

EMPOWERMENT OF ROMA AND TRAVELLER WOMEN: A CHANGE UNDER CONSTRUCTION

Towards a Roadmap for Advancing Gender Equality
of Roma and Traveller Women
in Council of Europe member states



Dr. Zora Popova

EMPOWERMENT OF ROMA AND TRAVELLER WOMEN: A CHANGE UNDER CONSTRUCTION

Towards a Roadmap for Advancing Gender Equality
of Roma and Traveller Women
in Council of Europe member states

Dr. Zora Popova

The opinions expressed in this work are the responsibility of the authors and do not necessarily reflect the official policy of the Council of Europe.

The reproduction of extracts (up to 500 words) is authorised, except for commercial purposes as long as the integrity of the text is preserved, the excerpt is not used out of context, does not provide incomplete information or does not otherwise mislead the reader as to the nature, scope or content of the text. The source text must always be acknowledged as follows “© Council of Europe, year of the publication”. All other requests concerning the reproduction/translation of all or part of the document, should be addressed to the Directorate of Communications, Council of Europe (F-67075 Strasbourg Cedex or publishing@coe.int).

All other correspondence concerning this document should be addressed to the Roma and Travellers Team of the Council of Europe.

Roma and Travellers Team,
Anti-discrimination Department
Council of Europe
F-67075 Strasbourg Cedex
France
E-mail: roma.team@coe.int

Cover and layout: Documents and Publications
Production Department (DPDP), Council of Europe

Cover photo: Council of Europe

This publication has not been copy-edited by the
SPDP Editorial Unit to correct typographical and
grammatical errors.

© Council of Europe, September 2021
Printed at the Council of Europe

TABLE OF FIGURES

Figure 1: UN Human Rights Treaties (scope).....	21
Figure 2: EU Instruments (scope).....	21
Figure 3: Roma women & girls in the power-relations pyramid.....	23
Figure 4: Gender Aspect of NRIS (in 2012).....	24
Figure 5: Roma Communities in EU states by size (as % of population and in real numbers).....	30
Figure 6: Gender Equality Index 2019 – Countries Ranking (Lowest 10).....	31
Figure 7: Gender Equality Index 2019 – Ireland vs EU-28 average.....	32
Figure 8: Roma Women Issues in a Comparative Perspective.....	35
Figure 9: Pyramid of discrimination and Solidarity Aspects.....	53
Figure 10: Solidarity Aspects.....	53

Contents

EXECUTIVE SUMMARY	5
1. INTRODUCTION	11
2. RESEARCH STRUCTURE AND METHODOLOGY	13
Research Question and Purpose	13
Structure	14
Sources used	14
3. THE CONTEXT: NON-DISCRIMINATION AND EQUALITY	16
International Legal Frameworks: An Overview	16
Gender & Ethnicity: The Intersectional Challenge before Roma Integration	17
4. ROMA WOMEN IN THE ROMA INTEGRATION POLICIES	22
The Complexity of the Roma Women Situation	22
The Gender Perspective of Roma Integration Policies	23
5. THE GENDER PERSPECTIVE IN THE NATIONAL STRATEGIES	30
Selection of Cases	30
Towards a Framework for Comparative Analysis	32
Roma Women's Issues in a Comparative Perspective	35
6. ANALYSIS OF FINDINGS	44
Background findings	44
Case-based comparative analysis	45
Overview of survey findings	49
7. TOWARDS A ROMA AND TRAVELLER WOMEN EMPOWERMENT ROADMAP	51
LIST OF ABBREVIATIONS	55
REFERENCES	56
APPENDIX TO THE REPORT	63
1. Introduction	64
2. Legal frameworks ensuring equality	64
3. Key challenges in Roma and Traveller women's equality	65
4. References to Roma and Traveller women in the national roma integration strategies (NRISs)	66
5. Legal and policy documents explicitly addressing Roma and Traveller women's issues	68
6. Positive practices	70
7. Roma and Traveller women's organisations and organisations working on Roma and Traveller women issues in council of europe member states – non-exhaustive list	76

Executive Summary

Roma and Traveller women and girls are among the most vulnerable groups within and across European states. They face multi-dimensional discrimination and intersectional challenges.

Since the end of the Second World War, the protection from discrimination and the promotion of equality have become fundamental principles of international human rights law. Over the years, the increased awareness of the fact that a person can be exposed to discrimination based on several personal factors or on their intersection, has had a direct impact on international and national anti-discrimination standards and legislation. However, despite the development of targeted measures and the overall achievements of the 1995 Beijing Platform for Action, gender equality and empowerment of all women and girls remain goals unreached in the UN Sustainable Development Agenda 2030, and even further out of reach for minority and Roma and Traveller women.

Empowerment, as a capacity of a person to control one's own life, results from the interplay of a complex set of factors. To establish to what extent Roma integration policies foster empowerment of Roma and Traveller women, the paper puts forward the following research questions: *Are Roma integration policies ensuring efficient protection of Roma and Traveller women's rights (with a focus on multiple and intersectional discrimination) and are they enabling development of the full potential of stakeholders?* Aiming to support the process of advancing gender equality, the research has focused not only on the challenges and shortfalls but on positive practices and achievements in the field, which become models for development of national or European level mechanisms. The positive examples have been collected through a thematic survey disseminated among the Council of Europe member states and they are presented in the Appendix to the Report. The purpose of the survey, the interviews and online exchanges was to ensure that the analysis is based on up-to-date information and to complement the perspective outlined by the main sources.

To identify to what extent the international and national efforts targeting Roma integration support the reduction of the existing gender equity gap, this research analyses strategic policy documents of six states in a comparative perspective. The selection of the states was based on the following criteria:

- ▶ National strategies adhering to international standards and subject to international monitoring mechanisms
- ▶ States with large Roma and Traveller communities as percentage of the total population with an additional verification of the selection through the Gender Equality Index 2019
- ▶ Five states with Roma communities and one state with a Traveller community

Based on the specified criteria, the National Roma Integration Strategies (latest versions) of Bulgaria, the Czech Republic, Ireland, Hungary, Romania, and the Slovak Republic, have been selected for analysis.

The recommendations of the European Parliament Resolution of 10 December 2013 on Gender Aspects of the European Framework of National Roma Inclusion Strategies, which request targeted measures from the member states to ensure gender equality in Roma integration policies, was used for the elaboration of the framework for this comparative analysis. Projecting the national approaches through the framework, the comparison at the level of each element revealed significant deficits both at the level of designing and implementation of measures for fostering Roma and Traveller women's empowerment. A lack of an overall comprehensive strategy for ensuring gender equity within the Roma integration policies emerges as a general challenge for the European states. The findings reveal the need for initiating a constructive debate about the factors impeding the advancement of gender equality of Roma and Traveller women and girls throughout Europe.

Identifying, in a comparative perspective, shortfalls and persisting challenges to Roma and Traveller women's empowerment, the research does not aim to criticise the efforts of the national governments but to highlight gaps and issues that need to be addressed. The purpose of the paper is to offer a structured approach for bringing together the measures taken by the Council of Europe (CoE) member states to address intersectional challenges faced by Roma and Traveller women. This approach will enable the development of a coherent policy model that decision makers, in cooperation with the grass-root level, activists and other stakeholders can apply and/or adapt with respect to the specific national contexts. It can also facilitate the elaboration of respective Plans of Action with relevant indicators for monitoring the implementation and progress of Roma integration. This model is referred to as a Roma and Traveller Women's Empowerment Roadmap.

The paper uses the term *Roma and Traveller women* with reference to the usage by the Council of Europe¹. While the Council of Europe uses the umbrella concept of Roma to cover the variety of ethnic groups and make a distinction between them and the nomad communities of Travellers, the research findings pushed forward adopting a slightly different approach. *Roma women* here refers to women from both the variety of ethnic Roma communities and the Traveller communities. The justification lies in the fact that no substantial differences were found when multiple discrimination, intersectionality and issues of empowerment were analysed. Women belonging both to Roma and to Traveller groups appear to experience quite similar challenges in terms of equality. Similarly, since generational aspect of integration policies is largely missing, the term is referring also to young Roma girls. The assumption is that the lack of explicit references in strategies and measures developed particularly for Roma girls is that the early motherhood of many of them constitutes them as women.

The **conclusions** of this research paper are based on the comparative analysis of the selected cases and summarised under three thematic lines:

■ Normative basis

Roma and Traveller women and girls are protected by the provisions of the general non-discrimination

1. The term "Roma and Travellers" is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of Roma and/or Travellers.

law. The intersectional disadvantages that constitute them as one of the most vulnerable groups in Europe, however, call for special attention and structured and targeted interventions, supported by relevant legislative provisions and/or strategic policy plans.

■ Policy Design

National governments have a clear understanding about the problems faced by Roma and Traveller women and about the multiple and intersectional discrimination to which they are exposed. Nevertheless, the Strategies for Roma Integration do not provide comprehensive frameworks to tackle the identified inequalities. The embedded gender-sensitive measures are fragmented and rarely interconnected. Apart from the single-issue sectoral approach, the Strategies fail to account for generational differences. The mainstreaming efforts are targeting either Roma rights or women's rights. Mainstreaming of *Roma women issues* is not in focus both at mainstream-society and community levels. When civil society representatives and stakeholders are actively involved in the process of planning and designing policies and measures, the positive impact is greater.

■ Policy elements

Certain measures targeting Roma and Traveller women explicitly exist in all policy areas except for housing. However, no state has developed a comprehensive approach to ensure that all identified problems within the specific field are covered. Although the prioritisation of different problems depends on the diverse national contexts, none of the strategies justify why the remaining issues under the specific area are not being tackled. The integration policies do not offer mechanisms for reducing the negative impact of cultural and structural barriers on Roma and Traveller women's empowerment. Raising awareness about Roma and Traveller women issues and training of public officials, especially social workers, is crucial for increasing the success of various interventions. Mediators play an important role in the process of raising awareness of stakeholders and providing direct support to Roma and Traveller women. Fostering civic initiatives and cooperation is crucial for achieving sustainable change.

The analysis of the chosen research data has resulted in the formulation of **additional conclusions**:

- ▶ Content analysis of policy documents should be performed alongside discourse analysis.
- ▶ Positive actions targeting women are an exception.
- ▶ Roma and Traveller women, as stakeholders, are mostly silent on the topic of gender equality, intersectionality and the multiple discrimination they face. The voice of Roma girls is still largely absent not only in matters such as Youth

consultations, design and implementation of the national Roma integration measures, but also on issues such as experienced discrimination, early marriages, etc.

- ▶ Comparative research on similarities and differences between the challenges faced by Roma women and those faced by Traveller women is generally missing. The speculation that their needs are identical is usually based on interpretation of reported problems but not on in-depth comparative analysis of underlying factors and their impact.
- ▶ Increasing the level of protection and promotion of gender equality in a state is a precondition for achieving success in the protection and promotion of Roma and Traveller women rights and the elimination of the multiple disadvantages faced by them.
- ▶ A positive change cannot occur without the active civil society and stakeholders' involvement in the processes of policy planning, implementation and monitoring.

Based on the findings, this paper offers the following **policy recommendations**:

- ▶ Governments need to conceptualise specific strategies aimed at Roma and Traveller women's empowerment, which need to be developed as a comprehensive set of mechanisms covering all sectors of identified needs for intervention, and involving all relevant stakeholders – both public authorities and civil society. It is crucial that policy makers take into account that differences between rural and urban environments and the discrepancies in regional development might entail adjustments of various measures to meet the context-specific challenges.
- ▶ Ensuring personal safety of Roma women as citizens of a state should be high on the political agenda of any European government. Public authorities must protect the cultural rights of communities but a clear line should be drawn between forms of cultural expression and practices that violate gender equity and human rights. Raising awareness about human rights among community members is essential, but governments cannot outsource their obligation to protect them from violations nor outsource preventive measures. States need to develop capacities and integrated approaches for efficiently addressing the

human and gender-based challenges – this is the way to alleviate the vulnerability of Roma and Traveller women.

- ▶ Governments need to develop multi-level and multi-faceted mainstreaming programmes at three levels: general society, Roma and Traveller communities and Roma and Traveller women. Although measures may differ at different levels, they all must lead to the elimination of discrimination against Roma and Traveller women. Raising awareness among Roma and Traveller women about their human and gender rights is a precondition for their emancipation and active participation in public and political life.
- ▶ Governments need to map the stakeholders (Roma and Traveller women activists, organisations and associations and pro-Roma women NGOs) and establish structured dialogue and partnerships with them. Providing capacity building assistance and fostering intercultural cooperation are preconditions for achieving sustainable positive change.

The model for a Roma and Traveller Women's Empowerment Roadmap based on findings, consists of three lines of action:

Step 1: Ensuring Protection

normative, institutional, personal levels (including health protection and protection from violence and discrimination)

Step 2: Enabling Emancipation

through education, employment, participation, awareness raising and building a vision for the future

Step 3: Fostering Cooperation

institutional and grassroots cooperation – through involvement of Roma and Traveller women and girls in decision-making, capacity building of civil society organisations, funding programmes for inter-cultural activities concerning gender equality

These lines are outlined also as *Steps* since if there is no guaranteed minimum of personal security, emancipation is not feasible and genuine cooperation based on mutual respect cannot occur. To advance the situation of Roma and Traveller women in Europe, coherent and comprehensive approaches to Roma and Traveller women's empowerment need to be developed at national level. The positive change that international and national actors have been trying to achieve for decades calls for more structured policies and constructive measures synchronised within and across borders.

EMPOWERMENT OF ROMA² AND TRAVELLER WOMEN: A CHANGE UNDER CONSTRUCTION

Romani women across Europe face the additional burden of racism as well as gender discrimination, which push them to the margins of their societies

Strategy on the Advancement of Romani Women and Girls (2014-2020)³

-
2. The footnote provides an explanation why the paper adopts the term **Roma women** instead of **Romani women**:
As the European Women's Lobby Position Paper clarifies (ref below), "in the Romani language, rom is a masculine noun, meaning "man, husband", the plural is roma. Romani is the feminine adjective, while romano is the masculine adjective. The term Roma is used as a noun for the whole community while Romani as an adjective. At the European Union level, policymakers have chosen to use the term Roma to encompass different related groups throughout Europe ..., nevertheless taking into account cultural diversity and lifestyles." European Women's Lobby Position Paper (2012) Tackling multiple discrimination of Romani and Traveller Women- a crucial factor for the successful implementation of the National Roma Integration Strategies, Available at: https://www.womenlobby.org/IMG/pdf/ewl_position_paper_on_romani_and_traveller_women_en-2.pdf
The term "Roma and Traveller", as used by the Council of Europe, encompasses the wide diversity of the groups covered by its the work in the field: Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; Balkan Egyptians (Egyptians and Ashkali); Dom, Lom, Abdal, Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. , Council of Europe, Roma and Traveller Inclusion, Available at: <https://rm.coe.int/council-of-europe-roma-and-traveller-inclusion-july-2020/16809f2a53>
To make a clear distinction between the women and girls belonging either to Roma or Traveller communities and the women and girls that identify themselves as 'Romani' (i.e. belonging to the Roma ethnic group but not to groups with other ethnic denominator), the current paper adopts the term **Roma Women**. The suggested umbrella concept covers all female representatives of the diverse community as defined by CoE and EU.
 3. Strategy on the Advancement of Romani Women and Girls (2014-2020), Available at: <https://rm.coe.int/16806f32ff>

1. Introduction

Since the end of the Second World War, protection from discrimination and promotion of equality has become a fundamental principle. Acknowledging that “All human beings are born free and equal in dignity and rights” (Article 1), as early as in 1948 the Universal Declaration of Human Rights⁴ prohibited (in Article 2) any distinction based on

... race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Half a century later, in 1995, the World Conference on Women issued the Beijing Declaration and Platform for Action, voicing out not only the concerns of the participants but also their determination to

Intensify efforts to ensure equal enjoyment of all human rights and fundamental freedoms for all women and girls who face multiple barriers to their empowerment and advancement because of such factors as their race, age, language, ethnicity, culture, religion, or disability, or because they are indigenous people.⁵

Over the years, the awareness that a person can be exposed to discrimination based on several personal factors or on their intersection increased. It had a

direct impact not only on the human rights agenda,⁶ but also on the international⁷ and the national⁸ legal frameworks. Despite the various programmes and measures and the achievements of the Beijing Platform for Action,⁹ gender equality and women's empowerment remain by large unmet sustainable development goals.¹⁰

4. United Nations (1948) Universal Declaration of Human Rights, United Nations, Available at: <https://www.un.org/en/universal-declaration-human-rights/>

5. Beijing Declaration and Platform for Action (1995), Beijing World Conference on Women, Available at: https://www.unwomen.org/-/media/headquarters/attachments/sections/csw/pfa_e_final_web.pdf?la=en&vs=1203

6. For example: Council of Europe (2012) Recommendation on the Protection and Promotion of the Rights of Women and Girls with Disabilities, Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805caaf7, United Nations (2017) General Assembly Resolution on the Situation of Women and Girls with Disabilities, GA Session 72, Available at: <https://www.un.org/development/desa/disabilities/resources/general-assembly.html>

7. European Commission (2016) Intersectional discrimination in EU gender equality and non-discrimination law, European network of legal experts in gender equality and non-discrimination, Available at: <https://op.europa.eu/en/publication-detail/-/publication/d73a9221-b7c3-40f6-8414-8a48a2157a2f>; European Commission (2009) Multiple Discrimination in EU Law. Opportunities for legal responses to intersectional gender discrimination? European Network of Legal Experts in the Field of Gender Equality, Available at: https://eige.europa.eu/docs/3028_multipliediscriminationfinal7september2009_en.pdf

8. Nowadays, multi-dimensional discrimination and intersectionality are explicitly addressed by the national legislation of Austria, Bulgaria, Croatia, Denmark, Germany, Greece, Ireland, Italy, Malta, Montenegro, North Macedonia, Poland, Romania, Serbia, and Turkey. In Belgium, Estonia, France, the Netherlands, Norway, Slovakia, Sweden, and the United Kingdom they are covered by the case-law. European Commission (2018) Gender Equality Law in Europe Justice and Consumers. How are EU rules transposed into national law in 2018? European network of legal experts in gender equality and non-discrimination, p.13, Available at: <https://op.europa.eu/en/publication-detail/-/publication/9b101483-3a44-11e9-8d04-01aa75ed71a1#>

9. United Nations (2020) Women – Snapshot, United Nations, Available at <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2020/gender-equality-womens-rights-in-review-key-facts-and-figures-en.pdf?la=en&vs=935>

10. United Nations (2015) Sustainable Development Goals, United Nations, Goal 5, Available at: <https://www.un.org/sustainabledevelopment/gender-equality/>

In this context, Roma¹¹ women and girls,¹² exposed to multi-dimensional discrimination and intersectional challenges¹³ appear as one of the most vulnerable groups within and across the European states. The First Congress of Roma from the European Union, organised in 1994 in Seville, Spain, put forward the question about the multiple barriers to Roma women. The issued Manifesto conceptualised the identified problems and stressed the need for empowerment of Roma women and their fight against discrimination and patriarchal rules within and outside the family.¹⁴

Since 1995, when the Steering Committee for the Equality between Women and Men held a Hearing of Roma women in Strasbourg, the Council of Europe (CoE) has also become actively engaged with the topic. Supporting the implementation of international human rights standards and developmental policies, the Council of Europe has been providing member states with policy guidelines and assistance not only to foster Roma inclusion but also to advance the protection and promotion of gender equality.

The current paper aims to contribute to the work of Council of Europe dedicated to Roma and Traveller women's empowerment. Addressing issues and goals set by the Council of Europe Gender Equality Strategy 2018-2023,¹⁵ the Council of Europe Strategic Action Plan for Roma and Traveller Inclusion (2020-2025),¹⁶ and the UN Strategic Development Agenda 2030, the analysis reflects on the content of national strategies for Roma integration as instruments for advancement of equality and social cohesion. Seeking the structural challenges behind the context-related examples, the research findings and recommendations reach out to the Council of Europe member states, offering a model for consideration and potential elaboration of national **Roma and Traveller Women's Empowerment Roadmaps**.

11. The term "Roma and Traveller", as introduced by the Council of Europe in 2012 and commonly adopted by the European institutions, is used to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Traveller, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. , Council of Europe, Roma and Traveller Inclusion, Available at: <https://rm.coe.int/council-of-europe-roma-and-traveller-inclusion-july-2020/16809f2a53>

12. As stated earlier, the term *Roma women (and girls)* is used as an umbrella concept, covering not only the great variety of groups as specified in note 10, but also the Traveller women and girls. The justification of the adopted approach is that no significant differences have been identified between the multiple and intersectional challenges that Roma and Traveller women face. Details are provided in the methodological section of the paper.

13. The concept became widely known with the work of Crenshaw, Kimberle (1991) "Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color" in *Stanford Law Review* 43, no. 6, p. 1241-299.

14. Phenjalipe (2014) *Strategy for the Advancement of Romani Women and Girls (2014-2020)*, Council of Europe, p.2, Available at: <https://rm.coe.int/16806f32ff>

15. Council of Europe (2018) *Gender Equality Strategy 2018-2023*, Council of Europe, Available at: <https://rm.coe.int/prems-093618-gbr-gender-equality-strategy-2023-web-a5/16808b47e1>

16. Council of Europe (2019) *Strategic Action Plan for Roma and Traveller Inclusion (2020-2025)*, Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680998933

2. Research Structure and Methodology

Research Question and Purpose

As capacity of a person to control one's own life, empowerment results from the interplay of a complex set of factors. Aiming to establish *to what extent Roma and Traveller integration policies foster empowerment of Roma and Traveller women*, the paper puts forward the following research question: *Are Roma integration policies ensuring efficient protection of Roma women's rights (with a focus on multiple and intersectional discrimination) and are they enabling the development of the full potential of stakeholders?*

Through a comparative analysis of cases, the paper aims to outline the situation in Europe. The assessment of policy approaches identifies areas and issues, which require attention not only of national governments but also of civil society and international organisations. The offered framework for comparison calls for a structured dialogue about the efficiency of the approaches to Roma women's empowerment adopted at European and at national levels. Acknowledging the research limitations and the fact that widening the scope of analysis might alter some findings, the paper emphasises some of the perceived policy deficits as well as approaches that could lead to significant positive changes.

Interested in the national frameworks for integration of Roma and Roma women in particular, the analysis explores the gender perspective in policy documents, which should regulate and guide the processes at national level. Selecting strategic instruments that adhere to the international standards and legal obligations of states, the research draws conclusions about the efficiency of the mechanisms for eliminating discrimination and fostering gender equality and social cohesion in a wider European perspective.

The objects of the comparative analysis are National Roma Integration Strategies (NRISs), which as EU instruments are relevant only for the member states. To overcome the limitations before the scope of validity, the focus does not fall on case-sensitive issues but seeks typological aspects that could enable the transposition of findings to all CoE states. Hence, for

the purposes of the current research, the NRISs are identified as a *type of policy documents*, which:

1. Strategically address the implementation of international standards of non-discrimination, equality, and social inclusion set forth by United Nations Treaties, to which all European governments are signatories, and by Council of Europe instruments, ratified by most of the member states
2. Adhere to a common policy framework, whose implementation is subjected to an annual or regular monitoring at international level
3. Offer structured country-specific approaches and measures to resolving problems, identified as common at European (CoE) level
4. Structure and synchronise the efforts targeting Roma and Traveller integration not only within states but also across them
5. Render national governments accountable

The validity of findings and recommendations can therefore be seen as relevant to *any Council of Europe member State that has already introduced or aims at developing a national strategic policy programme for fostering Roma and Traveller inclusion through a comprehensive and structured approach in compliance with the international laws and standards.*

Identifying, in a comparative perspective, shortfalls and persisting challenges for Roma and Traveller women's empowerment, the research does not aim to criticise the efforts of the national governments but to highlight gaps and issues that need to be addressed. The purpose of the paper is to offer a structured approach for bringing together the measures used by Council of Europe member states to address intersectional challenges faced by Roma and Traveller women and girls. This approach will enable the development of a coherent policy model that decision makers, in cooperation with the grass-root level and stakeholders, can apply and/or adapt with respect to the specific national contexts. It can also facilitate the elaboration of respective Plans for Action with relevant indicators for monitoring implementation and progress. This model is referred to as a Roma and Traveller Women's Empowerment Roadmap.

Structure

To achieve the goals set, the analysis starts with an overview of the international non-discrimination standards, and referring to the prohibited discrimination grounds in focus – race (ethnic origin) and gender (sex) – accounts for their intersection in the case of Roma and Traveller women. Outlining the key legal instruments and the scope of their validity, the paper highlights the established legal interconnectedness among the European countries. The implementation of commitments of states as members of international organisations not only provides a basis for the synchronisation of national policies, but also allows for cooperation on priority matters.

The introduction of the context enables projecting Roma and Traveller women's issues as one element of the overall non-discrimination agenda and not as a specific case with a limited policy relevance. Focusing on the development of the Roma and Traveller integration agenda, the paper aims at drawing attention to the nested equity problem, which despite the awareness of governments about the existing disparities, still awaits tackling.

Offering a framework for comparative analysis, elaborated on European Parliament resolutions, the research explores the gender perspective in six National Strategies targeting the integration of Roma and Travellers. Although the focus of the paper falls on the NRISs of selected European Union member states, the framework is applicable to any policy document that structures and guides the Roma and Traveller inclusion efforts at national level and it is relevant to all Council of Europe member states.

Projecting the national approaches through the framework, the comparison at the level of each element reveals significant deficits at the level of designing, implementing and evaluating measures for fostering the empowerment of Roma and Traveller women. A lack of an overall comprehensive strategy for ensuring gender equity within the Roma and Traveller integration policies emerges as a general challenge for the European states. The findings reveal the need for opening a constructive debate about the factors impeding the advancement of gender equality of Roma and Traveller women and girls throughout Europe. In the context of the post-2020 programme period, attention is also drawn to enduring problems as outlined by Council of Europe member states.¹⁷ Summarising the identified issues, the paper provides

17. CoE/ADI-ROM Thematic Survey "Gender Perspective in National Roma Inclusion Strategies of Council of Europe member states: A comparative Analysis within the Frameworks of the Strategic Action Plan for Roma and Traveller Inclusion (2020-2025)". The survey was disseminated among ADI-ROM member states in July 2020. By November 2020, 16 contributions from member states have been obtained.

policy recommendations and a suggestion for the model for elaboration of national Roma and Traveller Women's Empowerment Roadmaps based on three interconnected and interdependent lines of action.

Sources used

The research builds on primary and secondary sources of information (both publicly available and gathered from respondents) and available statistical data related to the three key aspects in focus: non-discrimination, gender equality and Roma integration. Alongside the international and national legal instruments and strategic policy documents, reports, analyses, and statistics published by international organisations, governmental institutions, NGOs, and research bodies have been considered. Particular attention was paid to materials discussing intersectionality and multiple discrimination issues, challenges and obstacles slowing down or hindering Roma and Traveller women's empowerment, and effective implementation of measures aiming at fostering gender equality.

