphasized the needs for support on civil registration and the legalization of housing and land ownership. Other priorities identified by Roma interviewees included addressing residential and educational segregation, combatting underage marriages, educational support, and preparing Roma for contacts with institutions.

Sub-question: How did Roma Integration Phase III align with the specific priorities and strategies of national governments concerning Roma inclusion, and what were the main areas of synergy or divergence?

Key finding: In addition to being well aligned with the priorities and strategies of Western Balkans Beneficiary governments, the Programme also played an agenda-setting role in the Western Balkans. Some stakeholders took the view that differences between Türkiye and the Western Balkans Beneficiaries made for an incomplete fit with the Programme.

The Beneficiaries' Roma integration strategies reflect the EU Roma Strategic Framework's overall vision of increased equality, inclusion, and participation of Roma. This vision is also taken into account in the design of the RI Phase III Programme with its three outcome areas. Some interviewed stakeholders observed that differences in the situation of Roma in Türkiye relative to the Western Balkans Beneficiaries made for an incomplete fit between the Programme and that Beneficiary's priorities and strategies, which include neither civil registration nor the Poznan Declaration.

Common among experts/consultants was the view that the Programme contributed to the implementation of policy priorities that corresponded to the needs of Roma communities but were not sufficiently implemented by Beneficiary institutions. Interviewed representatives of Beneficiary governments, as well as many experts/consultants, also praised the Programme's role in setting government priorities for future work on Roma inclusion through support for the development of new policy documents.

Sub-question: In what ways did Roma Integration Phase III address the immediate needs of Roma communities?

Key finding: The Programme was "minimalist but comprehensive", with both the thematic coverage of and direct support provided through the Programme well suited to the immediate needs of Roma communities.

The thematic coverage of the Programme corresponded to the needs of Roma communities. Additionally, the Programme's focus on central-level policy was assessed as appropriate for addressing the day-to-day needs of Roma communities. Stakeholders involved in the direct support provided to Roma through the Programme in the areas of civil registration and legalization of housing and land ownership confirmed the appropriateness of such support, with many pointing to considerable remaining objective demand for similar support among Roma in the Western Balkans Beneficiaries.

Sub-question: How did the Programme adapt to the emerging needs and challenges (e.g., post-COVID-19 recovery, green and digital transitions)?

Key finding: While some activity was reported under the Programme in relation to the green transition, stakeholders did not report experiences with Programme activities related to the digital transition or post-COVID-19 recovery.

The information gathered in the framework of the current evaluation suggests that the RI Phase III Programme did little once launched to adapt to the emerging needs and challenges identified in Programme documents. Post-COVID-19 recovery receives brief mention in the DoA, but does not appear in other Programme documents. As explained by the Programme team, the topic of digital transition was ultimately dropped, with the sole deliverable in this area a policy brief on Albania. The topic of green transition received more attention in the form of a study on existing opportunities for Roma in the Green Agenda and a training for Beneficiary governments. Interviewed stakeholders from Bosnia and Herzegovina, Serbia, and Türkiye also reported green transition-related activities of the Programme.²

EQ 2: How effectively did the Programme engage stakeholders—including government counterparts, Roma focal points, and civil society—to ensure ownership and active participation in achieving results?

Sub-questions: What was the role of Programme stakeholders in the design of the Programme? How has the active participation of the stakeholders and Roma communities been incorporated into the implementation of the Programme?

Key finding: There was considerable variation in the degree to which stakeholders were involved in the design of the Programme. Although the Programme's focus on central-level public administration limited the space for direct community participation, the Programme directed considerable efforts toward making use of the space available.

Whereas the DoA states that stakeholders will be contacted and introduced to the Programme in the initial phase of implementation, some stakeholders reported involvement also in the design phase. If stakeholder involvement in the design of the RI Phase III Programme was uneven, the incorporation of stakeholder and Roma community participation in Programme implementation was more consistent and spanned across all three outcome areas. Although the focus of the Programme on central-level public administration limited the space available for Roma communities to participate directly in Programme implementation, the Programme team made use of available resources to promote ownership of processes initiated and results generated through the Programme, particularly in relation to outcome area 2. Additionally, the Programme engaged Roma experts/consultants in all Beneficiaries for a wide range of roles.

EQ 3: To what extent are the Programme's objectives consistent with and relevant to broader regional policy frameworks and commitments, including alignment with the EU Roma Strategic Framework 2020–2030, support for national Roma integration strategies and Poznan Declaration targets, and relevance to the EU enlargement process (including Chapter 23 on fundamental rights) and other international obligations of the Beneficiaries?

Sub-question: How do stakeholders relate the Programme and its objectives to national and international commitments and processes?

Key finding: While Beneficiaries valued the support the Programme provided toward fulfilment of their national and international commitments to Roma inclusion and to the EU accession process, stronger links between the Programme and the EU Growth Plan for the Western Balkans were lacking.

Several stakeholders described the Programme as contributing to the implementation of national commitments that had not received sufficient attention prior to Programme implementation. Interviewed representatives of Beneficiary governments frequently referred to the Programme as useful for fulfilling various requirements of the EU accession process. Some interviewees stated that the Programme could have established stronger links to the EU Growth Plan for the Western Balkans.

² The Programme team reported additional activities in relation to the green transition in the Western Balkans Beneficiaries in the period beyond that covered by the evaluation.

EQ 4: How is the principle of gender equality and participation of women reflected in the implementation of the Roma Integration Phase III Programme?

Sub-question: How does the design of the Programme consider gender equality and participation of women?

Key finding: The design of the Roma Integration Phase III Programme navigates a structural limitation regarding gender-specific objectives, focusing instead on a gender mainstreaming commitment.

The Poznan Declaration lacks specific objectives for Roma women, creating a structural limitation for the Roma Integration Phase III Programme.³ The DoA commits to gender mainstreaming and including Roma women in all activities. Perspectives on this approach differ: Some staff feel that additional gender-specific measures would be burdensome given limited resources, while other interviewees view the lack of targeted focus as a missed opportunity to address critical issues, such as the rising rate of underage marriages.

Sub-question: How well was gender equality reflected in the implementation of the Programme?

Key finding: The Programme successfully achieved a balanced participation of Roma women in the Programme's training measures as well as the generation of gender-disaggregated data across its research and monitoring tools.

To integrate gender into the Programme, the primary focus was on balanced participation. Stakeholders confirmed that a balanced representation of women was generally achieved, sometimes even exceeding male participation. For example, in Serbia, more women attended training for the Digital Platform for Roma social inclusion. Additionally, the ERIAC media mentorship programme utilized positive action during selection to support equal participation and encourage female applicants. Stakeholders also pointed to increased outreach to Roma women under outcome 2 of the Programme which consequently achieved that Roma women benefitted from specific support measures in local communities in the fields of housing and civil registration: In Albania women were the primary participants in information sessions aimed to provide practical knowledge on the legalization of Roma settlements. In Kosovo the Programme successfully ensured that 25% of the beneficiaries of direct support in housing legalization and land ownership formalization were women. In Bosnia and Herzegovina Roma women constituted the majority of recipients of support related to civil registration and residency. In Montenegro, similar numbers of male and female recipients of civil registration support were ensured.

Sub-question: Were gender analyses employed in the course of Programme implementation?

Key finding: While the Programme did not apply gender analysis to systematically examine gender roles, relations, and power dynamics, its outputs contribute to an evidence-based foundation required for gender-sensitive policymaking in key areas, such as employment and housing.

Providing a framework for comprehensive gender analysis that examines how gender roles, social norms, and power dynamics create different opportunities and constraints for Roma women and men was beyond the scope of the Programme. Nevertheless, the Programme produced gender-disaggregated data and collected relevant evidence across its outputs, providing a basis for informed gender-sensitive policy-making.⁴ Interviews confirmed that the Programme succeeded in producing gender-disaggregated data across its research products, including studies and roadmaps containing gender-informed recommendations. Survey and focus group design enabled the collection of gender-disaggregated data. Furthermore, focus groups conducted in the framework of Programme implementation were intentionally structured to maintain a gender balance. Finally, the digital monitoring tool developed as part of the Programme was designed to collect gender-disaggregated data for relevant indicators which could be used in the future for further gender analysis.

Studies and reports considered the specific roles and challenges faced by Roma women. According to Programme staff, studies paid particular attention to Roma women in two key thematic areas: their role in economic empowerment and the distinct and often acute situations faced by divorced and single mothers. The Beneficiary-specific and regional policy papers addressing Roma statelessness referenced the situation of Roma women in the context of barriers to immediate birth registration. The 2019-2024 monitoring report on the Poznan Declaration

³ Only the conclusions of the fifth Ministerial Meeting state the need to design skills training and employment programmes to "incentivize the preparedness and resilience of young people and women" (Federal Foreign Office 2024).

⁴ For example, Roma women are a distinct (but not exclusive) target group of two measures (Employment and Growth of Legal Subjects; Internship) in North Macedonia's Operational Plan for Employment for 2025, which was developed with Programme support (see Agencija za vrabotuvanje na Republika Severna Makedonija 2025).

utilized gender-disaggregated data where available to illustrate key points and track progress specifically relating to Roma women. Conclusions of the assessment of the employment sector in Kosovo and North Macedonia highlighted the need to address the vulnerable position of Roma women in the labour market.

EQ 5: How is the CoE Human Rights Approach applied in the implementation of the Roma Integration Phase III Programme?

Sub-questions: How does the design of the Programme incorporate the CoE HRA principles of participation and inclusion, equality and non-discrimination, accountability and transparency and access to information? How does Programme implementation reflect those principles?

Key finding: The RI Programme effectively integrated the four principles of the CoE's Human Rights Approach: Participation and inclusion; equality and non-discrimination; accountability; and transparency and access to information, albeit to varying degrees.

The Human Rights Approach (HRA) was introduced to the CoE's technical cooperation in 2016 (Council of Europe 2016). Its core elements are outlined in the publication *Human Rights Approach: Practical Guide for Co-operation Projects* (Council of Europe 2020a). The CoE HRA stipulates four interconnected principles when implementing actions: (a) participation and inclusion; (b) equality and non-discrimination; (c) accountability; and (d) transparency and access to information.

Inclusion and participation

Stakeholder interviews confirmed that bringing together duty bearers and right holders through consultative processes in research and policy design was a key approach throughout implementation of the Programme. As one of the NRCs explained, bringing together various stakeholders including ministries, NRCs and CSOs can be seen as a crucial factor contributing to achievements of the Programme. Participation of CSOs was ensured in most activities, with some initiatives developed jointly with or through grants to CSOs. For example, the Programme consistently included Roma CSOs in targeted work on legal statelessness alongside lawyers and the European Network on Statelessness (ENS). Both CoE Programme staff and external stakeholders stressed various aspects of inclusive representation of the Programme by means of ensuring gender balance, the inclusion of Roma youth and students and the inclusion of stakeholders representing diverse political opinions in project activities. The Programme also ensured community participation. In Montenegro, for example, 36 Roma who were already active in their respective communities (many in the role of mediator between community and various institutions) were trained in research skills to collect data for a mapping of Roma settlements.

Equality and non-discrimination

Stakeholders particularly emphasized that the RI Programme contributed to equality and non-discrimination through direct community support measures. For example, with support to civil registration the Programme contributed to a fundamental precondition for inclusion in and coverage by state services in key areas of public life, including education, employment, healthcare, and social assistance. In similar fashion, supporting the legalization of land and housing contributed to Roma communities being placed on an equal footing with majority communities. Interviews further confirmed that direct community support on housing and civil registration was targeted based on need, hence ensuring that assistance reached the most vulnerable in Roma communities. Moreover, stakeholder interviews pointed out that the Programme sought a balanced gender representation and equally considered the particular needs of Roma women not only in community support, but also all other Programme measures. Stakeholders also pointed to the importance of access to unbiased information generated by the RI Programme; by prioritizing Roma lecturers and content creators, the Programme ensured authentic perspectives. For example, the "Roma Inspire" campaign improved access to positive information for both Roma and non-Roma communities by showcasing successful Roma role models and challenging negative stereotypes, thus combatting discrimination.

CoE Human Rights Approach for Co-operation Projects (2016)

Inclusion and participation

Empower rights-holders to hold duty-bearers accountable. Engagement with civil society is essential.

Equality and non-discrimination

Counteract discrimination. Vulnerable persons should be included and empowered to claim their rights.

Accountability

Enable duty-bearers to fulfil their responsibilities towards rights-holders. The CoE is accountable for its projects.

Transparency

Information about projects is available and accessible and decision-making strives to be transparent.

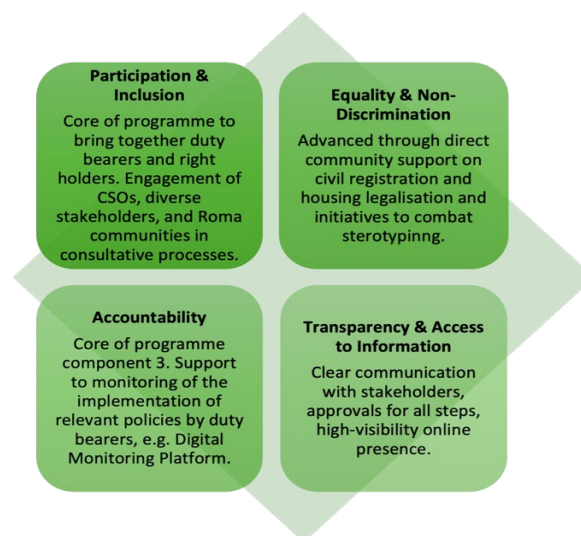
Accountability

Both Programme staff and external stakeholders located the principle of accountability at the core of the Programme, in particular through outcome area 3, which supports establishing and maintaining a system and practices of regular monitoring of the implementation of relevant policies. Stakeholders highlighted a number of Programme outputs, among which the handbook on antigypsyism produced by the Programme with its emphasis on the accountability of institutions and their employees in both policy design and service delivery. The digital monitoring platform stands out as a core tool, with its dual-system approach providing the public with real-time access to approved data, enhancing accountability for all citizens. Accountability was pursued throughout implementation by Programme staff, e.g. by explaining to institutional partners selection of external experts, emphasizing fairness and neutrality.

Transparency and access to information

Overall, the Programme ensured transparency with stakeholders throughout implementation. Programme staff highlighted that the Programme maintained clear communication with ministries, sought necessary approvals for all steps, and ensured a high-visibility online presence to keep stakeholders informed. Stakeholders pointed out that information on the Programme and the materials it produced were made publicly available on the internet. At times, however, delays in production due to time needed for graphic design led to the presentation of results before publications were available. Finally, inclusive outreach contributed to transparency. Partners and CoE staff highlighted that they employed a wide array of communication channels—including websites and diverse social media platforms – to disseminate information and engage Roma communities.

Table 1: HRA in the Roma Integration Phase III Programme



2.2. Effectiveness: Achievement of outcomes

EQ 6: Achievement of outcomes: To what extent have the intended outcomes and outputs of Roma Integration Phase III been achieved or are likely to be achieved by the end of the Programme in recognising and combating antigypsyism, improving socio-economic inclusion in key sectors, and strengthening institutional capacities to design, implement and monitor Roma inclusion policies?

Key findings:

- The Programme produced longer-term, systemic outcomes in each of the three outcome areas to different degrees in the various Beneficiaries. On the whole, the strongest progress was made in strengthening institutional capacities, including but not limited to official accreditation and state-funded rollout.
- Evidence for legal recognition of antigypsyism targeted in outcome area 1 remained weak. In outcome area 2, achievements in specific sectors like employment and housing beyond direct support were largely outside the Programme's sphere of influence. Outcome area 3 saw limited success towards monitoring and reporting on Roma inclusion due to the lack of adoption of digital monitoring tools and inconsistent stakeholder engagement.
- Because Türkiye is not a signatory to the Poznan Declaration and does not legally recognize as a minority the Programme had to adapt its scope in that Beneficiary.
- A persistent challenge in most Beneficiaries is the absence of robust, nationwide statistical data, which forced the Programme to rely on survey estimates and made it difficult to measure progress against specific Poznan Declaration targets.
- The Programme's contribution is shown through its role in transforming political commitments on Roma inclusion into national legislation, accredited training curricula, and approaches to budgeting by providing necessary technical expertise, expert legal analysis, and reputational weight.

Sub-question: What do stakeholders view as key contributions of the Programme to recognizing and combatting antigypsyism (outcome area 1)?

Confirmed key achievements:⁵

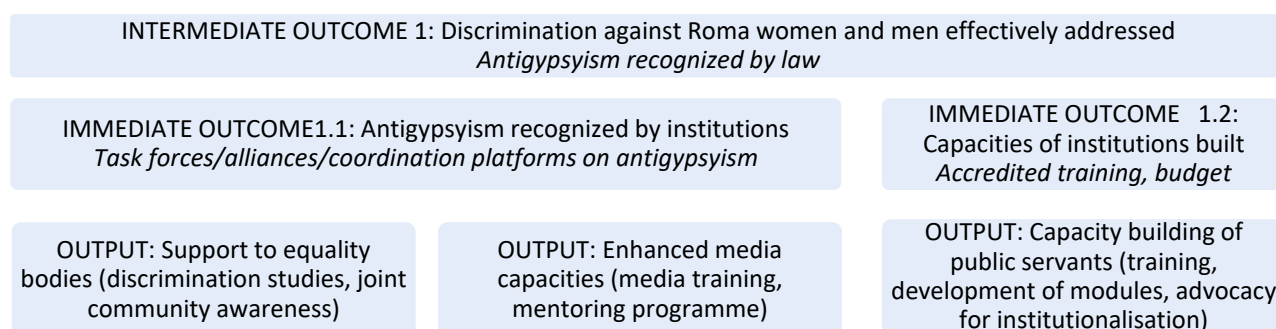
- Amendments to the Law on Protection from Discrimination in Kosovo.
- Official accreditation of the "Combating Antigypsyism" curriculum from the Centre for Vocational Education for civil servant training in Montenegro.
- Rapid nationwide training rollout in Türkiye financed by the government following revision of the social inclusion training model by the Programme (1,500 civil servants, 50% of envisioned target).
- New training plan by the office of Commissioner for the Protection of Equality in Serbia to further roll out the training for social workers supported by the Programme in 2026.
- Continuity and functional focus of existing platforms and task forces addressing antigypsyism.
- Regional and localized training to around 175 civil servants. Documented shift in participant attitudes and the challenging of stereotypes through the utilization of Roma experts as trainers. Institutionalized recognition of acquired knowledge through of certification by ReSPA.

Outcome area 1 focusses on addressing discrimination against Roma. Outputs aim to support to equality bodies and enhance media capacities; hence catalyse immediate outcome 1.1, the recognition of by institutions, measured through *task forces and coordination platforms on antigypsyism*. Outputs aiming at capacity building of public servants aim strengthen public institutions as immediate outcome 1.2, measured by the availability of *accredited training and budget*.⁶ Both immediate outcomes aim to effectively address discrimination against Roma, measured through the *legal recognition of antigypsyism*.

⁵ Additional achievements reported by the Programme team in the period beyond that covered by the evaluation include accreditation of a training curriculum on antigypsyism for civil servant training in Albania, as well as amendment of the Criminal Code in that Beneficiary to include a provision on antigypsyism.

⁶ Immediate outcome 1.2 slightly reformulated by consultants to visualize better the logical pathway (original logframe formulation: "Institutional capacities of public servants are built on countering antigypsyism"). This included the usage of a proxy indicator (in lieu of indicator of the original logframe, "capacity building activities carried out") to better capture progress (e.g. accreditation or availability of a budget for training, strengthened institutions).

Table 2: Intervention logic of outcome area 1 (condensed version)



Outcome-level achievements⁷

Discrimination against Roma women and men effectively addressed

Based on interviews, the recognition of antigypsyism by law in the Western Balkans varies significantly by Beneficiary, ranging from successful inclusion in draft legislation to structural and political setbacks. The most concrete legislative process is evident in Kosovo, where the Law on Protection from Discrimination is currently being amended. In 2024, a draft of the law was prepared and submitted to the Government for approval. However, since parliamentary elections were announced and the Government was not formed in 2025, the law remains pending and is expected to be approved by the new government that will be established soon. The new draft recognizes "Antigypsyism" as a term and creates a legal basis for combating it. Interviews confirm that the RI Phase III Programme expert supported the working group responsible for redrafting the Law with a legal analysis aiming to recognize antigypsyism. This analysis was accepted by the working group. Moreover, the RI Phase III Programme support to CSOs, including via trainings, indirectly influenced the conceptualization of antigypsyism in Kosovo.