Considering the earlier gender-related analyses of NRISs (conducted by the European Parliament in 2013¹⁸ and in 2015¹⁹), the fact that the validity of the current National Strategies expires at the end of 2020, and the limitation posed by the unavailability of post-2020 NRIS drafts,²⁰ the focus of the research shifted towards development of a model for a targeted (thematic) assessment of policy documents and future elaboration of coherent strategic approaches. Defined as small-scale project, the research focused on a limited number of cases – five states with Roma populations and one state with a Traveller community. In order to overcome the associated limitations regarding the wider validity of findings, the focus fell on the identification of intersecting issues and challenges among the national policies targeting Roma women's integration.

Acknowledging that the analysis of policy documents also imposes limitations on findings, additional information and updates were collected via phone interviews and targeted emails extended to stakeholders. A facts-finding survey, designed for the purposes of the current analysis, was disseminated among the

18. European Parliament (2013) Empowerment of Roma Women within the European Framework of National Roma Inclusion Strategies. Report. Policy Department C: Citizens' Rights and Constitutional Affairs. DG for Internal Policies, Available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET\(2013\)493019_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET(2013)493019_EN.pdf)

19. European Roma and Traveller Forum (2015) National Roma Integration Strategies – Evaluating Gender, European Roma and Travellers Forum (ERTF), Available at: https://www.academia.edu/10104151/National_Roma_Integration_Strategies_Evaluating_Gender

20. The only draft NRIS post-2020, provided during the research period, was the one of the Czech Republic.

CoE/ADI-ROM²¹ member states. Although the returned 17 replies²² in total (16 from member states and 1 from a civil society organisation Pavee Point Traveller and Roma Centre, Ireland) did not allow for representative conclusions, the information provided contributed to the verification of the earlier analytical findings and to the collection of illustrative examples. Of importance is also the fact that survey-based updates were gathered for five out of those six states that the wider comparative analysis focused on.

21. The CoE Committee of Experts on Roma and Traveller Issues (ADI-ROM) was established in 2019 by the Committee of Ministers' Deputies at their 1361st meeting on 19-21 November 2019. It started functioning in 2020 replacing the Ad-Hoc Committee on Roma and Traveller Issues (CAHROM), Available at: <https://rm.coe.int/adi-rom-2020-1-adi-rom-tor-en-26-11-19/16809e41eb>

22. Replies have been received from: Austria, Bosnia and Herzegovina, Bulgaria, Czech Republic, Croatia, Estonia, Finland, Germany, Greece, Hungary, Ireland, Italy, Norway, Poland, Romania, Slovakia, and Switzerland.

3. The Context: Non-discrimination and Equality

International Legal Frameworks: An Overview

Equality and non-discrimination are widely seen as the positive and negative statement of the same principle.²³ This principle, however, does not constitute a separate human right but results from the right of equality before the law. Among the first definitions of the concept was provided by Article 1 of the Discrimination (Employment and Occupation) Convention of 1958,²⁴ emphasizing that discrimination is

(a) **any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation**

After the 1980s, the definition clearly outlined that discrimination occurs when a distinction, exclusion, restriction or preference **“has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise by all persons, on an equal footing, of all rights and freedoms.”**²⁵

To prevent unequal or disadvantageous treatment of individuals and/or groups in connection to the enjoyment of rights set forth by the different international instruments, certain objective or personal characteristics or ‘status’ have been recognised as protected grounds.²⁶ Acknowledging the potential

limitations, some lists have been left open-ended and non-exhaustive. As early as 1950, Article 14 of the European Convention of Human Rights²⁷ of Council of Europe (ECHR), pointed out that:

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

Later, the Covenant on Economic, Social, and Cultural Rights (ICESCR, 1966)²⁸ and the International Covenant on Civil and Political Rights²⁹ (ICCPR, 1966) reaffirmed the equality of all persons before law and in enjoyment of rights, and emphasised the states’ obligations to ensure it. Both Article 2 of the ICESCR and Article 26 of the ICCPR provided open-ended lists of prohibited grounds of discrimination.

Among the first international instruments elaborating on protected grounds is the Convention on the Elimination of All Forms of Racial Discrimination (CERD, 1965).³⁰

Reaffirming that discrimination between human beings on the grounds of race, colour or ethnic origin is an obstacle to friendly and peaceful relations among nations and is capable of disturbing peace and security among peoples and the harmony of persons living side by side even within one and the same State.

23. Bayefsky, Ann F. (1990) The Principle of Equality or Non-discrimination in International Law, 11 Human Rights Quarterly, p. 5.

24. ILO, Convention 111 concerning Discrimination in Respect of Employment and Occupation (1958, entry into force: 15 June 1960), International Labour Organisation (ILO), Adoption: Geneva, 42nd ILC session (25 Jun 1958), Available at: https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/genericdocument/wcms_114189.pdf

25. United Nations (1989) Human Rights Committee (HRC), CCPR General Comment No. 18: Non-discrimination, Available at: <https://www.refworld.org/docid/453883fa8.html>

26. FRA (2018) Handbook on Discrimination, European Union Agency for Fundamental Rights (FRA), p.160, Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2018-handbook-non-discrimination-law-2018_en.pdf

27. Council of Europe (1950) Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), Available at https://www.echr.coe.int/Documents/Convention_ENG.pdf

28. United Nations (1966) International Covenant on Economic, Social, and Cultural Rights (ICESCR), Available at: <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

29. United Nations (1966) International Covenant on Civil and Political Rights (ICCPR), OHCHR, Available at: <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

30. United Nations (1965) International Convention on the Elimination of All Forms of Racial Discrimination, Available at <https://www.ohchr.org/en/professionalinterest/pages/cerd.aspx>

In 1979, the United Nations Convention on the Elimination of Discrimination Against Women (CEDAW)³¹ addressed the issue of gender equality, requesting (Article 3) that in all fields States take

all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men.

As a counterpart to the European Court of Human Rights (ECHR), referring to the civil and political rights, the European Social Charter (ESC 1961)³² was revised³³ in 1996 to guarantee that the principle of non-discrimination will be applied also with respect to the fundamental social and economic rights (Article E). Acknowledging, however, that discrimination needs to be prohibited generally and not only in connection to the rights set forth by the ECHR, in 2000 the Council of Europe adopted the ECHR Protocol 12³⁴ (ratified to the moment by only 20 CoE member states).³⁵

In the year 2000, the European Union made an explicit commitment to the protection of its citizens from discrimination. The Employment Equality Directive³⁶ established a general framework for equal treatment. The Race Equality Directive³⁷ enhanced the mechanisms protecting from discrimination based on race or ethnic origin in fields such as employment, education, social protection, membership of organisations, and access to goods and services. At the end of the same year, the European Union Charter of Fundamental Rights³⁸ brought “together all the personal, civic, political, economic and social rights

enjoyed by people within the EU in a single text.”³⁹ Adopting the rights found in the case law of the Court of Justice of the EU, the ECHR and the UN treaties, the EU Charter not only prohibited discrimination “on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation” and nationality (Article 21), but also called for respect to diversity (Article 22) and equality between men and women (Article 23). In contrast to the CoE and UN instruments, the EU law prohibits differential treatment based on a fixed list of protected grounds. In 2017, the European Pillar of Social Rights⁴⁰ proclaimed the commitment of the European Union to non-discrimination. Introducing 20 key principles, the soft-law document elaborated on the equality of the EU citizens and their rights in various fields of life.

Recognised as EU founding values already with the Lisbon Treaty,⁴¹ the principles of equality and non-discrimination were supported by the provisions of the Treaty of the European Union (TEU, Article 2 and Article 3 (3)),⁴² the TFEU (Article 10)⁴³ and the Charter of Fundamental Rights (Article 23).⁴⁴

Gender & Ethnicity: The Intersectional Challenge before Roma Integration

After the UN Charter, which lists sex among the prohibited grounds of discrimination, equality between men and women has been addressed by numerous provisions of the international non-discrimination legislation. Over the years following the adoption of the Convention on the Elimination of All Forms

31. United Nations (1979) Convention on the Elimination of All Forms of Discrimination against Women, Available at <https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>

32. Council of Europe (1961) European Social Charter, CETS No. 35, Available at: <https://rm.coe.int/168006b642>

33. Council of Europe (1996) European Social Charter (revised), Available at: <https://rm.coe.int/168007cf93>

34. Council of Europe (2000) Details of Treaty No.177, Protocol No. 12 to the Convention for the Protection of Human Rights and Fundamental Freedoms, Available at: <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/177>

35. Council of Europe, Chart of signatures and ratifications of Treaty 177, Protocol No. 12 to ECHR the Convention for the Protection of Human Rights and Fundamental Freedoms, Status as of 19/08/2020, Available at: https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/177/signatures?p_auth=rvnio4Qg

36. Council of the European Union (2000) Council Directive 2000/78/EC of 27 November 2000, OJ L 303, 2.12.2000, p. 16–22, Available at: <http://data.europa.eu/eli/dir/2000/78/oj>

37. Council of the European Union (2000) Council Directive 2000/43/EC of 29 June 2000 Implementing the Principle of Equal Treatment between Persons Irrespective of Racial or Ethnic Origin, OJ L 180, 19.7.2000, p.22–26, Available at: <http://data.europa.eu/eli/dir/2000/43/oj>

38. Council of the European Union (2012) Charter of Fundamental Rights of the European Union, OJ C 326, 26.10.2012, p. 391–407, Available at: http://data.europa.eu/eli/treaty/char_2012/oj

39. Council of the European Union Charter of Fundamental Rights of the European Union, Background, European Union, Available at: https://ec.europa.eu/info/aid-development-cooperation-fundamental-rights/your-rights-eu/eu-charter-fundamental-rights/why-do-we-need-charter_en

40. Council of the European Union (2017) The European Pillar of Social Rights in 20 principles. The Pillar of Social Rights is about Delivering New and More Effective Rights for Citizens, Built Upon 20 Key Principles. European Union, Available at: https://ec.europa.eu/commission/publications/european-pillar-social-rights-booklet_en

41. Council of the European Union (2007) Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community, signed at Lisbon, 13 December 2007, OJ C 306, 17.12.2007, Available at: <http://data.europa.eu/eli/treaty/lis/sign>

42. Council of the European Union (2012) Consolidated version of the Treaty on European Union OJ C 326, 26.10.2012, and OJ C 326, 26.10.2012, p. 13–390; European Union, Available at: http://data.europa.eu/eli/treaty/teu_2012/oj

43. European Union (2012) Consolidated version of the Treaty on the Functioning of the European Union, OJ C 326, 26.10.2012, p. 47–390, Available at: http://data.europa.eu/eli/treaty/tfeu_2012/oj

44. Council of the European Union (2012) Charter of Fundamental Rights of the European Union, OJ C 326, 26.10.2012, p. 391–407, Available at: http://data.europa.eu/eli/treaty/char_2012/oj

of Discrimination against Women (CEDAW), gender equality developed as a separate topic of the human rights agenda.

To foster the principle of gender equality, embedded in the policy agenda of the European Union since its establishment, the Lisbon Treaty set the elimination of inequalities as an aim before the EU (TFEU Article 8).⁴⁵ From just a single provision in Article 119 of the Treaty establishing the European Economic Community in 1957 (nowadays Article 157 of the Treaty on the Functioning of the European Union 'TFEU'), direct and indirect discrimination on the grounds of sex is currently prohibited by a series of EU Council directives. Among them are:

- ▶ The Directive on Equal Treatment of Men and Women in Statutory Schemes of Social Security (1979)⁴⁶ – guaranteeing equal treatment in relation to social security only and not to the broader welfare system, such as social protection and access to healthcare and education
- ▶ The Pregnant Workers' Directive (1992)⁴⁷
- ▶ The Employment Equality Directive (2000)⁴⁸
- ▶ The Directive on Equal Treatment of Men and Women in the Access to and the Supply of Goods and Services (2004)⁴⁹ – expanding the scope of sex discrimination to the area of goods and services
- ▶ The Directive on the Equal Opportunities and Equal Treatment of Men and Women in Matters of Employment and Occupation – known as the Recast Directive (2006)⁵⁰

Rights of women in the field of employment and occupation are addressed not only by EU law. The

45. Council of the European Union (2012) Consolidated version of the Treaty on the Functioning of the European Union.

46. Council of the European Union (1978) Council Directive 79/77/EEC on the Progressive Implementation of the Principle of Equal Treatment for Men and Women in Matters of Social Security, OJ L 6, 10.1.1979, p. 24–25, Available at: <http://data.europa.eu/eli/dir/1979/7/oj>

47. Council of the European Union (1992) Council Directive 92/85/EEC On the Introduction of Measures to Encourage Improvements in the Safety and Health at Work of Pregnant Workers and Workers Who Have Recently Given Birth or are Breastfeeding (Tenth Individual Directive within the Meaning of Article 16 (1) of Directive 89/391/EEC), OJ L 348, 28.11.1992, p. 1–7, Available at: <http://data.europa.eu/eli/dir/1992/85/oj>

48. Council of the European Union (2000) Council Directive 2000/78/EC of 27 November 2000, OJ L 303, 2.12.2000, p. 16–22, Available at: <http://data.europa.eu/eli/dir/2000/78/oj>

49. Council of the European Union (2004) Council Directive 2004/113/EC Implementing the Principle of Equal Treatment between men and Women in the Access to and Supply of Goods and Services, OJ L 373, 21.12.2004, p. 37–43, <http://data.europa.eu/eli/dir/2004/113/oj>

50. Council of the European Union (2006) Council Directive 2006/54/EC on the Implementation of the Principle of Equal Opportunities and Equal Treatment of Men and Women in Matters of Employment and Occupation (Recast), OJ L 204, 26.7.2006, p. 23–36, Available at: <http://data.europa.eu/eli/dir/2006/54/oj>

right to equal opportunities and equal treatment and the right of workers with family responsibilities are covered respectively by Article 20 and Article 27 of the revised European Social Charter.⁵¹ Protecting from discrimination on grounds of gender and sex (Article 14), ECHR ensures that the right to life (ECHR, Article 2) and prohibition of torture (Article 3) cover women, the Istanbul Convention⁵² of 2011 is the instrument that explicitly addresses violence against women as an act of discrimination, which impedes their full advancement. Beyond the focus on violence prevention, Article 1 (b) sets before the Convention the purpose to

contribute to the elimination of all forms of discrimination against women and promote substantive equality between women and men, including by empowering women.

Aiming to increase the impact and visibility of gender equality instruments, to support their implementation and to provide policy guidelines to the member states, in 2012 the Council of Europe launched its first Transversal Programme on Gender Equality and in 2013 adopted the Gender Equality Strategy 2014–2017.⁵³ Building upon the achievements of the first Strategy and on the established holistic and integrated approach, the Gender Equality Strategy 2018–2023⁵⁴ subsequently followed.

In the context of the prevention of discrimination based on race and ethnic belonging, the Roma and Traveller issues have become an integral part of the Council of Europe human rights agenda only a few years after the adoption of the UN Convention against Racial Discrimination (CERD). Since 1969, a number of instruments have been developed to support the fight against discrimination of Roma and Travellers and promote their empowerment and integration in the mainstream societies of the European states. Setting up international standards, the Strasbourg Declaration on Roma (2010), followed by the Thematic Action Plan on the Inclusion of Roma and Traveller (2016–2019) and the Strategic Action Plan for Roma and Traveller Inclusion (2020–2025) outlined a series of measures to support the protection and promotion of the rights of Roma and Travellers and the implementation of the legal framework of the Council of Europe across the member states.

51. Council of Europe (1996) European Social Charter (revised), Available at: <https://rm.coe.int/168007cf93>

52. Council of Europe (2011) Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), Available at: <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/090000168008482e>

53. Council of Europe (2018) Gender Equality Strategy 2018–2023, Available at: <https://rm.coe.int/prems-093618-gbr-gender-equality-strategy-2023-web-a5/16808b47e1>

54. Ibid.

Over the years, in cooperation with the European Commission and other partners at international and national levels, the CoE launched joint programmes such as Inclusive Schools – Making a Difference for Roma Children (INSCHOOL),⁵⁵ Roma and Traveller Women’s Access to Justice (JUSTROM),⁵⁶ Building capacity at local levels for the integration of Roma (ROMACT),⁵⁷ and Promoting good governance and Roma empowerment at local levels (ROMACTED). Aiming at raising awareness among the grass-root levels and the empowerment of stakeholders, the CoE launched initiatives such as public hearings of Romani women, the establishment of the International Romani Women’s Network (IRWN)⁵⁸, the International Roma Women’s Conferences (since 2007), the European Alliance of Cities and Regions for Roma Inclusion (set up by the CoE Congress of Local and Regional Authorities in 2013), and the regular Dialogue Meetings with Roma and Traveller civil society (established by the Committee of Ministers in 2015).

The problems of Roma have attracted the attention of other international organisations as well. In 1994, the Organization for Security and Co-operation in Europe (OSCE) established the Contact Point for Roma and Sinti Issues (CPRSI) within the OSCE Office for Democratic Institutions and Human Rights (ODIHR) in Warsaw. To combat discrimination and to ensure equal access and opportunities in all spheres of life, in 2003 the OSCE adopted the Action Plan on Improving the Situation of Roma and Sinti within the OSCE Area.⁵⁹ Embedding the topic in its policy agenda, the OSCE/ODIHR has been actively involved in increasing the capacities of participating states to address challenges faced by Roma, and by Roma women and youth in particular.⁶⁰

In the first decade of the 21st century, the need for a comprehensive and systematic approach to overcome the marginalization of the largest ethnic minority in Europe⁶¹ draws the attention of national governments

and international actors. Acknowledging that the discrimination of Roma and their social exclusion negatively impacts the development of societies, in 2005 the international initiative Decade of Roma Inclusion 2005–2015 was launched.⁶² It brought together governments, intergovernmental and non-governmental organizations, representatives of the Romani civil society and major international organisations.⁶³ Realising that ensuring efficient equality among its citizens requires the development and implementation of affirmative measures, the EU included the Roma integration in its policy agenda. Following the 2007 Presidency’s Conclusions of the European Council⁶⁴ and the First Summit to address problems faced by Roma minority, organised by the European Commission in 2008, Roma integration became one of the special EU goals.⁶⁵ To efficiently tackle⁶⁶ core factors of poverty and discrimination and to synchronise efforts both at EU and at national level, education, employment, health, and housing have been identified as the four priority areas of targeted intervention. The adoption of the Ten

55. Council of Europe INSCHOOL, Available at: <https://pjp-eu.coe.int/en/web/inclusive-education-for-roma-children/home>

56. Council of Europe JUSTROM, Available at: <https://pjp-eu.coe.int/en/web/access-to-justice-for-roma-women/justrom>

57. Council of Europe ROMACT, Available at: <https://www.coe-romact.org/>

58. Now merged to IRWN-Phenjalipe.

59. OSCE (2003) Action Plan on Improving the Situation of Roma and Sinti within the OSCE Area, Available at: <https://www.osce.org/odihr/17554>

60. OSCE Factsheet: ODIHR and Roma and Sinti Issues, Available at: <https://www.osce.org/files/f/documents/9/5/102598.pdf>

61. Out of an estimated 10-12 million Roma (encompassing diverse groups, including Roma, Gypsies, Traveller, Manouches, Ashkali, Sinti and Boyash) in Europe, some 6 million live in the EU, and most of them hold the citizenship of an EU country European Commission, Facts and Figures on EU’s Roma Population and Integration Strategies for Improving the Living Conditions of Roma in EU Countries, Available at: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu_en

62. Decade of Roma Inclusion 2005-2015, Available at: <https://www.rcc.int/romaintegration2020/romadecade>

63. The Decade of Roma inclusion 2005–2015, one of the first international initiative addressing Roma, resulted from a high-level regional conference in Budapest, Hungary in 2003. Over the years, the political commitment brought together twelve countries with significant Roma minorities (Albania, Bosnia and Herzegovina, Bulgaria, Croatia, the Czech Republic, Hungary, Macedonia, Montenegro, Romania, Serbia, Slovakia and Spain), intergovernmental, nongovernmental organizations, and a range of international partner organizations: the World Bank, the Open Society Foundations, the United Nations Development Program, the Council of Europe, Council of Europe Development Bank, the Contact Point for Roma and Sinti Issues of the Office for Democratic Institutions and Human Rights of the Organisation for Security and Co-operation in Europe, the European Roma Information Office, the European Roma and Traveller Forum, the European Roma Rights Centre, UN-HABITAT, UNHCR and the United Nations Children’s Fund (UNICEF). In 2011, the World Health Organization (WHO) also became a partner in the Decade.

64. Council of the European Union (2008) Council Conclusions 16616/1/07 Rev 1, Available at: <https://data.consilium.europa.eu/doc/document/ST-16616-2007-REV-1/en/pdf>

65. Council of the European Union (2008) Council Conclusions of the 2914th Council meeting General Affairs and External Relations, Available at: https://ec.europa.eu/commission/presscorner/detail/en/PRES_08_359

66. By 2011, € 26.5 billion of EU funding have been programmed to support member states efforts in the field of social inclusion, including to support efforts to help the Roma – see note 37 in European Commission (2011) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, An EU Framework for National Roma Integration Strategies up to 2020 (COM/2011/0173 final), Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52011DC0173>

Common Basic Principles (CBP) of Roma Inclusion⁶⁷ in 2009 and the aim to establish close cooperation between member states based on synchronisation of their efforts in adherence to the identified principles of inclusion⁶⁸ has enabled the development of the Common Framework for Roma Integration.⁶⁹

The 2012-2020 National Roma Integration Strategies (NRISs), or a set of solidified policies and measures, were developed in response to the EC Communication of April 2011.⁷⁰ Following the 2012 initial evaluations of the implementation of the Roma integration measures in the member states and the 2013 Council of EU Recommendation on effective Roma integration,⁷¹ an annual monitoring mechanism was established.⁷² Apart from the purpose of reporting progress in the key areas and structural improvements in each country, it aimed at aligning the national Roma integration strategies and implementation of measures with EU funding instruments.

Reporting the results of an in-depth evaluation of the relevance, effectiveness, coherence, efficiency and the added value of the EU NRIS Framework, the Communications of 2018 and 2019 pointed out that developments at the level of the EU member states has been uneven, especially concerning the gender equality of Roma and Traveller women. The EC called for attention to:

- ▶ Mainstreaming gender equality issues

67. These Common Basic Principles, which advocate an “integrated approach,” were developed on the basis of several reports and recommendations by the EU Agency for Fundamental Rights the Council of Europe, the Organization for Security and Cooperation in Europe (OSCE) as well as the relevant European Parliament resolutions, but also by advocacy groups and Roma civil society organizations, European Commission (2010), *Vademecum: the 10 Common Basic Principles on Roma Inclusion*, Directorate-General for Employment, Social Affairs and Inclusion, Available at: <https://op.europa.eu/bg/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

68. Council of Europe (2009) *Conclusions of the Council of Ministers of Employment, Social Policy, Health and Consumer Affairs, 2947th Council Meeting*, Available at: https://ec.europa.eu/commission/presscorner/detail/en/PRES_09_124

69. European Commission (2011) *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, An EU Framework for National Roma Integration Strategies up to 2020 (COM/2011/0173 final)*, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52011DC0173>

70. European Commission (2011) *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, An EU Framework for National Roma Integration Strategies up to 2020 (COM/2011/0173 final)*, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52011DC0173>

71. Council of the European Union (2013) *Recommendation on effective Roma integration measures in the member states*, Available at: https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/139979.pdf

72. Between 2013 and 2019 (incl.), seven annual reports have been issued by the European Commission – details and links are provided in the list of references at the end of the paper.

- ▶ Strengthening national anti-discrimination approaches to promote gender equality of the Roma and Traveller women
- ▶ Introducing and applying diverse measures and methods for the promotion of gender equality in the implementation of the National Roma Integration Strategies and other strategies protecting Roma and Traveller populations

With respect to the above and considering that:

- ▶ As signatories to the UN treaties, all the CoE member states have embedded non-discrimination and equality standards into their national legislation (Figure 1)
- ▶ All 47 CoE member states have ratified the European Convention on Human Rights,⁷³ and most of them⁷⁴ have ratified the other key instruments protecting against discrimination (Figure 2)
- ▶ With the Lisbon Treaty entering into force in 2009, the EU non-discrimination law became legally binding for all EU member states
- ▶ Since 2011, the EU member states are legally bound to implement the Framework for Roma integration through their NRISs of sets of consolidated policies and measures
- ▶ That the methods of transposition of the EU Directives in the national legislation of the member states differ greatly and significant discrepancies between countries persist⁷⁵
- ▶ That multiple discrimination and/or intersectional discrimination is explicitly covered in the national legislation of and/or by the case law in a number of European states⁷⁶
- ▶ That combating discrimination based on multiple grounds is a human rights standard protected and promoted by CoE⁷⁷

The Council of Europe is particularly concerned with the fact that Roma and Traveller women and girls are still among the most vulnerable groups of the European societies.

73. ECHR, Available at: https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005/signatures?p_auth=9PB0xIYh

74. Including EU as a CoE member.

75. European Commission (2019) *A Comparative Analysis of Non-discrimination Law in Europe 2019 (The 28 EU member states, Albania, North Macedonia, Iceland, Liechtenstein, Montenegro, Norway, Serbia and Turkey compared)*, Authors: Isabelle Chopin and Catharina Germaine, European network of legal experts in gender equality and non-discrimination, December 2019, DG for Justice and Consumers, p.9, Available at: <https://op.europa.eu/en/publication-detail/-/publication/a88ed4a7-7879-11ea-a07e-01aa75ed71a1>

76. See note 7.

77. Council of Europe, *Discrimination on Multiple Grounds*, Available at: <https://www.coe.int/en/web/sogi/discrimination-on-multiple-ground>

Figure 1: UN Human Rights Treaties (scope)

UN Human Rights Treaties	Ratified by ⁷⁸
International Covenant on Civic and Political Rights (ICCPR)	173 states
Covenant on Economic, Social, and Cultural Rights (ICESCR)	171 states
Convention on the Elimination of All Forms of Racial Discrimination (CERD)	182 states
Convention on the Elimination of Discrimination Against Women (CEDAW)	189 states
Convention on the Rights of the Child (1989) ⁷⁹	196 states
Convention on the Rights of the Persons with Disabilities (2006) ⁸⁰	182 states
ILO Discrimination Convention ⁸¹	175 states

Figure 2: EU Instruments (scope)

Instrument	Ratified by ⁸²	Signed by	No action
Revised European Social Charter (1996) ⁸³	34 members	11 members	3 members
Protocol 12, ECHR (2000) ⁸⁴	20 members	18 members	10 members
Istanbul Convention (2011) ⁸⁵	34 members	12 members	2 members

In pursuit of its mission to protect and promote the international human rights standards, including gender equality and Roma integration, and as a partner of the European Commission in a number of joint programmes, the CoE has been actively supporting its member states (27 of which are also EU members) in the process of the identification of policy gaps, design of targeted measures, exchange of good practices and the overall implementation of the international human rights standards. The current paper, looking at the gender aspect in the national Roma integration policies (with focus on NRISs as legally binding instruments in some of the CoE member states) does not aim to criticise but to identify issues that can help EU states to ensure that their NRISs post-2020 will contribute to the efficient inclusion and empowerment of Roma women and to provide guidelines to all of its members on the development of their national Roma Women’s Empowerment Roadmaps.

78. OHCHR, Status of Ratification of International Human Rights Treaties: OHCHR Interactive Dashboard, last updated 28 July 2020, Available at: <https://indicators.ohchr.org/>

79. United Nations (1989) Convention on the Rights of the Child, Available at: <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

80. United Nations (2006) Convention on the Rights of Persons with Disabilities, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-15&chapter=4&clang=_en

81. ILO, Ratifications of C111 – Discrimination (Employment and Occupation) Convention, 1958 (No. 111), as of August 2020, International Labour Organisation, Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:312256

82. Including EU.

83. Council of Europe, Ratifications of the European Social Charter (revised) – as of August 2020, Available at https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/163/signatures?p_auth=9PB0xIYh

84. Council of Europe, Chart of signatures and ratifications of Treaty 177, Protocol No. 12 to ECHR the Convention for the Protection of Human Rights and Fundamental Freedoms, Status as of 19/08/2020, Available at: https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/177/signatures?p_auth=rvnio4Qg

85. Council of Europe, Ratifications of the Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) – as of August 2020, Available at <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/210/signatures>

4. Roma Women in the Roma Integration Policies

The Complexity of the Roma Women Situation

Since 2005 and the First Decade of Roma Inclusion⁸⁶ – the first international initiative that has brought together national governments, international organisations, civil society and stakeholders – and the launch of the EU Framework⁸⁷ in 2011, Roma integration has become a policy priority both at national and international levels. Despite the reported progress achieved over the years in the four key areas – housing, healthcare, education, and employment – Roma are still facing numerous disadvantages, hatred, discrimination, and social exclusion. In this context, the fact that “Roma women continue to fare worse than Roma men and women in the general population”⁸⁸ and that “in some domains equality is even going backwards” is alarming. It is an indicator that the current approaches and strategies are not efficient and that more comprehensive and targeted measures to address the issue are needed.

Research findings about the position of Roma women in nine EU member states, presented in the Second EUMIDIS Report of the Fundamental Rights Agency in 2019, reveal that the situation has not changed much since 2013.⁸⁹ In addition to the inequalities across the 12 areas of the Beijing Platform for Action experienced by women in general, Roma women face additional challenges such as hate-motivated discrimination, harassment, physical violence, poverty, poor living conditions, impeded access to healthcare, limited educational and employment opportunities, etc.⁹⁰ Early/ under-age and forced marriages are particularly disruptive for the life prospects faced by young Roma women and girls because they violate children’s rights and limit their educational and employment opportunities and reproductive rights. According to the FRA Report, “the persistence of official or unofficial

early marriages is related to social exclusion and marginalisation,⁹¹ but it can also be accounted as an economic survival strategy or associated with certain cultural traditions.⁹² Acknowledging that in any case this practice often constitutes a serious violation of the fundamental human rights of Roma girls and women, FRA recommends that gender-sensitive measures are designed and implemented by national authorities in cooperation with the Roma stakeholders.⁹³

The complexity of the challenges that Roma and Traveller women and girls face results not only from the discrimination on multiple grounds but also from the intersection of the different layers at which inequalities occur. At the external (inter-community) level, discrimination based on race and gender and on their intersection is prevailing. At the internal (intra-community) level, gender and age are the factors that structure the power hierarchy. The status-based discrimination (i.e. marginalization) is rarely considered as an intersecting element. However, in diverse societies, where there are several minorities and especially if some of them enjoy protection by law,⁹⁴ Roma communities are likely to be positioned at the bottom of the social hierarchy. *Figure 3* below visualises the power relations in a stratified diverse society with existing patriarchal relations. An important note that needs to be made is that even if at the level of the mainstream society and/or at the level of the protected minorities patriarchal relations might not be strong or exist, in the majority (if not all) Roma communities, they are still a significant social factor.

As one can see from the power-pyramid model, Roma girls appear as the most vulnerable group of all. They are subjected simultaneously to external and internal discrimination, on intersection of inequalities based on race, gender, and age. The current research does not aim to make redundant statements but to point out the need for development of a comprehensive multilayer and multisector approach with interconnected horizontal measures and to offer a conceptual model for the elaboration of national-level and European plans for their implementation.

86. See note 63 and note 64.

87. See note 16.

88. FRA (2019) Second European Union Minorities and Discrimination Survey. Roma women in nine EU member states, European Union Agency for Fundamental Rights (FRA), p.5, Available at: <https://fra.europa.eu/en/publication/2019/roma-women-nine-eu-member-states>

89. FRA (2014) Discrimination against and living conditions of Roma women in 11 EU member states Roma Survey – Data in Focus, European Union Agency for Fundamental Rights (FRA), Available at: <https://fra.europa.eu/en/publication/2014/discrimination-against-and-living-conditions-roma-women-11-eu-member-states>

90. Ibid, p.6.

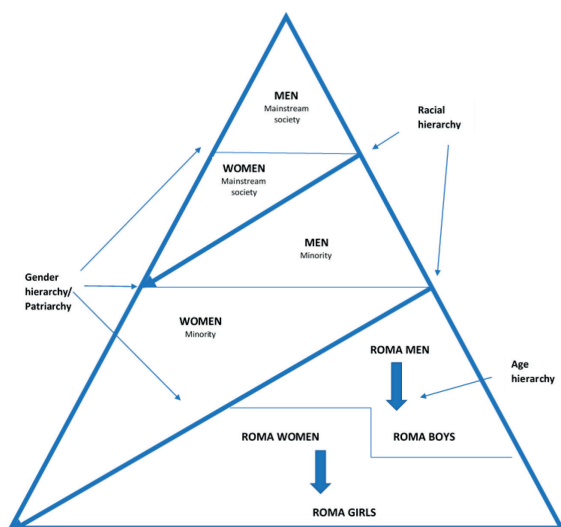
91. Ibid, p.22.

92. Ibid, p.21.

93. Ibid, p.41.

94. As for example, the officially recognised status of national minorities under the Council of Europe (1995) Framework Convention for Protection of National Minorities, Available at: <https://www.coe.int/en/web/minorities>

Figure 3: Roma women & girls in the power-relations pyramid



The Gender Perspective of Roma Integration Policies

Considering that since 2011 Roma integration has become a structured and coordinated process⁹⁵ of internationally guided implementation of policies and measures at national level, the lack of improvement of the situation of Roma women, as reported by FRA, calls for attention. To assess the underlying factors, the section focuses on the gender perspective in the EU Framework – as a key policy document – and in selected NRISs.

Already with the formulation of the 10 Common Basic Principles for Roma Inclusion⁹⁶ in 2009, the need for raising gender equality awareness (Principle 5) was put forward. In 2010, the Council of the European Union in its Conclusions on advancing Roma inclusion⁹⁷ invited the Commission and the member states

To address the specific needs of Roma women and girls and to apply a gender perspective in all policies and actions for advancing Roma inclusion⁹⁸

95. For the EU member states

96. European Commission (2010), Vademecum: the 10 Common Basic Principles on Roma Inclusion, Directorate-General for Employment, Social Affairs and Inclusion, Available at: <https://op.europa.eu/bg/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

97. Council of the European Union (2010) Council Conclusions on Advancing Roma Inclusion 3019th Employment, Social Policy Health and Consumer Affairs Council Meeting, Luxembourg, 7 June 2010, Available at <https://www.eumonitor.eu/9353000/1/j9vvik7m1c3gyxp/vj6ipjcfz2>

98. This recommendation was later embedded into the Council of the European Union (2011) Council Conclusions on an EU Framework for National Roma Integration Strategies up to 2020, 3089th Employment, Social Policy, Health and Consumer Affairs Council meeting Brussels, 19 May 2011, Available at: https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lisa/122100.pdf

Nevertheless, the EU Framework that has set the standards for the development of the National Roma Inclusion Strategies by the member states failed to ensure the efficient integration of Roma women and girls. No clear guidelines for the development of targeted measures to overcome multiple and intersectional discrimination were provided. The only explicit gender reference in the document was embedded in the objective of ensuring access to quality healthcare for Roma women (and children). Similarly, the Commission Staff Working Document,⁹⁹ providing the first assessment on the implementation of the Framework by the EU member states, has not accounted for gender differences and approaches towards Roma women’s empowerment.¹⁰⁰

The 2013 assessment of the NRIS potential for Roma women’s empowerment,¹⁰¹ disclosed that

- ▶ Most of the NRISs address gender equality in their general approach
- ▶ Only few NRISs refer to gender mainstreaming
- ▶ The EU Framework does not mention Roma women’s empowerment explicitly, neither among the key elements, nor among the identified gaps
- ▶ Only 6 NRISs mention Roma women’s empowerment explicitly – Croatia, Germany, Greece, Italy, Portugal, Slovak Republic and Slovenia
- ▶ In 20 NRISs, empowering is mentioned as an expected outcome of a process¹⁰²

Defining the empowerment of Roma women, in the context of different patriarchal Roma system(s), as enabling them “to define their own choices in life and to pursue their own goals”¹⁰³ on the basis of the outlined inequalities experienced by Roma women in the EU member states, it explored the empowerment approach and the attention to gender equality in the

99. European Commission (2012), Commission Staff Working Document accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a first step in the implementation of the European Union Framework (SWD/2012/0133 final) Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2012:0133:FIN:EN:PDF>

100. European Parliament (2013) Empowerment of Roma women within the European Framework of National Roma Inclusion Strategies, Policy Department C: Citizens’ Rights and Constitutional Affairs, Directorate General For Internal Policies, Available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/Join/2013/493019/IPOL-FEMM_ET\(2013\)493019_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/Join/2013/493019/IPOL-FEMM_ET(2013)493019_EN.pdf)

101. Ibid.

102. Ibid, p.11.

103. Ibid, p.11.

individual NRISs. The reported results revealed that gender is mentioned in the areas of:¹⁰⁴

- ▶ **Education** – in 21 NRISs: Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Germany, Greece, France, Hungary, Ireland, Italy, the Netherlands, Poland, Portugal, Romania, Slovak Republic, Slovenia, Spain, and Sweden
- ▶ **Employment** – 15 NRISs: Austria, Belgium, Croatia, Estonia, Finland, Germany, Greece, Hungary, Italy, Poland, Portugal, Romania, Slovak Republic, Slovenia, Spain, and Sweden
- ▶ **Healthcare** – 22 NRISs: Austria, Belgium, Bulgaria, Croatia, Finland, Germany, Greece, France, Hungary, Ireland, Italy, Poland, Portugal, Romania, Slovak Republic, Slovenia, Spain, Sweden, the United Kingdom
- ▶ **Human Trafficking** – 2 NRISs: Denmark and France
- ▶ **Housing** – 1 NRIS: Estonia
- ▶ **Culture** – 1 NRIS: Austria

Apart from the fact that 2 NRISs (**Latvia, Luxembourg**)¹⁰⁵ do not address gender in any of the areas for intervention, it is interesting to note that no country addresses gender in all of the above areas and only **Austria** considers it in 4 of them.

Under the other categories in focus, the report revealed that:

- ▶ **Gender** is mentioned in policy making process phases – 9 NRISs
- ▶ **Empowerment** is mentioned as a concept and approach – 22 NRISs
- ▶ **Women’s empowerment** is mentioned in policy making process phases – 4 NRISs
- ▶ **Areas of women’s empowerment** mentioned – employment (3 NRISs), gender equality (2 NRISs), Discrimination (2 NRISs), Health (1 NRIS)

The table below provides a focused excerpt for the states that will be compared in the next section.

Figure 4: Gender Aspect of NRISs (in 2012)

Country	Gender mentioned in areas	Gender mentioned in policy making process phases	Areas of women’s empowerment mentioned	Gender mentioned in policy making process phases	Empowerment mentioned as concept and approach
BG	Education, Health	No	No	No	Yes
CZ	Education	No	No	No	Yes
HU	Education, Employment, Health	No	No	No	Yes
RO	Education, Employment, Health	No	No	No	No
SK	Education, Employment, Health	Yes	No	Discrimination	Yes
IE	Education, Health	No	No	No	No

Source: *Empowerment of Roma women within the European Framework of National Roma Inclusion Strategies*, Policy Department C, European Parliament 2013, p. 34-36

104. Ibid, p.34-36.

105. Malta is not considered since the state has reported to EC that there is no Roma population in it.

Among the key policy recommendations provided in 2013 was the need for Roma women's issues to be embedded in the national policy documents on Roma integration. The Report pointed out that the European Parliament, Commission and Council should consider the development of targeted tools for Roma women's empowerment and "the adoption of integrated – gender mainstreamed – evidence based – participatory policy approach in the National Roma Inclusion Strategy focused on Romani women's human rights."¹⁰⁶

The Gender aspects report,¹⁰⁷ issued in January 2015 by the European Roma and Travellers Forum (ERTF), confirmed the findings that Roma women's issues are not addressed adequately by the EU Framework and by the NRISs of the member states. Acknowledging that women face more pressing challenges than men, the ERTF was particularly concerned that the EU Framework, establishing the national strategy system and the model for the annual assessments conducted by the European Commission (EC), failed to account for gender in the design and implementation of policies and measures.¹⁰⁸ The ERTF accounted the lack of requirement that member states develop measures to support the inclusion of Roma women as a factor impeding the improvement of the situation in general.

The ERTF's analysis suggested that the lack of commitment of NRISs to gender equality projected the standards established by the EU Framework, which mentioned the words *gender* and *women* only three and four times respectively.¹⁰⁹ Assessing the reference to gender in all of the NRISs as of 2014, the Report concluded that the EC should create a specific gender analysis category in their annual evaluations and that the recommendations of the EP Resolution¹¹⁰ adopted on 10 December 2013 should be incorporated into the EU Framework for Roma Inclusion and become binding for the member states.¹¹¹

The mid-term evaluation of the EU Framework for NRISs up to 2020,¹¹² conducted in 2018, repeated the conclusions of the assessments presented above. Pointing out that the EU Framework generally lacks a gender perspective, the analysis emphasised the need for a much stronger focus on multiple and intersectional discrimination. Accounting for the partial impact made by the 2013 Council recommendations,¹¹³ the report acknowledges that the "marginalisation of Roma women and girls in all sectors, including political participation, has not found adequate policy responses" and that the issues of early marriages and domestic violence have not been efficiently tackled by the member states. In the context of the absence of political commitment, the lack of clear targets and indicators set forth by the EU Framework has limited the impact of NRISs on improving the situation of Roma women. The only sector for which a positive change was accounted is healthcare.

The limited progress at European and national levels can be due to the fact that recommendations coming both from stakeholders and policy makers did not lead to the development and embedding of a thematic policy line into the EU Framework and National Strategies. As early as in the end of 2012, a comprehensive framework for enhancing the gender perspective of Roma inclusion policies at European and national levels was offered by the European Women's Lobby (EWL). In their Position Paper on Tackling multiple discrimination of Romani and Traveller Women,¹¹⁴ the EWL outlined six areas of needed intervention and under each one pointed at specific measures aiming at the protection and fostering the Roma women's rights and equality:

- ▶ Education
- ▶ Employment
- ▶ Healthcare (including prevention from forced sterilisation)
- ▶ Housing
- ▶ Safety (protection from violence, including domestic violence, forced/early marriages, trafficking, exploitation, racist-sexist violence)
- ▶ Participation

106. European Parliament (2013) Empowerment of Roma women within the European Framework of National Roma Inclusion Strategies, Policy Department C: Citizens' Rights and Constitutional Affairs, Directorate General For Internal Policies, Available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/Join/2013/493019/IPOL-FEMM_ET\(2013\)493019_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/Join/2013/493019/IPOL-FEMM_ET(2013)493019_EN.pdf)), p.61.

107. European Roma and Traveller Forum (2015) National Roma Integration Strategies – Evaluating Gender, European Roma and Travellers Forum (ERTF), Available at: https://www.academia.edu/10104151/National_Roma_Integration_Strategies_Evaluating_Gender

108. Ibid, p.6.

109. Ibid, p.6-7.

110. European Parliament (2013) Resolution of 10 December 2013 on Gender Aspects of the European Framework of National Roma Inclusion Strategies (2013/2066(INI)), OJ C 468, 15.12.2016, p. 36–44, European Parliament, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52013IP0545>

111. Ibid, p.24.

112. European Commission (2018) Mid-term evaluation of the EU Framework for national Roma integration strategies up to 2020, Directorate-General for Justice and Consumers, p.215, Available at: <https://op.europa.eu/en/publication-detail/-/publication/a1e33b4f-17af-11e9-8d04-01aa75ed71a1/language-en>

113. Council of the European Union (2013), Council Recommendation of 9 December 2013 on effective Roma integration measures in the member states [2013] OJ C378/1, Available at [http://eurlex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224\(01\)](http://eurlex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224(01))

114. European Women's Lobby Position Paper (2012) Tackling multiple discrimination of Romani and Traveller Women- a crucial factor for the successful implementation of the National Roma Integration Strategies, Available at: https://www.womenlobby.org/IMG/pdf/ewl_position_paper_on_romani_and_traveler_women_en-2.pdf

Integrating the EWL's recommendations into a working document on the gender aspects of the EU Framework for National Roma Inclusion Strategies,¹¹⁵ a Hungarian Roma Member of the European Parliament, Livia Jaroka, pointed out the need for the provision of clear and targeted guidelines not only regarding the expected thematic interventions, but also in connection with the allocation of responsibilities related to implementation of social inclusion policies. She expressed her concern that both member states and the European Commission are inclined to outsource measures to NGOs and that in many cases Roma stakeholders are not involved in the processes. The rapporteur highlighted that the lack of concrete objectives, targets and related indicators endangers the achievement of tangible results. Based on the subsequently detailed report,¹¹⁶ submitted on 10 December 2013, the European Parliament adopted a Resolution on Gender Aspects of NRIS,¹¹⁷ which was first published in the Official Journal of the European Union only at the end of 2016.

Highlighting that despite the adoption of the Council Resolution in 2006¹¹⁸ and the 10 Common Basic Principles on Roma Inclusion, by 2013 European and national policy makers failed to adequately address the vulnerable situation of Roma and Traveller women. The document provided comprehensive recommendations for the development of targeted measures and policy mechanisms to facilitate a positive change. The Resolution pointed out that to **address gender equality in a consistent manner**, the Commission needs to introduce more **effective instruments for measuring** the actual socio-economic situation of Roma women. It recommended that, to increase the efficiency of NRISs on gender equality, a **Dashboard on EU Roma inclusion indicators** should be developed and called on the Commission to urge member states to present **outcome indicators and measurable targets in the national strategies for the main priority areas**.

115. European Parliament (2013) Working Document on Gender Aspects of the European Framework of National Roma Inclusion Strategies, Committee on Women's Rights and Gender Equality, Rapporteur: Livia Járóka, Available at: https://www.europarl.europa.eu/meetdocs/2009_2014/documents/femm/dt/935/935736/935736en.pdf

116. European Parliament (2013) Report on Gender Aspects of the European Framework of National Roma Inclusion Strategies (2013/2066(INI)), Committee on Women's Rights and Gender Equality, Rapporteur: Livia Járóka, Available at: <https://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2013-0349+0+DOC+XML+V0//EN>

117. European Parliament (2013/2016) Resolution of 10 December 2013 on Gender Aspects of the European Framework of National Roma Inclusion Strategies (2013/2066(INI)), OJ C 468, 15.12.2016, European Parliament, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52013IP0545>

118. European Parliament (2005) Resolution on the situation of Roma women in the European Union (2005/2164(INI)), Adopted 1 June 2006, Available at: <https://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P6-TA-2006-0244&language=EN>

An emphasis was placed on the need for the **institutional division of tasks and responsibilities** among involved stakeholders¹¹⁹ and for defined roles in the supervision, control, and coordination of the EU Framework for NRIS. The Resolution recommended that **disaggregated data** for gender and ethnicity (collected in line with the human rights principles at national and EU level) is used for the development of **targeted measures related to women's rights and gender mainstreaming** and of **concrete indicators** for monitoring of their implementation.¹²⁰

To ensure the protection of the fundamental rights of Roma women and girls, the Resolution recommended that **awareness** of the target group is raised about existing national and international legal mechanisms on gender equality and discrimination and that **anti-discrimination bodies have complaint mechanisms accessible to Roma women and girls**. The European Parliament called onto the Commission and the member states to foster a **structured dialogue and cooperation** between policy makers and Roma stakeholders, and to involve Roma organisations and NGOs in the planning, implementation, monitoring and evaluation of European, national and local Roma inclusion strategies. Pointing at the need for the development of **financial mechanisms** to support civil society and community initiatives regarding Roma and Traveller women, for elaborating on **special measures aimed at teenage mothers and girl early school leavers** and for increasing the gender-sensitivity of **social services and healthcare providers**, the European Parliament recommended that the Commission **draws specific recommendations on the gender dimension for each member State**.

Addressing the member states' governments, the Resolution emphasises, among the usual references,¹²¹ that the national strategies must ensure that:

- ▶ **Empowerment of Roma women**¹²² and their capacity building becomes a **horizontal objective** in all policy areas
- ▶ **Gender mainstreaming** is strengthened by linking the policies and practices affecting Roma women to existing gender equality strategies

119. Such as the EC Roma Task Force, the Network of National Contact Points, the European Roma Platform, the EU Agency for Fundamental Rights, and its ad-hoc Working Group on Roma Inclusion.

120. Based on the United Nations Development Programme's Gender-related Development Index (GDI) for aspects such as long and healthy life, knowledge and decent standard of living and on the Gender Empowerment Measure (GEM) for political participation and decision-making, economic participation and decision-making and power over economic resources.

121. I.e. the identified needs in the fields of education, employment, housing, healthcare, poverty, discrimination, and culture.

122. Empowerment is articulated in terms of taking control of one's own life, of becoming visible agent of change within a community, and having the capacity to influence policies and programmes.

- ▶ Specific measures are designed based on conducted **gender impact assessments**, and also consider **generational differences**
- ▶ National policy commitments are supported by the allocation of respective **financial resources**
- ▶ Roma women become a **specific target group** in the operational programmes and in the development programmes for rural areas
- ▶ **Participation** of Roma women is promoted and fostered
 - At local, national, and European levels
 - In the process of the preparation, implementation, evaluation, and monitoring of the NRISs
 - In the process of the design, implementation, and evaluation of healthcare programmes, including disease prevention, treatment, care, and support programming, as well as in reducing stigmatisation and discrimination in the healthcare system
 - To work with Roma women to set up empowerment strategies that recognise their intersectional identity and promote activities that counteract gender stereotypes
- ▶ **Education of Roma girls is recognised as fundamental for achieving positive change** and therefore ensure that Roma girls and young women remain in primary, secondary, and higher education
- ▶ Active inclusion of Roma women in the **labour market** is facilitated by tailored programmes that
 - Provide high quality education and life-long learning opportunities
 - Facilitate self-employment of Roma women
 - Enable and promote Roma women entrepreneurship (including through friendly administrative procedures and provision of technical assistance)
 - Facilitate access to jobs in public administration
 - Elaborate integration-oriented unemployment support (retraining, job creation and placement with wage support, social security support, tax allowances, special licences for recognising seasonal and temporary jobs as work that contributes to social security payments)
 - Prevent dismissal of pregnant employees or in motherhood
 - Consider recognising raising children as a period counting towards pension entitlements
- ▶ Special **support programmes** are designed to address the needs of Roma women:
 - Belonging to large families (with four or more children) or single parent households (facilitated entry to the labour market, tailored welfare arrangements, extending childcare facilities and Roma children schooling)
 - Teenage mothers (to support uninterrupted education, subsidise their entry into the labour market, provide work-based training)
 - In connection to equal access to quality and affordable childcare, early childhood education, and childhood development services
- ▶ Roma women and girls have **equal access to quality healthcare** as well as to family planning, sexual and reproductive health care services, and sexual education
- ▶ Roma women and girls can rely on **efficient protection from violence and support** in case of
 - Child, early and forced marriages
 - Forced sterilization
 - Domestic violence
 - Sexual abuse
 - Sexual exploitation and human trafficking
 - Violence based on racial hatred
 - Human rights violations, also in the form of ‘traditional practices’¹²³
 - Violence committed by authorities in form of collecting and storing data in registries solely based on ethnic background or evictions without offering any adequate alternative housing or support (clear breaches of the ECHR)
- ▶ Roma women and girls are **aware of their human rights**, of the legal frameworks and institutions that protect them and have **access to complaint institutions and justice** in general
- ▶ Roma women and girls enjoy **protection from discrimination**
 - based on multiple or intersecting prohibited grounds and/or stereotypes and prejudices
 - through investigation, ban and prosecution of direct and indirect discrimination¹²⁴

The above presented summary of the Resolution reveals that a comprehensive framework for development of targeted European and national level policies on Roma women equality and integration already existed in 2013. Due to the limitations before

123. In some patriarchal societies, violence against women is still accepted as a legal exercise of power and therefore remains unreported.

124. The fact that perpetrators of violence against women are rarely held accountable for their acts, discourages women from seeking legal help.

its scope, the current paper can only point at the fact that until 2020, the recommendations made by the European Parliament have not been transposed into legally binding documents at European or national levels, but not provide an answer to the question *why*.

It is important to note that during the same period, an attempt for offering a comprehensive framework for Roma women integration and empowerment was made by the Council of Europe Platform Initiative Phenjalipe, launched in 2012 during the 4th International Romani Women's Conference in Helsinki, Finland. The Strategy for the Advancement of Romani Women and Girls (2014-2020),¹²⁵ defined four key goals and six specific objectives.

In pursue of the goal to improve the situations of Roma women and girls through:

- ▶ Mainstreaming of Roma women/girls' rights in all policies and programmes
- ▶ Protection of Roma women/girls' rights
- ▶ Empowerment of Roma women and girls
- ▶ Raise awareness and/or provide expertise to authorities, policy makers and stakeholders

The Phenjalipe Strategy focused on the implementation of the following six strategic objectives:

1. Combat racism, antigypsism and gender stereotypes against Roma women and girls
2. Preventing and combating various forms of violence against Roma women and girls
3. Guaranteeing equal access of Roma women and girls to public services
4. Ensuring access to justice of Roma women
5. Achieving adequate and meaningful participation of Roma women in political and public decision making
6. Achieving Gender and Romani Women's Mainstreaming in all policies and measures

Although the results achieved by the Strategy for the period of its implementation must still be evaluated and reported after the end of 2020, at the time of the preparation of the current analysis, it was already clear that the international initiative did not achieve a significant impact. Its multi-aspect approach was not projected in any of the legally binding and/or strategic documents at the national CoE level.