Antigypsyism recognized by institutions

A specialized task force on antigypsyism is in place in Kosovo. The Technical Working Group for Protection from Discrimination of Roma, Ashkali and Egyptian Communities was established in 2020 by a decision of the Prime Minister as an institutional mechanism for addressing cases of and combating discrimination against these communities on all grounds provided by applicable legislation. It is led by the Office of Good Governance and includes contact points from relevant ministries. Notably, while its focus is antigypsyism, the formulation "Protection from Discrimination" was chosen due to local resistance to the term 'antigypsyism'. Additionally, since 2022 a National Platform for Protection from Discrimination of Roma, Ashkali and Egyptian Communities has served as the secretariat of the Technical Working Group.

No specialized governmental task forces have been established in other Beneficiaries. In Bosnia and Herzegovina issues related to antigypsyism are handled by the Department for Elimination of All Forms of Discrimination within the Human Rights Ombudsman and the Ministry of Human Rights and Refugees. However, one interviewee pointed to increasing the visibility in policy circles and the public of antigypsyism and discrimination against Roma as a result of the RI Phase III Programme, which he viewed as significant given the tendency in Bosnia and Herzegovina to attend to the three constitutive nations at the expense of all others.

The Programme's implementation approach diverged from the original Programme logframe by expanding support to pre-existing processes on Roma integration with a remit that includes but is not focused exclusively on antigypsyism. Therefore, the Programme's contribution was to ensure the continuity and functional focus of these existing platforms rather than the creation of new, specialized bodies in the Beneficiaries. In Serbia, the relevant responsibilities currently fall under the Ministry for Human and Minority Rights and Social Dialogue. In Montenegro, while there is an inter-sectoral working group on Roma, it is reported to function poorly, with member institutions often avoiding their responsibilities.

Capacities of public institutions built/strengthened

The Programme's most significant success in building capacities of public institutions to tackle antigypsyism was realized in Montenegro, where the training curriculum for civil servants "Combating Antigypsyism and All Forms of

⁷ Output-level achievements are reported in Annex 2.

Discrimination Against Roma and Egyptians" received accreditation from the Centre for Vocational Education in September 2025 (see also case study).⁸ On the one hand, the accreditation of the curriculum demonstrates that Montenegrin institutions understand antigypsyism as a problem that must be addressed. On the other hand, conferring an official status on the training curriculum directly incentivizes civil servant participation in the training by tying it to credits for completion. While the training is currently not required of all civil servants, the accreditation provides the institutional basis for a possible full rollout of the training programme in future by increasing the scale on which the training can be delivered.

In Serbia, the Commissioner for the Protection of Equality office developed a new training plan for 2026 to further roll out the training for social workers supported by the Programme, as the training was seen as highly effective. The Programme and the Commissioner office have worked closely with the Republic Centre for Social Protection and Chambers for Social Protection on certification and currently aim for testing. Although accreditation is not necessarily needed, social workers are legally obliged to undergo a certain amount of training to keep their licenses. Stakeholder interviews pointed out that the Republic Institute for Social Protection has recognized the importance of this training and plans to include it among the courses offered through that institution.⁹ Additionally, the Chamber of Commerce and Industry of Serbia (CCIS) is interested in the training. The Commissioner has established a good cooperation with the Chamber.¹⁰

In Türkiye, stakeholders view the institutionalization of the social inclusion training as one of the most important outcomes of the Programme. The revised training model is now used for training in the provinces and the roll-out of training, financed directly by the Ministry of Family and Social Services, started in November 2025. A total of 80 trainings were conducted in a period of two months, covering an estimated 1,500 civil servants.¹¹ This constitutes already approximate 50% of the envisaged 3,000 trainees that the Ministry set as target coverage.

On the whole, the strongest evidence of progress in the period covered by the evaluation can be found concerning immediate outcome 1.2 (Institutional Capacities) through official accreditation in Montenegro and state-funded rollouts in Serbia and Türkiye. Evidence for Immediate Outcome 1.1 (Institutional recognition of antigypsyism through specialized task forces) is comparatively weak across most Beneficiaries. No new specialized governmental task forces were established under the Programme; instead, the Programme adapted by ensuring the continuity of existing, at times poorly functioning, platforms. Kosovo provides the only progress for the ultimate milestone to effectively address discrimination against Roma women and men (intermediate outcome 1), with draft amendments to the Law on Protection from Discrimination explicitly recognizing the term "Antigypsyism" pending approval.

The pathway for change of outcome area 1 fails to account for a critical link in the causal chain that could be further explored: By promoting ethical reporting, media outlets and journalists not only influence institutions directly, but they also influence citizens as voters, creating a bottom-up political incentive for institutions to effectively address discrimination.

Sub-question: What do stakeholders view as key contributions of the Programme to socio-economic inclusion of Roma (outcome area 2)?

Confirmed key achievements:

- *Employability:* Albania: Agreement reached with the Ministry of Economy and Innovation for new Roma-targeted employment programme within the National Employment Strategy (budgeted from 2026). Kosovo: Inter-institutional group on Roma employment established. Roadmap to be endorsed by the Office of Good Governance, making it mandatory to follow and report. North Macedonia adopted the 2025 Operational Plan for Employment with specific measures for Roma. Türkiye: Targets/actions integrated into the draft 2026-2030 National Action Plan for Roma.

⁸ The Programme team reported a similar success in Albania in the period beyond that covered by the evaluation.

⁹ Stakeholder interviews highlight that the Republic Centre for Social Protection and Chambers for Social Protection training (often via partners like e.g. University of Niš) is crucial, focusing on evidence-based practice, new policies e.g. for elderly, persons with disabilities, vulnerable groups), and system strengthening for social workers in Serbia. While specific courses are not listed as universally "obligatory", the Institute's work informs national standards, making related training essential for professionals to keep up with policy and practice.

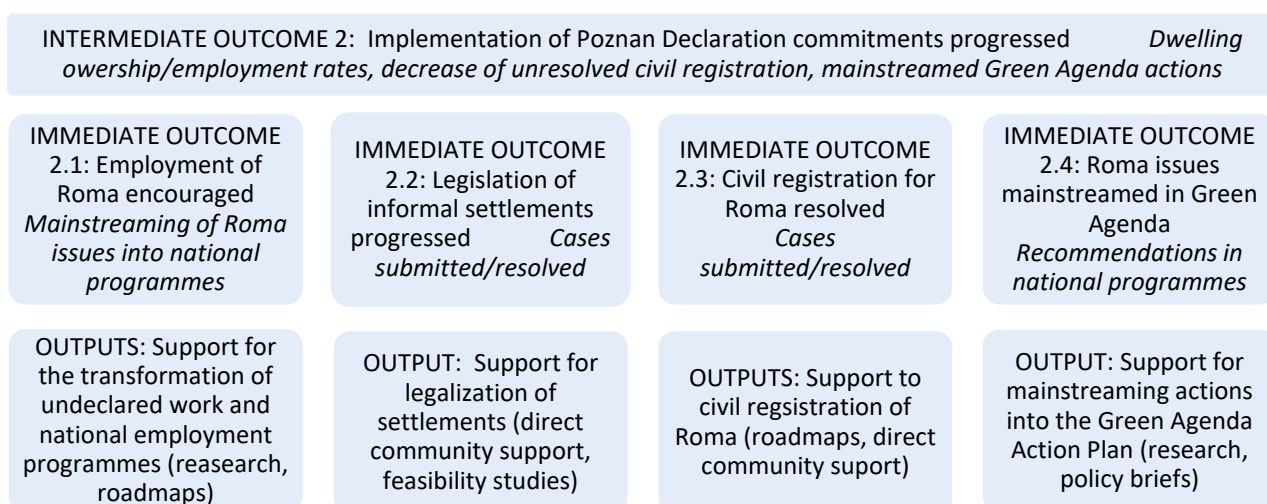
¹⁰ The CCIS promotes corporate social responsibility including supporting vulnerable groups and people with disabilities through partnerships with NGOs, training programmes for inclusive employment, and initiatives that align business with social welfare.

¹¹ Exact figures of training participants remain to be compiled.

- **Legalization of informal settlements:** At least 54 cases resolved. Albania: Legalization of land plots enabled approximately 15 families to establish a farmers' cooperative for corn and wheat, resulting in improved market influence and economies of scale. Bosnia and Herzegovina: Feasibility study findings integrated into the National Action Plan with a budget allocation of EUR 1.2 million. North Macedonia: Contribution to the draft Law on Social Housing. Türkiye: Programme data contributed to a renewed presidential commitment to construct over 1,000 new social buildings and implement a five-year renovation and housing aid plan for Roma communities.
- **Civil registration:** Programme contribution to the amendment of the Law on Civil Registry in Albania. 190 cases successfully resolved.
- **Green Agenda:** Integration of environmental priorities into Albania's National Action Plan for Roma and Egyptians and elaboration of scenarios for inclusive energy sector finance reform in Serbia.

Outcome area 2 focusses on commitments of the Poznan Declaration. Output level support includes research, policy briefs, roadmaps and direct community support. This leads to four immediate outcomes addressing employment of Roma, legalization of informal settlements, civil registration and Roma mainstreaming in the Green Agenda, measured by *initiatives for mainstreaming Roma into employment programmes; cases on legalisation and civil registration submitted/solved; and recommendations mainstreamed in Green Agenda programmes*.¹² Immediate outcome advancements aim to lead to the intermediate outcome of progress on the Poznan Declaration commitments (*increase in dwelling ownership and employment rates, decrease of unresolved civil registration, and mainstreamed Green Agenda actions*).

Table 3: Intervention logic of outcome area 2 (condensed version)



Outcome-level achievements¹³

Progress on the implementation of Poznan Declaration commitments

Progress on the Poznan Declaration commitments has been characterized as rather low according to available monitoring reports and fiches, although differences across sectors and Beneficiaries can be seen. Key data on the four indicators are not consistent as not all Beneficiaries can provide data for recent years (for a detailed overview see Annex 4):

- **Roma employment rates:** Employment progress across the region remains extremely limited. In Albania, Roma employment in local public administration decreased from 644 in 2019 to 253 in 2024. Kosovo reports unemployment levels exceeding 90%. Bosnia and Herzegovina recorded 3,679 registered unemployed Roma in June 2024. Minor increases in Roma employment rates were observed in North Macedonia (from 22% to 24%) and in Serbia, reaching 23% in 2022 (before Programme launch). Montenegro noted some progress in private sector employment and self-employment.

¹² For immediate outcome 2.2 the consultants formulated a proxy indicator "Cases submitted/resolved" (in lieu of indicator of the original logframe, "regional events with stakeholders addressing housing legalisation") to comprehensively capture outcome-level progress (as defined also in immediate outcome 2.3).

¹³ Output-level achievements are reported in Annex 2.

- *Legalization of informal settlements:* Available data is mostly outside the Programme time frame. For example, in Bosnia and Herzegovina legalized seven housing units in 2023. North Macedonia approved 879 legalization requests through separate projects between 2019 and 2023.
- *Unresolved civil registration:* Significant numbers of Roma remain at risk of statelessness. Albania reports 2,098 individuals at risk as of July 2024. Montenegro saw an increase to 431 stateless or undetermined persons in 2024. North Macedonia reduced unresolved cases to 159 by May 2025.
- *Mainstreamed Green Agenda actions:* Policy engagement on the Green Agenda and Roma inclusion is largely absent. Albania, Montenegro, and Bosnia and Herzegovina report no progress or specific information on Roma inclusion in green transitions. Kosovo and North Macedonia have endorsed green plans, but the benefits for Roma remain unclear. Serbia is the only Beneficiary with specific measures.

The Programme's achievements in the area of employment indicate increased institutional commitment but have not yet led to concrete increases of employment rates among Roma in line with the Poznan Declaration commitments. The Programme's concrete contributions to fulfilment of the Poznan Declaration commitments can be measured in terms of coverage of identified needs in civil registration and housing legalization across the Western Balkans Beneficiaries:

- *Housing legalization coverage:* Percentage coverage for housing is calculated against varying baseline units, such as settlements or households. In Albania, the 65 cases solved by the Programme amount to partial coverage of two of the 130 settlements identified at baseline (Fier and Vlora). In Bosnia and Herzegovina, the 29 supported cases constitute approximately 1.9% of the 1,539 families identified as requiring housing units. In North Macedonia, the 54 cases solved by the Programme represent a targeted intervention in the context of the broader national progress of 879 approved legalization requests recorded between 2019 and 2023.
- *Civil Registration coverage:* The Programme demonstrated its highest relative impact in North Macedonia, where it provided support for approximately 73% of the 750 cases identified in the initial 2019 baseline. Interviews with stakeholders in North Macedonia as part of this evaluation indicate that there are around 200 pending civil registration cases and around 600 children born in 2024 who were not promptly entered into the birth register. In Bosnia and Herzegovina, the Programme supported roughly 69% of the baseline population at risk of statelessness and successfully resolved cases for approximately 21% of that category. In Montenegro, although the 180 supported cases numerically exceed the 2019 baseline, they represent a coverage of approximately 42% of the currently identified 431 stateless persons. Lower relative coverage of identified needs is observed in Serbia (approximately 5.6% of current unresolved cases) and Albania (around 3.3% of the baseline population).

Findings concerning progress on the Poznan Declaration commitments as outlined above (and presented in more detail in Annex 4) must be reviewed with care, as they are often based on survey estimates rather than robust statistical data. According to interviews, the robust statistical data required to measure quantifiable deliverables in employment are largely absent in most Beneficiaries. Consequently, the reports enable the identification of broader trends rather than progress toward specific quantifiable targets. Related to this are challenges around operational scope and data discrepancies. The operational scope of the Programme exceeds official point-in-time statistics in two Beneficiaries (Bosnia and Herzegovina and North Macedonia concerning civil registration). This occurs because Programme figures reflect cumulative assistance provided to individuals over the entire reporting period, whereas official data often provide a snapshot of remaining cases at a single moment. Furthermore, the Programme frequently identified and supported new, emerging cases that may not be captured by official statistics. Finally, in some Beneficiaries there may be an incentive to underestimate the number of persons at risk of statelessness.

Employability

In Albania a new employment programme targeting Roma within the National Employment Strategy with a budget allotted from 2026 was agreed on with the Ministry of Economy and Innovation. In Kosovo the roadmap based on the findings of the regional analysis on the impact on Roma of government employment and self-employment measures led to establishment of an inter-institutional employment group to create employment opportunities for Roma in public administration and private sector. The roadmap will be endorsed by the Office of Good Governance, making it mandatory to follow and report on. In North Macedonia, based on the policy brief produced under the Programme, the Programme and REDI provided input on targeted measures into the 2025 Operational Plan for Employment which was adopted June 2025. In Türkiye, employment was prioritized on request of the government. The roadmap fed into the "Employment" section of Türkiye's upcoming National Action Plan for Roma (Phase Two,

2026-2030), currently awaiting presidential approval. It includes concrete actions and specific targets for relevant institutions, making these binding as they are integrated into the Phase II Action Plan. The Programme staff noted the value of recommendations for vocational training certification and the inclusion of Roma in entrepreneurship programmes. The NRCP pointed to the commitment of the Ministry of Labour and Social Security in follow-up meetings. As part of its advocacy strategy, the Programme also advocated with key institutions for inclusion of Roma in the employment strategy, albeit with no concrete results yet.

Legalization of informal settlements

At least 119 cases on legalization were successfully resolved (see Beneficiary-disaggregated data in Table A in Annex 1).¹⁴ Interviewees attributed the success of housing legalization and land ownership formalization to several key factors, most notably the direct and practical nature of the support provided. This included tangible assistance such as surveying and the coverage of administrative fees, which contrasted with earlier efforts by other actors that were often limited to information campaigns. The effectiveness of this support was further enhanced by the knowledge and experience of the individuals delivering the Programme. Additionally, achievements were made possible through strong cooperation with willing donors, municipalities, and relevant ministries, as well as partnerships with other CSOs.

Although three housing feasibility studies were finalized in late 2025, feedback by relevant ministries is positive, indicating studies provide a solid basis for institutional follow-up. Interviews suggest studies informed national and regional Roma action plans; findings were incorporated into Bosnia and Herzegovina's National Action Plan (budget approximately EUR 1.2 million) and shaped housing sections in Serbia and Türkiye. Studies facilitated funding and donor support, serving as a basis for municipalities to negotiate with the CoE Development Bank and stakeholders for housing improvements. Finally, feasibility studies addressed data gaps by producing the first thematic studies in Montenegro and Türkiye, involving local governments to generate research guiding policy-making and geographic priorities for Roma housing.

Evaluation focus groups reveal broader impact on beneficiaries' lives. In Albania, legalization support allowed most beneficiaries to fully legalize land plots stalled for 30 years. This legal stability led to a farmers' cooperative for corn and wheat—the first time many families farmed the land in 30 years. The cooperative, involving approximately 15 families, created economies of scale to coordinate production and influence prices. Beyond economic benefits, agriculture is now appealing to younger generations and viewed as redress for discrimination following the regime change. In North Macedonia, support addressed dwellings constructed on single private land parcels in the mid-1990s. Legalization was a prerequisite for individual deeds; residents had applications pending for years. The Programme provided consultants to track applications and covered administrative taxes and land purchase. Consequently, tenure was secured, granting legal rights to register addresses, receive mail, and apply for credit. Community members reported that this positive experience built confidence to communicate needs to institutions.

Stakeholders confirm that the Programme supported the development of a draft Law on Social Housing in North Macedonia. In Türkiye, stakeholder interviews indicate that the feasibility study contributed to bringing vulnerabilities and needs of Roma to the attention of the government and a renewed commitment from the President for over 1,000 new social buildings also benefitting Roma within five years, as well as renovation of existing houses and aid for Roma to build their homes. This commitment, previously stalled by the February earthquakes, was revived due to the study's findings emphasizing urgent needs.

Civil registration

During the Programme time frame a total of 190 civil registration cases were successfully resolved (for Beneficiary-disaggregated data see Table B in Annex 1). Interviews also suggest that the engagement of the Programme, including the production of the policy briefs on statelessness among Roma, contributed to overcoming initial resistance of central-level institutions to addressing this issue in a few of the Beneficiaries. In Albania it was noted that the Programme contributed to the amendment of the Law on Civil Registry. On the whole, interviews suggest that the Programme contributed to the integration of expertise on Roma rights into the broader framework of addressing statelessness.

¹⁴ As reported by the Programme team, 365 Roma individuals received counseling on housing issues, whereas 244 Roma families received support for legalization of their dwellings.

Although outcome area 2 delivered concrete results through direct community support, progress on a broader scale in the three sectors of employment, housing, and civil registration as aimed for at intermediate outcome level was clearly beyond the scope and the sphere of influence of the Programme.

Green Agenda

Outcomes with regard to the Green Agenda are rather limited. Interviewees pointed out that although the green transition is part of the Ministerial Declarations on the Poznan Declaration, Beneficiaries are unsure how to proceed on this topic. Nevertheless, follow-up meetings initiated certain processes. For example, in Albania the Ministry of Tourism and Environment committed to integrating targeted environmental measures into the National Action Plan for Roma and Egyptians and in Serbia a peer learning workshop was organized on “Scenarios for Inclusive Energy Sector Finance Reform.” In Türkiye, the study on housing highlighted particular vulnerabilities of Roma communities in light of climate change and led to discussions with the Ministry of Environment, Urbanization and Climate Change.¹⁵

Sub-question: What do stakeholders view as key contributions of the Programme to strengthening institutional capacities to design, implement and monitor Roma inclusion policies (outcome area 3)?