The paradox briefly touched upon by FRA in the introductory part of the EUMIDIS II Roma women report¹²⁶ deserves attention. On one hand:

- ▶ Gender and racial equality have been among the top priorities of the human rights agenda

125. Phenjalipe (2014) Strategy for the Advancement of Romani Women and Girls (2014-2020), available at: <https://rm.coe.int/16806f32ff>

126. FRA (2019), p.6.

at international and national levels for more than 50 years now

- ▶ The awareness that minority women face additional challenges and experience multi-dimensional and intersectional discrimination and that they need to be supported by additional protection have become transferred into legal documents at international and national level
- ▶ Since the mid-1990s, the Roma women issue has been clearly articulated and has become visible through a range of internationally supported initiatives and targeted data gathering and analysis
- ▶ Since the beginning of the 21st century, the EU has adopted a range of Directives and has developed measures and instruments to ensure that its citizens will be protected from discrimination based, among the rest, on race/ethnic origin and gender
- ▶ Since 2005, the national governments in Europe have committed to the goal of Roma integration and acknowledging that the issue needs to be addressed on a transnational level, have been joining forces in support
- ▶ Since 2011, Roma integration has become a separate Programme at EU level and EU has committed to the goal of fostering social inclusion
- ▶ Since 2012, EU member states have been implementing their National Roma Inclusion Strategies under the common EU Framework, which have been guided and subjected to annual monitoring by the European Commission
- ▶ Since 2013, specific recommendations and policy measures targeting Roma women's inclusion at international and national levels have been provided by the European Parliament
- ▶ Since 2014, a strategy for advancement of Roma girls and women, elaborated by stakeholders with the support of the CoE has provided additional incentives for the possible approaches to empowerment of Roma women
- ▶ According to the EU's gender equality index, in 2017 more than 9 out of 10 Europeans believed that gender equality is important for a fair and democratic society¹²⁷

On the other hand, by 2020:

- ▶ The European Commission has stated "gender equality moves forward at a snail's pace and in some domains is even going backwards"¹²⁸

127. Ibid, p.5.

128. Ibid, p.5 – European Commission quote.

- ▶ Important gender differences among EU citizens of Roma origin persist and in a range of areas, Roma women are disadvantaged both in comparison to Roma men and non-Roma women¹²⁹
- ▶ National policy plans and measures, although embracing some knowledge concerning the intersectional and multiple disadvantages faced by Roma women, “tend to endorse patriarchal norms by conceiving of Roma women’s role as primarily as a caring for the family and children”¹³⁰

As it becomes clear, there is a significant discrepancy between the levels of policy efforts (their number, scope and invested resources) and the real positive impact on the advancement of the situation of Roma women and girls in Europe. Attempting to account for the factors behind the lack of real positive change and to identify possible solutions, the next section will look at the approaches adopted at national levels in the selected countries.

129. Ibid, p.41.

130. European Commission (2019) Roma Civil Monitor: A Synthesis Report on Implementation of the National Roma Integration Strategies in Bulgaria, Czech Republic, Hungary, Romania and Slovakia: Assessing the progress in four key policy areas, Available at: <https://op.europa.eu/en/publication-detail/-/publication/446cb4f2-3c82-11e8-b5fe-01aa75ed71a1>

5. The Gender Perspective in the National Strategies

Selection of Cases

The race/gender intersection in the case of Roma women was identified as the key factor for the selection of country-based cases for consideration by this comparative analysis. Preference was given to the ethnic belonging since its quantitative variable determines not only the number of stakeholders but also the weight of the issues in the context of the mainstream social agenda and national integration policies. Hence, states were ranked by the size of their Roma communities and the percentage of the total population was given priority before the real numbers of community members. *Figure 5* below, referring to the 2012 CoE estimates of the Roma population in Europe, visualises the countries' ranking by the size of their Roma communities. Since, as described, the focus of the analysis is placed on the NRISs, the chart presents only the CoE member states that are also EU members.

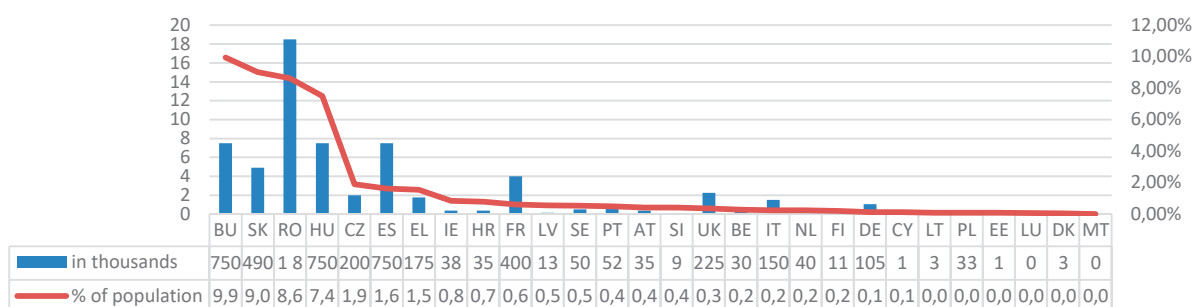
As the chart reveals (*Figure 5*), in Bulgaria, Hungary, Romania, and Slovak Republic, Roma constitute not only a significant part of the population but are also in higher real numbers. Although the Roma communities in Spain and in UK are larger in real numbers than the community in the Czech Republic, considering the priority of the percentage-component, the latter

case ranks fifth in the list. Applying the same principle, Ireland was selected as a case to illustrate the situation of Traveller women in the context of the current comparative research.

To identify the most relevant cases for the analysis, the Gender Equality Index 2019 was also considered.¹³¹ Taking into account that gender constitutes a separate realm of the non-discrimination agenda and that gender equality is a horizontal issue concerning both mainstream societies and minority communities within them, the ranking provided by the Gender Equality Index has been used for the identification of the countries where women are still facing significant challenges. For the purposes of the research, *Figure 6* below presents the 10 states that rank the lowest against each of the indicators. All of these cases rank below the EU-28 average and the margin between them and the state that ranks highest is significant.

131. EIGE (2019) Gender Equality Index 2019 (data from 2017), European Institute for Gender Equality website <https://eige.europa.eu/gender-equality-index/2017/compare-countries/violence/bar>

Figure 5: Roma Communities in EU states by size (as % of population and in real numbers)¹³²



132. Council of Europe, Data as of July 2012, <https://rm.coe.int/1680088ea9>

After the overall ranking, the table provides the breakdown of the countries' scores by indicators. Reference is made only to the main indicators – *work, money, knowledge, health, violence, time*. Only the indicator of *power* is presented with its sub-domains (*economic power, political power, social power*) since they address three significantly different domains.¹³³

Figure 6: Gender Equality Index 2019 – Countries Ranking (Lowest 10)

INDICATORS GE INDEX 2019 ¹³⁴	HIGHEST	EU-28	LOWEST 10									
OVERALL RANKING	SE (83.6)	67.4	EL (51.2)	HU (51.9)	SK (54.1)	RO (54.5)	PL (55.2)	LT (55.5)	HR (55.6)	CZ (55.7)	CY (56.3)	BG (58.8)
BY INDICATORS	HIGHEST	EU-28	LOWEST 10									
WORK (employment & opportunities)	SE (83.0)	72.0	IT (63.1)	EL (64.2)	SK (66.5)	CZ (67.0)	PL (67.0)	HU (67.4)	RO (67.7)	BG (69.0)	HR (69.2)	CY (70.7)
MONEY (resources & economic status)	LU (91.8)	80.4	BG (61.8)	RO (62.0)	LT (64.7)	LV (65.5)	EE (69.4)	EL (71.4)	HU (71.6)	PT (72.1)	SK (74.2)	PL (75.1)
KNOWLEDGE (attainment & segregation)	SE (73.8)	63.5	LV (49.7)	HR (50.4)	RO (51.5)	BG (53.2)	DE (53.7)	PT (55.1)	EE (55.5)	EL (55.7)	LT (55.9)	SI (56.0)
POWER (overall)	SE (83.4)	51.9	HU (20.6)	EL (24.3)	CZ (26.1)	SK (26.8)	CY (28.2)	PL (29.1)	MT (32.2)	LT (32.5)	EE (34.6)	HR (34.8)
Economic power	FR (82.9)	43.6	CZ (13.6)	EL (14.9)	SK (17.9)	LT (18.5)	HR (19.8)	RO (20.5)	AT (21.1)	CY (23.0)	HU (23.1)	EE (23.4)
Political power	SE (95.1)	55.0	HU (15.0)	CY (27.5)	MT (32.9)	SK (35.3)	EL (35.8)	LV (36.7)	CZ (37.8)	RO (40.8)	LT (40.9)	HR (42.2)
Social power	SE (87.8)	55.0	HU (20.9)	EE (21.4)	EL (24.2)	PL (24.4)	CY (25.8)	MT (27.5)	SK (29.1)	HR (31.6)	LV (33.2)	CZ (34.2)
HEALTH	SE (94.1)	87.4	RO (70.4)	BG (76.4)	LV (78.4)	LT (79.1)	EE (81.5)	PL (82.2)	EL (83.1)	HR (83.3)	PT (83.6)	SK (85.3)
VIOLENCE¹³⁵	PL (22.1)	27.5	BG (44.2)	LV (38.2)	DK (32.6)	FI (32.4)	LU (32.3)	NL (31.5)	SK (30.0)	SE (29.7)	BE (29.7)	FR (29.1)
TIME (care & social activities)	SE (90.1)	65.7	BG (42.7)	EL (44.7)	SK (46.3)	PT (47.5)	RO (50.3)	LT (50.6)	HR (51.0)	CY (51.3)	PL (52.5)	HU (54.3)

133. As the EIGE Gender Equality Index 2019 Metadata table explains, the indicators cover the following aspects: * WORK – Participation (type of employment and duration of working life) & Segregation and quality of work (employment in sectors, possibility for care-related flexible arrangements, career prospects) * MONEY – Financial resources (monthly earnings, net income) & Economic situation (not-at-risk-of-poverty, income quintile share) * KNOWLEDGE – Attainment and participation (graduates of tertiary education, participation in formal or non-formal education and training) & Segregation (tertiary students in the fields of Education, Health & Welfare, Humanities & Art) * POWER – Political (Share of ministers, % of members of parliament, regional assemblies), Economic (share of members of boards in largest quoted companies, supervisory board or board of directors, share of board members of central bank), Social (Share of board members of research funding organisations, of publicly owned broadcasting organisations, of highest decision making body of the national Olympic sport organisations) * HEALTH STATUS – Self-perceived good health (life expectancy at birth, healthy life), Behaviour (no smoking & drinking), People doing physical activities and/or consuming fruits and vegetables, Access to healthcare (Population without unmet needs for medical and/or dental examination) * VIOLENCE – Prevalence, Severity, Disclosure * TIME – Care activities (related to everyday education of children or grandchildren, care of elderly or people with disabilities, cooking and/or housework) & Social activities (regular sporting, cultural or leisure activities, involvement in voluntary or charitable activities).

134. EIGE (2019).

135. "The year of data collection for Violence is 2012 unless stated otherwise. Unlike the general score of the Gender Equality Index, for which the higher the score the closer the country is to achieving equality between women and men in all areas, the interpretation of the composite measure of violence against women uses the opposite approach. This means that the higher the score of the composite measure the more serious the phenomenon of violence against women is in the country", EIGE (2019).

Applying the adopted approach for selection of case-studies based on the race/gender intersection, the five states with the largest Roma communities (as percentage) appear among the states with the lowest scores in the Gender Equality Index 2019 (highlighted in Figure 2 Table in yellow). As the breakdown reveals, four states hold the bottom places in eight out of the ten categories considered.¹³⁶

The fact that women in the five states with large Roma communities are facing more equality-challenges than the women from the other EU states indicates that the intersection of race and gender creates significant obstacles for Roma women’s integration and empowerment. As the figures show, even if absolute equality based on race is secured, women in the five states will still need protection from discrimination and support to fully enjoy their rights. The fact that Roma women experience gender-based discrimination not only at the level of the mainstream society but also within their own communities, further complicates the situation.

Although there is no evidence that equality challenges faced by Traveller women differs significantly from those of the Roma women in Europe, the situation in Ireland appears as a counterpoint. According to the Gender Equality Index 2019, Ireland scores better than the EU 28 average (as shown in Figure 7), which makes it a positive case in the context of protection and promotion of women’s rights. The question that emerges here is whether there is a correlation between the level of general protection of women’s rights in a state and the level of protection of the rights of Roma (Traveller) women ensured by the National Inclusion Policies.

Figure 7: Gender Equality Index 2019 – Ireland vs EU-28 average

INDICATORS GE INDEX 2019 ¹³⁷	HIGHEST	IE	EU-28	LOWEST
OVERALL RANKING	SE (83.6)	71.3	67.4	EL (51.2)
BY INDICATORS	HIGHEST	IE	EU-28	LOWEST
WORK (employment & opportunities)	SE (83.0)	75.5	72.0	IT (63.1)
MONEY (resources & economic status)	LU (91.8)	85.5	80.4	BG (61.8)

136. States scoring under the EU-28 per indicator are: Money – CZ (76.7), Knowledge – HU (56.9), CZ (59.0), SK (60.4), Power – RO (38.8), Social power RO (51.8), Health – CZ (86.0), HU (86.0); Violence – CZ (28.0). Above the EU-28 average per indicators are: Power overall – BG (59.9), Economic power – BG (59.9), Political power – BG (53.8), Social power – BG (67.0); Violence – HU (26.7), RO (25.0), EIGE (2019).

137. Ibid.

KNOWLEDGE (attainment & segregation)	SE (73.8)	66.9	63.5	LV (49.7)
POWER (overall)	SE (83.4)	53.4	51.9	HU (20.6)
Economic power	FR (82.9)	46.4	43.6	CZ (13.6)
Political power	SE (95.1)	44.1	55.0	HU (15.0)
Social power	SE (87.8)	72.4	55.0	HU (20.9)
HEALTH	SE (94.1)	90.9	87.4	RO (70.4)
VIOLENCE¹³⁸	PL (22.1)	25.6	27.5	BG (44.2)
TIME (care & social activities)	SE (90.1)	74.2	65.7	BG (42.7)

Hence, the five Roma related cases, which will be examined in a comparative perspective to analyse the status-quo and the potential way forward towards ensuring efficient integration of Roma/ Traveller women and their empowerment, are those of: Bulgaria, Czech Republic, Hungary, Romania and Slovak Republic. The Traveller related case, which in the context of the Roma integration, will be compared with the other five but in the context of gender equality will be considered as a (potentially) positive example, is the one of **Ireland**.

Towards a Framework for Comparative Analysis

Achieving a fundamental and sustainable social transformation is a long-term process that requires systematic efforts and identification of efficient context-specific measures, which might involve adjustments with regard to changing environments. Interested in whether the existing strategic national instruments enable the full integration of Roma women and the protection of their gender rights (as an element of the equality agenda), the current research focuses exclusively on the policy documents that have provided the framework and guided the development and implementation of programmes and measures until 2020. Gender-impact resulting from the implementation of non-targeted measures have not been considered, unless embedded within the policy documents in focus. Reports on implementation of NRISs, therefore, have been used only for the purposes of the background research and verification of findings – they are not discussed here. Earlier research¹³⁹ on the gender perspective of the NRISs has been considered,

138. See note 135.

139. Documents considered: European Parliament (2013) Empowerment of Roma women within the European Framework of National Roma Inclusion Strategies, Policy Department C: Citizens’ Rights and Constitutional Affairs, Directorate General For Internal Policies, Available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET\(2013\)493019_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET(2013)493019_EN.pdf) and European Roma and Traveller Forum (2015) National Roma Integration Strategies – Evaluating Gender, European Roma and Travellers Forum (ERTF), Available at: https://www.academia.edu/10104151/National_Roma_Integration_Strategies_Evaluating_Gender

but due to the revision of the national strategies after the EC recommendations of 2013, the validity of their findings is limited. Besides the NRISs, the information gathered through the survey carried out with the CoE member states and via interviews was used to enrich the content and to enable the interpretation of the findings.

The aim of the case-analysis is not to explore the individual examples, but to identify common issues in the policy design and adopted approaches, which eventually impede the advancement of Roma and Traveller women and girls also at the European level. The comparative perspective therefore draws on the key thematic lines, that have been established with respect to the type of documents in focus, namely: **Normative basis, Policy design, and Policy elements.**

Under each of the three lines, a set of categories has been outlined. The challenges and the recommendations as specified in the 2012 EWL Position Paper which were later embedded into the EP Resolution of December 2013 have been used as a basis. Justification for the relevance of the two documents to the NRISs is that the challenges articulated by the two key international documents (articulated by stakeholders and confirmed by policy makers at European level) is the fact that they project the same situation as reflected by the NRISs at the time of their submission in 2012.

As different policy documents and surveys conducted over the years reveal, **gender-equality of Roma women is challenged by similar (identical) factors in different national contexts.** Hence, although acknowledging that NRISs address country-specific issues through context-sensitive measures, the current paper claims that like the problems, the approaches adopted for addressing them are also comparable. To outline the national political commitment to gender equality and Roma women's integration in particular, the analysis looks at the **general non-discrimination laws** and at **normative documents and/or strategic policy frameworks addressing Roma women's rights.**

Based on the EP and EWL recommendations related to the process of designing and planning of policies and measures, several categories have been developed. They cover: **use of disaggregated data**¹⁴⁰ for policy planning purposes; structured **assessment of gender impact**; establishment of **gender equality as a horizontal policy line**; development of **comprehensive measures** for ensuring equality of Roma women; identification of **indicators** to measure progress in the fields of intervention; recognition of the need to tackle **multiple and intersectional discrimination**, and awareness that the gender equality in a

140. As the cited policy documents emphasise, collection of disaggregated data must be conducted with respect to the international human rights standards and only for policy planning purposes.

stratified patriarchal society needs to also address the **generational aspect.**

Regarding the fields of intervention, a comparison is drawn under each of the six key areas outlined by the chosen documents. These are: **education, employment, healthcare** (including prevention from forced sterilisation), **housing, safety** (protection from violence, including domestic violence, forced/early marriages, human trafficking, exploitation, racist-sexist violence, and abuse), and **participation.**

In addition to the six categories listed above, four more have been added to project the key recommendations provided by the documents. The first one is **"mainstreaming."** Although here, both gender mainstreaming and mainstreaming of Roma women's issues have been considered, the two need to be separated in future comprehensive research. The second one is **"cultural barriers,"** since the traditional roles ascribed to Roma and Traveller women have been identified widely as one factor impeding their empowerment. The third category is **"targeted social measures,"** considering the outlined specific situation of women mothers of four or more children or single mothers. The definition of "social measures" points to the fact that social support can be measures related to education and/or employment and not necessarily to social security and social services. The fourth one – **"awareness raising"** – covers not only the awareness related to human rights and equality, but also to the services and access to them.

Empowerment, however, is not included as a category since the current research claims that as the capacity of a person to control one's own life, empowerment results from the progress made in several or all of the previously listed domains.

Although the current analysis is conducted only over the six countries selected as case-studies for the purposes of the research, the table can be expanded to include all other EU member states and also, with a minor adaptation, be applied to CoE member states.

The following documents were used for the purposes of the comparison.

► **Bulgaria**

- National Roma Integration Strategy (2012-2020)¹⁴¹
- National Action Plan (2015-2020)¹⁴²
- Contribution from Bulgaria to the CoE/ADI-ROM Thematic Survey 2020

141. Bulgaria (2012) National Roma Integration Strategy of the Republic of Bulgaria (2012-2020), Available at: https://ec.europa.eu/info/sites/info/files/roma_bulgaria_strategy_en.pdf

142. Bulgaria (2015) National Action Plan (2015-2020), Available at: https://ec.europa.eu/info/sites/info/files/roma_bulgaria_strategy2_bg.pdf

- ▶ **Czech Republic**
 - The Czech Republic’s national strategy n° 2 (until 2020)¹⁴³ – updated 2015
 - Contribution from the Czech Republic to the CoE/ADI-ROM Thematic Survey 2020
- ▶ **Hungary**
 - Hungarian National Social Inclusion Strategy II (2011-2020)¹⁴⁴ – updated 2014
 - Contribution from Hungary to the CoE/ADI-ROM Thematic Survey 2020
- ▶ **Romania**
 - Strategy of the Government of Romania for the Inclusion of the Romanian Citizens Belonging to Roma Minority for 2015-2020 (Annex I)¹⁴⁵
 - Contribution from Romania to the CoE/ADI-ROM Thematic Survey 2020
- ▶ **Slovak Republic**
 - Slovak Republic’s National Roma Integration Strategy, 2012¹⁴⁶
 - Contribution from the Slovak Republic to the CoE/ADI-ROM Thematic Survey 2020
- ▶ **Ireland**
 - National Traveller and Roma Inclusion Strategy (2017-2021)¹⁴⁷
 - National Strategy for Women and Girls (2017-2020)¹⁴⁸
 - Pavee Point Traveller and Roma Centre¹⁴⁹ Submission to the Citizens’ Assembly on Gender Equality (March 2020)¹⁵⁰

- Contribution from Ireland (provided by Pavee Point) to the CoE/ADI-ROM Thematic Survey 2020

Recognising that Roma and Traveller integration is a process in development and that an update of a policy document indicates emerging awareness of an issue to be addressed, the comparative analysis considered the latest publicly available versions of the National Roma Integration Strategies. This approach accounted for improvements connected to change of priorities, of context or of stakeholders’ needs. Therefore, all the analysed national strategies are considered as of the same policy weight. Since by the time of the preparation of the current report, a contribution from the representative of Ireland to the ADI-ROM was not available, the Irish NGO Pavee Point was invited to provide information. Pavee Point’s submission to the Citizens’ Assembly on gender equality (March 2020) was also used.

143. Czech Republic (2015) Strategie romské integrace do roku 2020, updated version 2015, Available at: https://ec.europa.eu/info/sites/info/files/roma_czech_republic_strategy2_cs.pdf

144. Hungary (2014) Hungarian National Social Inclusion Strategy II, Permanently Deprived – Children Living In Poor Families – Roma (2011-2020), Updated Version 2014, Available at: http://ec.europa.eu/justice/discrimination/files/roma_hungary_strategy_en.pdf

145. Romania (2015) Strategy of the Government of Romania for the Inclusion of the Romanian Citizens Belonging to Roma Minority for 2015-2020, Available at: https://ec.europa.eu/info/sites/info/files/roma_romania_strategy2_en.pdf

146. Slovak Republic (2012) National Roma Integration Strategy Available at: https://ec.europa.eu/info/sites/info/files/roma_slovakia_strategy_en.pdf

147. Ireland (2017) National Traveller and Roma Inclusion Strategy (2017-2021), Available at <http://www.justice.ie/en/JELR/National%20Traveller%20and%20Roma%20Inclusion%20Strategy,%202017-2021.pdf/Files/National%20Traveller%20and%20Roma%20Inclusion%20Strategy,%202017-2021.pdf>

148. Ireland (2017) National Strategy for Women and Girls (2017-2020), Available at: http://www.justice.ie/en/JELR/National_Strategy_for_Women_and_Girls_2017_-_2020.pdf/Files/National_Strategy_for_Women_and_Girls_2017_-_2020.pdf

149. Pavee Point, Website <https://www.paveepoint.ie/>

150. Pavee Point (2020) Submission to the Citizens’ Assembly on Gender Equality March, 2020 (Public Consultations 2020), Available at: <https://www.paveepoint.ie/wp-content/uploads/2015/04/CitizensAssembly-on-Gender-Equality-05032020.pdf>

Roma Women's Issues in a Comparative Perspective

Figure 8: Roma Women's Issues in a Comparative Perspective

LINE	CATEGORY	EU MEMBER STATES					
		BG	CZ	HU	RO	SK	IE
SOURCE	NRIS in focus	2015*	2015	2014	2014	2012	2017
	Survey 2020	Yes	Yes	Yes	Yes	Yes	No
NORMATIVE	General anti-discrimination law covering Roma women	Yes	Yes	Yes	Yes	Yes	Yes
	Normative/strategic documents on Roma women	No	No	No	No	Yes	Yes
POLICY DESIGN	Policy planning on ethnic/gender disaggregated data	Yes	Yes	Yes	Yes	Yes	Yes
	Gender impact evaluation	No	Yes	No	No	Yes	Yes
	Gender equality as a horizontal line in Roma inclusion	No	Yes	Yes	Yes	Yes	Yes
	Multiple discrimination / intersectionality	No	Yes	Yes	Yes	Yes	Yes
	Comprehensive measures	No	Yes	No	No	Yes	Yes
	Indicators	No	Yes	Yes	Yes	Yes	No
	Generation-sensitive approach	No	No	No	No	No	No
	Gender mainstreaming	No	No	No	No	Yes	Yes
POLICY ELEMENTS	Safety (protection from all types of violence)	Yes	No	Yes	No	No	Yes
	Cultural barriers (set by traditional practices and roles)	Yes	No	Yes	Yes	Yes	Yes
	Awareness raising of Roma women	Yes	No	Yes	Yes	Yes	Yes
	Training/awareness raising of public officials	No	No	Yes	Yes	No	Yes
	Education	Yes	Yes	Yes	Yes	Yes	Yes
	Employment	No	Yes	Yes	Yes	Yes	Yes
	Healthcare	Yes	No	Yes	Yes	Yes	Yes
	Housing	No	No	No	No	No	Yes
	Targeted social measures	No	Yes	No	Yes	No	Yes
	Participation (public/political life and decision making)	Yes	Yes	Yes	No	Yes	Yes
	Capacity building and support to NGOs	No	No	Yes	No	Yes	Yes

The table (Figure 8) offers an overview of the findings, while the explanatory notes below elaborate on the different categories as a basis for comparison. It must be noted that the **Yes/No** accounts for the **presence or the lack of a gender-sensitive approach articulated** explicitly in the assessed documents under the respective categories or implicitly established through the provided additional information. By no means does the indicator outline a lack of interest, political commitment, or total absence of targeted efforts in the specific area. For the purposes of consistency, the analysis focused on the strategic frameworks for Roma integration as instruments guiding the processes at national level and aiming at achieving a sustainable positive change, measures developed by governments but not mentioned in the NRISs have not been considered. Hence, the table does not reflect the gender perspective of implementation of NRISs but only of the outlined policy frameworks and approaches.