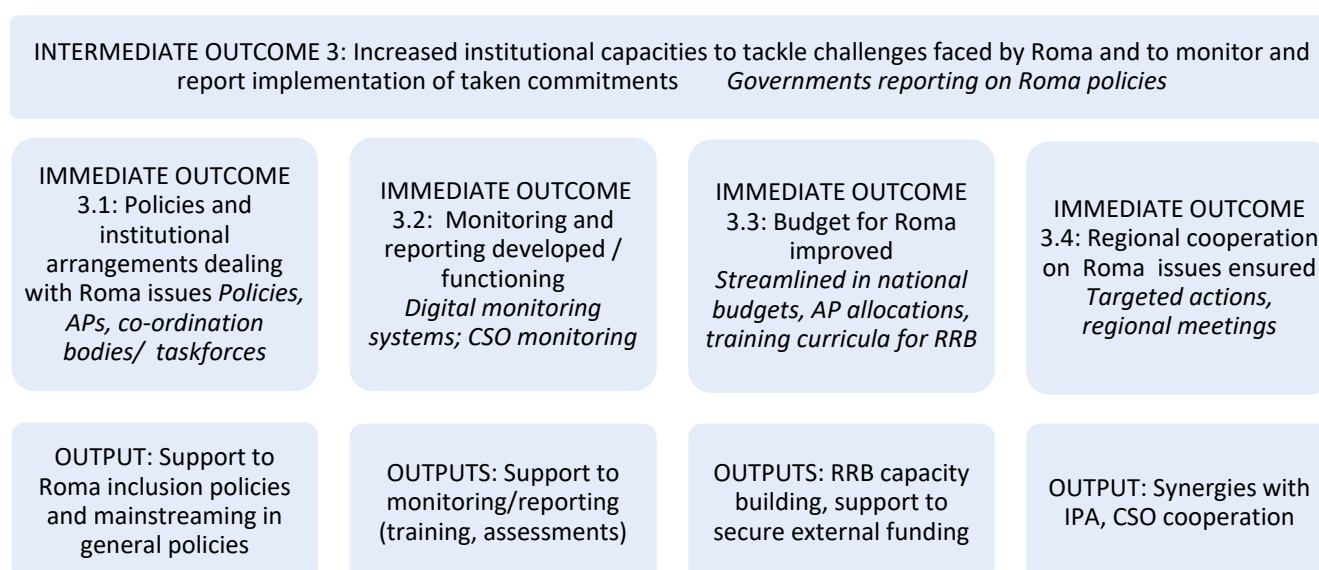
Confirmed key achievements:

- Roma Responsive Budgeting (RRB) institutionalized in Albania, with principles of RRB incorporated in all new strategies and action plans developed with Programme support.
- Draft legislation on social housing developed in North Macedonia.
- One strategy (Montenegro), six action plans (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, Serbia, Türkiye), and seven operational plans (North Macedonia) developed.
- Digital monitoring tool developed and introduced to Western Balkans Beneficiaries (minus Albania).
- Three funding proposals involving at least two Beneficiaries prepared and submitted.
- Midterm review of Poznan Declaration implementation produced.
- Implementation of National Roma Integration Strategies and Action Plans reviewed in six Beneficiaries.

The programmatic pathway for outcome area 3, “Increased institutional capacities to tackle challenges faced by Roma and to monitor and report implementation of taken commitments”, starts with outputs to support Roma inclusion policies and mainstreaming into general policies, along with support for monitoring and reporting. Additional outputs include capacity building for RRB, securing external funding, developing synergies with IPA, and fostering CSO cooperation. These outputs aim at four immediate outcomes: establishing policies and institutional arrangements dealing with Roma issues, measured by *policies, strategies, action plans, NRCP, coordination bodies, national platforms, and regional conferences*; monitoring and reporting as indicated by *digital monitoring systems and CSO monitoring*; improved budgeting, with indicators including *streamlining in national budgets, financial allocations for action plans, and RRB training curricula for RRB*; and regional cooperation on Roma issues. Collectively, these elements contribute to intermediate outcome 3, increased institutional capacities to tackle challenges faced by Roma and to monitor and report implementation of taken commitments, as evidenced by *governments reporting on Roma policies*.

¹⁵ The Programme team reported that it initiated meetings in the period beyond that covered by the evaluation with relevant ministries to discuss the findings of the regional study on the inclusion of Roma in the green economy and Green Agenda produced through the Programme, as well as the incorporation of Roma issues in green policies and initiatives.

Table 4: Intervention logic of outcome area 3 (condensed version)



Outcome-level achievements¹⁶

Increased institutional capacities to monitor and report implementation of taken commitments

Whereas the indicator for this outcome is defined in the Programme logframe as “Number of Governments reporting on Roma policies (including statistics and budget)”, discussions with the Strasbourg-based CoE team yielded the explanation that the emphasis of the outcome was on continuity and quality of reporting. While Beneficiaries have continued to report on implementation of their strategies and action plans for Roma throughout Programme implementation, there are few indications that the Programme has contributed to improved monitoring and reporting practices. As one interviewed stakeholder explained, the Poznan Declaration aims for quantifiable deliverables (e.g., percentages for employment and education), yet the necessary robust statistical data to measure these objectives are largely absent in most Beneficiaries. The digital monitoring tool developed in the framework of the Programme holds considerable potential for increasing the availability of relevant data and thereby providing a basis for significant improvements in governments’ reporting on policies for Roma, but its prospects for adoption in the Beneficiaries are uncertain. Moreover, some interviewees expressed the view that populating and maintaining the database through regular updating of indicators from key policy documents will likely require at least one full-time position to ensure that the necessary staff time and capacity are consistently available.

Policies and institutional arrangements dealing with Roma issues

Although policies, strategies, and action plans for Roma existed in all Beneficiaries before the RI Phase III Programme, stakeholders from all Beneficiaries identified the development of new strategies and action plans (and, in the case of North Macedonia, operational plans) on Roma as a key Programme achievement. An interviewee from Kosovo praised the approach taken, explaining that the meetings organized with Programme support for collecting data on the implementation of strategic documents generated valuable reference material for drafting a new strategy taking into account the challenges, achievements, and shortcomings of the previous one.

Where institutional arrangements are concerned, with the sole exception of North Macedonia, National Roma Contact Points in the Beneficiaries assessed the support received from the RI Phase III Programme in positive terms. For example, stakeholders from Türkiye reported that the expert support provided through the Programme helped the relatively new team around the National Roma Contact Point to quickly gain an understanding of the capacities of relevant institutions and to establish collaboration with them. Overall, however, the institution of National Roma Contact Point generally remains weak across Beneficiaries, regardless of incumbents’ technical capacities. A stakeholder from Montenegro credited the Programme for establishing routine communication among a core of long-term middle management employees in relevant institutions.

¹⁶ Output-level achievements are reported in Annex 2.

Monitoring and reporting mechanisms developed and functioning

Albania and Türkiye continued using existing monitoring platforms, while some stakeholders in Kosovo expressed interest in adopting Albania's ROMALB platform. Stakeholders in Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia generally viewed the new digital monitoring tool positively in terms of design and potential. However, many raised concerns about staff time and technical expertise required to maintain the database, as well as the need for additional training. In Bosnia and Herzegovina and Montenegro, the tool's full launch awaited adoption of new strategic documents defining the indicators to be included. As of late January 2026, the tool was not yet in use in any Beneficiary. CSOs in several Beneficiaries received Programme training on monitoring implementation of the Poznan Declaration and participated in activities assessing expiring strategies as a basis for new ones. However, regular CSO involvement in monitoring remains limited. The role of national statistical offices has also been uneven. In North Macedonia, the State Statistical Office was initially involved in planning monitoring activities, including a tri-annual "census" on Roma, but the planned activities were not implemented after staff turnover. In Bosnia and Herzegovina, the Agency for Statistics provides data upon request but does not coordinate monitoring.

Budgeting for Roma improved

The RI Phase III Programme continued and expanded previous CoE work on Roma Responsive Budgeting. For this purpose, the Programme was able to draw on the experiences of several Beneficiaries with RRB at municipal level, as well as the regional *Guidelines for Roma Responsive Budgeting* developed with support from the Regional Cooperation Council in 2018.

The most significant achievement of the RI Phase III Programme in relation to improving budgeting for Roma is the institutionalization of Roma Responsive Budgeting in Albania. There, the official integration of RRB into the national Medium-Term Budgeting Guidelines for 2026-2028 resulted in five budget programmes focusing on Roma for this period, with Roma mentioned in another three budget programmes. The focus on Roma in five budget programmes in turn provided a basis for a government decision issued in January 2026 that will make inclusion of Roma in budget programmes a legal obligation in future.¹⁷

In most other Beneficiaries, the main achievement related to improving budgeting for Roma is the incorporation of the principles of RRB in the new strategies and action plans developed with Programme support. Additionally, the Programme supported the development of a guideline on RRB in Kosovo which has been validated by the Office of Good Governance and other relevant institutions.

Regional cooperation on Roma issues ensured

NRCPs praised the Programme's regional networking opportunities. Regional events provided forums to identify common problems and discuss solutions. The Programme also supported bilateral exchanges of good practices, including study visits from Montenegro to North Macedonia (February 2025) and from Kosovo to Albania (April 2025). Several interviewees emphasized that such peer learning is important because NRCPs often receive limited institutional support. Although there was discussion about creating a formal NRCP network, no concrete steps were taken during Programme implementation. Of four funding proposals prepared with Programme support, three involved multiple Beneficiaries. One was rejected, while two remained pending as of January 2026. Without continuation of RI Phase III regional activities, future regional cooperation may depend largely on the success of these proposals.

The strongest progress under intermediate outcome 3 relates to immediate outcome 3.3 (budgeting for Roma), particularly the institutionalization of RRB in Albania and incorporation of RRB principles in new policy documents across Beneficiaries. There is some progress under outcome 3.1 (policies and institutional arrangements) through development of new strategies and support to NRCPs. Progress under outcome 3.2 (monitoring and reporting) is more limited, as Programme measures created a basis for improvements that have not yet materialized. Similarly, progress under outcome 3.4 (regional cooperation) depends largely on pending funding decisions.

Progress on Outcome 3 was less than on the other two Programme outcomes. The main reason for this is the lack of significant advances in relation to monitoring and reporting: The digital monitoring tool developed through the Project is not in use in any Beneficiary, CSOs have not generally been involved in regular monitoring, and the engagement of national statistical offices has been uneven across the Beneficiaries. With the introduction of the

¹⁷ Albania's experiences and achievements in Roma Responsive Budgeting are explored in detail in one of the two case studies undertaken in the framework of the current evaluation.

digital monitoring tool, the Programme might have been too ambitious by aiming to achieve ownership of Beneficiaries as well as systematic collection of robust, comparable data on progress on the Poznan Declaration commitments.

Contribution of the Programme

Where capacity-building measures of the RI Programme are concerned, there are assessment gaps. While post-training surveys and stakeholder interviews indicate a shift in participant attitudes and the challenging of stereotypes, this evidence remains largely anecdotal. Broader results beyond immediate knowledge acquisition are currently unclear. There is a lack of systematic assessment regarding the practical application of these concepts in the day-to-day work of civil servants. To validate these results, it would be necessary to move beyond immediate post-training assessments through a longitudinal assessment of behavioural change. Similarly, a longitudinal assessment of trained journalists (e.g., through content audits or periodic reviews) would be required for more systematic monitoring of the application of ethical storytelling in daily journalistic work.

A central strategic challenge identified is the integration of Türkiye into the Programme portfolio. Türkiye is not a signatory to the Poznan Declaration on Roma Integration primarily because the declaration was designed as a specific regional commitment for the "Western Balkans Six" within the Berlin Process. Unlike the Western Balkans Beneficiaries, Türkiye operates under a legal framework that does not recognize Roma as a minority and most Roma have Turkish citizenship; hence issues of exclusion and discrimination had to be approached differently. Whereas the Western Balkans are moving toward recognition of antigypsyism, Türkiye required a different terminology and approach through a focus on social exclusion, creating a certain disconnect to outcome area 1. Additionally, activities in Türkiye under outcome area 2 focused on employability and housing of Roma rather than civil registration. Overall, Türkiye's lack of connection to the Poznan Declaration challenges comparability to other Beneficiaries on a like-for-like basis; progress in Türkiye must be evaluated based on its internal policy development.

Isolating the Programme's specific contribution poses challenges also because the Programme operates within a complex environment where the EU accession process and related reforms act as primary drivers. A three-year cycle is often too brief to measure long-term institutional or behavioural shifts. This difficulty is compounded by a scarcity of robust, nationwide statistical data. Nevertheless, the evaluation can establish the Programme's added value and its specific contributions to the achievements detailed below.

Overall, without the CoE's unique "reputational leverage" as an impartial mediator, CSOs would likely face continued resistance from central ministries, and the "door-opening" required for policy reform would cease. High-level commitments like the Poznan Declaration would likely remain "unfunded mandates" as without the specific RRB frameworks provided by the Programme, there would be no technical mechanism to ensure that money follows policy. In several Beneficiaries the Programme has been vital to ensure that addressing discrimination is no longer dependent on fluctuating political will but is a recognized, permanent state function.

For example, the Programme contributed to the codification of RRB into national law in Albania through continuous advocacy and technical expertise, by which the Programme adapted regional guidelines to the national context and built on Albania's experience with Gender Responsive Budgeting. Without the support provided through the Programme, RRB likely would have remained a broad political pledge rather than a mandatory legal requirement, and Roma-related expenditures would remain targeted rather than mainstreamed.

A second example of Programme contribution is the accredited training curriculum in Montenegro, where the Programme navigated a 12-month accreditation process and provided expert support to adapt curricula to official standards, leveraging momentum from the Poznan Declaration. Without the support provided through the Programme, the training would presumably have remained informal, small-scale, and dependent on ad-hoc donor funding without the official certification that incentivizes civil servant attendance.

Third, the Programme contributed to the legal recognition of antigypsyism in Kosovo through expert legal analysis and technical advocacy to ensure that specific nomenclature was used in the draft Law on Protection from Discrimination. This was supported by the EU accession process and the CoE's reputational weight. Without the support provided through the Programme, amendments likely would have focused on general discrimination, lacking the specific "antigypsyism" terminology required for targeted judicial redress.

Finally, in Türkiye the Programme supported social inclusion curriculum revision and "Train the Trainer" modules for provincial staff, leveraging domestic funding to reach 1,500 civil servants. While the Ministry had a desire to

train staff also before the RI Programme, budgetary hurdles and the lack of a standardized, modular curriculum had previously stalled the process.

2.3. Effectiveness: Cross-cutting issues

Sub-question: Did stakeholders identify any additional outcomes?

Key finding: Strengthening of CSO capacities and regional networks are additional outcomes to which the Programme contributed.

The Programme strengthened CSOs and regional networks, including contributing to the consolidation of ENS's cross-country collaboration and peer support in the Western Balkans in relation to civil registration. Serbia shared experience in handling civil registration for citizens from Kosovo, enabling documentation exchange for cross-border cases. ERIAC Serbia widened its community as many participants and mentees signed up for membership. Additionally, an exhibition on Roma Holocaust and ethnical storytelling provided ERIAC Serbia with visibility among the public, institutions, and academia. CSO capacities were strengthened for approaching new donors and fundraising. In Albania, engagement led to improved recognition of the Tirana Legal Aid Society's work, which is expected to help the organization secure external funding to continue civil registration efforts.

Sub-question: What are the key factors that enabled or hindered the achievement of outputs and outcomes?

Key finding: Programme implementation benefitted from several enabling factors, mainly linked to the strategic linkage to the EU accession process, CoE reputation and staff expertise, as well as good cooperation. On the other hand, political complexities, institutional discontinuity in various Beneficiaries, and continuous need for coordination constituted challenges that the Programme had to navigate.

Programme implementation benefitted from a number of **enabling factors**:

- *Institutional legitimacy*: The association with the CoE served as a driver for Programme achievements. Stakeholders emphasized the CoE's reputation as opening doors to major institutions. As both government and CSOs trust the CoE, the Programme was well positioned to mediate between parties.
- *Strategic political linkages*: The Programme benefitted from its linkage to the EU accession process, e.g. in Montenegro, expectations of imminent accession to the EU contributed to an enabling overall political environment.
- *Previous support*: Lessons learned from prior phases of the Roma Integration and ROMACTED provided a sound basis for the design and implementation of the Programme. This was particularly evident in Albania, where earlier support to local-level RRB paved the way for integration of RRB at central level.
- *Networking and cooperation*: Networking to bring together governmental stakeholders and CSOs was identified as the most crucial factor for success. Collaboration among institutions within the Beneficiaries and at the regional level (e.g. ASPA and ReSPA), helped to maximize reach and impact.
- *Programme team*: Stakeholders emphasized the professionalism and dedication of the Programme team. The staff fostered an atmosphere of mutual understanding across different Beneficiaries. In Bosnia and Herzegovina advocacy by Programme staff was seen as essential to overcome official government positions on civil registration.
- *Roma expertise and ownership*: Utilizing Roma trainers and experts was identified as a key factor in maintaining the relevance and authenticity of the Programme's content. Fostering "Roma ownership" and providing specialized expert knowledge were essential for developing and implementing measures.
- *Funding*: Programme funding was seen as crucial in an increasingly challenging donor landscape.

Equally, there were various **challenges** which the Programme had to navigate:

- *Administrative and political complexity*: Interviews highlighted that in Bosnia and Herzegovina, convoluted administration made sustaining cooperation difficult. In Serbia, communication with state institutions on issues of civil registration and citizenship was described as adversarial, largely due to sensitivities regarding the status of Kosovo.
- *Institutional discontinuity*: Staff turnover was a considerable challenge. In Albania, ongoing restructuring resulted in delays. In Bosnia and Herzegovina, a retirement created a vacuum that halted activities for several months. In Serbia, the Coordination Body for Roma Inclusion remains inactive.
- *Social dynamics*: Factors related to social attitudes and internal community divisions challenged progress. Experts noted "compassion fatigue" among non-Roma.

- *Institutional discontinuity*: NRCP turnover was a considerable challenge in a number of Beneficiaries, e.g. in Albania, Bosnia and Herzegovina, and North Macedonia.
- *Recruitment challenges*: The Programme faced difficulties finding Roma researchers experienced in antigypsyism. Working with inexperienced researchers proved challenging.
- *Türkiye*: Türkiye is not a signatory to the Poznan Declaration, as Roma are not legally recognized as a minority. This restricted involvement in certain components. Differing approaches were needed to bring Roma to the attention of stakeholders.

Sub-question: What else do stakeholders and target groups think the Programme will achieve by the time it ends?

Key finding: Stakeholders expectations regarding additional Programme achievements by its conclusion vary by Beneficiary and outcome area. While some achievements are within reach, many are contingent on external factors such as political will and legislative changes.

Capacities of public institutions built/strengthened: In Albania, accreditation of the training curriculum on antigypsyism for civil servants in central government institutions is imminent. In North Macedonia, the Programme supported the incorporation of Roma history, culture, and language into the grade eight history course. A governmental stakeholder emphasized that national curriculum incorporation will require continuing external pressure.

Antigypsyism recognized by law: In Serbia, specific articles on antigypsyism are planned for inclusion in the "Law on prohibition of discrimination" during 2026-2027. In North Macedonia, an attempt to incorporate the concept into law failed, and staff turnover in the Ministry of Justice following the 2024 elections has worsened prospects. In Bosnia and Herzegovina, prospects for legislative recognition are assessed as poor. Resistance is rooted in disagreements over terminology and a lack of recognition of the phenomenon itself.

Legalization of informal settlements: In Albania and North Macedonia, the Programme exceeded goals for housing legalization, though demand is unlikely to be fully met. In Bosnia and Herzegovina, a feasibility study is expected to serve as a basis for future housing projects. In Montenegro, adoption of legislation on social housing is expected in the second half of 2026.

Civil registration: In Bosnia and Herzegovina, a formal initiative for amendments of the Law on Registry Books has been submitted. Stakeholders do not expect adoption by the end of the Programme, as the Federation refused amendments at a late stage, reflecting a preference for the *status quo*.

Roma Responsive Budgeting: Interviews indicate that in Kosovo the roll-out of RRB was not achieved due to the political situation, despite a general agreement among relevant institutions. Assuming that a government is formed soon, this outcome is likely to be achieved by the end of the Programme.

EQ 7: Management and coordination: How effective are the Programme's implementation arrangements, including the project management structure, coordination between the Council of Europe, the European Commission, and Beneficiary authorities, and the contribution of any supporting partners or consultants to overall effectiveness?

Sub-question: What is stakeholders' overall assessment of the Programme's implementation?

Key finding: While stakeholders generally viewed the implementation of the Programme as positive and constructive, its design was criticized as overly ambitious, with a broad scope disproportionate to the budget. This misalignment within complex political environments negatively affected implementation.

Overall, Programme staff and external stakeholders, especially partner organizations, view implementation of the Programme as positive, supported by effective coordination and sustained partner engagement. Nevertheless, interviews also emphasized challenges related to the Programme design as well as to the administrative and management structures affecting implementation. The development of the Programme's logical framework was a result of intensive coordination between the CoE and the European Commission to align themes with the priorities of the Poznan Declaration. While this alignment was crucial for political relevance, interviewees perceived the resulting design as overly ambitious, noting that the Commission requested the inclusion of numerous indicators and a broad range of topics disproportionate to the available budget. At the operational level, the logframe was criticized for its lack of specificity; broad activity descriptions like "capacity building" required project staff to perform extensive detailing to define specific actions. Certain target values were deemed unrealistic for specific

political contexts. Implementation was also affected by the financial administrative and management structures of the CoE which was perceived as slow and unsupportive at times, particularly regarding urgent requests. Partner organizations noted that CoE's bureaucratic processes led to slow decision-making, such as protracted approvals, which delayed implementation. In some instances, partner organizations emphasized that they contributed significantly more staff time than was initially allotted or funded, thus subsidizing the Programme's activities. Implementation effectiveness also varied based on local partnerships, capacities of NRCPs and relations between government ministries.

Sub-question: Which aspects of Programme implementation arrangements do stakeholders see as most effective?

Key finding: Both Programme staff and external stakeholders see the inclusive approach, regional cooperation, and practical learning as particularly effective aspects of the Programme.

Stakeholders highlight several key aspects of the Programme's implementation arrangements as particularly effective. These include the following:

- *Inclusive approach:* Stakeholders pointed to the Programme's inclusive approach as particularly successful, mentioning engaging CSOs and stakeholders with diverse political opinions and maintaining a gender balance in activities.
- *Regional cooperation:* The Programme's inclusion of regional exchanges and networking is considered highly effective for creating applicable practical learning. One partner organization particularly emphasized the Programme's role as a testing ground for training approaches that worked well and target group expectations for future replication.
- *Grant management:* For partner organizations the set-up and implementation of grants provided through the Programme functioned well, with Programme staff administering grants to partners well and "fairly straightforward" reporting requirements to the CoE.
- *National Roma Contact Points:* Despite challenges in some of the Beneficiaries, Programme staff saw the focus on NRCPs as beneficial for enhancing ownership and reducing the need for the Project Officers to coordinate directly among institutions for Programme implementation.

Sub-question: Which aspects of Programme implementation arrangements do stakeholders think could or should be improved?

Key finding: Stakeholders identified an increase in Programme staff and multi-year partner grants as concrete measures to improve implementation. In addition, the expansion of certain approaches such as advocacy or the involvement of the local level was highlighted.

Stakeholders identified key areas where implementation arrangements could be improved:

- *Grant allocations to partner organizations:* Multi-year funding would allow sustained follow-up on policy priorities. In the absence of multi-year funding, more attention by CoE at an early stage to issues of sustainability would be important.
- *Programme staffing:* For complex environments, such as Bosnia and Herzegovina, a dedicated Project Officer is suggested. Some stakeholders recommend having a Project Officer based in each Beneficiary.
- *National Roma Contact Points:* While some interviewees emphasized strengthening the existing role of the NRCPs, others suggest that NRCPs' capacity to advance policy agendas is limited. The latter recommend engaging other high-level institutions to overcome institutional constraints.
- *Advocacy:* Stakeholders suggested that higher level CoE interventions are necessary to break bureaucratic impasses, such as the accreditation of teaching materials.
- *Focus on CSOs:* Stakeholders noted the need to increase the involvement of CSOs in monitoring.
- *Inclusion of local level:* Stakeholders emphasized the importance of including the local level. Suggested measures include building institutional capacity to secure funding, such as through IPA, and strengthening focal points for Roma at municipal level.
- *Regional vs. Beneficiary-specific projects:* While regional interventions are recommended, interviewees from Türkiye suggested that the Beneficiary might benefit from a separate project due to unique dynamics and a large, diverse Roma population.

2.4. Efficiency

EQ 8: Cost-effectiveness: Were Programme resources used optimally to achieve the outputs and outcomes, including instances where targets were overachieved with a limited budget? Examine whether the staffing, budget, and activities were proportional to the results achieved. Could similar results have been achieved with fewer resources or in a shorter time frame, or would additional investment have led to significantly better outcomes?

Sub-question: What is stakeholders' assessment of staffing arrangements relative to the Programme's scope and expected outcomes?

Key finding: Although resource-conscious, the staffing ratio of one Project Officer per two Beneficiaries was sub-optimal in view of the complexity and scope of the Programme.

The Programme was managed from the CoE's Strasbourg headquarters, with a Programme Supervisor based in Belgrade to enhance regional coordination. The field implementation structure relied on Project Officers located in CoE offices in Belgrade, Skopje, and Tirana. Under the initial design, each Project Officer was responsible for two Beneficiaries. A subsequent addendum in 2023 provided for an additional Project Officer dedicated solely to Türkiye. Interviews suggest that the staffing ratio of one Project Officer to two Beneficiaries created operational challenges. This approach, while resource-conscious, proved to be sub-optimal for a programme of this complexity and political sensitivity. Operating in a Beneficiary without a direct physical presence posed difficulties to build the essential professional relationships necessary for effective implementation. The issue of understaffing was at times exacerbated by the CoE's internal bureaucratic procedures. For example, one Project Officer reported that these administrative tasks consumed (too) much time, diverting focus from substantive Programme work and, in some cases, delaying Programme implementation. Overall, the prevailing view among interviewees was that the staffing arrangements were inadequate for the Programme's ambitious scope. Nevertheless, several external stakeholders observed that the Project Officers performed at their full capacity, achieving the best possible outcomes despite these constraints.

Sub-question: What is stakeholders' assessment of the project budget relative to the Programme's scope and expected outcomes?

Key finding: The allocated budget was insufficient for the Programme's scope. Budgetary constraints led to a reduction in the scale of activities and a shift to lower-cost modalities.

There was a clear consensus among the CoE Programme team that the allocated budget was insufficient for the Programme's objectives and geographical reach. This concern was formally identified as early as the first 2024 report, which noted the inadequacy of the budget relative to the proposed indicators and outputs. The limited budget had direct and tangible consequences on Programme delivery through necessary adjustments. This included:

- *Reduction in scale:* The budget necessitated a reduction in the scale of planned activities. For example, during a ToT event in Türkiye, only one person per regional administrative unit could attend, limiting the potential for sustainable impact, whereas the Project Officer noted that two participants would have been preferable to reinforce sustainability. In addition, possibilities for scaling up were at times constrained. For example, the number of applications for a civil servant training in Serbia was three times higher than the number of places available.
- *Shift in activity modality:* To remain within budget, activity modalities were often altered. For instance, a training for CSOs on monitoring was moved from an on-site format to an online one to cover more participants at a lower cost. While this change increased participant reach at a lower unit cost, it can also potentially result in a loss of engagement and interaction among participants.
- *Difficulty managing expectations:* Several interviewees noted that the small budget made it difficult to manage stakeholder expectations, particularly regarding the provision of direct support to Roma communities in relation to housing and civil registration through partner organizations under outcome area 2.

Sub-questions: Were Programme resources used optimally to achieve the outputs and outcomes, including instances where targets were overachieved with a limited budget? Were there cases of over- or underspend in the implementation of specific measures?

Key findings: Following necessary budgetary and target adjustments to align with available resources, Programme resources were used optimally, as evidenced by a high number of overachieved output and outcome targets. There were no cases of significant over- or underspend.

The insufficient alignment between the Programme's strategic objectives and its constrained human resource capacity and financial framework required both budgetary adjustments and adaptations of Programme targets. Hence, with the 2024 addendum the "Human Resources" budget heading was increased through decreases in "Travel" and "Other costs and services". Additionally, several key quantitative targets were revised downwards.¹⁸ The Programme also had to delete a few specific activities and outputs: The survey on Roma issues and support to the digitalization of Roma businesses. Provision of direct assistance to 400 Roma workers and entrepreneurs was deleted to avoid programmatic overlap with REDI, which has specialized expertise in providing direct business support in the region, and to allow the Programme to concentrate on policy-level interventions such as developing strategic roadmaps for central-level institutions.

Despite these constraints, the Programme demonstrated sound financial management. The budget was closely monitored, with quarterly reviews and revisions conducted based on evolving needs and implementation progress. Consequently, according to Programme management, there were no instances of major over- or underspending. Programme staff reported that 95% of the budget had been spent as of February 2026. According to the Programme logframe, target indicators were mostly met or exceeded. Output underachievement was registered concerning the number of cases supported for legalization of Roma settlements, the number of Roma inclusion coordination bodies/taskforce meetings to discuss the progress on Poznan Declaration commitments, and the number of analyses/assessments of budgetary allocations and expenditures (RRB).

Sub-question: Could similar results have been achieved with fewer resources or in a shorter time frame, or would additional investment have led to significantly better outcomes?

Key finding: The Programme could not have achieved similar results with a shorter duration or fewer resources, as budgetary and human resources were already stretched to work towards policy and institutional changes, which involve long-term processes if they are to be sustainable.

The Roma Integration Phase III Programme could not have achieved similar results with a shorter duration or fewer resources as budgetary and human resources were already stretched, as outlined above. The Programme aims at policy and institutional changes, which involve long-term processes, especially if these are to be sustainable. For this reason, only at output level could additional investment into direct support or training measures have enabled the Programme to scale up and increase coverage. Additional investment alone would not necessarily have led to significantly better outcomes related to longer-term policy processes and institutionalisation in a diverse and complex environment.

¹⁸ This included scaling back housing legalization support from 1,000 to 300 cases, refining civil registration support to 350 cases and lowering support for funding proposals from 18 to seven, one per Beneficiary.

2.5. Sustainability

EQ 9: To what extent are the results of Roma Integration Phase III likely to continue after the Programme ends, considering whether the achieved practices have been institutionalized, domestic funds committed, and Roma inclusion targets integrated into regular government plans and policies?

Sub-question: Which Programme achievements do stakeholders expect to be sustained after completion of the Programme?

Key findings: The likelihood of the results of Roma Integration Phase III continuing after the Programme concludes is high in areas where achievements have been legally or structurally embedded but remains precarious due to limited domestic financial commitments. Knowledge gained through training is expected to be utilized long-term. Research methodologies and studies are projected to serve as frameworks for future interventions. Regional networks and partnerships were strengthened for continued collaboration.

Several Programme measures are considered sustainable, though for others, success depends on stakeholder interest and funding:

- *Skills and knowledge transfer:* Knowledge acquired by public servants and target groups is expected to be utilized. For example, CSOs will continue to produce shadow reports following monitoring training. Through the mentorship programme, young Roma journalists gained lasting skills, social capital, and employment opportunities, with some continuing in media roles or housing further education.
- *Studies and surveys:* Feasibility studies on housing are expected to maintain utility. Studies are projected to serve as reference materials in Bosnia and Herzegovina, where the Assistant Ombudsman expects them to be cited in operations. For the Commissioner for the Protection of Equality in Serbia, the methodology will serve as a basis for future surveys. In Montenegro, institutions are expected to sustain self-assessment practices. For ENS, publications provide a basis for field work and fundraising. ReSPA is considering the integration of ERIAC training manuals into public servant resources.
- *Institutional awareness:* The Programme facilitated a shift in institutional mindsets. Interviewees from Türkiye and Bosnia and Herzegovina pointed to an increased understanding of Roma vulnerability to climate change and the "green transition". In Bosnia and Herzegovina, there is a reported increase in municipal willingness to address concerns of local Roma communities.
- *Strengthened partnerships and networks:* Coordination among ENS members is expected to remain operational for resolving complex cases. Advocacy-based relationships with central-level institutions, NRCPs and the CoE are expected to persist. ERIAC Serbia enhanced its legitimacy as a primary source of expertise, securing partnerships with media houses and ReSPA. These strengthened ties provide a foundation for future multi-sectoral collaboration.
- *Housing legalization and civil registration:* Resolved civil registration cases provide community members with lifelong access to public services. In Albania and Montenegro, experts view knowledge and CSO commitment as resources for addressing housing demand. Conversely, sustainability in Kosovo is challenged by post-submission procedures, which may leave applicants unable to navigate administrative follow-up for land tenure formalization.
- *Digital monitoring tool:* Prospects are uncertain as Beneficiaries must assume ownership and maintenance following the Programme's conclusion in April 2026. While maintenance costs are modest, interviews suggest a general reluctance among governments to fund these ongoing expenses.

A longer-term financial commitment beyond the time frame of the Programme would be necessary to sustainably anchor the achievements made through the Programme. Capacity-building measures, such as the development of training programmes for civil servants, would need to be reinforced by institutionalization in the Beneficiaries. Similarly, the roll-out and use of the digital platform developed by the Programme would need to be accompanied by technical support. In order to sustain the momentum and secure achievements, continued advocacy to cultivate a lasting will to implement among key stakeholders is also required. Finally, the Programme operates in a quite complex environment marked by the diverse, political, and sensitive issues it addresses, the involvement of multiple Beneficiaries across a wide and varied geographical scope, and the requirement for extensive and continuous stakeholder engagement at multiple levels.

Sub-question: Which Programme achievements have been institutionalized?

Key finding: Several key Programme achievements have been converted into permanent government functions, such as the Taskforce on Anti-Discrimination in Kosovo and Roma Responsive Budgeting in Albania.

Institutionalization involves the conversion of temporary interventions into permanent government functions or codified legal standards. These shifts are critical for mitigating risks associated with the "frequent turnover and political appointments" within public administration noted by interviewees, ensuring that technical expertise built by the Programme remains within the state apparatus regardless of individual personnel changes. Across the Beneficiaries, the Programme achieved significant institutional milestones, including the codification of Roma Responsive Budgeting in Albania, the formal accreditation of antigypsyism training in Montenegro,¹⁹ and the adoption of guidelines in Bosnia and Herzegovina. In Kosovo, success was marked by the creation of a permanent anti-discrimination taskforce and an inter-institutional employment roadmap, while Türkiye and North Macedonia focused on systematizing and piloting curricula for social inclusion and Roma history. Additionally, both Albania and Kosovo successfully piloted antigypsyism training, and Serbia secured official recognition for social worker training within its Centres for Social Work (see also Table D in Annex 1).

Sub-question: Which Roma inclusion targets have been integrated into government plans and policies?

Key finding: Roma inclusion targets are integrated into government plans and policies across several Beneficiaries, primarily through national action plans and strategic frameworks extending toward 2030.

Across the Beneficiaries, several key plans and policies have been established to incorporate Roma inclusion targets. Albania has adopted the National Action Plan for Equality, Inclusion, and Participation of Roma and Egyptians (2026-2030) and Mid-Term Budgeting Guidelines for 2026-2028, though stakeholders worry that funding remains tied to other vulnerable groups. In Kosovo, the adopted 2025-2026 Action Plan includes a 2027–2031 roadmap supported by Roma Responsible Budgeting, while North Macedonia has adopted operational plans for its National Action Plans and has a Draft Law on Social Housing with adoption pending. Türkiye has adopted its Second-Phase Action Plan (2026-2030) for the Strategy Document for Roma Citizens, integrating employment and human rights roadmaps. Meanwhile, adoption is pending for the Action Plan on Social Inclusion of Roma in Bosnia and Herzegovina (2026-2030), the Strategy for Social Inclusion of Roma and Egyptians 2026-2030 in Montenegro, and the 2025-2027 Action Plan in Serbia (see overview in Table E in Annex 1).

Sub-question: For which Programme achievements have domestic funds been committed?

Key finding: Domestic funding commitments are currently limited to a small number of initiatives. Many Roma inclusion initiatives remain heavily dependent on international funding, and a perceived shift in donor priorities poses a critical threat to long-term financial viability.

Only two Beneficiaries have committed domestic funds for Programme achievements; adoption of action plans does not entail a concrete funding commitment. In Albania, the institutionalization of RRB has secured domestic funding through five budget programmes for 2026-2028. A January 2026 Government decision requiring Roma inclusion in budget programmes is expected to bring additional funds. A new employment programme within the National Employment Strategy, with a budget allotted from 2026, was agreed with the Ministry of Economy and Innovation. In Türkiye, the Government has guaranteed five years of funding for training on social inclusion for civil servants.

Financial sustainability remains dependent on international funding, with the EU as the primary driver. The expiration of donor programmes and a perceived shift in EU interest pose critical threats. This is exacerbated by limited institutional capacity and complex procedures for accessing funds. CSOs face significant financial instability; one ENS member is experiencing a crisis following the termination of UNHCR support. Consequently, organizations in Serbia and Bosnia and Herzegovina are seeking bridging funds from alternative donors, such as the German and Norwegian governments, to continue activities modelled after the RI Phase III Programme.

The Programme serves as a critical instrument within the EU's pre-accession architecture to operationalize Poznan Declaration commitments. Sustainability entails the structural embedding of Roma inclusion into permanent institutional, legislative, and budgetary frameworks. Evaluation findings indicate significant progress, exemplified

¹⁹ As reported by the Programme team, a training curriculum on antigypsyism for civil servants was also accredited in Albania in the period beyond that covered by the evaluation.

by Albania's codification of RRB into law and Kosovo's integration of the Anti-Discrimination Taskforce into a permanent government structure. Policy trajectories are supported by national action plans extending to 2030, formally adopted in Albania, Kosovo, North Macedonia, and Türkiye. However, long-term financial viability remains the most significant challenge to sustainability.

3. CONCLUSIONS, RECOMMENDATIONS AND LESSONS LEARNED

3.1. Conclusions and recommendations

Relevance

The Programme demonstrated high relevance by addressing the priorities of both national governments and Roma communities. Whereas governments tended to prioritize institutional capacity and funding for policy implementation, Roma communities emphasized support in the areas of civil registration and legalization of housing and land ownership. There is potential for the relevance of Programme work on institutional capacity to grow further as funding opportunities for Roma-specific measures give way to a tendency to address Roma integration goals through mainstream policy frameworks.

The purpose of the Programme was to support the implementation of the Poznan Declaration. In addition, the Programme aligns closely with national strategies and the EU Roma Strategic Framework 2020–2030. At the same time, Türkiye is not a signatory to the Poznan Declaration, and not all areas addressed in the Declaration are of relevance for this Beneficiary. For example, Türkiye does not face issues related to civil registration of Roma like the Western Balkans Beneficiaries.

The Programme combined Roma-specific and mainstreaming approaches to Roma integration, albeit not in a systematic way. There was a greater overall emphasis on approaches designed specifically for Roma, with some variations by Beneficiary. Notwithstanding the expressed preferences of some stakeholders for one approach over the other, both approaches are relevant.

Although the foundational Poznan Declaration lacks gender objectives, the Programme successfully implemented a gender mainstreaming strategy that ensured balanced participation in training and produced essential gender-disaggregated data. These efforts, combined with direct legal support for women in housing and civil registration, have established a robust evidence-based foundation for future gender-sensitive policymaking. Moreover, the Programme also integrated the four principles of the CoE's Human Rights Approach – participation and inclusion; equality and non-discrimination; accountability, and transparency and access to information – throughout all three outcome areas.

Recommendations:

- 1) **Mainstreaming Roma integration (Medium):** Considering the increasing relevance of mainstreaming approaches to Roma integration (particularly at European level), the CoE should step up support to the Beneficiaries for linking general policy frameworks to Roma integration goals.
- 2) **Gender analysis (Medium):** Although gender is not an explicit theme and focus of the Poznan Declaration and subsequent Ministerial Conclusions, the design of future Programme interventions addressing Poznan commitments should be preceded by systematic gender analysis along the objectives key objectives in the areas of antigypsyism, civil registration, education, employment, health, and housing. For future interventions of the CoE, the introduction of gender markers could build a consistent understanding of the CoE Programme team, partners and stakeholders on gender mainstreaming and respective intervention outcomes, allowing for differentiation (gender-sensitive, gender-transformative).

Effectiveness

The Programme was effective in producing high-quality outputs, including new Roma national strategies and action plans, development of training curricula, and delivery of training, as well as providing direct legal support to hundreds of Roma individuals. The Programme also produced longer-term or systemic outcomes in each of the three outcome areas to different degrees in the various Beneficiaries. While successes have been documented at the policy-formulation level, such as RRB in Albania, training on antigypsyism for civil servants in Montenegro, and legislation on social housing in North Macedonia, the transition to practical implementation and the enforcement of legislation remains uncertain. All three outcome areas have formulated goals which related to long-term and complex policy processes and substantial changes in attitude and behaviour of stakeholders and target groups that go beyond a three-year project cycle, challenging a systematic follow-up. In view of limited resources, the Programme could have benefitted from a stronger focus on selective policy processes based on a prior analysis of the initial situation, with clear, realistic, and Beneficiary-specific goals formulated in accordance with the time frame

available within the project (visibly documented in a way that is comprehensible to donors and external stakeholders). With a more precise, Beneficiary-specific description of baselines/starting points of certain policy process or target group capacities and corresponding goal settings, Programme achievements would have been more visible.

The Programme provided a hospitable environment for informal networking and exchange of knowledge and experience among Beneficiary National Roma Contact Points. At the same time, the institution of NRCP generally remains weak across Beneficiaries, regardless of incumbents' technical capacities. With the partial exception of Türkiye, regional cooperation among Beneficiaries carries potential to bring more effective tackling of challenges faced by Roma. Such cooperation is currently at an early stage both among governments and CSOs and will require external support for its development. Much of the work undertaken in the framework of the RI Phase III Programme builds on previous phases of the Roma Integration Programme, as well as of the ROMACTED Programme. A case in point is Roma Responsive Budgeting, where previous work by CoE and the Regional Cooperation Council provided an important basis for institutionalization of RRB in one Beneficiary, as well as for the incorporation of principles of RRB in the new strategies and action plans developed with Programme support.