The following paragraphs present the different sections of the three thematic lines of the introduced framework: normative, policy design and policy elements. The comparative perspective, used to introduce the sections, aims to outline the similarities both in the positive approaches and in the shortfalls and hence to offer a general (and not case-based) overview of the situation

NORMATIVE LINE

Roma and Traveller women covered by general or thematic anti-discrimination law

In pursuit of their international commitments, by 2020, all six states have adopted national non-discrimination laws and/or non-discriminatory normative provisions. Considering that race, ethnicity, sex, and gender are among the prohibited grounds of discrimination, the groups of Roma and Traveller women are by default protected by the national legislation. The EU Race Equality Directive (2000) had a significant impact on the development of the national legal and policy frameworks in protecting and promoting gender equality.

Equality between men and women is guaranteed and promoted:

- ▶ At constitutional levels – Bulgaria, Czech Republic, Hungary, Romania, Slovak Republic
- ▶ By gender equality laws – Bulgaria, Hungary, Ireland, Romania, Slovak Republic
- ▶ Within non-discrimination laws – all states
- ▶ In different thematic laws (different sectors) – all states
- ▶ By gender equality strategies – Czech Republic, Hungary, Ireland, Slovak Republic

Specific normative and/or strategic policy documents addressing Roma and Traveller women issues

Considering that all states acknowledge the fact that Roma and Traveller women and girls are more vulnerable than Roma and Traveller men, this category accounts for the existence of structured policy approach and/or strategic framework addressing the **equity gap** in the Roma integration policies. The initial screening aimed at identifying whether the policy awareness has resulted in the development of systematic approaches and specific measures in support of Roma women. Therefore, only the existence of a separate normative or strategic document addressing Roma women issues is indicated, but not the conceptualisation of the issue in the format of a section within a policy instrument or as an embedded thematic line.

Four out of six states in focus (Bulgaria, Czech Republic, Hungary, Romania)¹⁵¹ stated that their National Strategies are the (only) policy documents tackling Roma women issues. No other instrument was reported to explicitly target Roma women's equality and empowerment. Since none of the NRISs provides a comprehensive set of equity measures, the table indicates the lack of a structured approach.

At the same time, in the case of Ireland, the general National Strategy for Women and Girls (2017-2020) and the Second National Strategy on Domestic, Sexual and Gender-based Violence (2016 – 2021) place special attention to the challenges that Traveller and Roma women face and identify relevant approaches and measures to tackle them. It is worth noting that the Irish National Strategy highlights the synergy between the policy document and the other national legal and policy instruments.¹⁵² Similarly, the Slovak National Strategy for Gender Equality (2014-2019) explicitly mentions Roma women,¹⁵³ with a reference to the intersectional disadvantages that they are exposed to and an emphasis on the need for strengthening the non-discrimination measures in the field of labour and social policies.¹⁵⁴

151. The information was collected through the conducted survey. Since by the time of the preparation of the current report, a reply from Ireland was not received, information was obtained from the NRIS 2017.

152. NRIS Ireland 2017, p. 20.

153. Slovak Republic (2014) National Strategy for Gender Equality (2014-2019) of the Slovak Republic, Ministry of Labour, Social Affairs and Family, p.13, p.15, Available at: https://www.legislationline.org/download/id/6850/file/Slovakia_National_strategy_gender_equality_2014_2019_en.pdf

154. Information provided through the CoE/ADI-ROM Thematic Survey, August 2020.

POLICY DESIGN

Use of ethnic/gender disaggregated data for policy purposes

The use of disaggregated data in policy planning is not only stated by two of the NRISs (Hungary, Slovak Republic), but embedded in both the justification of policy goals and tasks and the setting up of benchmarks and indicators. In three of the Strategies (Bulgaria¹⁵⁵, Czech Republic, Romania), statistical data serves primarily to support the stated need for intervention in a specific area.

The updated Strategy of Ireland mentions explicitly that collection of disaggregated data will be conducted for policy planning purposes with a focus on fostering gender equality within the Traveller and Roma communities. However, it must be noted that under the provisions of the 'Public Sector Equality and Human Rights Duty' introduced in the Irish Human Rights and Equality Commission Act 2014,¹⁵⁶ public bodies in Ireland are required to gather sex-disaggregated data and to conduct ongoing gender impact assessments.¹⁵⁷

Gender impact evaluation

With the aim to support Roma and Traveller women in the areas of disadvantage in comparison to men, gender impact analysis precedes the adoption of legislative and/or strategic measures in two of the states in focus (Czech Republic, Slovak Republic), as stated by their integration Strategies. In the case of Ireland, there is no such explicit statement, since as of 2011, gender impact assessment has become a standard policy planning procedure regulated by law.¹⁵⁸

Gender equality as a horizontal line in the Roma inclusion policies

While four of the NRISs (Czech Republic, Hungary, Slovak Republic, Romania) indicate that the gender equality principle underlines the development of policies targeting Roma inclusion, Ireland, already in the first version of its Integration Strategy, has emphasised that the "Programme for Government,

published in March 2011, requires all public bodies to take due note of equality and human rights in carrying out their functions"¹⁵⁹ Gender equality is outlined as a separate policy objective with tasks assigned for its implementation.¹⁶⁰

Under this category, the NRIS of Slovak Republic deserves attention. Highlighting that it adheres to eight core principles, among which are solidarity, partnership and gender equality, the document emphasises that a gender-sensitive approach is a necessity "due to the fact that no measure, no policy, and no decision are gender neutral."¹⁶¹ It also asserts:

Empowering women and respecting their human rights (including reproduction rights) and equality constitutes one of the base attributes of human development; therefore, it is necessary to pay special attention to eliminating prejudices and inequality of women within MRK¹⁶²

Multiple discrimination and intersectionality

Multidimensional discrimination is explicitly acknowledged as a significant impediment to Roma women's integration by five out of the six Strategies in focus (Czech Republic, Hungary, Romania, Slovak Republic, Ireland).

Ireland includes the tackling of multiple discrimination among the Strategy's objectives and sets the tasks of the provision of "targeted supports for Traveller and Roma women to engage effectively with stakeholder groups" and "development of community leadership in gender equality."¹⁶³

The Czech Republic focuses on the multiple disadvantages that Roma women face in the labour market and highlights that favourable conditions need to be created to foster social entrepreneurship and self-employment.¹⁶⁴

The need for "concentrated interventions" to address problems that are "typical and almost exclusive to Roma women" is clearly articulated in the Hungarian Strategy.¹⁶⁵ The document highlights the correlation between lower social status, lower levels of education and early motherhood.¹⁶⁶ Reducing multiple discrimination through targeted programmes is defined among the expected results from the implementation of the Inclusion Strategy in the sector of social policy.¹⁶⁷

155. New data-collection instrument was developed and launched by the Bulgarian government in 2019 in support of the implementation of the national policy for Roma Integration.

156. IHREC (2017). Public Sector Equality and Human Rights Duty: eliminating discrimination, promoting equality and protecting human rights. Dublin: IHREUROPEAN COMMISSION Available at: https://www.ihrec.ie/app/uploads/2019/03/IHREC_Public_Sector_Duty_Final_Eng_WEB.pdf

157. EIGE, Gender Mainstreaming: Ireland, Available at: <https://eige.europa.eu/gender-mainstreaming/countries/ireland>

158. Ireland (2012) Reference to Programme for Government: Government for National Recovery 2011- 2016, Ireland's National Traveller/Roma Integration, Available at: https://ec.europa.eu/info/sites/info/files/ireland_national_strategy_roma_inclusion_en.pdf

159. Ibid.

160. NRIS Ireland (2017) p. 37.

161. NRIS Slovakia (2012) p. 12.

162. NRIS Slovakia (2012) p. 44.

163. NRIS Ireland (2017) p. 38.

164. NRIS Czech Republic (2015) p. 57-58.

165. NRIS Hungary (2014) p. 30.

166. Ibid, p. 54.

167. Ibid, p. 19.

Providing inter-sectorial services, with an emphasis on prevention, is the approach that the NRIS of Romania puts forward for tackling the multiple forms of exclusion. Fragmented regulatory framework, lack of skilled local staff in public services, and the lack of adequate budgets are also among the identified challenges that need to be addressed.¹⁶⁸ A particular reference is made to the cases of multidimensional discrimination in the field of healthcare.

The discrimination associated with the traditional model of family organization is identified among the challenges that add to the multiple inequalities that Roma women in the Slovak Republic face. The Strategy explicitly articulates the need to tackle the issue in both public and private lives of Roma women.¹⁶⁹

Comprehensive measures

Taking into account the fact that Roma women are exposed to multiple and intersectional discrimination and challenges, this category accounts for approaches that aim at tackling a single problem through different measures in various fields or different challenges through the implementation of a specific, multi-dimensional measure.

Such an approach is visible in the Strategy of Ireland. The set of measures planned to address the gender-violence issue as an inter-sectoral concern establishes a mechanism, the impact of which, although limited, has been recognised by the stakeholders.¹⁷⁰

Interconnectedness between social policy, employment policies and cooperation between state administration and local self-governments is identified by the Czech NRIS as a mechanism to fight social exclusion.

The Strategy of the Slovak Republic highlights the importance of addressing the goal of economic independence of Roma women not only through labour-market measures, but also through education on gender equality in cooperation with the civil society.¹⁷¹ Targeted awareness raising measures and the provision of specialised consultancy and services is seen as a mechanism to address not only health-related issues (and their prevention) but also gender violence.¹⁷²

Indicators

As the comparison reveals, most of the states in focus have outlined gender-sensitive indicators for the purposes of monitoring and evaluating the

168. NRIS Romania (2015) p. 15.

169. NRIS Slovakia (2012) p. 12.

170. Pavee Point Submission (2020) p.3 (note 9 in the cited document)

171. NRIS Slovakia (2012) p. 44.

172. Ibid, p. 43.

implementation of their Strategies (Czech Republic, Hungary, Romania, Slovak Republic).

By area of intervention however, gender-sensitive indicators are provided only regarding employment (Czech Republic, Hungary, Romania, Slovak Republic), healthcare (Hungary, Romania, Slovak Republic) and education (Slovak Republic). None of the NRISs has a set of indicators that elaborate on the assessment of the gender-impact of the planned integration measures.

Another interesting finding is that although the Strategy of the Czech Republic has a separate section on the evaluation of progress and results for each of the outlined policy areas, a reference to women can be found only under the section of employment.

Generation-sensitive approach

Taking into consideration that Roma and Traveller women face multiple disadvantages and that in a traditional patriarchal society, the age-factor is an impediment to equality, the category of *generation-sensitive approach* was included. It accounts for targeted policy efforts and mechanisms aiming at addressing problems specific for Roma and Traveller women of different ages – girls, young women, active women, and elderly women. One of the findings of the current analysis is that the usual reference to “Roma women and girls” is a formula rather than an indication for a stratified approach. The umbrella concept of “Roma women and girls” appears in all the NRISs, but none of the Strategies in focus account for the particular needs and challenges of elderly Roma women, who are often also people with disabilities or who may function as child-carers in the absence of the parents. Therefore, the comparative table indicates that a generation-sensitive approach is missing from all Strategies.

Particularly interesting is that, despite the acknowledgement that Roma girls face greater disadvantages than Roma women and that early marriages are a violation of their rights and impediment to their full development, none of the documents elaborates on specific measures and approaches tackling this issue. References to awareness raising have not been taken into account due to their proven inefficiency.

Gender mainstreaming

Mainstreaming, although not always explicitly articulated as a policy goal, is addressed by all the examined documents. However, gender mainstreaming and the mainstreaming of Roma women’s rights is only partially covered by the Strategies.

Gender mainstreaming at the Roma community level can be spotted only in the Strategy of the Slovak Republic, drawing special attention to the goal of

“eliminating prejudices and inequality of women within marginalised Roma communities.”¹⁷³ While the 2012 Integration Strategy of Ireland explicitly refers to gender mainstreaming, the 2017 updated version only touches upon the issue – an explanation for this is that the approach has become a legal obligation of all the public authorities in the country.

The Strategy of the Czech Republic contains a whole section dedicated to the preservation and promotion of the Roma culture and language¹⁷⁴ – two of the specific objectives focus on the remembrance of the Holocaust victims and the provision of objective information about Roma. These mainstreaming measures have no gender-perspective. In the field of employment however, the envisaged measure of supporting companies and employees to adapt to changes and to the market needs in addition to the opening of positions within the public services to both Roma men and women,¹⁷⁵ can be viewed as a mainstreaming measure with a focus on Roma women, although not explicitly defined as such by the NRIS.

The operational objective of “creating conditions for equitable presentation of the Roma community, for changing its negative image and combating hate speech in the printed and electronic media” put forward by the Bulgarian NRIS can also be viewed as a mechanism aiming at mainstreaming of Roma issues. The overview table, however, indicates the lack of clear reference to the associated gender-issues.

In a similar perspective, Hungary suggests that in order to eliminate prejudices, increasing trust and making stakeholders and services more sensitive to social inequalities, specific programmes fostering cooperation between Roma and non-Roma actors as well as facilitating “the employment of Roma experts in public services, public administration and the media” are needed.¹⁷⁶ Although implicitly this goal covers Roma women, a direct reference is missing and hence the proposed measure cannot be characterised as a gender-sensitive approach.

POLICY ELEMENTS

Safety (protection from all forms of violence such as early/underage and forced marriages, domestic violence, hate crime, racist-sexist acts, abuse, trafficking, exploitation)

Violence is widely acknowledged as the factor with probably the most devastating and profound negative effect on a person’s life. In the case of Roma women, it not only hinders their emancipation, but also traps them in fear, oppression, and abuse. Introducing the

category “safety,” the current analysis looks at the mechanisms envisaged to ensure efficient protection of the target groups. The category takes into consideration references made to violence (in all its forms, including early marriages and hate speech as specific acts of human rights violations) which Roma and Traveller women often face, as reported by national and international surveys and analyses.

In the Strategy of Bulgaria, Roma women are clearly defined as a target group under the Rule of Law Operational Objective: “guaranteeing citizen rights, with an emphasis on the rights of women and children, protecting public order, prevention and combating any manifestations of intolerance and hate speech.”¹⁷⁷ Besides the planned 10 roundtable discussions over the programming period, the National Action Plan does not include any particular measures to address this objective.

Hungary places attention on the vulnerability of Roma women and girls to human trafficking and sexual exploitation and acknowledging the lack of statistical data on this topic, highlights the need to target the elimination of these disadvantages.¹⁷⁸

Raising awareness and conducting educational activities on violence against women, domestic violence, sexual abuse and human trafficking are mentioned in the NRIS of the Slovak Republic alongside the provision of consultancy services as measures aiming to protect Roma women and girls from discrimination and abuse of their human rights.

As already pointed out, **Ireland** puts forward the envisaged comprehensive approach, involving a variety of measures implemented by different actors, as a mechanism to protect Roma women from gender-based violence.¹⁷⁹

Cultural barriers (traditional practices and roles violating women’s rights)

Traditional community practices and ascribed gender roles that violate the human rights of Roma and Traveller women and expose them to additional disadvantages compared to Roma and Traveller men, are identified as a field for intervention by four of the six Strategies in focus (Bulgaria, Czech Republic, Hungary, Slovak Republic).

Although, according to Bulgaria, the problems can be overcome by promoting affirmative actions, such are not specified and listed in the policy documents under consideration.¹⁸⁰ Similarly, despite the fact that

173. Ibid, p. 44.

174. NRIS Czech Republic (2015) p. 35-41.

175. Ibid, p. 54.

176. NRIS Hungary (2014) p. 107.

177. NRIS Bulgaria (2012) p. 16.

178. NRIS Hungary (2014) p.115.

179. NRIS Ireland (2017) p. 38.

180. NRIS Bulgaria (2012) and Bulgaria (2015) National Action Plan (2015-2020).

Hungary and Slovak Republic outline the gender roles in families as an impediment for the education of Roma women (Hungary) and their low economic activity and consequent level of poverty (Slovak Republic), no measures are envisaged to address the problem in the Strategies. Viewing the traditional role of Roma and Traveller women and girls as childcare providers as a challenge to their participation in the labour market, the Czech Strategy suggests development of flexible forms of work that would enable them to combine family obligations with employment.

Awareness raising of Roma women

Five out of six Strategies (Bulgaria, Hungary, Romania, Slovak Republic, Ireland), pay attention to the need for raising the awareness of Roma and Traveller women about their human rights, the principle of gender equality, their citizens' rights in different fields of life, and about the services to which they are entitled.

The Bulgarian Strategy sets equality awareness raising of Roma women as Task N5 of an operational objective associated with the Rule of Law,¹⁸¹ while the National Action Plan envisages the organisation of 10 public events (discussions).¹⁸² Organisation of information campaigns is identified as a mechanism to address issues regarding public health, early marriage, domestic violence, and trafficking in persons by Romania and the Slovak Republic. The Slovak Republic defines an objective of the national integration policies to increase the knowledge of the target group about modern contraceptive methods and sexual and reproductive health services, parenthood, motherhood and childcare.¹⁸³ As mentioned earlier, gender equality awareness raising within communities has also been put forward as a tool for combating multiple discriminations of Roma women.¹⁸⁴ The Hungarian Strategy explicitly highlights the need for providing information to young girls about their rights within a marriage.

Adopting a pro-active approach to ensure women's safety, Ireland commits to the introduction of "positive action measures to enable Traveller and Roma women to access gender-based violence training and employment opportunities in state and voluntary sector services."¹⁸⁵

Training /awareness raising of public officials

The need for training in gender-equality and for raising the awareness of Roma women's issues has been

articulated in the NRIS of Hungary. Romania and Ireland identify such needs, but with a focus on the provision of specific services.

While Romania aims to enhance the capacity of local public authorities to recognise and respond to health problems of the Roma (both men and women)¹⁸⁶ and other vulnerable groups, Ireland focuses on the delivery of "training to service providers on violence against Traveller and Roma women to remove barriers to services."¹⁸⁷ Hungary, however, addresses the issue from a wider point of view, acknowledging that the competences of "professionals continuously working with people coming from disadvantaged situations or different cultural backgrounds or people who encounter prejudice from the majority of society more often" in appropriate communication, conflict prevention and management need to be increased.¹⁸⁸ Increasing the capacity of community network staff engaged with the provision of information and supporting Roma women on issues related to their health has also been envisaged in the Romanian Strategy.¹⁸⁹

Education

Gender differences in educational attainment, prospects and drop-out rates are acknowledged by most of the NRISs, but vary in the focus that they place on challenges.

Bulgaria focuses on the functional illiteracy of Roma women, pointing out that their education has a direct impact on children.¹⁹⁰ The reason behind the early school leaving of Roma girls is explained by existing patriarchal norms of excessive control in some Roma subgroups.¹⁹¹ The Slovak Republic, Hungary and Romania also point out the fact that girls face disproportionate risks and that their retention in upper levels of education (even in secondary) is difficult. Among the goals that the Slovak Republic sets in the field of education is the integration of a gender sensitive approach and the establishment of "conditions preventing teenage mothers to drop out of school prematurely."¹⁹² The monitoring of the percentage of Roma girls (alongside the Roma boys) in special schools has also been listed among the tasks before the state. It is interesting to note that both the Strategies of the Slovak Republic and Ireland promote the adoption of an individualised approach to the educational needs of children as a mechanism to foster inclusiveness, rather than placing a focus on the child's origin and identity.

181. Task n5: "Creating the mindset of recognition of the equality of the Roma women. Encouraging their full individual, social and economic participation in social life", NRIS Bulgaria (2012) p. 16.

182. Bulgaria (2015) National Action Plan, Measure 5.1.

183. NRIS Slovakia (2012), p. 36.

184. Ibid, p. 44.

185. NRIS Ireland (2017) p. 38.

186. NRIS Romania (2015) p. 25.

187. NRIS Ireland (2017), p. 38.

188. NRIS Hungary (2014) p. 108.

189. NRIS Romania (2015) p. 25.

190. NRIS Bulgaria (2012) p.24.

191. Ibid, p. 8.

192. NRIS Slovakia (2012), p. 29.

Involvement of parents in education alongside promoting respect for women, according to Hungary, can be achieved through the establishment of clubs for mothers and parent training centres in primary schools.¹⁹³ The NRIS outlines that the provision of support to Roma women to complete the years of compulsory education will provide them with skills that can enable not only their participation in the labour market but also lifelong learning opportunities.

While Ireland focuses on the goal of increasing literacy and developing soft skills of Roma women, Hungary aims to enhance their interest in learning by connecting education with the needs of the labour market. Vocational education and training in jobs in skill shortage (i.e. nurses in health care) is seen as an opportunity for attracting and involving Roma women. In a similar way, the Czech Republic refers to the planning of educational activities for women returning to the labour market after years of childcare.¹⁹⁴ Ensuring access to and the provision of support with childcare is among the measures that Ireland plans with the aim to increase women's engagement in education.

Employment

Targeted support to Roma and Traveller women in the field of employment is considered by five out of the six documents in comparison (Czech Republic, Hungary, Romania, Slovak Republic, Ireland). While the Strategy of Ireland only mentions that special measures will be developed for facilitating the access of Traveller and Roma women to the labour market (82% of which were unemployed as the census of 2011 revealed)¹⁹⁵ and retaining them in it, the other states pay special attention to the issue.

Focused on promoting equality in the labour market, the employment strategy of the Czech Republic identifies specific measures and areas of potential intervention, as for example the above cited support of companies to adapt to the labour market needs and the development of public services employment.¹⁹⁶ Attention should be given to the objectives aimed at the provision of support to Roma women in self-employment, entrepreneurship, and social entrepreneurship with a focus on poor areas (seen also as a mechanism that has a potential to foster local development).¹⁹⁷ The Strategy outlines the need for the creation of favourable conditions of social entrepreneurship so that self-employed Roma women can also provide services within the Roma communities.

193. NRIS Hungary (2014) p. 81.

194. NRIS Czech Republic (2015) p. 52.

195. NRIS Ireland (2017) p. 14.

196. NRIS Czech Republic (2015) p. 52.

197. Ibid, p. 57-58.

"Increasing the number of Roma women who are active on the labour market" is one of the two specific objectives in the section focused on employment integration of the NRIS of Romania. The lack of specific measures to support Roma women in overcoming the specific challenges in respect to Roma men raises a question about the expected impact of the listed measures on the target group.¹⁹⁸

The reduction of the higher unemployment rate also appears as an objective in the Strategies of the Slovak Republic and Hungary. Targeted programmes for unemployed and low-skilled Roma women to obtain qualification are planned by Hungary alongside a carefully planned provision of assistance of personal services and subsidies to avoid situations of poverty traps.¹⁹⁹ An interesting approach is the planned training and involvement of Roma women in jobs as "family support social workers, community developers, occupational and health intermediaries."²⁰⁰

Healthcare

Alongside employment, healthcare is the sector where the gender-perspective is particularly visible in most of the National Strategies (Bulgaria, Hungary, Ireland, Romania, Slovak Republic).

Preventive care for pregnant women and mothers is a focus in Bulgaria.²⁰¹ Hungary places particular emphasis on teenage pregnancy, family planning and contraception.²⁰² Aiming at the improvement of quality of life, the state focuses on the development of prevention mechanisms such as encouraging the participation of Roma women in screening programmes.²⁰³ An interesting aspect of the Strategy is that it also accounts for significant regional disparities in healthcare.²⁰⁴

Support to pregnant women and family planning services are also among the measures listed in the Romanian NRIS.²⁰⁵ A special focus is placed on young Roma women and the need to raise their awareness about risks associated with reproductive health, early marriages, human trafficking and domestic violence; the provision of information on contraception methods has also been envisaged. Clearly outlined in the document is the need for enhancing the capacity of the community network staff on the matters.²⁰⁶

Combating addictions, especially regarding pregnant Roma women, is on the priority list of the Slovak Republic. Identifying the lack of information on sexual

198. NRIS Romania (2015) p. 81-84.

199. NRIS Hungary (2014) p. 52, p. 92.

200. Ibid, p. 96.

201. NRIS Bulgaria (2012) p. 18-20.

202. NRIS Hungary (2014) p. 89.

203. Ibid, p. 95.

204. Ibid, p. 55.

205. NRIS Romania (2015) p. 33, p. 35, p. 90.

206. Ibid, p. 25.

conduct and childcare, the state sets a goal to increase the awareness of Roma women about parenthood, sexual and reproduction health, motherhood, and childcare.²⁰⁷ In connection with the acts of forced sterilisation in the past, the Slovak Republic highlights reproductive justice among its policy priorities.

Taking into account the shorter life expectancy of Traveller and Roma women in comparison with women of the general population, Ireland is also engaged with ensuring access to quality healthcare and services, including maternal health services, to the target group. An interesting approach is the recruitment of community healthcare workers in the primary healthcare among the Traveller women.²⁰⁸

Housing

Housing appears to be the field in which gender-sensitive approach is largely missing. Based on the documents examined, only the Integration Strategy of **Ireland** refers to the involvement of women in planning and decision-making related to housing issues, but the objective is not elaborated and supported with specific measures.

Targeted social measures

As the comparison reveals, the provision of social services to Roma women, aimed at their active involvement rather than at making them passive recipients of social support, is conceptualised in some of the Strategies (Czech Republic, Ireland, Romania).

A measure to support Roma mothers, envisaged in the Strategy of the Czech Republic, connects career training and educational activities alongside the provision of childcare services.²⁰⁹ Introduction of flexible jobs and part-time work have also been considered as a mechanism to facilitate the access to employment for Roma women as primary child carers. In the Romanian NRIS, the idea of flexible employment is combined with the possibility for Roma mothers to continue receiving social security payments. Facilitated access to nurseries, kindergartens and after-school care for children is also listed among the measures to support the working Roma mothers. To foster Traveller and Roma women's participation in education and employment, Ireland has introduced a provision for accessible and affordable childcare as a gender-equality measure.²¹⁰

Participation in public and political life and in decision making at local and national levels

Although all of the NRISs address the need for fostering the participation of Roma in public and political life

and their active involvement in the decision-making processes at local and national levels, gender falls in focus in three out of the six documents (Bulgaria, Hungary, Ireland).²¹¹

Building culture of equality among Roma women and fostering their individual participation in the public, social and economic life is defined as a separate objective (number 5) in the National Action Plan (2015-2020) of Bulgaria. Recognizing that the *"improvement of the situation of Roma women can only be achieved with the active participation of the target group"*, Hungary highlights the Roma women's role in civil organisations.²¹² Ireland explicitly states that Roma and Traveller women's involvement is crucial in the designing of measures in all the sectors of integration (including housing) as well as in the decision-making process.²¹³

Capacity building and support to NGOs

Explicit commitment to the empowerment of Roma women through fostering their roles and visibility as civil society actors is articulated by the Strategies of Hungary, Ireland, and the Slovak Republic.

Strengthening of the role of Roma women, encouraging their civil and political engagement, and creating a framework for institutionalised dialogue with representatives of Roma communities is defined as one of the priorities of the Hungarian Integration Strategy.²¹⁴ The Slovak Republic also acknowledges the importance of the cooperation between the public authorities and the NGOs active in the field of gender equality²¹⁵ to efficiently support the economic independence of Roma women.