The lack of connection to the Poznan Declaration posed a challenge for the integration of Türkiye into the Programme portfolio, requiring adjustments to the focus of measures. This also challenges comparability to other Beneficiaries on a like-for-like basis; progress in Türkiye must be evaluated based on its internal policy development.

Recommendations:

- 3) **Digital monitoring tool (High):** The CoE should consider hosting the platform for the coming three to four years until fully introduced and governments established routine, with the medium-term plan to hand over and nationalize the platform.²⁰ National statistics offices should be utilized as counterparts to improve data accuracy and independence.
- 4) **Strategic programme design (High):** Future programme interventions of the Roma and Travellers Division should formulate realistic objectives, taking into account the available resources and implementation time frame and considering the specific contexts and challenges of the respective Beneficiaries. Focus should be directed to a limited number of targeted policy processes that have been initiated or followed by the Programme. Here, consideration should be given to a balance between processes for which an already existing basic political will is evident (sustainability orientation) and processes for which this requires CoE leverage and advocacy more prominently (needs orientation).
- 5) **Measuring effectiveness of capacity building (High):** In order to ascertain longer-term effectiveness and to lay the groundwork for impact evaluation, CoE should develop a unified approach to project design which ensures that future interventions incorporate follow-up on and monitoring of the outcomes of capacity-building and training components more systematically to measure not only knowledge gains, but also changes in attitude and practice. To that end, CoE should consider (a) developing a practical toolkit and targeted training for CoE staff and (b) supporting partner institutions in assessing mid- to long-term training outcomes. Time and resource intensity need to be adequately considered when planning and budgeting for capacity-building interventions.
- 6) **Beneficiary-specific approaches (Medium):** Future projects by the Roma and Travellers Division should consider introducing logical frameworks at Beneficiary level as a starting point, with specific objectives to contribute to progress on the overall impact the Roma Integration Programme aims for in the region. This would help in establishing clear pathways, considering Beneficiary-specific contexts and challenges.
- 7) **Inclusion of the local level (Medium):** Future programmes by the Roma and Travellers Division should link work on central-level policies with support for the development of related policies at local level in a synergistic approach. Linking central-level policies with local-level support for effective Roma inclusion takes into account that local authorities are well positioned to understand and address the challenges in their communities. Such links also create a system of accountability for monitoring local progress and ensuring that inclusion efforts are not sidelined.
- 8) **Networking and collaboration (Low):** Future programmes should (continue to) prioritize and fund regional mechanisms to facilitate shared learning collaboration, making use of CoE's Programme Offices in the region.

²⁰ The CoE hosts similar digital platforms include e.g. CEPEJ-COLLECT, collecting data regarding judicial systems which are subsequently published in the public CEPEJ-STAT database.

Among possible mechanisms, consideration could be given to supporting a network of National Roma Contact Points for the purposes of capacity building, sharing experiences, and facilitating replication of successful pilots across Beneficiaries.

- 9) **Scaling-up media work (Low):** In future programmes the Roma and Travellers Division should (continue to) build on the RI Phase III Programme and further scale up work with media as a target group to aim for citizens' awareness on discrimination and stereotyping of Roma. Linkages to other CoE interventions should be sought, e.g. with programmes and campaigns focused on citizen awareness and anti-discrimination or with relevant HELP courses.

Efficiency

The Programme's implementation was challenged by an overly ambitious design disproportionate to its available budget and staffing. By revising key targets downward and deleting resource-intensive activities, the Programme successfully realigned with its resources. However, findings also indicate that the Programme reached the limit of resource optimization. In order to stay on track with targets, the Programme was forced into strategic trade-offs, reducing the scale to potentially less impactful modalities like online training. These constraints signify a limit to "doing more with less". While targets were largely met or exceeded, the results remain fragile because the long-term institutional changes intended require more time and investment.

Recommendations:

- 10) **Staffing (Medium):** Future regional interventions by the Roma and Travellers Division should ensure a dedicated Project Officer for each Beneficiary, even on a part-time basis, to maintain a consistent presence and navigate local political dynamics.

Sustainability

The likelihood of outcomes continuing is high where they have been legally or structurally embedded, such as the institutionalization of Roma Responsive Budgeting in Albania and the Anti-Discrimination Taskforce in Kosovo. Civil registration and legalization of informal settlements will continue to be problem areas in the Beneficiaries, with new cases constantly emerging. This requires a stronger focus on appropriate policy and legislative processes which will also have to be systematically implemented. As these are long-term processes, case-based support will continue to be necessary in the foreseeable future. However, interventions with a financial volume such as the RI Programme can cover only a certain percentage of the objective demand. Therefore, to sustainably secure case-based support it is necessary to address and advocate with Beneficiary governments as duty bearers and also to continue to raise international donor awareness of the need to finance such support. Financial sustainability remains the primary threat, as most initiatives are still heavily dependent on international donor funding because domestic funding commitments continue to be limited to a small number of initiatives.

3.2. Good practice and lessons learned

Key Lessons Learned

1. **Role of the CoE:** The Council of Europe's reputation acts as a powerful mediator, opening doors to high-level institutions that might otherwise be closed to civil society or Roma representatives. The CoE can effectively leverage its reputation to support policy agendas that national governments might otherwise not sufficiently push for.
2. **Institutionalization as a prerequisite for sustainability:** Long-term sustainability is most effectively achieved when results are legally or structurally embedded into government functions, such as Albania's codification of Roma Responsive Budgeting into national law. Without such structural embedding, initiatives remain precarious and heavily dependent on fluctuating international funding.
3. **Necessity of robust statistical data:** The absence of reliable, nationwide statistical data—particularly regarding employment and housing—impedes the ability of governments to provide quantifiable reporting on Poznan Declaration commitments. This data gap forces reliance on survey estimates rather than definitive progress metrics.

4. **Interconnectedness of local and central levels:** Simultaneous work at central and local levels generates potential for synergies among Roma integration policies.
5. **EU accession process as a continuous driving force:** For some Beneficiaries the accession process continues to be an incentive to adhere to regional commitments such as the Poznan Declaration.

Good Practices

1. **Institutionalizing Roma Responsive Budgeting:** Integrating RRB into national budgeting guidelines and legal frameworks, as demonstrated in Albania, creates a mandatory requirement for domestic funding and secures long-term financial commitments for Roma-specific measures.
2. **Targeting media gatekeepers:** Engaging directly with media house editors as key influencers of media messages was identified as a strategic way to ensure the long-term impact of ethical reporting guidelines.
3. **Regional peer learning and networking:** Using regional events as a testing ground for identifying common problems and sharing immediately applicable practical learning proved vital for National Roma Contact Points, who often lack support within their own national institutions.
4. **Proactive community engagement for trust building:** Moving beyond incident-driven visits to proactive community engagement, such as the sessions conducted by equality bodies in Serbia, helped build trust and led to a tangible increase in the reporting of discrimination cases.
5. **CSO cooperation:** The cooperative approach with CSOs as implementation partners has contributed to the generation and transfer of knowledge and expertise, resulting in high-quality knowledge products and strengthening the standing of the actors themselves.
6. **Utilization of Roma expertise:** The inclusion of Roma experts as trainers not only ensures authentic content, but also actively challenges institutional stereotypes among civil servants. The utilization of experts who had previously been involved in the ROMACTED Programme and the previous phase of the RI Programme worked well, enabling continuity and support for long-term processes beyond the timeframes of the Programmes.

Annex 1: Programme achievements

Table A: Cases of legalization supported/pending and resolved by Beneficiary²¹

Beneficiary	Cases supported and pending	Cases resolved	
Albania		65	Mostly agricultural land in Fier and Vlora.
Bosnia and Herzegovina	29		Approval of submitted applications expected by the end of Programme.
Kosovo	52	52	Several houses successfully legalized were built with international donor support without a construction permit from the corresponding municipalities. Also included more complicated cases on land purchased before 1999.
Montenegro	50		Cases in progress, expected to be resolved but after completion of the Programme.
North Macedonia		54	
Serbia	82		Good chances for approval despite uncertainties in light of legislative changes.
Total cases	213	At least 171	

Table B: Cases on civil registration supported and solved by Beneficiary²²

Beneficiary	Cases supported	Cases resolved	
Albania	122	122	Included focus on childbirth registration and access to services such as education and healthcare.
Bosnia and Herzegovina	50	27	Mostly in relation to civil registration at local level. Regional cooperation with focus on Roma women from Serbia.
Kosovo	30	30	
Montenegro	180	59	The Programme also obtained 83 identity cards and 33 passports from Kosovo as a basis for further procedures in Montenegro.
North Macedonia	545	68	Figure for cases supported includes citizenship (68 cases), children added to birth registry (35), and residence permit as pre-condition for citizenship application (30).
Serbia	27	18	
Total cases	954	324	

²¹ Figures based on annual Programme reports and stakeholder interviews.

²² Figures based on annual Programme reports and stakeholder interviews.

Table C: Funding proposals prepared with Programme support

Programme/call	Proposal title	Beneficiaries	Funding organization
LIFE Clean Energy Transition (LIFE-2025-CET)	Multilevel approach and correlated support to address the energy poverty in Southeast Europe based on evidence-based policy and scaled-up best practices	Bulgaria, Greece, Moldova, North Macedonia, Romania	European Commission
Citizens, Equality, Rights and Values Programme (CERV-2025-CITIZENCE-CIV)	Roma Youth Engagement in EU Integration	Albania, Bosnia and Herzegovina, Bulgaria, Montenegro, Kosovo, North Macedonia, Serbia	European Commission
Interreg Danube Region Programme	Danube STREAM – Skills, Training, and Regional Employment Advancement	Montenegro, Slovenia, Serbia	EU
Cross-border programme Bosnia and Herzegovina – Montenegro (IPA III)	SAFE-HOME: Strengthening Adaptation, Financing, and Emergency Preparedness for Vulnerable Housing	Bosnia and Herzegovina, Montenegro	European Commission

Table D: Institutionalized RI Phase III Programme achievements

Beneficiary	Mechanism/achievement	Institutional Status
Albania	Roma Responsive Budgeting	Codification into national law
	Training programme on antigypsyism	Piloted
Bosnia and Herzegovina	Guidelines on antigypsyism	Adopted by Ministry of Human Rights and Refugees
Kosovo	Taskforce on Anti-Discrimination	Incorporated into permanent structure of the Office of Good Governance
	Roadmap for Roma employment	To be implemented by a permanent inter-institutional team
	Training programme on antigypsyism	Piloted
Montenegro	Training programme on antigypsyism	Formally accredited for civil servant professional development
North Macedonia	Content on Roma history	Pending accreditation and incorporation in regular curriculum for grade 8
Serbia	Social worker training	Recognition by Centres for Social Work
Türkiye	Social inclusion curricula	Revised curriculum systematized for Ministry usage (5-year horizon)

Table E: Key government plans and policies incorporating Roma inclusion targets

Beneficiary	Documents	Status	Stakeholder assessment
Albania	National Action Plan for Equality, Inclusion, and Participation of Roma and Egyptians (2026-2030)	Adopted	Concern that Ministry remains unlikely to increase specific funding for Roma separate from other vulnerable groups.
	Mid-Term Budgeting Guidelines for 2026-2028	Adopted	
Bosnia and Herzegovina	Action Plan on Social Inclusion of Roma in Bosnia and Herzegovina (2026-2030)	Adoption pending	Regarded as high-quality reference material, ultimate sustainability remains strictly contingent on adoption by the Government.
Kosovo	2025-2026 Action Plan for the Implementation of the Strategy for Advancing the Rights of Roma and Ashkali Communities in the Republic of Kosovo 2022-2026	Adopted	Including 2027–2031 roadmap, provides a clear policy trajectory, supported by institutionalized Roma Responsible Budgeting.
Montenegro	Strategy for Social Inclusion of Roma and Egyptians 2026-2030 2030 and Action Plan for 2026-2027	Adoption pending	
North Macedonia	Operational plans for the implementation and monitoring of National Action Plans in 2024-2025	Adopted	Clarifies institutional responsibilities of the 2023-2025 AP and 2022-2030 Strategy.
	Draft Law on Social Housing	Adoption pending	Expected in 2026. Provides a legislative safeguard, though experts remain sceptical regarding the actual budget for construction.
Serbia	2025-2027 Action Plan for the Implementation of the Strategy for Social Inclusion of Roma in the Republic of Serbia for the period 2022 through 2030	Adoption pending	
Türkiye	Second-Phase Action Plan (2026-2030) for the Strategy Document for Roma Citizens (2023-2030)	Adopted	Employment and human rights roadmaps are integrated into the AP extending the policy horizon to 2030.

Annex 2: Output-level achievements

Anti-discrimination

Support to non-discrimination and equality bodies

Community awareness: Measures were carried out in Albania and in Serbia. In Albania awareness sessions in Tirana and Vlora with the Commissioner for Protection from Discrimination reached 75 community members. Interviews confirmed an increase of awareness about rights and available remedies in case of discrimination, as well as success in addressing cases of non-delivery to Roma children of social and medical services. Stakeholders highlighted that in Serbia the office of the Commissioner for the Protection of Equality saw this as a particular valuable measure of the Programme, noting that the proactive approach was distinct from previous incident-driven community visits of the Commissioner, building trust and leading to an increase in reported complaints over time (a total 35 received after events). Subsequently formulated joint petitions for redress of discrimination led to concrete results, e.g. to removal of a garbage dump in Kragujevac near a Roma settlement and to road construction in Ripanj. The Commissioner will continue with community engagement in this format.

Research on discrimination: Research on discrimination was produced in Albania, Bosnia and Herzegovina, Serbia, and Türkiye. In Serbia research on Roma's perceptions of discrimination and antigypsyism conducted jointly with the Public Policy Research Centre was used to monitor measures outlined in the Action Plan for the implementation of the Strategy for Social Inclusion of Roma in the Republic of Serbia 2022–2030 and for the drafting of the new Action Plan. Stakeholder interviews with the office of the Commissioner for the Protection of Equality emphasize that the Programme's commitment to community engagement and stakeholder diversity addressed a critical knowledge gap, as no comparable research had previously been available to inform the responsibilities of other government ministries. With its specific references to the Ombudsperson Institution and the Human Rights and Equality Institution of Türkiye (TIHEK), the roadmap developed in Türkiye on raising awareness and accessing rights mechanisms among Roma contributed to the "Access to Rights" section of the Action Plan.

Appointment of Roma in equality body: In Albania the Programme placed a Roma expert with the Office of the Commissioner for the Protection from Discrimination who subsequently was in the process of receiving a permanent appointment at the time of the interview, the first Roma to receive such an appointment.

Enhanced media capacities

Mentorship programme: The mentorship programme for nine young Roma media professionals resulted in the production and publication of over 30 articles and six videos at major regional outlets like N1 and Al Jazeera Balkans, showcasing their ability to cover both Roma-specific and mainstream topics. Key results included one job offer, two OSCE awards for contributions to Roma inclusion, and the establishment of an active professional network. Interviews pointed out that this initiative significantly boosted the mentees' careers by building their CVs and creating valuable social capital within the media industry.

Training for journalists: A regional training on ethical story telling for over 40 media professionals from the seven Beneficiaries conducted by ERIAC led to continued collaboration and the creation of an informal network of Roma journalists. In Albania over 135 participants, including institutional communication officers, professors, and journalism students, received training on ethical reporting and effective communication with Roma communities based on guidelines developed by the Programme. A meeting with media editors A similar training session on ethical reporting and portrayal of Roma in North Macedonia failed due to a lack of interest from the targeted media editors. Nevertheless, CoE Programme staff highlighted the engagement with media house editors as key influencers of media messages as good practice.

Capacity building of public servants

Training for civil servants: The Programme partner ERIAC collaborated with the Regional School of Public Administration (ReSPA) to develop a training manual and deliver online antigypsyism training to over 150 civil servants. Stakeholder interviews indicate that this initiative is considered particularly significant as it addresses a capacity gap not covered by other regional stakeholders or donors. According to ERIAC, post-training surveys and conversations revealed a shift in the attitudes and views of the participants toward the Roma community. To ensure that the training had professional weight, ReSPA provided formal certificates, offering participants official recognition for their participation in closing these institutional knowledge gaps. Interviews also highlighted that the

training utilized Roma experts as trainers, which not only ensured high-quality content but also challenged stereotypes by demonstrating the professional capacity of the Roma community to lead high-level institutional sessions.

The regional online model led to a demand for localized, in-person sessions. In Albania, 25 central-level civil servants underwent a two-day training. Focus group participants reported high satisfaction with the training, valuing both the historical overview of domestic legal frameworks and the practical application of concepts related to antigypsyism in their daily work. Many attendees, most of whom were unfamiliar with the concept before the sessions, learned that antigypsyism can be unconscious and gained concrete insights into preventing segregation. Additionally, the inclusion of roleplays was highlighted as a particularly effective method for combating everyday stereotypes. Stakeholder interviewees emphasized that while the initial feedback to the trainings delivered under this output is positive and the "right people" were targeted, long-term follow-up is necessary to fully assess the sustained behavioural changes of the trainees.

Other capacity-building measures: In North Macedonia, a review of the primary school curriculum for grades 6-9 led to the creation of content on Roma history for incorporation in the existing lesson on the Holocaust in the history course for grade 8. In Serbia, the research on discrimination revealing that 60% of Roma experienced discrimination in social centres resulted in the development of a training programme for social workers. From its beginning the training proved to be sought after, with 60 applications for 25 places. In Türkiye, the Programme revised and created new, functional training modules for social inclusion. A four-day Training of Trainers (ToT) session was conducted in October 2025 for 30 staff members from the Ministry of Family and Social Services, covering 25 provinces with significant Roma populations.

Socio-economic integration

Employability

Research

In cooperation with REDIn employment measures relevant to Roma was completed in all seven Beneficiaries. This included stakeholder engagement across Beneficiaries, focus groups, meetings with ministries and CSOs, and National Employment Platform conferences in Montenegro and North Macedonia. In Türkiye, provincial workshops informed local directorates, encouraging them to integrate roadmap steps into local employment plans. Interviews highlight that Programme studies provided valuable, trusted data for partners, especially in Bosnia and Herzegovina and Montenegro. REDIn will follow up this research, expanding activities to Bosnia and Herzegovina for the first time.

Legalization of informal settlements

The Programme supported 278 cases throughout the six Western Balkans Beneficiaries currently pending resolution (see Table A in Annex 1). Feasibility studies in all Beneficiaries contained recommendations on legalization of informal settlements and infrastructure investments to support governmental implementation. In Albania, measures were complemented by a bilingual guideline and training for local authorities and Roma communities. A "Geoportal of Roma Settlements with Substandard Conditions" was re-launched in June 2024. However, use of the geoportal by Beneficiary institutions varies (with Serbia as a positive example).

Civil registration

Through cooperation with ENS and its member organizations the Programme has supported a total of 954 cases throughout the six Western Balkans Beneficiaries (see Table B in Annex 1). A regional policy paper and six Beneficiary-level state-of-play assessments/policy briefs were produced for Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia. Additionally, a joint regional event on statelessness was organized in May 2025 with the United Nations High Commissioner for Refugees (UNHCR). In Bosnia and Herzegovina a petition and factsheet were submitted to the Human Rights Council for the 48th session of the Universal Periodical Review on to legal gaps affecting civil registration of Roma.

Green Agenda

A regional study on the inclusion of Roma in the green economy and Green Agenda was produced identifying good practices and recommendations for Beneficiaries. Two training sessions on green transition and Green Agenda were delivered for central-level institutions across Beneficiaries to strengthen their knowledge of the Green Agenda and inclusion of Roma communities into the green transition.

Monitoring and reporting

Support to Roma inclusion in Roma-specific and mainstream policies

The RI Phase III Programme provided support for the preparation of one strategy (Montenegro), six action plans (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, Serbia, Türkiye), and seven operational plans (North Macedonia).²³ The strategy and action plans developed with Programme support also incorporate principles of RRB. With the exception of North Macedonia, the policy documents extend beyond Programme completion. The Programme also supported draft legislation on social housing in North Macedonia to ensure Roma inclusion in a mainstream policy document.

Support to monitoring and reporting

Digital monitoring tool: The Programme supported development, delivery, and initial training on a digital tool to monitor and report progress on Roma inclusion. Trainings were delivered to officials in Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia, with participation ranging from 10 to 70 participants. In Albania, online trainings on the ROMALB platform were delivered to 140 officials. Additional training for CSOs on monitoring implementation of the Poznan Declaration was provided in Albania, Kosovo, Montenegro, and Serbia.

Midterm review of Poznan Declaration implementation: The Programme commissioned *reviews of Poznan Declaration implementation (2019–2024) in all Western Balkans Beneficiaries*, later synthesized into a five-year evaluation report.

Monitoring implementation of Beneficiary-level policies for Roma: Reports reviewing implementation of National Roma Integration Strategies and Action Plans were prepared in all Beneficiaries except North Macedonia and Türkiye, with findings used to develop new policies. Stakeholders in Kosovo and Serbia described these review activities as key Programme achievements.

Survey on situation of Roma: From July through September 2024, a survey was conducted, covering all areas of the National Action Plan. 135 of 146 local self-government units responded, and the report was published by the Ministry for Human and Minority Rights and Social Dialogue at the end of 2024. The findings were used in drafting Serbia's new Action Plan.

Capacity building for Roma Responsive Budgeting

Training for civil servants: Training on RRB was delivered in Albania, Bosnia and Herzegovina, Kosovo, and North Macedonia. In Albania, a two-day training for 25 participants from line ministries and oversight institutions drew on an analysis of ministry budgets and an adaptation of regional RRB guidelines.²⁴ In Bosnia and Herzegovina, the training on RRB was combined with a capacity-building on development of operational plans for realizing the objectives of the national strategy for Roma. In Kosovo, an RRB guideline drafted with Programme support was validated and used as the basis for training of about 30 officials. In Montenegro, the Programme supported an assessment of national budget allocations for Roma and Egyptian inclusion programmes. In North Macedonia, RRB training was delivered in a single session for central-level institutions.

Support for securing external funding

Capacity building for government institutions: The Programme provided training on project cycle management and proposal writing in Kosovo and Türkiye, and training on preparing funding proposals for Roma inclusion in Montenegro and North Macedonia, involving several ministries and public institutions.

Submission of funding proposals: The Programme supported the preparation and submission of four funding proposals in involving Beneficiaries. Details of the proposals are provided in Table C in Annex 1.

Synergies with IPA and establishment of regional CSO cooperation

Synergies with IPA: As shown in Table C in Annex 1, one funding proposal supported by the Programme responded to the IPA III Cross-border programme Bosnia and Herzegovina – Montenegro, aiming to strengthen housing resilience and build synergies with RI Phase III activities on housing. Another synergy relates to the housing feasibility study in North Macedonia and an upcoming IPA call on social mapping of Roma settlements.

Regional CSO cooperation: Cooperation among CSOs based in different Beneficiaries is at an early stage of development, with two relevant funding applications submitted to EU programmes. One was rejected, while the other remained pending as of January 2026.

At the level of outputs, the support to Roma inclusion in policies delivered through the Programme for the preparation of new policies on Roma provided broad continuity from the previous policies that expired during Programme implementation, as well as concrete progress in the areas of social housing in North Macedonia. The measures of the Programme delivered in support of monitoring and reporting provided a basis for major improvements in this area, but it remains to be seen whether and how they will be applied in practice. While delivery of the output on RRB has contributed to a change in approach to budgeting for Roma inclusion, the contribution of Programme support for securing external funding depends on pending decisions on funding proposals. Finally, although the numerous synergies generated to date through the Programme with relevant IPA projects and other initiatives bode well for cooperation at Beneficiary level in addressing priority issues for Roma, cooperation among CSOs based in different Beneficiaries remains at an early stage of development.

Annex 3: Relevant international documents by intermediate outcome

Documents covered

- CoE Strategic Action Plan for Roma and Traveller Inclusion (2020)
- EU Roma Strategic Framework (2020)
- Poznan Declaration (2019)
- Conclusions of Ministerial Meetings on Roma Integration (Poznan Declaration follow-up, 2021-2024)

IMPACT: Contribute to the socio-economic integration (education, employment, housing, health, civil registration) and effective inclusion and equality and meaningful participation of the Roma population in the Western Balkans and Türkiye.

1. Intermediate Outcome - Discrimination against Roma women and men and consequences effectively addressed in Western Balkans and Türkiye

CoE Strategic Action Plan for Roma and Traveller Inclusion	• EU/CoE Joint Programme “Access to Justice of Roma and Traveller women (JUSTROM)” involved training for legal and other relevant professionals on human rights, discrimination, and gender issues (among other issues) (10) • ERIAC’s objectives include tackling antigypsyism and discrimination against Roma (10) • Objectives of Strategic Action Plan (SAP): “to promote and protect the human rights to Roma and Travellers, to combat anti-Gypsyism and discrimination, and to foster inclusion in society” (11) • “[C]ombating anti-Gypsyism and discrimination and supporting real and effective equality” is one of the 3 main lines of action around which SAP is structured (11) • This line of action advanced by raising awareness about CoE standards and instruments, fostering their application, and supporting access to justice (13) • “[I]nitiatives to improve situation and integration of Roma should include measures combating discrimination and addressing anti-Gypsyism” (14) • <i>df. anti-Gypsyism</i>: “a specific form of racism fuelled by prejudice and stereotypes” (14) • Types of measures to be applied in addressing discrimination against Roma: legal responses/setting standards; training for legal professionals, public authorities and law enforcement; capacity building of authorities (all levels) and civil society; “specific empowerment for particular groups” (e.g., Roma women and youth); raising awareness of general public (15) • Persistent “invisibility” in politics and decision-making processes undermines Roma’s potential to reverse marginalization and discrimination (17) • Inclusion strategies need to consider and address specific situation of (various) Roma and Traveller groups (21) • “In line with the 2010 Strasbourg Declaration on Roma, which highlights women’s rights and gender equality, the Council of Europe will remain sensitive to multiple discrimination and intersectionality as cross-cutting issues which will permeate all specific actions in a horizontal way” (21)
EU Roma Strategic Framework	• “Antigypsyism (a form of racism against Roma) is a historically rooted structural phenomenon that appears at institutional, social and interpersonal levels. It has its origins in how the majority views and treats those considered ‘gypsies’. It is rooted in a process of ‘othering’ that builds on negative as well as positive, exoticising stereotypes” (1 fn4) • “[N]ot all Roma are socially excluded, but all can experience discrimination and disempowerment” (3) • “Fight and prevent antigypsyism and discrimination” is one of three horizontal objectives and has 2 targets: Cutting the proportion of Roma with discrimination experience by at least half and decreasing the proportion of general population who feel uncomfortable having Roma neighbours by at least a third (4). • Call for incorporating the fight against discrimination and antigypsyism in national Roma strategic frameworks as cutting across all policy areas (6)

	• Call for measures to tackle antigypsyism and discrimination to be incorporated in national Roma strategic frameworks (8) • Call for national Roma strategic frameworks in Member states with significant Roma populations to include a plan for preventing and combating antigypsyism, discrimination, segregation in education and housing, anti-Roma prejudices and stereotypes, as well as to mainstream equality and inclusion at regional and local levels (9) • Antigypsyism as one of the most commonly reported grounds of hate speech (12) • "As antigypsyism and exclusion form a vicious circle, they should be tackled together. Fighting discrimination and antigypsyism will contribute to the success of inclusion measures, which in turn will foster greater openness and acceptance in society" (Annex 1)
Poznan Declaration	• Non-discrimination is one of six sectors in which the governments of the Western Balkans and TR pledge achievements in the Poznan Declaration • Pledge includes strengthening government structures for combatting discrimination "and establish a specific sub-division for non-discrimination of Roma within the formal non-discrimination bodies to process complaints by Roma, provide legal support to alleged victims and identify discrimination schemes, including institutional and hidden discrimination"
Conclusions of Ministerial Meetings on Roma Integration (Poznan Declaration follow-up)	Second Ministerial Meeting (2021): no mention of discrimination Third Ministerial Meeting (2022): agreement among ministers to exchange experiences through regional coordinated actions in fight against antigypsyism and racial discrimination Fourth Ministerial Meeting (2023): acknowledgement that Roma often live "in a marginalized position" (1) Fifth Ministerial Meeting (2024) – section on addressing antigypsyism includes: • Teaching Roma history • Development of curricula and teaching materials on Roma history, arts, and culture with roadmap for implementation (ERIAC) • Need for multidisciplinary approach • Encourage reporting and effective processing of cases of discrimination to increase Roma's confidence in justice system

IMPACT: Contribute to the socio-economic integration (education, employment, housing, health, civil registration) and effective inclusion and equality and meaningful participation of the Roma population in the Western Balkans and Türkiye.

2. Intermediate Outcome - Implementation of Poznan Roma inclusion commitments related to housing, employment, civil registration and green and digital transition firmly progressed

CoE Strategic Action Plan for Roma and Traveller Inclusion	• Need for inclusive policies at local level to bring about improvements in relation to housing and employment (among other areas) (17) • Need for particular attention to transition from education to employment (19) • Increased expertise expected to lead to improved employment prospects for Roma and Traveller youth (20)
EU Roma Strategic Framework	• Roma equality to be mainstreamed in broader EU policy initiatives, including (but not limited to) the Green Deal and digital inclusion (12) • EU Recovery and Resilience Facility's requirement that Member States draw up plans addressing the "digital and green transitions" creates opportunities for fostering the inclusion of marginalized groups, including Roma (13)
Poznan Declaration	Pledged achievements: • Housing – legalization where possible, “permanent, decent, affordable and desegregated housing” where informal settlements cannot be legalized • Employment – increase overall employment rate among Roma to at least 25%; employment rate of Roma in public sector to be equalized with Roma’s share of total population • Civil registration – all Roma to be included in civil registries • Green and digital transition – not covered in Poznan Declaration
Conclusions of Ministerial Meetings on Roma Integration (Poznan Declaration follow-up)	Second Ministerial Meeting (2021) • Housing – geographic mapping of Roma settlements to be completed by end 2021 expected to provide clear understanding of needs • Employment – need for supporting transition from informal to formal economy • Civil registration – roadmaps toward ending statelessness finalized and will be incorporated in new Roma strategies in each Beneficiary • Green and digital transitions – Roma must be included in operationalizing Green Agenda, particularly in relation to circular economy, environmental protection, climate actions. Roma must be included in Digital Agenda, especially in relation to digital education, digital skills, literacy Third Ministerial Meeting (2022) • Housing – geographic mapping (completed) to be used to support legalization and access to property documents • Employment – targeted support for Roma entrepreneurs and self-employed Roma; enhancing agreed aid for supporting transition from informal to formal economy; governments to earmark at least 10% of active employment measures for Roma, reviewing eligibility criteria to facilitate access; exploring possibilities for employing Roma on full-time basis in central and local government • Green and digital transitions – mainstream reforms should not leave Roma behind; Ministers confirm intention to implement commitments on Roma inclusion adopted at 5th Digital Summit side event “Digital and Inclusive Made Compatible”

Fourth Ministerial Meeting (2023): Full access to education, employment, health, housing, and participation in green and digital agendas as means of recognizing Roma's talents and economic potential

Fifth Ministerial Meeting (2024)

- Housing – pledge to develop/adopt urban plans based on mapping and “Geoportal for Roma Settlements with Substandard Conditions” to regulate informal settlements, tap new funding sources and partnerships to improve access to “decent sustainable housing” (2); priority placed on access to public services (including internet, as well as water, electricity, sewage) and public transport
- Employment – pledge to increase Roma's access to skills training and programmes for occupations in market demand with an eye to “reduce formality, offer equal opportunities, and incentivize the preparedness and resilience of young people and women” (2)
- Green and digital transitions – opportunities for Roma via appropriate skills training and programmes

IMPACT: Contribute to the socio-economic integration (education, employment, housing, health, civil registration) and effective inclusion and equality and meaningful participation of the Roma population in the Western Balkans and Türkiye.

3. Intermediate Outcome – Increased institutional capacities of the governments of the Western Balkans and Türkiye to tackle the challenges faced by Roma and to monitor and report implementation of taken commitments

CoE Strategic Action Plan for Roma and Traveller Inclusion	• Capacity building of national, regional, and local authorities integral to combating prejudice, discrimination, and hate crimes against Roma and Travellers (15) • Local-level technical assistance expected to increase authorities' capacity for sustained policy engagement (17) • Among expected results of EU/CoE joint programmes is increased capacity of national and local authorities "to perform their roles and responsibilities in an effective and efficient manner when designing and implementing plans, policies, and projects" (18)
EU Roma Strategic Framework	• Improving monitoring and evaluation proposed as a common feature of national Roma strategic frameworks, including setting targets, collecting data, monitoring, and reporting (7) • National baselines and targets toward EU objectives and targets to be based on comprehensive needs assessment (8) • Proposed features of National Roma Contact Points include a mandate, resources, and staff adequate for coordination and monitoring (8) • National Roma strategic frameworks should include quantitative and qualitative targets for all 7 EU objectives, as well as a funding plan and an account of "how institutional or administrative reforms will contribute to equality and inclusion" (9) • Data disaggregated by ethnicity and sex necessary for design, monitoring, and review of policies (9) • Member States with significant Roma populations should include in their national Roma strategic frameworks a financial plan for inclusive mainstream policy reform and targeted action, as well as a dedicated team and institutional mandate for cross-sectoral coordination and mainstreaming of Roma equality and inclusion at regional and local levels (9-10) • Governments to report on implementation of national Roma strategic frameworks every 2 years from 2023 (11) • National Roma Contact Points responsible for convening and managing participation and consultation processes ("national Roma platforms") (15 fn 60) • Annex 2 of the EU Roma Strategic Framework is a portfolio of indicators developed by the European Union Agency for Fundamental Rights • In the absence of quantitative data, countries should collect qualitative data at the level of process indicators (Annex 2: 3)
Poznan Declaration	• Available data to be used to formulate evidence-based policies for integration of Roma • Proper mechanism for monitoring and reporting on implementation of policies for Roma to be established, including data for measuring progress toward objectives in Poznan Declaration • National statistical offices to be designated as "key responsible institutions" • National Roma Contact Points to be strengthened and supported to coordinate and implement Poznan Declaration objectives
Conclusions of Ministerial Meetings on Roma Integration (Poznan)	Second Ministerial Meeting (2021): "the process to establish robust monitoring and reporting systems to measure the progress on Roma integration policies has been discussed with all Statistical Offices in the region" (2) Third Ministerial Meeting (2022): Agreement among Ministers to ask State Statistical Offices to present "robust monitoring and reporting systems" Fourth Ministerial Meeting (2023): no mention of capacity building, monitoring, or reporting

Declaration follow-up)	Fifth Ministerial Meeting (2024): no mention of capacity building, monitoring, or reporting
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Annex 4: Poznan Declaration commitments: Progress and Programme contribution²⁵

Beneficiary	Indicator	2019 Baseline	2024/2025 Progress
Albania	Roma Employment Rate (%)	18%	Data not available. In its 2024 report, the European Commission assesses that the overall employment rate of Roma and Egyptians remained “very low”. 253 persons in local public administration (down from 644 in 2019).
	Legalization of Informal Settlements	130 settlements	<i>Cases resolved by the Programme: 65 (2 settlements)</i>
	Unresolved Civil Registration	3,687	205 stateless persons identified (INSTAT, 2023); 2,098 individuals at risk of statelessness (UNHCR estimate, July 2024). From January 2019 to September 2023, a total of 2,128 children at risk of statelessness received identification documents. <i>Cases supported by the Programme: 122</i>
	Mainstreamed Green Agenda Actions	Not applicable	No progress reported.
Bosnia and Herzegovina	Roma Employment Rate (%)	11%	No progress. June 2024, 3.679 Roma were registered as unemployed (3258 Roma in the Federation of Bosnia and Herzegovina, 112 Roma in Republika Srpska and 309 Roma in Brčko District).
	Legalization of Informal Settlements	1,539 families requiring units (local level data, 2020)	2023: 7 housing units legalized (grant for Roma housing) <i>Cases supported/pending by the Programme: 29</i>
	Unresolved Civil Registration	65–72 cases	2024: 12 cases (central authority data); 27 cases (UNHCR) <i>Cases supported by the Programme: 50</i> <i>Cases resolved by the Programme: 15</i>
	Mainstreamed Green Agenda Actions	Not applicable	In 2024, BiH was working on its reform agenda, covering the green and digital transitions. No specific information on inclusion of the Roma population.
Kosovo	Roma Employment Rate (%)	13%	No progress. Unemployment above 90%.
	Legalization of Informal Settlements	32 – 95 settlements	No data available. In 2023, there was no significant progress in legalising informal settlements where Roma and Ashkali communities live (European Commission report, 2023). <i>Cases supported/pending by the Programme: 65</i> <i>Cases solved by the Programme: XX</i>
	Unresolved Civil Registration	89% with ID; 97% with birth certificate	No updated data by the authorities; UNHCR 2023-2024 estimate: 481 stateless people <i>Cases supported by the Programme: 30</i> <i>Cases resolved by the Programme: 30</i>
	Mainstreamed Green Agenda Actions	Not applicable	Green Agenda and its Action Plan for the Western Balkans, endorsed by Kosovo in October 2021. Unclear how Roma benefit.

²⁵ Data compiled from: *Assessment on Roma Integration in the Western Balkans. From 2019 Poznan Leaders’ Declaration to 2024 Berlin Process Conclusion* (March 2025); *Assessment of the Implementation of the Poznan Declaration Commitments: 2024-2025* (October 2025); and the Beneficiary Poznan Declaration Commitments assessment fiches (revised versions July 2025). Data on Programme contribution (in italics) taken from Tables A and B in Annex 1 of this report.

Montenegro	Roma Employment Rate (%)	14%	2.6% progress in the number of employed Roma in the private sector and 11% progress of self-employed Roma.
	Legalization of Informal Settlements	27 settlements	2023: Public call for selection of 18 families for legalization support but no official data available on number of cases resolved. <i>Cases supported/pending by the Programme: 50</i>
	Unresolved Civil Registration	142 stateless people, mainly Kosovo IDPS (UNHCR)	2024: 431 stateless persons and individuals of undetermined nationality (UNHCR) <i>Cases supported by the Programme: 180</i> <i>Cases resolved by the Programme: 59</i>
	Mainstreamed Green Agenda Actions	Not applicable	Roma are not explicitly included in related policies.
North Macedonia	Roma Employment Rate (%)	22%	Progress to 24% (through Youth Guarantee programme).
	Legalization of Informal Settlements	32–95 settlements	42% of the Roma population have not legalized their houses (2024 mapping); 2019–2023: 2,009 legalization requests submitted, 879 approved (IPA housing project). <i>Cases solved by the Programme: 54</i>
	Unresolved Civil Registration	750 identified as at risk (2018–2019 government campaign); 584 (2021 census)	May 2025: 159 cases remain unresolved out of a total of 526 registrations (reported by authorities). <i>Cases supported by the Programme: 545</i> <i>Cases resolved by the Programme: 68</i>
	Mainstreamed Green Agenda Actions	Not applicable	Several policies on the Green and Digital agendas exist, but unclear how they affect vulnerable groups, especially the Roma.
Serbia	Roma Employment Rate (%)	21%	Increase to 23% in 2022; Nov 2024: 25,486 persons on the unemployment register who declared themselves as the members of the Roma national minority.
	Legalization of Informal Settlements	583 settlements (50% with urban plans)	No data on the number of dwellings legalized have been reported for 2024–2025. 2,153 legalization applications submitted by individuals or local self-government units. Legal aid provided: 247 cases. <i>Cases supported/pending by the Programme: 82</i>
	Unresolved Civil Registration	94% have identification cards; 99% have birth certificates	2023: 1,032 without ID card, 253 without birth registration <i>Cases supported by the Programme: 72</i> <i>Cases resolved by the Programme: 18</i>
	Mainstreamed Green Agenda Actions	Not applicable	In January 2022, Serbia adopted the Waste Management Programme (2022–2031) to help informal waste collectors affected by system upgrades. The Government also adopted the Decision on Energy Endangered Consumers in 2022, updated in 2023/24. This helps vulnerable Roma reduce energy costs if they receive financial social aid.