Ireland makes special reference to the commitment of the state to continue to support the *"development of community leadership in gender equality with men and women from the Traveller and Roma communities with a view to developing gender equality."*²¹⁶

211. In 2006, the Czech government defined the Principles of the long-term strategy for Roma integration to 2025, published as an Annex to Government Resolution No 393 of 12 April 2006. Although the active involvement of Roma in drafting and implementing the Integration policies and measures is seen as a crucial factor for their success, the NRISs of 2015 does not reflect the Principle 9. Roma women participation is not mentioned in any of the documents. Czech Republic (2006) Annex to Government Resolution No 393 of 12 April 2006, Available at: https://adsdatabase.ohchr.org/IssueLibrary/CZECH%20REPUBLIC_Perspectives%20of%20the%20long-term%20strategy%20for%20Roma%20integration%20to%202025.pdf

212. NRIS Hungary (2014) p. 33.

213. NRIS Ireland (2017) p. 37.

214. NRIS Hungary (2014) p. 108.

215. NRIS Slovakia (2012) p. 44.

216. NRIS Ireland (2017) p. 98.

207. NRIS Slovakia (2012) p. 36.

208. NRIS Ireland (2017) p. 15.

209. NRIS Czech Republic (2015), p. 27-29.

210. NRIS Ireland (2017) p. 37.

The vertical perspective

The Table shows that each of the compared National Strategies addresses most of the existing gender-sensitive categories. Nevertheless, it also indicates that none of them has the full set of these categories covered. The table, however, does not reveal the different weight of the positive indicators – the fact that under the same category, different states address different challenges and none of them addresses all the identified problems (as outlined in the introductions of the documents).

Fortunately, this limitation does not contest the validity of the comparative table and of the findings. The emphasis is placed on pointing out that the framework for comparison is a preliminary model for assessment of the gender-aspect in Roma integration strategies. **To become a ‘check-list’ and a guide for the development of national strategies for Roma women’s empowerment – either as separate programmes or as an element of a general Roma integration policy – the categories need to be developed further to include sub-categories according to existing challenges that are relevant for each state.**

6. Analysis of Findings

The critical examination of surveys, reports, analytical papers, national and international strategies and normative documents on the intertwined topics of non-discrimination, gender equality and Roma issues outlined several important issues that need to be considered. The following section presents these background conclusions, while the section after it discusses the findings resulting from the comparative analysis.

Background findings

Content analysis of policy documents should be performed alongside discourse analysis

The conclusion highlights the fact that in the field of non-discrimination and gender equality, there is a lack of unified policy terminology at international level, which might lead to significant misunderstandings and false interpretations of the existing documents and evidence. As a critical look at the findings presented in the report on the non-discrimination laws in Europe reveals,²¹⁷ the anti-discrimination laws in most of the European states use the concepts of 'gender' and 'sex' as interchangeable. The differences between the national languages and the translation of the concepts into English also has to be considered. A reference to 'gender' in an English version does not necessarily implies a conceptual distance from 'sex'. The point is that only a few states (the Slovak Republic being one of them) use both terms in their non-discrimination provisions. Bulgaria, the Czech Republic, and Hungary refer to 'sex,' while Ireland²¹⁸ and Romania to 'gender.'

Hence, any content analysis performed over the NRISs needs to first clarify the usage of concept in the national legislation, and second, to identify possible

translation issues when English versions of documents are examined. In short, when exploring the Strategies, one needs to consider that the reference to 'women's issues' is quite likely to stand for 'gender rights' and vice versa.²¹⁹

Positive actions targeting women are an exception

The report of the European network of the gender and equality experts revealed that European states have developed and implemented positive actions targeting Roma, but gender falls out of the scope of the assertive measures in place.²²⁰ The only state where in 2017 'sex' was already included among the positive action grounds was the Netherlands.

Although this is not a problem *per se*, it highlights the fact that women's rights are not high on the political agenda in Europe. In the context of the established significant gap between the levels of gender equality achieved by the European states,²²¹ this comes forward as an issue that calls for attention, especially in the light of the multiple discrimination and intersectionality faced by Roma women.

Roma and Traveller women, as stakeholders, are mostly silent on the topic of gender equality, intersectionality and multiple discrimination faced by them. Roma and Traveller girls have no voice.

During the data gathering process, apart from the personal testimonies in media and declarations or statements associated mostly with public events, no document was found presenting in a structured and comprehensive way the opinion and the position of the Roma women on the issues. Roma girls and their views are not reflected even through personal testimonies.

217. European Commission (2019) A Comparative Analysis of Non-discrimination Law in Europe 2019 (The 28 EU member states, Albania, North Macedonia, Iceland, Liechtenstein, Montenegro, Norway, Serbia and Turkey compared), Authors: Isabelle Chopin and Catharina Germaine, European network of legal experts in gender equality and non-discrimination, December 2019, DG for Justice and Consumers, Available at: <https://op.europa.eu/en/publication-detail/-/publication/a88ed4a7-7879-11ea-a07e-01aa75ed71a1>

218. According to the cited report, Ireland is the only state out of the examined, which main specific anti-discrimination law refers explicitly to the 'Traveller community'.

219. A similar issue emerges when the concepts of 'race' and 'ethnic origin' are considered. They are not discussed here however since the connotation-gap between the two is rather insignificant as compared to the case of 'gender-sex'.

220. European Commission (2017) A comparative analysis of non-discrimination law in Europe 2017, The 28 EU member states, the Former Yugoslav Republic of Macedonia, Iceland, Liechtenstein, Montenegro, Norway, Serbia and Turkey compared, Authors: Isabelle Chopin and Catharina Germaine, European network of legal experts in gender equality and non-discrimination, DG for Justice and Consumers, p.82-83, Available at: <https://op.europa.eu/en/publication-detail/-/publication/36c9bb78-db01-11e7-a506-01aa75ed71a1>

221. EIGE (2019).

Hence, it cannot be established to what extent the problems faced by Roma and Traveller women and the challenges of their equality within and beyond their communities **are perceived as such** by the stakeholders. Even if such documents exist (in English and/or not available online), the limited access to them still impedes the visibility of the issues. It does not allow an increase in the awareness of mainstream societies and governments about existing inequalities and their impact on societies at large. Making the problems visible will enable policy makers, institutions, and human rights activists to acquire a better understanding of the situation and to plan adequate intervention measures. Obviously, measures developed to boost Roma and Traveller women's equality activism would not be applicable if stakeholders perceive discrimination and traditional forms of patriarchal oppression as "normality."

Research on similarities and/or differences between the challenges faced by Roma women and those faced by Traveller women is missing. The speculation that their challenges and needs are identical is usually based on the interpretation of reported problems but not on an in-depth comparative analysis of underlying factors and their impacts.

The second finding during the data gathering stage was that there is no awareness whether there are specific challenges to which Traveller women and girls are exposed in comparison with Roma women and girls. The most comprehensive survey on the topic of Roma women gender equality²²² examines the situation in nine EU states,²²³ but Traveller communities are not present in any of them.

The documents studied so far for the purposes of the current research have not revealed any significant differences between the challenges faced by Traveller and Roma women. Acknowledging, however, the structural limitations and the possible discrepancies associated with the specific national contexts, the paper insists that the general findings and the proposed policy framework are valid due to the fact that they discuss the structural approach towards development of gender-sensitive Roma integration programmes and not the relevance of concrete measures.

Increasing the level of protection and promotion of gender equality in a state is a precondition for achieving success in the protection and promotion of Roma Traveller women's rights and the elimination of the multiple disadvantages before them

Processing data for the identification of the most relevant cases for analysing equality challenges in

222. FRA (2019).

223. Bulgaria, Croatia, Czech Republic, Greece, Hungary, Portugal, Romania, Slovakia, Spain.

the context of the gender/ethnic intersection, the research established that the **states with the largest Roma communities** (in numbers and as percentage of the total population) **are ranked below the EU-average** in the Gender Equality Index 2019.²²⁴ Although only a speculation at this stage, the potential correlation requires attention and further fact-based analysis since it might constitute a significant impediment to the efficient integration of Roma women.

Connected with the above, another assumption also calls for verification. The paper puts forward a hypothesis that **states with good frameworks and established practices for the protection of women's rights and the promotion of equality achieve better results in fostering Roma/Traveller women's empowerment** than states with a comprehensive Roma integration mechanism, but limited capacities or deficits in their gender policies and measures.

Case-based comparative analysis

Acknowledging that the current findings are based on the examination of six cases, the fact that the scope of their validity covers the majority Roma populations in Europe makes them of significant importance. They highlight issues and policy challenges relevant both to states with large and small Roma communities, since the number of stakeholders in focus does not have a direct impact on the development of mechanisms to ensure gender equality. In the following paragraphs, the findings will be discussed under the three thematic lines introduced and specific aspects will be elaborated as accordingly.

NORMATIVE BASIS

Roma and Traveller women and girls are protected by the provisions of the general non-discrimination law. The intersectional disadvantages that constitute them as one of the most vulnerable groups in Europe, however, call for special attention and structured and targeted intervention, supported by relevant legislative provisions and/or strategic policy plans.

As the research established, discrimination and gender equality are covered by a solid body of legal texts in all European countries. Although they provide protection against unequal treatment based on race (ethnicity) and sex/gender, the specific situation of Roma and Traveller women calls for particular attention. In only a few states (among which are **Bulgaria** and **Romania**), multiple discrimination is referred to in legal texts but intersectionality remains implicit.

The fact that situation of Roma and Traveller women has not advanced over the past decades and that violations of their human rights are still perpetuated

224. EIGE (2019).

indicates a need for special legal and/or strategic provisions to ensure efficient protection of the target groups. The paper does not advocate for the development of separate laws on Roma and Traveller women, but for the elaboration of provisions and/or focused strategic plans to enhance the efficiency of the existing legislation. In this respect, **Ireland** provides a positive example for explicit references to Traveller women not only in documents addressing issues related to Roma and Traveller Integration (as for example the National Roma Needs Assessment,²²⁵ conducted in 2018), but also in mainstream policy documents. Practices such as child-marriages, for example, demand legal protection. The overall lack of affirmative measures in support of women (especially Roma), is an additional indicator that the equity gap in the equality policies requires special attention.

Finally, it needs to be outlined that the gender-sensitive policy planning should take into account not only the general categories, as presented here, but the sub-categories identified with respect to specific problems and challenges to which Roma and Traveller women are exposed within the national contexts. Drawing conclusions on the overall country performance by looking at the main aspects, outlined by the comparative framework, would be misleading since the current model takes into account only whether gender-related issues have been considered in any possible dimension. The framework, however, provides the structure for the elaboration of national checklists, including sub-categories based on the challenges before Roma women inclusion as identified by each state. Since the aim of the current paper is not to conduct an in-depth country-based analysis but to outline challenges of the empowerment of Roma and Traveller women and girls in a wider European perspective, such individual checklists have not been elaborated on.

POLICY DESIGN

Although national governments have a clear understanding about the problems that Roma women face and about the multiple and intersectional discrimination that they are exposed to, the National Strategies for Roma Integration do not provide a comprehensive framework to tackle the identified inequalities. The embedded gender-sensitive measures are fragmented and rarely interconnected. Apart from the single-issue sectoral approach, the Strategies fail to account for differences between different generations of Roma and Traveller women. The mainstreaming efforts target either Roma or women's rights. Mainstreaming of Roma and Traveller women's issues is not in focus both at mainstream-society and community levels.

225. Pavee Point Traveller and Roma Centre & Department of Justice and Equality (2018) Roma in Ireland – A National Needs Assessment, Available at <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>

Comparing the selected NRISs, the first conclusion that can be drawn is that there is a general discrepancy between identified challenges, stated objectives, and planned measures. The Strategies do not offer a comprehensive approach for tackling problems at sectoral or at horizontal levels. Only a few documents have a section devoted to the situation of Roma women (e.g. Hungary) or a set of thematic measures targeting multi-aspect approach to a particular challenge (e.g. Ireland).

However, some positive developments should still be acknowledged. The analysis has established that the analysed member state strategies place the focus on certain thematic or specific challenges. None of them has introduced a framework for systematic planning, implementation and monitoring of measures aiming at reducing the vulnerability of Roma women in general or even in a particular sector. Considering that five out of six states have referred to multiple and intersectional disadvantages faced by Roma women, their actual content indicates a low level of awareness and/or capacities to strategically address these problems.

Specific challenges covered by specific measures appeared as the dominant approach to Roma women's issues underlying the policy design of the examined NRISs. In this context, it is important to draw attention to attempts for the development of multi-aspect mechanisms combining objectives (e.g. Czech Republic, Slovak Republic) or fostering multi-sectoral interventions (e.g. Ireland).

The analysis has established that most, if not all, of the states in focus collect ethnicity/gender disaggregated data, although based on the examined documents it was not possible to establish whether they do so for policy planning purposes *only* and with respect to the human rights standards. Although all states refer to gender disparities when justifying general intervention, some NRISs have used the data for setting up benchmarks and target indicators (Czech Republic, Hungary, Romania, Slovak Republic). It needs to be noted that none of the examined cases have provided gender-sensitive indicators for all the identified gender-sensitive issues.

In general, the NRISs in focus do not offer clear evidence that gender equality is a horizontal priority of the Roma integration policies at national level. The statements put forward in the Strategies are not supported by exact implementation plans. The gender perspective is missing from most of the planned measures. Although it is worth pointing out that awareness exists, the fact that no major positive changes can be accounted for in any of the six countries, indicates that this is still a goal-to-be-achieved. **The change is still under construction.**

In this light, gender impact evaluation is a tool that could help governments and policy makers to plan targeted interventions that would enable the achievement of the desired objectives. Such an assessment would certainly help authorities direct their support towards initiatives and programmes enabling and fostering Roma women's empowerment and would increase the gender-sensitive approach in policy planning and implementation.

The gender perspective in all the examined documents fails to account for the different problems that different generations of Roma and Traveller women face. None of the policy approaches pays attention to the needs of elderly Roma and Traveller women. Problems of Roma and Traveller girls are touched upon but not elaborated. Girls are often mentioned as a target group of measures in the field of education or healthcare. Early/child and forced marriages are acknowledged as a significant impediment to the full development of Roma girls and to their opportunities in life, but none of the strategies has a conceptualised approach for tackling this issue. The unfortunate role of some Roma mothers and fathers in the perpetuation of the violation of the child- and human rights of their daughters- is disregarded even by strategies discussing cultural barriers to Roma women's inclusion.

Although mainstreaming of Roma and Traveller issues /or gender issues has been defined as a priority by almost all integration policies, the Roma women agenda remains largely neglected. The analysis has not identified any measures planned to increase the awareness of societies about the severity of the situations that this particularly vulnerable group is facing. Roma and Traveller women's issues are in general not embedded within the mainstream Women's Equality agenda – they emerge as a separate issue that is of interest to a limited group of peoples. In this respect, the case of Ireland is an exception at a policy level with the references to Traveller women in the key national equality instruments. Fostering gender-based support and solidarity -cutting through ethnic divides- cannot be spotted as a specific goal in any of the six NRISs.

The equity gap in the integration policies remain elusive. Apart from the objective listed in the Strategy of Bulgaria:²²⁶ "creating the mindset of recognition of the equality of the Roma women," none of the discussed strategies outlines the need for targeted interventions to foster equality – for Roma and Traveller women as minority members, Roma and Traveller women as women, and for Roma and Traveller women as citizens and nationals. Roma and Traveller women's issues are not articulated as an all-community concern calling for the active involvement of different actors (including Roma and Traveller men), they are not articulated as a mainstream gender-equality issue, nor as an issue

challenging the rights of the countries' citizens or simply as human beings.

POLICY ELEMENTS

In all the policy areas, but housing, certain measures that target Roma and Traveller women explicitly exist. However, no state has developed a comprehensive approach to ensure that all identified problems within the specific field are covered. Although the prioritisation of different problems can be ascribed to the diverse national contexts, none of the Strategies offer a justification for why the rest of the issues under the specific area are not tackled. The integration policies do not offer mechanisms for reducing the negative impact of cultural barriers on Roma women's empowerment. Raising awareness about Roma and Traveller women's issues and training of public officials, especially social workers, is crucial for increasing the success of interventions. Mediators play an important role in the process of raising awareness of stakeholder and providing direct support to Roma and Traveller women. Fostering civic initiatives and cooperation is crucial for achieving sustainable change.

Protection from violence is one of the fundamental human rights guaranteed under the Universal Declaration on Human Rights (UDHR). The variety of forms of violence that Roma women experience however seems addressed by the integration strategies with less attention that it merits. Apart from the external threats of human trafficking, sexual exploitation, racist behaviour (antigypsyism), hate-crimes, and hate-speech, Roma women and girls are often victims of domestic violence, sexual abuse, and early marriages. The demanded adherence to traditional gender roles can also be viewed as a type of oppression that limits the possibilities of women to enjoy their rights in full and to take control over their own lives.

Although there is a clear awareness about the complex situation in all the strategies, the approach towards ensuring the much-needed protection and elimination of all forms of violence lacks structure and comprehensiveness. Focused on specific types of violence, strategies in general fail to address the safety needs of Roma women. The example of the cross-sectoral integrated programme in Ireland illustrates an alternative to the scattered measures, which calls for attention. In none of the policy documents however, there is an explicit commitment of public authorities and state institutions to establish mechanisms for protections of Roma women and support to victims.

Unfortunately, domestic violence and sexual abuse present also in the Roma and Traveller communities often remain hidden and unreported, sometimes due to complex reasons such as lack of trust towards the helping authorities, attempts to interpret the acts as "acceptable" or strong cultural taboos. Oppression associated with ascribed gender roles falls under the

226. NRIS Bulgaria (2012) p. 17.

category of 'tradition.' Early/underage and forced marriages, which directly violate human rights and especially rights of children, are sometimes also excused with culture. The comparative analysis revealed that although some states have initiated programmes to raise awareness among Roma and Traveller communities on these issues and to provide support to the women and child victims of domestic violence, structured measures are largely missing. None of the Strategies have proposed a systemic approach to efficiently prevent child and forced marriages and subsequent early pregnancies and violations of reproductive rights.

Cultural barriers have been widely acknowledged as an impediment to efficient intervention, not only in connection to the safety-issues but also to healthcare and participation. Nevertheless, no state has outlined a plan for balancing cultural and human rights. Awareness raising among stakeholders seems the only mechanism used at large, but again, its efficiency has not been monitored and analysed – and no evidence for the opposite has been provided. At large, integration strategies focus on promoting gender equality and women rights exclusively among Roma women and not at community levels.

The role of Roma and Traveller mediators (and other mediators) still needs to be elaborated to support gender-mainstreaming. As trusted providers of services in fields of healthcare, education, social support, they have the potential to increase the awareness of community members and to work directly with Roma women. Provision of such services however requires not only planning and a structured approach but also active support from institutions. Indications for such activities have not been found in the analysed Strategies.

The importance of training public officials and social workers in gender equality and in Roma and Traveller women's issues has been highlighted by some states, although no evidence is available that in the other countries the level of expertise of service providers is sufficient. The institutional lack of understanding and lack of interest in community level gender problems appear among the major challenges to the implementation of planned measures. Capacity building of staff is a precondition for achieving a positive change in any field of Roma and Traveller integration.

Although all the examined NRISs have clearly addressed the gender-perspective in the field of education, it is striking that despite the detailed list of disadvantages faced by Roma girls and women, each Strategy covers only a few of those. The prevailing lack of gender-sensitive indicators to monitor the impact of the educational measures and the lack of assertive measures to keep Roma and Traveller girls at school are inconsistent with identified problems and stated

policy objectives. Overall, little (if any) attention is paid to promoting life-long learning opportunities among Roma and Traveller women. A positive approach, even in a single case, is the focus placed on the education of teenage mothers and on provision of integrated social services to enable their return to school.

The development of mechanisms for social support aiming at increasing Roma women's involvement in social life and their possibilities for personal development is a positive aspect of integration programmes adopted by some of the states in focus. Offering flexible educational schemes, providing childcare services alongside career training programmes, and additional financial assistance to part-time studies and jobs for mothers are examples for positive measures that governments should consider and introduce in their strategic plans.

As the analysis revealed, policy makers are particularly concerned with Roma and Traveller women's employment and health status. All states demonstrate engagement with increasing women's participation in the labour market and improving their health-status (through programmes focused on prevention of health-risks, family planning, maternity health, combating of addictions, and removing healthcare disparities). Similar to the approaches adopted in the other fields, national measures planned in both sectors are not elements of full-fledged intervention models but stand-alone initiatives, tackling one or another issue.

An interesting fact that emerged from the analysis is that the gender perspective is totally absent in the context of housing policies.²²⁷ The only time Roma women were mentioned in relation to housing was a short note in the Irish Strategy that the target group will be involved actively in the processes. Although accounted positively in the table above, it is obvious that the reference shows some gender-awareness, but not a clear engagement with gender-related disadvantages in the sector.

Although national policies refer to the need for enhancing participation of stakeholders in public and political life and their active involvement in decision-making, not all strategies have considered measures to include Roma women in these processes. Outlining participation among the strategic objectives of integration (Bulgaria), expected involvement of Roma women in different stages of planning and implementation of measures in the fields of education, employment, housing and healthcare (Ireland) and the fostering of their role as civil society members (Hungary), are positive approaches that deserve attention. At the same time, the lack of respective measures,

227. A reference to the gender perspective in the housing policies appeared in the contribution to the survey submitted by the Slovak Republic.

performance indicators and expected results puts under question the real engagement of governments with the involvement of the target group in decision-making processes. There is also no reference to the need for raising awareness among women about the importance of their participation as well as planned support and protection in case their will to become actors of change clashes with traditional gender roles and family/community resistance.

An essential aspect in this context that the Strategies have touched upon is the planned assistance to Roma and Traveller women's civil society organisations and the building of their capacities. Not all states aiming at fostering participation of Roma and Traveller women have connected their policy objectives with the aim to increase capacities of civil society organisations and vice versa. Another problem emerging from the analysis is that cooperation is either considered at the level of civil society or between the civil sector and the public institutions. None of the integration policies have considered both aspects, and not all states have considered the facilitation of the establishment of Roma and Traveller women's organisations and their empowerment as a necessity.

Overview of survey findings

The processing of the information provided by the states participating in the survey confirmed that integration of Roma and Traveller women has been and still is an issue throughout Europe. In the context of the programmes, strategies and measures targeting Roma or Traveller inclusion that have been implemented for more than 10 years now, the reported situation as of 2020 is rather concerning and certainly indicates a need for a change of approach.

Among the current challenges faced by Roma and Traveller women in the fields of education, healthcare, and employment, the respondents²²⁸ listed also:

- ▶ Prejudices and discrimination – all states
- ▶ Multiple and intersectional discrimination – Austria, Bulgaria, Slovak Republic
- ▶ Cultural barriers and traditional practices – Austria, Bosnia and Herzegovina, Bulgaria, Estonia, Greece, Hungary, Poland, including fear from loss of identity – Norway, Switzerland
- ▶ Violence and injustice – Czech Republic, Germany, Ireland
- ▶ Low level of participation and lack of leadership – Czech Republic, Croatia, Italy, Poland, Slovak Republic, Switzerland

228. Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Greece, Estonia, Germany, Hungary, Ireland, Italy, Norway, Poland, Romania, Slovakia, and Switzerland.

- ▶ Lack of institutional support and cooperation with stakeholders – Finland, Ireland, Norway, Poland
- ▶ Lack of awareness of public officials regarding Roma and Traveller women's issues – Bulgaria,²²⁹ Ireland
- ▶ Lack of capacities of public officials to address adequately the needs of Roma and Traveller women (including use of allocated budgets) – Ireland
- ▶ Access to housing and quality of housing conditions – Ireland, Slovak Republic
- ▶ Social protection – Ireland

At the same time, the survey revealed that in all the seventeen states, a few projects explicitly targeting Roma and Traveller women have been implemented and many of them have achieved positive results. The good practices are summarised and offered as an Annex to this report since the 'stock-taking' of the initiatives can provide policy makers in Europe with ideas for their future planning of measures and activities.

Among the survey-findings is that European states have already identified the above-described need for targeted legislative and/or strategic provisions to ensure protection of and support to Roma women. One of the new normative and policy documents which is worth highlighting is the Act on compensation for the forced sterilisation of women, which was voted by the Czech Parliament in the autumn of 2020.²³⁰ The online inquiries brought forward the information that the Romanian National Strategy for Roma Inclusion 2021-2027, which is in a process of preparation, will place a special focus on gender balance and on the provision of targeted support to Roma women.²³¹ The involvement of the National Agency for Equal Opportunities for Women and Men (NAEOWM) in the process of the preparation of the Strategy by the Romanian Government is an example not only of a positive approach, but for the necessary cooperation in the field.

It should be mentioned that the surveys have confirmed not only the low civic activism among Roma and Traveller women, but the general lack of interest in Roma and Traveller women's issues at the level of the mainstream civil society. The fact that governments are not aware of the existence of organisations working in this thematic field of representing stakeholders indicates that for all the years of implementation of Roma integration measures, policy makers have not

229. Information was provided during a phone interview with Ms Theodora Krumova, NGO Amalipe, Bulgaria (18 July 2020).

230. Information provided by the Czech Republic through the survey.

231. Information provided in email exchange with Mr Nicolae Toderas, Ministry of European Funds, Romania (30.07.2020).

held any consultation on gender-equality and gender-based challenges. This also is in an indicator that even if they exist, such organisations are invisible and have little or no impact on social and political processes. Acknowledging the stated intention of the Greek government to conduct a mapping of stakeholders, the paper aims to emphasise the need for a structured and systematic cooperation between policy makers and stakeholders, between public authorities and civil society. As the analysis revealed, such a collaboration is already taking place in certain states. But, to achieve a positive change, this approach should become a regular practice instead of an exception.

It is also interesting to note that the civic activism of Roma women differs from one country to another. While in some states there are no or just a few NGOs to represent the rights of the target group, in other states Roma women are not only organised locally but also have established networks and associations (Bosnia and Herzegovina, Croatia, Ireland). The case of Ireland highlights the importance of the active involvement of stakeholders in the process of fostering positive changes. Committed to protect and promote the rights of Roma and Traveller Women, among other issues, the Pavee Point Traveller and Roma Centre has become a partner to national level policy makers and has advocated for and contributed

to the development of policies and measures for the advancement of the situation of the target group. Among the interesting findings, which call for further exploration, is the existing 'segregation' at the level of civil society in all states – no mainstream Women's Rights NGOs have been reported to place a special focus on Roma women issues or to have established a structured and strategic cooperation with a Roma /Traveller Women organisation.