Annex 5: Interviewed stakeholders and focus group participants

Overview of interviews and focus groups by Beneficiary

Stakeholder	All	Albania	BiH	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye	Total
Interviews									
CoE staff	2	2	(1)	(1)	2	1	(1)	1	8 ²⁶
Gov. stakeholders		2	2	1	2	3	5	1	16
Partner organization	4								4
Experts/CSOs	4	4	4	2	4	4	3	2	27
Total interviews	10	8	6	3	8	8	8	4	55
Focus groups									
Civil servants		12							12
Roma community		8				4			12
Total participants		20				4			24

Interviewed stakeholders

Beneficiary	Gender	Organization/Institution	Date	Modality
All	F	European Network on Statelessness	13-Jan-26	Online
All	F	European Roma Institute for Arts and Culture (ERAC)	18-Dec-25	Online
All	F	Roma Entrepreneurship Development Initiative (REDI)	23-Dec-25	Online
All	F		15-Dec-25	Online
All	M	European Roma Institute for Arts and Culture (ERAC)	18-Dec-25	Online
All	F	iVote	12-Dec-25	Online
All	F	Roma Foundation for Europe	20-Jan-26	Online
All	F	Roma Foundation for Europe	20-Jan-26	Online
All	F	Council of Europe, Roma and Travellers Division	5-Dec-25 and 22-Jan-26	Online
All	F	Council of Europe, Roma and Travellers Division	05-Dec-25	Online
Albania	F	Ministry of Health and Social Protection	09-Dec-25	In person
Albania	M	Ministry of Finance	09-Dec-25	In person
Albania	F		09-Dec-25	In person
Albania	M	CSO Together for the Integration of Roma Community	10-Dec-25	In person
Albania	F		09-Dec-25	In person
Albania	F		08-Dec-25	In person
Albania, Kosovo	F	Council of Europe Office in Tirana	5-Dec-25 and 22-Jan-26	Online
BiH	M	Ministry for Human Rights and Refugees	16-Jan-26	Online
BiH	M	Institution of Ombudsman	08-Jan-26	Online
BiH	M	CSO Otaharin	13-Jan-26	Online
BiH	M	CSO Vaša prava	15-Dec-25	Online
BiH	M	CSO Vaša prava	15-Dec-25	Online
BiH	F		29-Jan-26	Online
BiH, Serbia	F	Council of Europe Office in Belgrade	02-Dec-25	Online

²⁶ The total in this row reflects the Programme staffing arrangement by which CoE Project Officers in the Western Balkans covered two Beneficiaries each.

Kosovo	M	Office for Good Governance	06-Feb-26	In writing
Kosovo	M		20-Jan-26	In writing
Kosovo	M		15-Dec-25	Online
Montenegro	M	Ministry of Human and Minority Rights	11-Dec-25	In person
Montenegro	M		12-Dec-25	In person
Montenegro	M		12-Dec-25	In person
Montenegro	F	Ministry of Labor and Social Welfare	11-Dec-25	In person
Montenegro	F	Council of Europe Office in Podgorica	11-Dec-25	In person
Montenegro	M	CSO Phiren Amenca	11-Dec-25	In person
Montenegro	F		23-Jan-26	Online
Montenegro, North Macedonia	F	Council of Europe Office in Skopje	02-Dec-25	Online
North Macedonia	M	Government of the Republic of North Macedonia	20-Jan-26	In person
North Macedonia	F	Ministry of Social Policy, Demography, and Youth	20-Jan-26	In person
North Macedonia	F	Ministry of Education and Science	22-Jan-26	In person
North Macedonia	F	OSCE Mission to Skopje	20-Jan-26	In person
North Macedonia	M	CSO Romalitico	20-Jan-26	In person
North Macedonia	F	Macedonian Young Lawyers Association	20-Jan-26	In person
North Macedonia	F	Macedonian Young Lawyers Association	20-Jan-26	In person
	F	Ministry for Human and Minority Rights and Social Dialogue		
Serbia			19-Dec-25	Online
Serbia	M	Commissioner for the Protection of Equality	18-Dec-25	Online
Serbia	F	Centre for Public Policy Research	12-Dec-25	Online
Serbia	M		08-Dec-25	Online
Serbia	M	Commissioner for the Protection of Equality	18-Dec-25	Online
Serbia	F	Commissioner for the Protection of Equality	18-Dec-25	Online
Serbia	M	Commissioner for the Protection of Equality	18-Dec-25	Online
Serbia	F	CSO Praxis	19-Jan-26	Online
Türkiye	F	Aelur Research and Consulting	18-Dec-25	Online
Türkiye	M		12-Dec-25	Online
Türkiye	M	Ministry of Family and Social Services	05-Jan-26	Online
Türkiye	F	Council of Europe Programme Office in Ankara	01-Dec-25	Online

Focus group with civil servants trained on antigypsyism in Albania (Zoom, 19 January 2026)

Gender	Institution
F	Commissioner for the Protection against Discrimination
F	Directory of Health Care
F	Health Operator for Health Care
F	Ministry of Agriculture
F	Ministry of Education
F	Ministry of Health and Social Protection
F	Ministry of Health and Social Protection
F	Ministry of Health and Social Protection
F	Multifunctional Transitory Centre
F	National Employment and Skills Agency
F	National Employment and Skills Agency
F	Top Channel TV

Focus group with Roma community members who received legalization support (Baltëz, Albania, 10 December 2025)

Gender	Municipality
F	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier
M	Baltëz/Fier

Focus group with Roma community members who received legalization support (Vinica, North Macedonia, 27 January 2026)

Gender	Municipality
F	Vinica
M	Kočani
M	Vinica
M	Vinica

Annex 6: Documents consulted

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2nd Progress Report: 1 May 2024-30 April 2025 (June 2025)

Activities and Indicators follow-up – Roma Integration III (November 2025)

Annex 13: Meetings in the Roma Integration III Programme Beneficiaries

Assessment of the Implementation of the Poznan Declaration Commitments: 2023 (July 2023)

Assessment on Roma Integration in the Western Balkans. From 2019 Poznan Leaders’

Declaration to 2024 Berlin Process Conclusion (March 2025)

Description of the Action: Roma Integration Project – Phase III

Logframe table for project “Roma Integration Project – Phase III” (3472)

Poznan Declaration Commitments: 2019-2024 Assessment of Albania

Poznan Declaration Commitments: 2019-2024 Assessment of Bosnia and Herzegovina

Poznan Declaration Commitments: 2019-2024 Assessment of Kosovo

Poznan Declaration Commitments: 2019-2024 Assessment of Albania

Poznan Declaration Commitments: 2019-2024 Assessment of Montenegro

Poznan Declaration Commitments: 2019-2024 Assessment of North Macedonia

Poznan Declaration Commitments: 2019-2024 Assessment of Serbia

Explanatory Note: Request for an addendum – modification of the Description of Action and revised budget of “Roma Integration Phase III” – CN2022/440-703 (6 September 2024)

Explanatory Note: Roma Integration Phase III – Request for modification of the Description of Action and budget (28 June 2023)

Annex 7: Evaluation questions, sub-questions and judgement criteria

Evaluation criteria	Evaluation question	Sub-questions	Measures/Indicators
RELEVANCE	1. To what extent did Roma Integration Phase III meet the priorities and needs of national governments and Roma communities, and adapt to emerging needs challenges (e.g., post-COVID-19 recovery, green and digital transitions)?	• Which priorities and needs did national governments and Roma communities identify? • How did Roma Integration Phase III align with the specific priorities and strategies of national governments concerning Roma inclusion, and what were the main areas of synergy or divergence? • In what ways did Roma Integration Phase III address the immediate needs of Roma communities? • How did the Programme adapt to the emerging needs and challenges (e.g., post-COVID-19 recovery, green and digital transitions)?	• Appraisal of stakeholders and target groups of alignment levels of the Roma Integration Phase III to their priorities and needs. • Identification of adaptations to emerging needs challenges.
	2. How effectively did the Programme engage stakeholders—including government counterparts, Roma focal points, and civil society—to ensure ownership and active participation in achieving results?	• What was the role of Programme stakeholders in the design of the Programme? • How has active participation of the stakeholders and Roma communities been incorporated into the implementation of the Programme?	• Stakeholder perceptions on their engagement levels in the Roma Integration Phase III. • Identification of concrete examples of participation and ownership.
	3. To what extent are the Programme's objectives consistent with and relevant to broader regional policy frameworks and commitments, including alignment with the EU Roma Strategic Framework 2020–2030, support for national Roma integration strategies and Poznan Declaration targets, and relevance to the EU enlargement process (including Chapter 23 on fundamental rights) and other international obligations of the Beneficiaries?	• How do stakeholders relate the Programme and its objectives to national and international commitments and processes?	• Extent to which stakeholders confirm consistency of the Programme's objectives with relevant international and national commitments. • Identification of key areas of relevance of the Programme's objectives for international and national commitments and processes.

	4. How is the principle of gender equality and participation of women reflected in the implementation of the Roma Integration Phase III Programme?	• How does the design of the Programme consider gender equality and participation of women? • How well was gender equality reflected in the implementation of the Programme? • Were gender analyses employed in the course of Programme implementation?	• Evidence of gender mainstreaming in implementation of the Programme and/or specific measures targeting women. • Evidence that gender analyses were undertaken in the framework of the Programme. • Gender disaggregated outcomes included in Programme reports.
	5. How is the CoE Human Rights Approach applied in the implementation of the Roma Integration Phase III Programme?	• How does the design of the Programme incorporate the CoE HRA principles of participation and inclusion, equality and non-discrimination, accountability and transparency and access to information? • How does Programme implementation reflect those principles?	• Evidence of the CoE Human Rights Approach in programme design and implementation in accordance with the principles of participation and inclusion; equality and non-discrimination; accountability; and transparency and access to information.
EFFECTIVENESS	6. Achievement of outcomes: To what extent have the intended outcomes and outputs of Roma Integration Phase III been achieved or are likely to be achieved by the end of the Programme, particularly in recognising and combating antigypsyism, improving socio-economic inclusion in key sectors (e.g. employment, housing, civil registration), and strengthening institutional capacities to design, implement, and monitor Roma inclusion policies?	• What do stakeholders view as key contributions of the Programme to - Recognizing and combatting anti-gypsyism? - Socio-economic inclusion of Roma - Strengthening institutional capacities to design, implement and monitor Roma inclusion policies? • What are the key factors that enabled or hindered the achievement of outputs and outcomes? • What else do stakeholders and target groups think the Programme will achieve by the time it ends?	• Extent to which outcomes have been achieved based on indicators in the Programme's logical framework and confirmed by stakeholders and target groups. • Stakeholder and target group appraisal of the Programme's contributions to identified intermediary outcomes. • Appraisal of stakeholders and target groups on likelihood of achievement of remaining outcomes and outputs.
	7. Management and coordination: How effective are the Programme's implementation arrangements, including	• What is stakeholders' overall assessment of the Programme's implementation arrangements?	• Appraisal of stakeholders on the effectiveness of implementation arrangements.

	the project management structure, coordination between the Council of Europe, the European Commission, and Beneficiary authorities, and the contribution of any supporting partners or consultants to overall effectiveness?	• Which aspects of Programme implementation arrangements do stakeholders see as most effective? • Which aspects of Programme implementation arrangements do stakeholders think could/should be improved?	• Identification of any good practice or lessons learned on management and coordination.
EFFICIENCY	8. Cost-effectiveness: Were Programme resources used optimally to achieve the outputs and outcomes, including instances where targets were overachieved with a limited budget? Examine whether the staffing, budget, and activities were proportional to the results achieved. Could similar results have been achieved with fewer resources or in a shorter time frame, or would additional investment have led to significantly better outcomes?	• What is stakeholders' assessment of staffing arrangements relative to the Programme's scope and expected outcomes? • What is stakeholders' assessment of the project budget relative to the Programme's scope and expected outcomes? • Which alternative approaches do stakeholders see for achieving Programme outcomes? • Were there cases of over- or underspend in the implementation of specific measures?	• Appraisal of the value gained for each project beneficiary relative to the total amount spent per beneficiary. • Stakeholder appraisal on appropriateness of staffing and budget in relation to the Programme's scope and expected outcomes. • Stakeholder appraisal on efficiency of alternative approaches.
SUSTAINABILITY	9. To what extent are the results of Roma Integration Phase III likely to continue after the Programme ends, considering whether the achieved practices have been institutionalized, domestic funds committed, and Roma inclusion targets integrated into regular government plans and policies?	• Which Programme achievements do stakeholders expect to be sustained after completion of the Programme's third phase? • Which Programme achievements have been institutionalized? • For which Programme achievements have domestic funds been committed? • Which Roma inclusion targets have been integrated into government plans and policies?	• Stakeholders' appraisal on the extent to which the results of the Programme are likely to continue after completion of the third phase. • Identification of Beneficiary examples of institutionalization of practices, committed domestic funds and Roma inclusion targets into policies and action plans

Annex 8: Evaluation matrix

Evaluation criteria		Relevance					Effectiveness		Efficiency	Sustainability
Evaluation questions		To what extent did Roma Integration Phase III meet the priorities and needs of national governments and Roma communities, and adapt to emerging challenges?	How effectively did the Programme engage stakeholders to ensure ownership and active participation in achieving results?	To what extent are the Programme's objectives consistent with and relevant to broader regional policy frameworks and commitments.	How is the principle of gender equality and participation of women reflected in the implementation of the Roma Integration Phase III Programme?	How is the CoE Human Rights Approach applied in the implementation of the Roma Integration Phase III Programme?	To what extent have the intended outcomes and outputs of Roma Integration Phase III been achieved or are likely to be achieved by the end of the Programme?	Effectiveness of the Programme implementation arrangements, including the project management structure, coordination and the contribution of supporting partners.	Were Programme resources used optimally to achieve the outputs and outcomes? Could similar results have been achieved with fewer resources or shorter time?	To what extent are the results of Roma Integration Phase III likely to continue after the Programme ends?
Data collection Instrument	Data source									
Document review; secondary data analysis	Programme/budget documentation									
	Project and activity reports									
	CoE strategic documents									
	Beneficiary policies, strategies etc.									
	EU frameworks, declarations									
Key informant interviews	CoE Programme staff									
	DG ENEST									

and focus groups	Programme partners									
	National Roma Contact Points									
	Government officials									
	Resource persons									
	Focus groups with Roma communities									
	Case studies									

Annex 9: Terms of Reference

TERMS OF REFERENCE EVALUATION OF THE ROMA INTEGRATION PHASE III PROGRAMME

October 2025

A. INTRODUCTION

The Roma Integration Phase III is a Joint Programme of the European Union (DG ENEST) and the Council of Europe, launched to strengthen the capacities of governments in the Western Balkans and Türkiye to effectively address the multifaceted challenges faced by Roma communities. It builds on two previous phases of Roma Integration efforts (2016–2022) and aligns with broader European initiatives in this field. The Programme is implemented over three years (1 May 2023 – 30 April 2026) in seven Beneficiaries²⁷ – Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Türkiye, with a total budget of €3,000,000 (90% funded by the EU and 10% by the Council of Europe). The Council of Europe’s Roma and Travellers Division (DG II Democracy and Human Dignity) in cooperation with the Directorate of Programme Coordination is responsible for the implementation of the Programme.

B. EVALUATION BACKGROUND AND CONTEXT

The Roma Integration Phase III Programme works with national governments to tackle long-standing barriers to Roma inclusion through improved public policies and governance. In particular, it supports the participating Beneficiaries in addressing key issues such as access to housing, employment, civil registration, green transition, while also combating antigypsyism and promoting the participation of Roma in public life. The Programme helps the governments implement their commitments under the [EU Strategic Framework on Roma Equality, Inclusion, and Participation 2020-2030](#) and the 2019 Western Balkans [Poznan Declaration](#) on Roma Integration within the EU enlargement process. It also emphasizes the application of the Council of Europe’s human rights approach principles – participation, inclusion, equality and non-discrimination, accountability, and transparency – in policy design and implementation. By providing policy advice, technical support, regional coordination, and pilot initiatives with direct impact on the ground, the Programme aims to achieve three main outcomes: **(1)** reduced antigypsyism and strengthened equality measures, **(2)** improved socio-economic inclusion of Roma through effective public services and projects, and **(3)** enhanced institutional capacities in governments to design, budget, implement and monitor Roma inclusion policies. Ultimately, these efforts contribute to the long-term vision of increased equality, inclusion and meaningful participation of an estimated four million Roma in the Western Balkans and Türkiye.

²⁷ The Council of Europe uses the term “Beneficiary” instead of “country” when referring to Kosovo in its documents to maintain a neutral stance regarding its political status, reflecting its role in providing assistance without implying statehood.

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 (1999) and the ICJ Opinion on the Kosovo Declaration of Independence.

The Roma Integration III Programme operates at the national level in all seven Beneficiaries and focuses on supporting central governments and public institutions to adopt, implement and monitor strategic policies for Roma inclusion. The Programme's methodology emphasises alignment with national reform agendas, tailored technical assistance, and institutional coordination mechanisms.

The main activities of the Programme are envisaged as follows:

- Technical assistance to central institutions (e.g. Ministries of Labour, Social Protection, Education, Infrastructure/Construction, Interior, etc.) through coaching, provision of expertise, and development of guidelines, methodologies and tools;
- Capacity building for public officials, including training workshops, peer learning and exchange events on the topics of employment, housing, civil registration, monitoring the implementation of Roma integration strategic documents, Green Agenda and green transition, development of project proposals and access to funding, etc.
- Policy development support, such as drafting or reviewing of national Roma strategies, action plans or laws relevant to Roma inclusion;
- Monitoring and evaluation support, including the development and implementation of Roma-responsive budgeting guidelines;
- Promotion of Roma-responsive budgeting and integration of Roma inclusion into national budgets and mainstream policies;
- Regional cooperation and coordination, including meetings of National Roma Contact Points, study visits, and regional thematic events;
- Roma participation and consultation mechanisms, including structured platforms and consultations with Roma civil society;
- Awareness raising and anti-discrimination efforts aimed at reducing antigypsyism and fostering public support for Roma inclusion;
- Provision of small-scale grants to support specific actions or pilot interventions identified as priorities by national counterparts;
- Regional coordination meetings or events with National Roma Contact Points and relevant stakeholders to enhance Roma inclusion.

The Programme adapts its support to the specific context and policy cycle of each Beneficiary, ensuring that interventions are relevant, timely and responsive to needs. The inception phase (May–October 2023) was used to tailor activities and priorities to the institutional context of each Beneficiary.

The primary target group of the Programme includes national public institutions and officials responsible for Roma inclusion (National Roma Contact Points), with indirect beneficiaries being Roma communities in the region who are expected to benefit from improved public services and policy frameworks.

C. EVALUATION PURPOSE

This evaluation is commissioned as a final (ex-post) evaluation of the Roma Integration Phase III Programme, to be conducted in the final year of its implementation. The purpose of the evaluation is to assess the Programme's achievements and challenges in order to inform improvements in future initiatives in the field and ensure accountability for results. In particular, the evaluation will examine the relevance, effectiveness, efficiency, and sustainability of the Programme and its approach, in order to assess its results and identify good practices or adjustments needed for similar actions in the future. The aim is both retrospective (reviewing what has been accomplished and learned during Phase III) and forward-looking (providing actionable recommendations for the Council of Europe in shaping subsequent policies or programmes on Roma inclusion).

More specifically, the evaluation will help determine to what extent the Roma Integration Phase III interventions have improved governance processes and outcomes for Roma inclusion at the national and regional levels, and how the Programme's methodology contributed to these changes. The evaluation envisages to draw lessons regarding capacity-building measures, policy coordination mechanisms, and regional cooperation efforts, thereby guiding stakeholders in refining approaches beyond the Programme's timeline. The conclusions and recommendations from this evaluation are expected to feed into the design of any future phases or related programmes, and to inform the broader work of the Council of Europe and European Union in promoting Roma equality and inclusion. Furthermore, the evaluation results will be disseminated with the Programme's stakeholders and key actors (e.g. the National Roma Contact Points). The target audience is the Roma and Travellers Division in general and senior management, particularly for use in negotiations on future programmes and projects.

D. EVALUATION OBJECTIVES

The evaluation's objectives are:

- To assess the overall **relevance, effectiveness, efficiency, and sustainability** of the Roma Integration Phase III Programme's strategy and interventions in contributing to the intended outcomes (improved public policies and practices for Roma inclusion in the Western Balkans and Türkiye). This includes examining the Programme's methodology and management arrangements in achieving its specific objectives across the seven Beneficiaries.
- To identify **lessons and insights** from the implementation of Phase III that the Council of Europe, the European Commission, and national stakeholders can learn for future programming. This should encompass successful approaches, challenges encountered, and factors affecting performance, including the sustainability of results achieved through the Programme.
- To provide **concrete recommendations** for follow-up actions or improvements. These recommendations should address how to consolidate gains made by the Programme, how to enhance the prospects for sustainable impact, and how future Roma inclusion projects or policies (including a possible next phase or other initiatives) could be better designed and implemented based on the evaluation findings.

E. EVALUATION SCOPE

Timeframe: The evaluation will cover the entire implementation period of the Roma Integration Phase III Programme, from its start on 1 May 2023 up to its anticipated end on 30 April 2026. All activities, outputs and results delivered during this period (including any inception/instruction phase, interim milestones, and up to the point of evaluation field work in 2025–2026) will be within the scope of analysis. The evaluation will be final in nature, assessing cumulative performance and results over the full duration of the Programme.

Geographic and Thematic Coverage: The evaluation encompasses all seven Beneficiaries of the Programme – Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Türkiye. It will consider the Programme’s work at both regional level (e.g. regional conferences, peer learning, and overall coordination) and country level (specific support, national action plans and commitments, and any actions carried out under the Programme). Given the broad scope of the intervention, the evaluator is expected to ensure coverage of each Beneficiary in the data collection and analysis. For manageability, and deeper insight, the evaluation may include a *focused examination of selected case studies*. For example, particular thematic focus areas (such as a successful policy reform, or a challenge in one of the areas targeted by the Programme, for example in addressing antigypsyism, statelessness, housing or employment) may be examined. Particular national contexts may also be included. These case studies illustrate the Programme’s performance in depth and its effectiveness in achieving outputs and outcomes, including in the three outcome areas of equality/antigypsyism, socio-economic inclusion, and institutional capacity. Any such focus (e.g. selecting a few representative thematic issues for case studies or Beneficiaries, such as Bosnia and Herzegovina, Kosovo*, Montenegro,) will be agreed during the Inception Phase in consultation with the Evaluation Reference Group (ERG)²⁸, ensuring a representative and balanced assessment. Regardless of case studies chosen, the evaluation findings should be aggregated to draw conclusions relevant for the entire Programme.

The *scope excludes* any activities outside Phase III or outside the defined Beneficiaries, though linkages with prior phases or parallel initiatives may be considered under sustainability analysis.

F. EVALUATION CRITERIA

The evaluation will be structured around the standard DAC criteria of **Relevance, Effectiveness, Efficiency, and Sustainability**. For each criterion, a set of **guiding evaluation questions** is outlined below to guide the inquiry; these questions will be refined and expanded by the evaluator in the Inception Report, in consultation with stakeholders. The evaluator should also develop an **Evaluation Matrix (Annex 1)** mapping these questions to specific indicators, data sources, and methods. The evaluation will cover all aspects of the Programme’s design, implementation, and results as they relate to these criteria and the evaluation scope. This includes the relevance of objectives to stakeholder needs and policies, the effectiveness in achieving outputs and outcomes (across equality/antigypsyism, socio-economic inclusion, and institutional capacity), the efficiency of resource use and

²⁸ The Evaluation Reference Group (ERG) will be convened as an advisory body composed of representatives from the Council of Europe and the European Commission (DG ENEST). It will advise on the accuracy of key deliverables (Inception Report, Draft Report) and the feasibility of recommendations, help provide access to information and ensure that stakeholders take ownership of the evaluation findings. The ERG will meet virtually or in person at important stages of the evaluation, such as discussing the inception report, validating findings, and reviewing the draft report.

implementation modalities, and the prospects for sustaining the changes introduced. Cross-cutting aspects, such as adherence to human rights and gender equality principles and any unintended effects (positive or negative), will also be reviewed.

G. EVALUATION QUESTIONS

Relevance: This criterion examines the extent to which the Programme’s objectives and design respond to the needs of the beneficiaries, target groups, and the policy context. Key questions include:

- 1. To what extent did Roma Integration Phase III meet the **priorities and needs** of national governments and Roma communities, and adapt to emerging needs challenges (e.g., post-COVID-19 recovery, green and digital transitions)?
- 2. How effectively did the Programme engage stakeholders—including government counterparts, Roma focal points, and civil society—to ensure ownership and active participation in achieving results?
- 3. To what extent are the Programme’s objectives consistent with and relevant to broader regional policy frameworks and commitments, including alignment with the EU Roma Strategic Framework 2020–2030, support for national Roma integration strategies and Poznan Declaration targets, and relevance to the EU enlargement process (including Chapter 23 on fundamental rights) and other international obligations of the Beneficiaries?

Effectiveness: This criterion assesses the extent to which the Programme achieved its expected results and objectives. Key questions:

- **Achievement of outcomes:** 4. To what extent have the intended outcomes and outputs of Roma Integration Phase III been achieved or are likely to be achieved by the end of the Programme, particularly in recognising and combating antigypsyism, improving socio-economic inclusion in key sectors (e.g. employment, housing, civil registration), and strengthening institutional capacities to design, implement, and monitor Roma inclusion policies?
- **Management and coordination:** 5. Evaluate the effectiveness of the Programme’s implementation arrangements, including the project management structure, coordination between the Council of Europe, the European Commission, and Beneficiary authorities, and the contribution of any supporting partners or consultants to overall effectiveness.

Efficiency: This criterion concerns how well the Programme converted resources (funds, expertise, time) into results. The evaluation should address:

- **Cost-effectiveness:** 6. Were Programme resources used optimally to achieve the outputs and outcomes, including instances where targets were overachieved with a limited budget? Examine whether the staffing, budget, and activities were proportional to the results achieved. Could similar results have been achieved with fewer resources or in a shorter time frame, or would additional investment have led to significantly better outcomes?

Sustainability: This criterion examines the likelihood that the benefits of the Programme will continue after external support ends. Key questions:

7. To what extent are the results of Roma Integration Phase III likely to continue after the Programme ends, considering whether the achieved practices have been institutionalised, domestic funds committed, and Roma inclusion targets integrated into regular government plans and policies?

H. Evaluation Methodology and Approach

The evaluation will be conducted by an evaluation team, following a participatory and mixed-methods approach. Bidders for the evaluation are expected to propose a detailed methodology in their offers, which will be assessed and finalised in coordination with the Council of Europe prior to contractual agreement. In general, the methodology should combine **qualitative and quantitative data collection and analysis** to ensure robust findings and triangulation of information. The evaluator should adhere to recognised evaluation standards and ethical guidelines, including the Council of Europe's Code of Conduct for Evaluators.

Data Collection Methods: The evaluation will likely include, at a minimum:

- **Desk review** of all relevant documentation (project proposal/Description of Action, logical framework, progress reports, monitoring data, minutes of meetings, training materials, policy documents produced, etc.). A list of initial documents will be provided by the Programme team, and the evaluator is expected to identify any further sources as needed.
- **Key informant interviews** with a range of stakeholders, potentially including: Council of Europe programme management and field staff; the European Commission (DG ENEST) representatives; National Roma Contact Points and other relevant government officials in each Beneficiary (e.g. from line ministries or coordination bodies); representatives of Roma communities or Roma civil society involved in the Programme; and other international or civil society partners who have insight into the Programme (e.g. Programme beneficiaries, partners such as the European Network on Statelessness, European Roma Institute for Arts and Culture - ERIAC, Roma Foundation for Europe, Roma Entrepreneurship Development Initiative REDI etc.). Interviews may be conducted in person during field visits or online, via video/teleconference as appropriate. Approximately 30-35 interviews will be conducted.
- **Field visits or online interviews** in a selection of Beneficiaries: The evaluator is expected to visit selected Beneficiaries to conduct face-to-face interviews and observe any on-site activities or results. Given the regional nature of the Programme, the evaluator should plan visits to ensure coverage of diverse contexts (for example, in 2–3 Beneficiaries from the Western Balkan and Türkiye). These visits will be arranged in consultation with the Council of Europe; the Programme team can facilitate contact with local stakeholders and support logistical arrangements, such as organisation of meeting venues or provision of interpretation upon the request of the evaluator.
- **Focus group discussions or workshops** (if feasible) with certain stakeholder groups, such as Roma community members who benefitted from pilot actions, or with teams of National Roma Contact Points, to gather collective perspectives.

- **Surveys or questionnaires** (optional): If appropriate, the evaluator might use an online survey to reach a broader range of stakeholders (for example, to gather feedback from training participants or officials involved). This can be discussed during inception.

The chosen methods should ensure inclusion of diverse perspectives, including gender balance and representation of different groups (for example, ensuring that Roma women's experiences are captured, considering youth perspectives, etc., where relevant). All data collection must be conducted in a culturally sensitive and ethical manner, obtaining informed consent from interviewees and preserving confidentiality.

Quality Assurance: The evaluator should integrate internal quality assurance measures throughout the evaluation. The Council of Europe's evaluation guidelines and quality checklists (please see the list of annexes at the end of the document) should be used as a reference to ensure the evaluation design, process, and reports meet high standards. Notably, the **Quality Assurance Checklists for Evaluation Inception Report and Quality Assurance Checklist for the Final Evaluation Report** (Annexes 3, 4) provide criteria on structure, clarity, evidence, etc., that the reports will be assessed against. The evaluator should also ensure that the evaluation design is **gender-responsive and human rights-based**, in line with Council of Europe and EU policies, meaning the methodology should pay attention to differential impacts on men/women and uphold the rights and dignity of participants throughout.

Triangulation: Data triangulation is critical for credibility. The evaluator will ensure that findings are cross verified by multiple sources of evidence (document review, interview testimony, and quantitative indicators). Any contradictory evidence should be examined further and explained in the analysis. The evaluator is expected to maintain an evidence file with full data sets for findings (including the evaluation matrix to track which sources support each finding).

Limitations: The methodology should acknowledge any limitations (such as incomplete data, potential response bias, language barriers, etc.) and indicate about how these will be mitigated.

Ethical considerations: The evaluation will adhere to ethical standards. The evaluator(s) must be independent and have no prior direct or indirect involvement with the Programme. They must obtain consent from interviewees in written form and ensure the protection of sensitive information. The [Council of Europe Code of Conduct for Evaluators](#) provides guidance which the evaluator is obliged to follow.

I. Evaluation Work Plan

The evaluator will be responsible for producing the following key deliverables:

- **Inception Report:** After an initial document review and preliminary interviews with the Programme team, the evaluator will prepare an Inception Report (approx. 10–15 pages). The Inception Report will outline the evaluator's refined understanding of the assignment, present a detailed evaluation matrix and work plan, and include elements such as: the finalised evaluation questions and criteria; the methodology and data collection tools to be used (e.g. draft interview guides, survey design); the sampling strategy for field visits or case studies; a stakeholder map; any changes proposed to the scope; and a detailed timeline of activities. The inception report should also include a proposed schedule of tasks, a description of stakeholders' roles in the evaluation

process, and any initial observations or issues identified. This report will be submitted within **four weeks** of contract signature and discussed with the Evaluation Reference Group in a meeting. The evaluator will incorporate feedback from that discussion into the final inception report before proceeding.

- **Draft Evaluation Report:** After completing the data collection and analysis, the evaluator will submit a Draft Evaluation Report (not more than 30 pages). The draft report should be a comprehensive account of the evaluation findings, conclusions, and preliminary recommendations. It should cover all aspects outlined in the inception phase and answer the evaluation questions with evidence. The report should include, at minimum: an Executive Summary, an introduction (background and purpose), a description of the object of evaluation (the Programme), the evaluation methodology (including limitations encountered), the detailed findings organised by evaluation criteria/questions, case study summaries (if relevant), overall conclusions, lessons learned, and a set of actionable recommendations. Relevant annexes (such as the list of documents reviewed, list of people interviewed, data collection instruments, and the completed evaluation matrix) should accompany the draft. The Evaluation Reference Group will review the draft report to verify that it meets the required quality standards and covers the desired scope. The evaluator is expected to submit the draft report by **28 February 2026** (about four weeks before final report due date to allow time for feedback).
- **Final Evaluation Report:** The evaluator will finalize the report after addressing comments and suggestions on the draft. The **Final Evaluation Report** should be delivered by **31 March 2026** (exact date to be determined in the work plan, likely by the end of the Programme or shortly thereafter). The draft and final reports must meet the Council of Europe's quality criteria (see Annexed Quality Assurance Checklist for the Final Evaluation Report). It should be well-structured, clear, evidence-based, and logically present the evaluation results. The final report will include all the elements of the draft (revised as needed) and additionally a stand-alone Executive Summary of 2-3 pages that highlights the most important findings and recommendations. The recommendations should be practical and addressed to Council of Europe) with a suggested timeframe for action. The evaluator may be asked to make a brief presentation of findings during this meeting. The Final Report (in Word and PDF formats) and all raw data collected (interview notes, survey data, etc.) will be delivered to the Council of Europe. The final report will be published on DIO's website together with the management response.
- **Synthesis Summary (if required):** The evaluator may be requested to prepare a concise **evaluation brief or synthesis report** for wider dissemination, such as a 4-5-page summary highlighting key findings, lessons and recommendations for policy makers. If required, this will be specified at the inception phase. Alternatively, the Executive Summary of the Final Report should be suitable for this purpose.

All reports should be written in **English** in a clear and accessible style. The evaluator should ensure correct terminology, especially for technical terms related to Roma inclusion and public administration. The Final Report will be expected to be of publishable quality as it may

be shared with stakeholders and published on the Programme’s website, in addition to DIO’s website.

Timeline (indicative): A detailed timeline will be agreed in the Inception Report. The following is an indicative schedule assuming the evaluation starts in November 2025:

Deliverables and other key-steps	Deadline
Desk study – documentation review, finalizing methodologies	November 2025
Submitting the Inception report	30 November 2025
1 st Joint meeting with the Evaluation Reference Group	November 2025
Field work – Evaluation missions	November 2025– January 2026
Draft Case Studies	
Validation workshop	Beginning of February 2026
Submitting the Draft Evaluation report	28 February 2026
2 nd meeting with the Evaluation Reference Group to discuss draft findings	February/ March 2026
Final Evaluation Report (with incorporated feedback)	31 March 2026

(The above timeline will be adjusted as necessary to align with the Programme’s closure deadlines and stakeholders’ availability. One evaluation exercise is foreseen in the final year of implementation; thus, scheduling aims to complete the process by the end of April 2026.)

Management and Logistics

The evaluation will be managed by the Council of Europe, Roma and Travellers Division, as the Programme Implementation Division, under the oversight of the Directorate of Internal Oversight (Evaluation Division) responsible for quality assurance. The **contracting authority** for the evaluator will be the Council of Europe. Day-to-day coordination with the evaluator will be ensured by a designated Evaluation Manager within the Programme team, who will serve as the primary focal point.

Logistical Arrangements: The evaluator is responsible for making all practical arrangements for the evaluation missions, including travel and accommodation bookings, scheduling of interviews, and translation/interpretation if needed. The Council of Europe will provide support in terms of official introduction letters, contacting stakeholders to endorse the evaluation, scheduling interview, and helping to identify key contacts in each country (through its field offices or local networks). The Programme team will also provide support in organising the meeting venue of field visits if necessary. However, costs of the field work are to be covered within the evaluator’s budget and work plan. The evaluator should account for

multiple country visits; if travel is restricted or difficult (e.g. due to public health or security reasons), alternative methods (such as remote interviews) should be employed.

The Programme team will provide the evaluator with available working facilities while in Strasbourg (if the evaluator visits CoE headquarters) or connect them with CoE Offices in the field where possible, but the evaluator should be prepared to work independently. If the evaluator anticipates needing translation or interpretation for local languages, this should be factored into the approach (the evaluator may include team members with the necessary language skills or plan for interpreter services). Any interpretation or translation services required for interviews or documents must be arranged by the evaluator (the CoE can advise on sources). Upon request, in some of the CoE field offices, CoE can provide support with translation/interpretation during interviews and field visits.

Communication: The evaluator will keep the Council of Europe informed regularly of progress, especially if any issues arise that could affect the scope or timeline. Weekly meetings should be scheduled to ensure the evaluation stays on track. All interim deliverables should be submitted electronically. All communication and reports will be conducted in English.

After the final report is delivered, the Council of Europe and possibly the Beneficiaries will prepare a management response to the evaluation's recommendations. The evaluator may be asked to clarify findings or participate in dissemination events (such as presenting to a Steering Committee or at a lessons-learned workshop); any such tasks would be agreed separately and could be part of the assignment if within the available days.

Budget and Payment

The **maximum budget** available for this evaluation is **35,000 EUR**, covering all fees, travel and subsistence costs, and any other incidentals. This amount is **inclusive of any applicable taxes**. The evaluator's financial proposal should not exceed this ceiling. The budget corresponds approximately to a minimum of 40 service days for the evaluator(s).

Payment terms will be linked to deliverables: 20% upon approval of the Inception Report, 30% upon submission of the Draft Report, and 50% upon acceptance of the Final Report (exact payment schedule to be confirmed in the contract). The evaluator should submit an **all-inclusive daily rate** in their offer and a breakdown of expected expenses in line with their methodology (number of field trips, interpretation, translation, local transport, etc.). In their financial proposal, evaluators should budget for their own travel and accommodation.

All payments will be processed by the Council of Europe in Euros. The Council of Europe's standard contract for consultancy services (Act of Engagement) will govern the terms, including payment conditions, confidentiality, and intellectual property of the deliverables. The evaluator is responsible for compliance with their own tax and social insurance obligations related to the fees.

Qualifications and Experience of the Evaluator(s)

The evaluation will be conducted by an external consultant or team of consultants selected through a competitive process. Prospective evaluators must meet the following **minimum qualifications**:

- **Proven Evaluation Expertise:** A strong record in designing, managing, and leading evaluations of international technical assistance projects or programmes is required, preferably with at least 5-7 years of experience as a lead evaluator. Experience should include applying both qualitative and quantitative evaluation methods and familiarity with evaluation standards (e.g. OECD DAC criteria).

- **Thematic Knowledge:** Demonstrated expertise in the field of **social inclusion of disadvantaged groups**, particularly Roma inclusion and related public policies, is essential. The evaluator should be knowledgeable about issues of minority rights, anti-discrimination, and social policies in areas such as education, employment, housing, healthcare, etc., as they pertain to Roma communities in Europe.
- **Regional Experience:** Extensive knowledge of and experience in the **Western Balkans and Türkiye** context is highly desirable. This includes understanding the socio-political environment, government structures, and Roma community dynamics in one or more of the Beneficiaries. Previous evaluation or project experience in any of the seven Beneficiary territories is a strong asset (experience in multiple countries is an advantage). Familiarity with the EU enlargement process, Poznan Declaration, and related reforms in the Western Balkans/Türkiye (Chapter 23 on Judiciary and Fundamental Rights, etc.) is also relevant.
- **Institutional Knowledge:** Good understanding of the role and functioning of the Council of Europe and the European Commission in the field of Roma inclusion or human rights is expected. The evaluator should be aware of key strategies and instruments such as the EU Roma Strategic Framework, national Roma integration strategies, and relevant Council of Europe standards (e.g. ECRI recommendations, relevant Committee of Ministers recommendations, etc.). Experience with evaluations of EU-funded joint programmes or similar donor-funded projects is an asset.
- **Language Skills:** The evaluator or evaluation team must have **excellent command of English** (at least C1- both written and spoken), as all deliverables will be in English and communication with the core stakeholders is in English. In addition, **language proficiency relevant to the Beneficiary countries** is highly desirable. For instance, knowledge of any of the local languages (Albanian, Bosnian / Croatian / Serbian / Montenegrin, Macedonian, Turkish) or Romani language can facilitate field work and is considered an asset.
- **Analytical and Communication Skills:** Excellent analytical skills and the ability to synthesize complex information succinctly are required. The evaluator should be able to formulate clear and actionable recommendations. Strong communication and interpersonal skills are needed to conduct interviews and present findings effectively, including to high-level stakeholders.
- **Independence and Integrity:** The evaluator must be independent from the Roma Integration Phase III Programme (no prior involvement in its implementation) and free from any conflict of interest. He/she should demonstrate a commitment to impartiality and ethics in evaluation. The evaluator will be required to sign the Council of Europe's **declaration of integrity and absence of conflict of interest** as part of the contract.

Additional assets include: familiarity with gender equality and social inclusion considerations; ability to use participatory evaluation techniques; and prior experience evaluating policy advocacy or capacity-building projects.

The following annexes and resources are provided to the evaluator to facilitate the assignment:

- **Annex 1:** [Evaluation Matrix Template](#) – a template that the evaluator can use to develop the evaluation matrix linking questions to criteria, indicators, data sources, and methods.
- **Annex 2:** [Council of Europe Code of Conduct for Evaluation](#) – outlining the ethical and professional guidelines to be adhered to in this evaluation.
- **Annex 3:** [Quality Assurance Checklist for Evaluation Inception Report](#) – a checklist used by the Council of Europe to ensure the inception report meets quality standards (for reference in preparing the inception report).
- **Annex 4:** [Quality Assurance Checklist for Evaluation Reports](#) – a detailed checklist of quality criteria for the final report. The evaluator should consult this to understand the expectations for the structure and content of the evaluation report (e.g. clarity of objectives, sound methodology, evidence-based findings, useful recommendations, etc.).
- **Annex 5:** [Evaluation Policy for the Council of Europe](#).
- **Annex 6:** [Council of Europe Evaluation Guidelines](#).

All the documentary resources will be made available via a shared repository or email upon the start of the contract. The evaluator is obliged to treat internal documents with confidentiality and use them only for the purposes of the evaluation. Additional information or documents may be provided upon request as the evaluation progresses.