Finally, two points raised by Bulgaria and Ireland call for additional attention. The **lack of specific financial mechanisms to support the implementation of Roma integration programmes**, as reported by Bulgaria, challenges the possibility for establishing a stable systematic approach aiming at bringing in a positive change. Such a mechanism has been suggested by the European Parliament Resolution of 2013. Ireland, on the other hand, has outlined among the persisting challenges both the **significant reduction of budgets** for Traveller accommodation (dropping by 90% from 2008 to 2013) and the **failure of local authorities to spend allocated funds**. Hence, not only availability of funding but also the capacity of responsible authorities to adequately absorb budgets can be included in the national checklists for the assessment of Roma women's empowerment programmes.

7. Towards a Roma and Traveller Women Empowerment Roadmap

The current research was conducted with the aim to identify whether the Roma integration policies contribute to the empowerment of Roma and Traveller women. In line with the purpose, it focused on the gender perspective in the National Roma Integration Strategies of six EU member states, exploring how they have addressed identified challenges, ensured protection of gender rights and enabled Roma women to develop their full potential. The overall conclusion that the paper makes is that **Roma and Traveller women's empowerment is still a project under construction**. Despite the numerous activities and efforts, no significant advancement and structural changes can be accounted for over the past decade. The following section summarises the findings into several policy recommendations, which aim at supporting policy makers at national and European levels to identify areas for improvement and intervention. In the pursuit of this goal, a Roadmap model for Roma women's empowerment is proposed.

Empowerment of Roma and Traveller women appears as an umbrella concept, which in fact does not refer to specific policy objectives. It is quite likely that different European governments have **different understandings of what the concept entails and how the goals can be achieved**. Furthermore, key national actors, expected to implement the change and guide and monitor its progress, might have their own views on the issues. Building capacities of Roma women to take control over their own lives cannot take place if their human and gender rights are being challenged, if their problems remain widely ignored and if they are left alone to fight merely for the status-quo. Becoming aware of the issues and willing to overcome them, acquiring the needed knowledge about the possible mechanisms to change the situation, and building capacities to mobilise support are preconditions for fostering Roma women's empowerment. **Personal safety**, however, is the bottom line for women to become visible and to stand for their rights with no fear of violence and abuse.

Analysing the gender perspective in key policy documents (the NRISs), the research has established that

that **there is no systematic and comprehensive approach for tackling Roma and Traveller women's issues**. Although it can be accepted that different states have different priorities (with respect to the national contexts), it is a fact that no strategy covers all the identified problems, as outlined by the same documents. The adopted scattered approach results in achieving great success within the frameworks of a thematic initiative, but has no change in the respective sector and hardly any change in a wider perspective. Roma women are not a target group of the NRISs, nor of any other strategy. Although protected by default, they fall beyond the scope of the general non-discrimination law, which (implementation) cannot address adequately cases of multiple or intersectional discrimination.

Policy Recommendation No. 1

Governments should conceptualise specific strategies aimed at Roma and Traveller women's empowerment as a comprehensive set of mechanisms, covering all sectors of needed interventions, and involving all relevant stakeholders – both public authorities and civil society. Special attention should be placed on the synergies between national policies and institutions responsible for their implementation. Gender equality and the advancement of the situation of Roma and Traveller women should become the binding horizontal line. Policy makers should take into account that rural and urban environments and the discrepancies in regional development might entail adjustments of measures to meet the context-specific challenges.

To change the approach, there is no need for additional resources or for elaboration of complex policy models. Knowledge about the problems already exists. Data to set up target indicators and benchmarks is available. Standards and guidelines have been provided in a range of international documents (and especially by the 2013 EP Resolution). Stakeholders, if not known, can easily be mapped out, and involved. Hence, the point is whether there is a political will for making a difference and building new organisational culture.

The second major conclusion that the analysis puts forward is that **culture is not a justification of human rights violations**. The awareness of practices that harm children and women (such as early and forced marriages, sexual abuse, and domestic violence) and the lack of measures for ending them cannot be acceptable both at the level of public authorities and at civil society level. Although the cultural differences are protected from discrimination, the forms of their expression can be contested by law. Traditions within a patriarchal society are deeply rooted in the minds and the behaviour of the community members and are often associated with performing their identity. Therefore, a comprehensive approach involving legal and preventive measures, awareness raising and provision of support to victims is needed.

Integrated methods for tackling violence against women in some of the member states that are already achieving certain success will remain isolated positive examples if they not seen as a model for adaptation and future implementation. Combating human trafficking, sexual and any other type of exploitation, racist-sexist acts, gendered expressions of aggression (including hate speech, direct and indirect discrimination, etc) call for inter-agency cooperation, but in cases of Roma women who often perceive such situations as 'normal,' additional mechanisms should be in place. Among them is the capacity building of public officials and social workers to recognise problems, to address them accordingly and to offer adequate support to the victims.

Policy Recommendation No. 2

Ensuring personal safety of Roma and Traveller women as citizens of a state should be high on the political agenda of any European government. Public authorities must protect cultural rights of communities, but a clear line between the negative forms of cultural expression and negative socio-cultural practices that violate human rights should be drawn. Raising awareness about human rights among community members is crucial, but governments cannot outsource the obligation to protect from and prevent their violation. States need to develop capacities and integrated approaches for efficiently addressing the human and gender-based challenges – this is the way to approach vulnerability of Roma and Traveller women and girls.

Another conclusion that this paper draws is that the **integration and equality of Roma women are not feasible without multidimensional mainstreaming**. In contrast to the regular process of mainstreaming, when efforts are directed towards the majority and the Roma and Traveller rights to support the elimination of discrimination against Roma and Traveller women, efforts need to be directed at three levels:

- ▶ At the level of majorities – mainstreaming of Roma and Traveller rights

- ▶ At the level of Roma and Traveller communities – mainstreaming of gender rights
- ▶ At the level of Roma and Traveller women – mainstreaming of human and gender rights

The lack of awareness among Roma and Traveller women about their own rights is a significant impediment for making them overcome the barriers that individuals put before themselves and the predisposition to self-discrimination. Emancipation cannot take place if oppression is seen as a normality and no alternatives are recognised. Building a vision for a different future that would open the door to opportunities is a necessary component of the awareness raising process and certainly a precondition for participation.

Mainstreaming of gender rights among traditional societies will be faced by resistance, if approached directly. A possible alternative method is creating inter-dependencies. Developmental programmes, for example, can offer a context in which Roma and Traveller men and women can build alternative type of relationships. Support to Roma and Traveller women entrepreneurs and access to specific funding lines that aim at community development would not only provide women with employment opportunities, but can also enable the development of a feeling of respect for women within the community. Such measures fall under the category of multi-aspect, integrated targeted efforts for which the current paper advocates.

Mainstreaming at the level of the majority can also have a gender aspect. One of the findings during the research process, which needs verification, is that Roma and Traveller women's issues are not embedded into the general Women's Rights agenda. It is certainly interesting to explore the question of how many of the active women's organisations in a state have a thematic line and/or a programme in support of Roma and Travellers (but also) women. Mainstreaming through gender solidarity lines can open new opportunities, not only for Roma women, but also for public authorities interested in mobilising support for the targeted general non-discrimination programmes.

Policy Recommendation No. 3

Governments need to develop multi-aspect mainstreaming programmes at three levels: general society, Roma and Traveller communities, and women. Although messages and measures will differ among the levels, all of them must lead to eliminating discrimination against Roma and Traveller women. Raising awareness among Roma and Traveller women about their human and gender rights is a precondition for their emancipation and active participation in public and political life.

The model (Figure 9) provides an idea for the different levels of solidarity, which need to be activated as a mechanism for overcoming divides and enabling development of lines of support. To fight discrimination, grounds for integration and solidarity must be identified. Elimination of discriminatory practices against Roma and Traveller girls cannot happen if their parents are not involved in the processes. Respect for diversity cannot become a horizontal principle if diverse ethnic or cultural groups do not have respect for the other communities within a state. Overall inclusion without gender solidarity -cutting through ethnic divides- is also not feasible. Put in a different perspective, grounds of discrimination can become lines of solidarity if managed properly.

To illustrate the idea, the first model shows the pyramid of discrimination with the cross-cutting solidarity lines. The second figure (Figure 10) presents only the solidarity platforms. The model is an example that can be further elaborated and/or adapted to cover specific situations or national contexts.

The last conclusion that the research puts forward is that improving the situation of Roma and Traveller women is a process that requires **support both from public authorities and civil society**. Cooperation between institutions and stakeholders is crucial for achieving sustainable positive change. Conducting consultations and involving Roma and Traveller women in decision-making processes is certainly needed; but, increasing the awareness and building capacities of public officers and staff, especially social service providers who work with the target group, is crucial. Overcoming the existing lack of trust among Roma and Traveller women and the mainstream community needs targeted efforts. Many states successfully use the services of Roma and Travellers or other mediators to reach out to groups and individuals. Possible support, however, can be sought also from trusted institutions such as religious communities deeply

Figure 9: Pyramid of discrimination and Solidarity Aspects

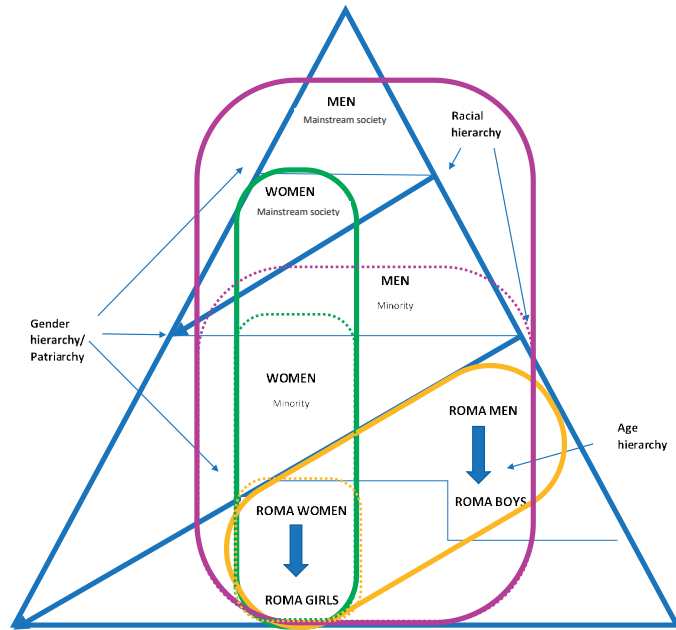
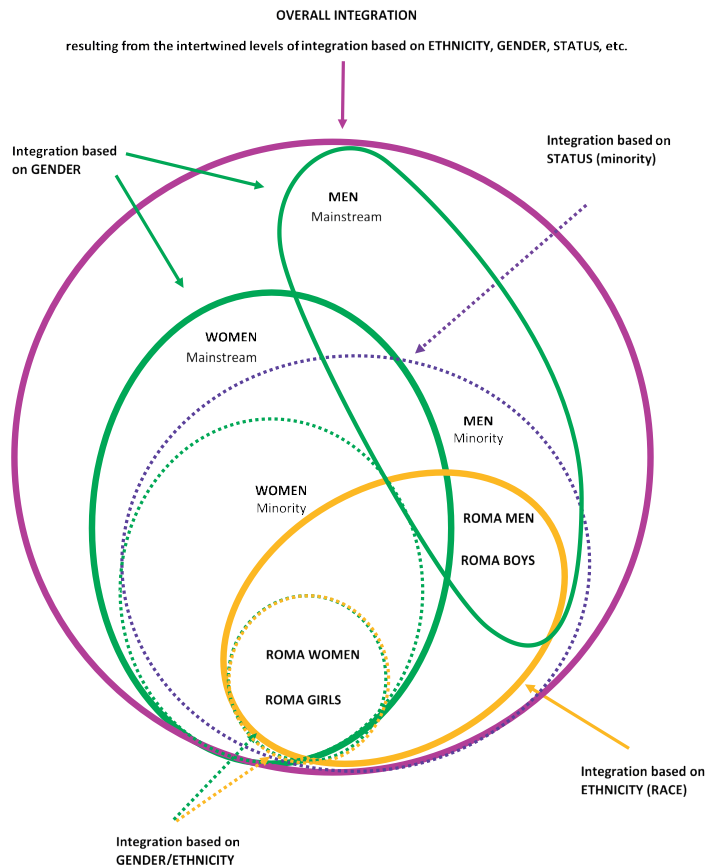


Figure 10: Solidarity Aspects



involved in the lives of Roma and Traveller communities.²³² The bottom line here is that institutions and especially the public institutions responsible for providing protection against violence, need to become not only easily accessible to Roma and Traveller women but also security hubs and not mechanisms for further discrimination.

Provision of institutional support to Roma and Traveller women's organisations and associations to build their capacity and to become active players at the level of the civil society is important not only for achieving a positive change but also for ensuring its sustainability. Fostering cooperation between mainstream and minority players will enable the establishment of additional mechanisms for integration. Authorities can assist such a process by creating a platform and line for inter-cultural encounters by, for example, opening funding lines for joint initiatives both at community level and at the level of the mainstream society.

Policy Recommendation No. 4

Governments need to map the stakeholders (Roma and Traveller women activists, organisations and associations and pro-Roma and -Traveller women NGOs) and to establish structured dialogue and partnership with them. Provision of capacity building assistance and fostering the intercultural cooperation are preconditions for achieving sustainable positive change.

Summarising the above conclusions, the model for a **Roma and Traveller Women's Empowerment Roadmap** emerges. Its three steps are:

Step 1: Ensuring Protection

Normative, institutional, personal (including health, protection from violence and non-discrimination)

Step 2: Enabling Emancipation

Through education, employment, participation, awareness raising and building a vision for the future

Step 3: Fostering Cooperation

Institutional and grassroots cooperation – through the involvement of Roma and Traveller women and girls in decision-making, capacity building of civil society organisations, and funding programmes for inter-cultural activities

Without a minimum level of guaranteed personal security, emancipation would not be feasible and no real cooperation based on mutual respect can occur. To advance the situation of Roma women in Europe, coherent and comprehensive approaches to Roma women's empowerment need to be developed at the national level. The positive change that international and national actors have been trying to achieve for decades calls for structured policies and constructive measures synchronised within and across borders.

Roma women's issues are not just a Roma women's matter – only joint efforts can advance gender equality and enable every individual to develop their full potential as citizens of their states.

²³². Information from NRIS Hungary (2014).

List of abbreviations

Countries

AT	Austria
BE	Belgium
BA	Bosnia and Herzegovina
BG	Bulgaria
CH	Switzerland
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MK	North Macedonia
MT	Malta
NL	Netherlands
NO	Norway
PT	Portugal
RO	Romania
SE	Sweden
SK	Slovak Republic
SL	Slovenia
TR	Turkey
UK	United Kingdom

Institutions

CoE	Council of Europe
EC	European Commission
EIGE	European Institute for Gender Equality
EP	European Parliament
EU	European Union
FRA	Fundamental Rights Agencies
ILO	International Labour Organisation
OSCE	Organisation for Security and Cooperation in Europe
ODIHR	OSCE Office for Democratic Institutions and Human Rights
OHCHR	United Nations Human Rights Office of the High Commissioner
UN	United Nations

Other

NGO	Non-governmental organisation
NRIS	National Roma Integration Strategy

References

All links have been accessed in the period September-December 2020

Bayefsky, Ann F. (1990) The Principle of Equality or Non-discrimination in International Law, 11 Human Rights Quarterly

Beijing Declaration and Platform for Action (1995), Beijing World Conference on Women, Available at: https://www.unwomen.org/-/media/headquarters/attachments/sections/csw/pfa_e_final_web.pdf?la=en&vs=1203

Bulgaria (2012) National Roma Integration Strategy of the Republic of Bulgaria (2012-2020), Available at: https://ec.europa.eu/info/sites/info/files/roma_bulgaria_strategy_en.pdf

Bulgaria (2015) National Action Plan (2015-2020), Available at: https://ec.europa.eu/info/sites/info/files/roma_bulgaria_strategy2_bg.pdf

Council of Europe (1950) Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR), Available at https://www.echr.coe.int/Documents/Convention_ENG.pdf

Council of Europe (1961) European Social Charter, CETS No. 35, Available at: <https://rm.coe.int/168006b642>

Council of Europe (1995) Framework Convention for Protection of National Minorities, Available at: <https://www.coe.int/en/web/minorities>

Council of Europe (1996) European Social Charter (revised), Available at: <https://rm.coe.int/168007cf93>

Council of Europe (2000) Details of Treaty No.177, Protocol No. 12 to the Convention for the Protection of Human Rights and Fundamental Freedoms, Available at: <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/177>

Council of Europe (2009) Conclusions of the Council of Ministers of Employment, Social Policy, Health and Consumer Affairs, 2947th Council Meeting, Available at: https://ec.europa.eu/commission/presscorner/detail/en/PRES_09_124

Council of Europe (2011) Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), Available at: <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/090000168008482e>

Council of Europe (2012) Recommendation on the Protection and Promotion of the Rights of Women and Girls with Disabilities, Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900016805caaf7

Council of Europe (2018) Gender Equality Strategy 2018-2023, Available at: <https://rm.coe.int/prems-093618-gbr-gender-equality-strategy-2023-web-a5/16808b47e1>

Council of Europe (2019) Strategic Action Plan for Roma and Traveller Inclusion (2020-2025), Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680998933

Council of Europe Committee of Experts on Roma and Traveller Issues (ADI-ROM), Available at: <https://rm.coe.int/adi-rom-2020-1-adi-rom-tor-en-26-11-19/16809e41eb>

Council of Europe ROMACT, Available at: <https://www.coe-romact.org/>

Council of Europe ROMACTED, Available at: <https://pjp-eu.coe.int/en/web/roma-local-governance/home>

Council of Europe, Chart of signatures and ratifications of Treaty 177, Protocol No. 12 to ECHR the Convention for the Protection of Human Rights and Fundamental Freedoms, Status as of 19/08/2020, Available at: https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/177/signatures?p_auth=rvnio4Qg

Council of Europe, Data as of July 2012, <https://rm.coe.int/1680088ea9>

Council of Europe, Discrimination on Multiple Grounds, Available at: <https://www.coe.int/en/web/sogi/discrimination-on-multiple-grounds>

Council of Europe, INSCHOOL, Available at: <https://pjp-eu.coe.int/en/web/inclusive-education-for-roma-children/home>

Council of Europe, JUSTROM, Available at: <https://pjp-eu.coe.int/en/web/access-to-justice-for-roma-women/justrom>

Council of Europe, Ratifications of the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) as of August 2020, Available at https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005/signatures?p_auth=9PB0xIYh

Council of Europe, Ratifications of the Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) – as of August 2020, Available at <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/210/signatures>

Council of Europe, Ratifications of the European Social Charter (revised) – as of August 2020, Available at https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/163/signatures?p_auth=9PB0xLYh

Council of Europe, Roma and Traveller Inclusion, Available at: <https://rm.coe.int/council-of-europe-roma-and-traveller-inclusion-july-2020/16809f2a53>

Council of the European Union (1978) Council Directive 79/7/EEC on the Progressive Implementation of the Principle of Equal Treatment for Men and Women in Matters of Social Security, OJ L 6, 10.1.1979, p. 24–25, Available at: <http://data.europa.eu/eli/dir/1979/7/oj>

Council of the European Union (1992) Council Directive 92/85/EEC On the Introduction of Measures to Encourage Improvements in the Safety and Health at Work of Pregnant Workers and Workers Who Have Recently Given Birth or are Breastfeeding (Tenth Individual Directive within the Meaning of Article 16 (1) of Directive 89/391/EEC), OJ L 348, 28.11.1992, p. 1–7, Available at: <http://data.europa.eu/eli/dir/1992/85/oj>

Council of the European Union (2000) Council Directive 2000/43/EC of 29 June 2000 Implementing the Principle of Equal Treatment between Persons Irrespective of Racial or Ethnic Origin, OJ L 180, 19.7.2000, Available at: <http://data.europa.eu/eli/dir/2000/43/oj>

Council of the European Union (2000) Council Directive 2000/78/EC of 27 November 2000, OJ L 303, 2.12.2000, p. 16–22, Available at: <http://data.europa.eu/eli/dir/2000/78/oj>

Council of the European Union (2004) Council Directive 2004/113/EC Implementing the Principle of Equal Treatment between men and Women in the Access to and Supply of Goods and Services, OJ L 373, 21.12.2004, p. 37–43, <http://data.europa.eu/eli/dir/2004/113/oj>

Council of the European Union (2006) Council Directive 2006/54/EC on the Implementation of the Principle of Equal Opportunities and Equal Treatment of Men and Women in Matters of Employment and Occupation (Recast), OJ L 204, 26.7.2006, p. 23–36, Available at: <http://data.europa.eu/eli/dir/2006/54/oj>

Council of the European Union (2007) Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community, signed

at Lisbon, 13 December 2007, OJ C 306, 17.12.2007, Available at: <http://data.europa.eu/eli/treaty/lis/sign>

Council of the European Union (2008) Council Conclusions 16616/1/07 Rev 1, Available at: <https://data.consilium.europa.eu/doc/document/ST-16616-2007-REV-1/en/pdf>

Council of the European Union (2008) Council Conclusions of the 2914th Council meeting General Affairs and External Relations, Available at: https://ec.europa.eu/commission/presscorner/detail/en/PRES_08_359

Council of the European Union (2010) Council Conclusions on Advancing Roma Inclusion 3019th Employment, Social Policy Health and Consumer Affairs Council Meeting, Luxembourg, 7 June 2010, Available at <https://www.eumonitor.eu/9353000/1/j9vvik7m1c3gyxp/vj6ipjcfz2>

Council of the European Union (2011) Council Conclusions on an EU Framework for National Roma Integration Strategies up to 2020, 3089th Employment, Social Policy, Health and Consumer Affairs Council meeting Brussels, 19 May 2011, Available at: https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lisa/122100.pdf

Council of the European Union (2012) Charter of Fundamental Rights of the European Union, OJ C 326, 26.10.2012, p. 391–407, Available at: http://data.europa.eu/eli/treaty/char_2012/oj

Council of the European Union (2012) Consolidated version of the Treaty on European Union OJ C 326, 26.10.2012, and OJ C 326, 26.10.2012, p. 13–390; European Union, Available at: http://data.europa.eu/eli/treaty/teu_2012/oj

Council of the European Union (2012) Consolidated version of the Treaty on the Functioning of the European Union, OJ C 326, 26.10.2012, p. 47–390, Available at: http://data.europa.eu/eli/treaty/tfeu_2012/oj

Council of the European Union (2013) Recommendation on effective Roma integration measures in the member states, Available at: https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lisa/139979.pdf

Council of the European Union (2013) Recommendation on Effective Roma Integration Measures in the member states, OJ C 378, 24.12.2013, p. 1–7, Available at: [https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224\(01\)](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224(01))

Council of the European Union (2013), Council Recommendation of 9 December 2013 on effective Roma integration measures in the member states [2013] OJ C378/1, Available at [http://eurlex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224\(01\)](http://eurlex.europa.eu/legal-content/en/TXT/?uri=CELEX:32013H1224(01))

Council of the European Union (2017) The European Pillar of Social Rights in 20 principles. The Pillar of Social Rights is about Delivering New and More Effective Rights for Citizens, Built Upon 20 Key Principles. European Union, Available at: https://ec.europa.eu/commission/publications/european-pillar-social-rights-booklet_en

Council of the European Union Charter of Fundamental Rights of the European Union, Background, European Union, Available at: https://ec.europa.eu/info/aid-development-cooperation-fundamental-rights/your-rights-eu/eu-charter-fundamental-rights/why-do-we-need-charter_en

Crenshaw, Kimberle (1991) "Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color" in *Stanford Law Review* 43, no. 6, p. 1241-299.

Czech Republic (2006) Annex to Government Resolution No 393 of 12 April 2006, Available at: https://adsdatabase.ohchr.org/IssueLibrary/CZECH%20REPUBLIC_Perspectives%20of%20the%20long-term%20strategy%20for%20Roma%20integration%20to%202025.pdf

Czech Republic (2015) Strategie romské integrace do roku 2020 , updated version 2015, Available at: https://ec.europa.eu/info/sites/info/files/roma_czech_republic_strategy2_cs.pdf

Decade of Roma Inclusion 2005-2015, Available at: <https://www.rcc.int/romaintegration2020/romadecade>

EIGE (2019), Gender Equality Index 2019 (data from 2017), European Institute for Gender Equality website: <https://eige.europa.eu/gender-equality-index/2017/compare-countries/violence/bar>

EIGE, Gender Mainstreaming: Ireland, European Institute for Gender Equality website: <https://eige.europa.eu/gender-mainstreaming/countries/ireland>

European Commission (2009) Multiple Discrimination in EU Law. Opportunities for legal responses to intersectional gender discrimination? European Network of Legal Experts in the Field of Gender Equality, Available at: https://eige.europa.eu/docs/3028_multipliediscriminationfinal7september2009_en.pdf

European Commission (2010), Vademecum: the 10 Common Basic Principles on Roma Inclusion, Directorate-General for Employment, Social Affairs and Inclusion, Available at: <https://op.europa.eu/bg/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

European Commission (2011) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, An EU Framework for National Roma Integration

Strategies up to 2020 (COM/2011/0173 final), Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52011DC0173>

European Commission (2012), Commission Staff Working Document accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: a first step in the implementation of the European Union Framework (SWD/2012/0133 final) Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2012:0133:FIN:EN:PDF>

European Commission (2013) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Steps forward in implementing National Roma Integration Strategies. COM/2013/0454, (NRIS Annual Monitoring Report 2013) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52013DC0454>

European Commission (2014) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Report on the implementation of the EU Framework for National Roma Integration Strategies. COM/2014/0209, (NRIS Annual Monitoring Report 2014) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1587104981903&uri=CELEX:52014DC0209>

European Commission (2015) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Report on the implementation of the EU Framework for National Roma Integration Strategies. COM/2015/0299, (NRIS Annual Monitoring Report 2015) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52015DC0299>

European Commission (2016) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Assessing the implementation of the EU Framework for National Roma Integration Strategies and the Council Recommendation on effective Roma integration measures in the member states. COM/2016/0424, (NRIS Annual Monitoring Report 2016) Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A52016DC0424>

European Commission (2016) Intersectional discrimination in EU gender equality and non-discrimination law, European network of legal experts in gender equality and non-discrimination, Available at: <https://op.europa.eu/en/publication-detail/-/publication/d73a9221-b7c3-40f6-8414-8a48a2157a2f>

European Commission (2017) A comparative analysis of non-discrimination law in Europe 2017, The 28 EU member states, the Former Yugoslav Republic of Macedonia, Iceland, Liechtenstein, Montenegro, Norway, Serbia and Turkey compared, Authors: Isabelle Chopin and Catharina Germaine, European network of legal experts in gender equality and non-discrimination, DG for Justice and Consumers, Available at: <https://op.europa.eu/en/publication-detail/-/publication/36c9bb78-db01-11e7-a506-01aa75ed71a1>

European Commission (2017) Communication from the Commission to the European Parliament and the Council: Midterm review of the EU framework for national Roma integration strategies. COM/2017/0458, (NRIS Annual Monitoring Report 2017) Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A52017DC0458&qid=1522237232017>

European Commission (2018) Communication from the Commission to the European Parliament and the Council: Report on the evaluation of the EU Framework for National Roma Integration Strategies up to 2020. COM/2018/785, (NRIS Annual Monitoring Report 2018) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1544112037077&uri=CELEX:52018DC0785>

European Commission (2018) Gender Equality Law in Europe Justice and Consumers. How are EU rules transposed into national law in 2018? European network of legal experts in gender equality and non-discrimination, Available at: <https://op.europa.eu/en/publication-detail/-/publication/9b101483-3a44-11e9-8d04-01aa75ed71a1#>

European Commission (2018) Mid-term evaluation of the EU Framework for national Roma integration strategies up to 2020, Directorate-General for Justice and Consumers, Available at: <https://op.europa.eu/en/publication-detail/-/publication/a1e33b4f-17af-11e9-8d04-01aa75ed71a1/language-en>

European Commission (2019) A Comparative Analysis of Non-discrimination Law in Europe 2019 (The 28 EU member states, Albania, North Macedonia, Iceland, Liechtenstein, Montenegro, Norway, Serbia and Turkey compared), Authors: Isabelle Chopin and Catharina Germaine, European network of legal experts in gender equality and non-discrimination, December 2019, DG for Justice and Consumers, Available at: <https://op.europa.eu/en/publication-detail/-/publication/a88ed4a7-7879-11ea-a07e-01aa75ed71a1>

European Commission (2019) Communication from the Commission to the European Parliament and the Council: Report on the implementation of the national Roma integration strategies. COM (2019) 406 (NRIS Annual Monitoring Report 2019) Available

at: <https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX:52019DC0406>

European Commission (2019) Roma Civil Monitor: A Synthesis Report on Implementation of the National Roma Integration Strategies in Bulgaria, Czech Republic, Hungary, Romania and Slovak Republic: Assessing the progress in four key policy areas, Available at: <https://op.europa.eu/en/publication-detail/-/publication/446cb4f2-3c82-11e8-b5fe-01aa75ed71a1>

European Commission, Facts and Figures on EU's Roma Population and Integration Strategies for Improving the Living Conditions of Roma in EU Countries, Available at: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu_en

European Parliament (2005) Resolution on the situation of Roma women in the European Union (2005/2164(INI)), Adopted 1 June 2006, Available at: <https://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P6-TA-2006-0244&language=EN>

European Parliament (2013) Empowerment of Roma women within the European Framework of National Roma Inclusion Strategies, Policy Department C: Citizens' Rights and Constitutional Affairs, Directorate General For Internal Policies, Available at: [https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET\(2013\)493019_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493019/IPOL-FEMM_ET(2013)493019_EN.pdf)

European Parliament (2013) Report on Gender Aspects of the European Framework of National Roma Inclusion Strategies (2013/2066(INI)), Committee on Women's Rights and Gender Equality, Rapporteur: Livia Járóka, Available at: <https://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2013-0349+0+DOC+XML+V0//EN>

European Parliament (2013) Working Document on Gender Aspects of the European Framework of National Roma Inclusion Strategies, Committee on Women's Rights and Gender Equality, Rapporteur: Livia Járóka, Available at: https://www.europarl.europa.eu/meetdocs/2009_2014/documents/femm/dt/935/935736/935736en.pdf

European Parliament (2013/2016) Resolution of 10 December 2013 on Gender Aspects of the European Framework of National Roma Inclusion Strategies (2013/2066(INI)), OJ C 468, 15.12.2016, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52013IP0545>

European Roma and Traveller Forum (2015) National Roma Integration Strategies – Evaluating Gender, European Roma and Travellers Forum (ERTF), Available at: https://www.academia.edu/10104151/National_Roma_Integration_Strategies_Evaluating_Gender

- European Women's Lobby Position Paper (2012) Tackling multiple discrimination of Romani and Traveller Women- a crucial factor for the successful implementation of the National Roma Integration Strategies, Available at: https://www.womenlobby.org/IMG/pdf/ewl_position_paper_on_romani_and_traveller_women_en-2.pdf
- FRA (2014) Discrimination against and living conditions of Roma women in 11 EU member states Roma Survey – Data in Focus, European Union Agency for Fundamental Rights (FRA), Available at: <https://fra.europa.eu/en/publication/2014/discrimination-against-and-living-conditions-roma-women-11-eu-member-states>
- FRA (2018) Handbook on Discrimination, European Union Agency for Fundamental Rights (FRA), Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2018-handbook-non-discrimination-law-2018_en.pdf
- FRA (2019) Second European Union Minorities and Discrimination Survey. Roma women in nine EU member states, European Union Agency for Fundamental Rights (FRA), Available at: <https://fra.europa.eu/en/publication/2019/roma-women-nine-eu-member-states>
- Hungary (2014) Hungarian National Social Inclusion Strategy II, Permanently Deprived – Children Living In Poor Families – Roma (2011-2020), Updated Version 2014, Available at: http://ec.europa.eu/justice/discrimination/files/roma_hungary_strategy_en.pdf
- IHREC (2017). Public Sector Equality and Human Rights Duty: eliminating discrimination, promoting equality and protecting human rights. Dublin: IHREUROPEAN COMMISSION Available at: https://www.ihrec.ie/app/uploads/2019/03/IHREC_Public_Sector_Duty_Final_Eng_WEB.pdf
- ILO (1958) Convention 111 concerning Discrimination in Respect of Employment and Occupation (1958, entry into force: 15 Jun 1960), Adoption: Geneva, International Labour Organisation, 42nd ILC session (25 Jun 1958), https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/generic-document/wcms_114189.pdf
- ILO, Ratifications of C111 – Discrimination (Employment and Occupation) Convention, 1958 (No. 111), as of August 2020, International Labour Organisation, Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:312256
- Ireland (2012) Reference to Programme for Government: Government for National Recovery 2011-2016, Ireland's National Traveller/Roma Integration, Available at: https://ec.europa.eu/info/sites/info/files/ireland_national_strategy_roma_inclusion_en.pdf
- Ireland (2017) National Strategy for Women and Girls (2017-2020), Available at: http://www.justice.ie/en/JELR/National_Strategy_for_Women_and_Girls_2017_-_2020.pdf/Files/National_Strategy_for_Women_and_Girls_2017_-_2020.pdf
- Ireland (2017) National Traveller and Roma Inclusion Strategy (2017-2021), Available at <http://www.justice.ie/en/JELR/National%20Traveller%20and%20Roma%20Inclusion%20Strategy,%202017-2021.pdf/Files/National%20Traveller%20and%20Roma%20Inclusion%20Strategy,%202017-2021.pdf>
- Karoly, M. & Milosheva-Krushe, M. & Tsviliy, O. (2020) Gender-responsive evaluation of the “Strategy for the protection and integration of the Roma national minority into Ukrainian society until 2020”, available at: Kóczé, A. & Zentai, V. & Jovanovic, J. & Vincze, E. (2019) Romani Women's Movement: Struggles and Debates in Central and Eastern Europe. Routledge
- OHCHR, Status of Ratification of International Human Rights Treaties: OHCHR Interactive Dashboard, last updated 28 July 2020, Available at: <https://indicators.ohchr.org/>
- OSCE (2003) Action Plan on Improving the Situation of Roma and Sinti within the OSCE Area, Available at: <https://www.osce.org/odihr/17554>
- OSCE Factsheet: ODIHR and Roma and Sinti Issues, Available at: <https://www.osce.org/files/f/documents/9/5/102598.pdf>
- Pavee Point Traveller and Roma Centre (2020) Submission to the Citizens' Assembly on Gender Equality March, 2020 (Public Consultations 2020), Available at: <https://www.paveepoint.ie/wp-content/uploads/2015/04/CitizensAssembly-on-Gender-Equality-05032020.pdf>
- Pavee Point Traveller and Roma Centre, Website: <https://www.paveepoint.ie/>
- Pavee Point Traveller and Roma Centre & Department of Justice and Equality (2018) Roma in Ireland – A National Needs Assessment, Available at: <https://www.paveepoint.ie/wp-content/uploads/2015/04/RNA-PDF.pdf>
- Phenjalipe (2014) Strategy for the Advancement of Romani Women and Girls (2014-2020), Council of Europe, Available at: <https://rm.coe.int/16806f32ff>
- Romania (2015) Strategy of the Government of Romania for the Inclusion of the Romanian Citizens Belonging to Roma Minority for 2015-2020, Available at: https://ec.europa.eu/info/sites/info/files/roma_romania_strategy2_en.pdf
- Slovak Republic (2012) National Roma Integration Strategy Available at: https://ec.europa.eu/info/sites/info/files/roma_slovakia_strategy_en.pdf

Slovak Republic (2014) National Strategy for Gender Equality (2014-2019) of the Slovak Republic, Ministry of Labour, Social Affairs and Family, p.13, p.15, Available at: https://www.legislationline.org/download/id/6850/file/Slovak_Republic_National_strategy_gender_equality_2014_2019_en.pdf

United Nations (1965) International Convention on the Elimination of All Forms of Racial Discrimination, Available at <https://www.ohchr.org/en/professionalinterest/pages/cerd.aspx>

United Nations (1966) International Covenant on Economic, Social, and Cultural Rights (ICESCR), Available at: <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

United Nations (1948) Universal Declaration of Human Rights, United Nations, Available at: <https://www.un.org/en/universal-declaration-human-rights/>

United Nations (1966) International Covenant on Civic and Political Rights (ICCPR), OHCHR, Available at: <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

United Nations (1979) Convention on the Elimination of All Forms of Discrimination against Women, Available at <https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>

United Nations (1989) Convention on the Rights of the Child, Available at: <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

United Nations (1989) Human Rights Committee (HRC), CCPR General Comment No. 18: Non-discrimination, Available at: <https://www.refworld.org/docid/453883fa8.html>

United Nations (2006) Convention on the Rights of Persons with Disabilities, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-15&chapter=4&clang=_en

United Nations (2015) Sustainable Development Goals, United Nations, Available at: <https://www.un.org/sustainabledevelopment/gender-equality/>

United Nations (2017) General Assembly Resolution on the Situation of Women and Girls with Disabilities, GA Session 72, Available at: <https://www.un.org/development/desa/disabilities/resources/general-assembly.html>

United Nations (2020) Women – Snapshot, United Nations, Available at <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2020/gender-equality-womens-rights-in-review-key-facts-and-figures-en.pdf?la=en&vs=935>

Interviews & Email exchanges

- ▶ Ms Theodora Krumova, NGO Amalipe, Bulgaria (18 July 2020)
- ▶ Dr Rositsa Ivanova, National Contact Point, Secretariat of the National Council for Cooperation on Ethnic and Integration Issues (SNCCEII), Administration of The Council of Ministers, Bulgaria (10 July 2020)
- ▶ Mgr. Klara Junova, Office of the Government of the Czech Republic (24.07.2020)
- ▶ Dr Laszlo Ulicska, Department of Strategic Planning for Social Inclusion, Deputy State Secretariat for Social Inclusion, Ministry of Interior, Hungary (23.07.2020)
- ▶ Mr Nicolae Toderas, Programme Evaluation and Social Cohesion Policies Service, Ministry of European Funds, Romania (30.07.2020)
- ▶ Dr Ludmila Placha, Monitoring and evaluation of inclusive policies and their impact on marginalised Roma communities, Project Implementation Department, Office of the Plenipotentiary of the Government of the Slovak Republic for the Roma Community (21.07.20)

Contributions to the CoE/ADI-ROM Thematic Survey

“Gender Perspective in National Roma Inclusion Strategies of Council of Europe member states: A comparative Analysis within the Frameworks of the Strategic Action Plan for Roma and Traveller Inclusion (2020-2025)”, conducted in July-November 2020:

1. Austria
2. Bosnia and Herzegovina
3. Bulgaria
4. Czech Republic
5. Croatia
6. Estonia
7. Finland
8. Germany
9. Greece
10. Hungary
11. Ireland (submission by Pavee Point Traveller and Roma Centre)
12. Italy
13. Norway
14. Romania
15. Poland
16. Slovak Republic
17. Switzerland

Appendix to the report

TABLE OF CONTENTS

1.	Introduction	64
2.	Legal frameworks ensuring equality	65
3.	Key challenges in Roma and Traveller women's equality	65
4.	References to Roma and Traveller women in the national roma integration strategies (NRIS)	66
5.	Legal and policy documents explicitly addressing Roma and Traveller women's issues	68
6.	Positive practices	70
7.	Roma and traveller women's organisations and organisations working in Roma and Traveller women's issues in council of europe member states – non-exhaustive list	76

LIST OF ABBREVIATIONS

CoE	Council of Europe
EC	European Commission
EIGE	European Institute for Gender Equality
EP	European Parliament
EU	European Union
FRA	Fundamental Rights Agency
ILO	International Labour Organization
NRIS	National Roma Integration Strategy
OSCE	Organization for Security and Cooperation in Europe
ODIHR	OSCE Office for Democratic Institutions and Human Rights
OHCHR	Office of the United Nations High Commissioner for Human Rights
UN	United Nations
UNSC	United Nations Security Council

1. Introduction

During the period of data gathering for the preparation of the Report *Empowerment of Roma Women: A Change Under Construction*, the Council of Europe disseminated among the ADI-ROM member states a thematic Survey “Gender Perspective in National Roma Inclusion Strategies of Council of Europe member states: A comparative analysis within the framework of the Strategic Action Plan for Roma and Traveller Inclusion (2020-2025).” At the time of the finalisation of the Report, a total of 17 contributions were received. 16 of them were submitted by member states, namely: Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Germany, Greece, Hungary, Italy, Norway, Poland, Romania, the Slovak Republic, and Switzerland, and one contribution was received from the Pavee Point Roma and Traveller Centre, a non-governmental organisation (NGO) from Ireland. The information provided enabled the development of this Appendix to the Report which focuses particularly on the positive examples about policies and practices aiming at advancing gender equality of Roma and Traveller women and girls.

Acknowledging the significance of the information provided by the survey participants through their contributions, the current document starts with highlighting persistent challenges to the integration of Roma and Traveller women and to ensuring their equality as members not only of the mainstream society, but also within Roma and Traveller communities. Acknowledging the explicit references to Roma and Traveller women in national legal and policy documents and in the National Roma Integration Strategies (NRISs), the paper identifies positive approaches and practices under several thematic categories. Contact details of civil society organisations representing or dedicated to Roma and Traveller women’s issues are provided at the end of this paper.

The purpose of the current document is to serve as a guiding tool and inspiration to policy makers and civil society actors committed to protecting and promoting minority rights and gender equality and to bringing positive changes in their states and in Europe. Exposed to multiple and intersectional challenges, Roma and Traveller women and girls are among the most vulnerable groups in Europe. Advancing their gender equality depends on strategic planning, design and implementation of targeted measures, but mostly, on constructive cooperation between decision makers and civil society with the active participation of all stakeholders.

2. Legal frameworks ensuring equality

To outline different discourses of the Roma and Traveller women’s issues, the survey participants were invited to

provide information about the general legal framework and policy documents that address the gender equality perspective in their respective countries.

The survey participants provided detailed information about existing legislation and normative documents under development, which for the purposes of the comparative analysis are summarised below.

Equality between men and women is guaranteed and promoted at different levels

- ▶ At the constitutional level – Austria, Bulgaria, CH, Czech Republic, Germany, Estonia, Croatia, Hungary, Italy, Poland, Romania, Slovak Republic
- ▶ In gender equality laws – Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Hungary, Estonia, Finland, Ireland, Romania, Slovak Republic
- ▶ In non-discrimination/equal treatment laws – all member states
- ▶ In different thematic laws (different sectors) – all member states
- ▶ In (gender) equality strategies and action plans – Bosnia and Herzegovina, Czech Republic, Croatia, Hungary, Ireland, Slovak Republic

Although most of the respondents stated that the principle of gender equality is fundamental for the national normative frameworks, the following facts are worth highlighting:

- ▶ **Bosnia and Herzegovina** has adopted an Action Plan for the Implementation of UNSC Resolution 1325 “Women, Peace and Security” for the period 2018-2022.²³³
- ▶ In **Germany**, gender mainstreaming is a cross-sectoral topic. Each federal ministry is obligated to achieve gender equality within its areas of responsibility and to eliminate existing disadvantages (German Basic Law (GG), Art. 3 (2), 1994).²³⁴ With the amendment to the Joint Rules of Procedure of the Federal Ministries (GGO)²³⁵ by a Cabinet resolution of 26 July 2000, gender mainstreaming has been an integral component of those procedures.
- ▶ In **Greece**, Law 4604/2019²³⁶ on substantive gender equality was the first national attempt to

233 Action Plan for Implementation of UNSC Resolution 1325 “Women, Peace and Security” for the period 2018-2022, “Official Gazette of BA” No. 01/19.

234. Basic Law of the Federal Republic of Germany, Available at: https://www.gesetze-im-internet.de/englisch_gg/

235. Joint Rules of Procedure of the Federal Ministries (GGO), Cabinet resolution of 26 July 2000 Available at: https://www.bmi.bund.de/SharedDocs/downloads/EN/themen/moderne-verwaltung/ggo_en.pdf?__blob=publicationFile&v=1

236. The official translation of the Law in English can be found in the GSFPE website : <http://www.isotita.gr/en/law-4604-2019-substantive-gender-equality-preventing-combating-gender-based-violence/>.

draft a horizontal bill aiming at creating conditions to achieve gender equality and to eliminate gender inequalities in all sectors of public, social and economic life. The notions of gender mainstreaming and gender budgeting are introduced for the first time into a legislative text.

- ▶ In the **Slovak Republic**, there is not a single law on equality, but in addition to the anti-discrimination law, there are principles of equal treatment in which the issue of gender is also regulated in accordance with Directive 2000/43 / EC.²³⁷

Only a few member states (Bosnia and Herzegovina, Czech Republic, Estonia, Greece, Norway) have made a particular reference to international and European legal tools which precede the national legal provisions. It is interesting to observe that the four member states of the survey participants, which have not signed and ratified the Istanbul Convention,²³⁸ are member states with the lowest rating in the Gender Equality Index (Bulgaria, Czech Republic, Hungary, Slovak Republic).

The overall finding attracting attention is that most of the legal frameworks protecting and promoting gender equality have been introduced over the past 10 years and some of them are currently under development. This indicates that even though women's rights have been a topical issue at the international level for almost half a century, at the national level it is a novel approach that many of the European governments are just beginning to introduce as a horizontal and cross-cutting policy.

In this respect, it is not surprising that with the Roma integration becoming a priority on the international and national agenda only about 10 years ago, ensuring Roma and Traveller women's equality is a challenging task and a change under ongoing construction.

3. Key challenges in Roma and Traveller women's equality

Each of the 16 respondents to the survey highlighted different challenges to the advancement of the situation of Roma women. The section below summarizes their replies and presents them under several major thematic categories. The list should not be considered as exhaustive but indicative. It reveals that efforts in many different areas are still needed in the member

237. Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32000L0043>

238. Council of Europe Convention on preventing and combating violence against women and domestic violence, Istanbul, 11/05/2011, Available at: <https://www.coe.int/en/web/istanbul-convention/text-of-the-convention>; Ratification list, Available at: <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/210/signatures>

states in order to foster the integration of Roma and Traveller women and to ensure their equality within their own communities and within societies at large.

Human rights issues

(Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Germany, Greece, Hungary, Ireland, Norway, Poland)

- ▶ Racism and discrimination in various fields of life
- ▶ Gender-based discrimination
- ▶ Multiple and intersectional discrimination
- ▶ Trafficking and sexual violence
- ▶ Violence
- ▶ Compensation for violation of reproductive rights (justice)

Mainstreaming

(Bosnia and Herzegovina, Croatia, Germany, Greece)

- ▶ Social exclusion
- ▶ Prejudices and negative stereotypes

Participation & representation issues

(Bulgaria, Croatia, Czech Republic, Greece, Italy, Poland, Slovak Republic)

- ▶ Low level of participation (in policy/decision-making and in administration)
- ▶ Low level of civic activism & leadership opportunities
- ▶ Lack of representation in public offices and at high-level positions

Awareness raising issues

(Bulgaria, Finland, Norway)

- ▶ Low level of awareness about human and gender rights
- ▶ Fear from identity loss associated with integration
- ▶ Need for strengthening the equality competencies of Roma organisations

Issues related to culture & traditional practices

(Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Greece, Hungary, Poland, Slovak Republic, Switzerland)

- ▶ Intra-community gender discrimination
- ▶ Patriarchal norms and structures
- ▶ Ascribed strict gender and generational roles
- ▶ Traditional economic activities
- ▶ Forced and early marriages & early motherhood
- ▶ Domestic violence

Institutional support

(Croatia, Greece, Finland, Ireland, Norway, Switzerland)

- ▶ Lack of adequate protection and support from public institutions in cases of violation of human rights
- ▶ Lack of trained public officials and law enforcement officers to provide adequate support
- ▶ Lack of tailored support based on specific needs (e.g., for nomad communities, for groups from different communities within the same state)
- ▶ Lack of institutional capacities to adequately manage integration policies
- ▶ Lack of awareness of public officials about Roma and Traveller women's issues
- ▶ Discriminatory attitudes of public officials
- ▶ Gender equality line is not always considered when designing, implementing and administering activities and measures targeting Roma integration

Education

(Bulgaria, Croatia, Hungary, Ireland, Norway, Poland, Switzerland)

- ▶ Low levels of educational attainment
- ▶ Low level of literacy
- ▶ Early school leaving
- ▶ Low level of parents' education (lack of possibilities to support children)
- ▶ Discrimination

Employment

(Germany, Greece, Hungary, Ireland, Norway, Poland, Romania, Slovak Republic, Switzerland)

- ▶ Low employment rate of Roma and Traveller women (also in comparison to Roma and Traveller men)
- ▶ Lack of possibilities for professional development due to low level of education and discrimination
- ▶ Discrimination

Healthcare

(Bosnia and Herzegovina, Bulgaria, Croatia, Greece, Hungary, Ireland, Romania, Slovak Republic)

- ▶ Higher mortality rate
- ▶ Life expectancy at birth lower than the average for the women from the general population
- ▶ Health status and access to healthcare
- ▶ Health-related awareness (health prevention)
- ▶ Sexual and reproductive health education
- ▶ Higher suicide rate

- ▶ Poorer mental health in comparison to women from the general population
- ▶ Discrimination in healthcare services

Housing

(Ireland, Norway, Slovak Republic)

- ▶ Poor living conditions
- ▶ Discrimination at the housing market
- ▶ Homelessness
- ▶ Reduction of budgets for allocated for accommodation
- ▶ Poor absorption rate of available funds for accommodation

Social welfare and services

(Croatia, Greece, Hungary, Ireland, Slovakia)

- ▶ Access to services
- ▶ Poor housing conditions
- ▶ Discrimination

4. References to Roma and Traveller women in the national roma integration strategies (NRISs)²³⁹

Austria: The Austrian NRIS addresses the empowerment of Roma women and girls as one of its seven main focuses since its update in 2017. Based on close cooperation with and input from Roma civil society, these main focuses were selected and included in the updated version of the document. A main objective is the empowerment of Roma women and girls regarding self-determined social participation. To pursue this objective, activities aiming at the prohibition of forced marriages, raising awareness about contraception and sexual self-determination empowerment of women, and provision of consulting services, considering the (culture-)specific needs of Roma women, have been implemented. The results of the evaluation of the Austrian NRIS, which comes to an end in 2020, and its achievements in fostering gender equality with respect to Roma women are expected in the autumn of 2021.

Bosnia and Herzegovina: The Revised Action Plan of Bosnia and Herzegovina (2017-2020) to address the issues faced by Roma in the areas of employment, housing, and health care covers the rights of Roma women in all those areas. Most of the measures in the existing Action Plan concerning education and raising public awareness about Roma issues were retained from the previous Action Plan for the years 2013-2016. Activities under the new programme are focused on

239. All cited NRIS are accessible via the website of the European Commission, Available at: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country_en

the education of target groups, in which women and girls are included. Roma women are to be educated about property and housing rights and other topics that are gender-sensitive. Solving problems through a project-based approach was identified as the most appropriate mechanism since it can generate funds from different sources and address the specific needs of different segments of the Roma society, such as: employment of women and youth, provision of support to people with disabilities, Roma associations, etc.

Bulgaria: Meeting the international standards of human rights and rights of persons belonging to minorities, the National Roma Integration Strategy of Republic of Bulgaria (2012-2020) addresses the situation of Roma women. One of the horizontal approaches of the Strategy is promoting affirmative action aimed at overcoming the negative traditional practices of the Roma community which violate the rights of women and children. The Operational objective of the “Rule of Law and Non-discrimination” priority under the NRIS is “guaranteeing citizens’ rights, with an emphasis on the rights of women and children, protecting public order, prevention and combating any manifestations of intolerance and hate speech.” Concrete tasks listed under this priority focus on fostering the recognition of the equality of Roma women and encouraging their full individual, social and economic participation in society.

Croatia: The NRIS pays attention to gender even though there is no separate section on issues of gender. The Roma women’s situation in the various target areas is well analysed and specific objectives and measures aim at the empowerment of Roma women and at the promotion of women’s human rights and gender equality. Among the specific objectives envisaged are improving employment opportunities, eliminating violence against Roma women, and promoting gender equality in public life with a specific focus on political representation. The NRIS stresses the need for a more active participation of Roma, especially Roma women’s participation in all phases of the policy process. The NRIS highlights that Roma women are exposed to the risk of becoming victims of human trafficking because of their poorer socio-economic status, lower education, and higher unemployment rates. Specific actions have been planned to improve the knowledge and awareness of this and measures combating human trafficking in Roma communities.

Czech Republic: Intersectional issues are addressed by the current and future Strategy for Equality of Women and Men, in which addressing Roma women’s needs is one of the cross-cutting/horizontal principles. It is expected that the new national Roma Integration Strategy will be adopted by the Czech government at the end of 2020. The future Roma Integration Strategy will also contain several specific targets aimed at

bettering the situation of Roma women, especially in the fields of health, emancipation, and employment. To foster the integration of Roma women, the new Strategy will include specific objectives; but so far, no special budget has been forecasted for the implementation of the Strategy and for ensuring that these objectives will be reached.

Finland: The primary objective of Finland’s National Roma Policy for 2018–2022 (ROMPO2) is to support the progress seen in the societal integration of Roma and positive development in Roma linguistic, cultural and social rights. The policy programme is based on the premise that Finland’s current legislation and comprehensive service system provide a good foundation for the promotion of the inclusion and equality of the Roma population.

Hungary: The current Hungarian National Social Inclusion Strategy (HNSIS, which is also the NRIS of Hungary) strives to reduce the multiple disadvantages of Roma women, such as their low levels of education and employability, poor health status and access to health and social care systems, vulnerability within the family (including early and forced marriages), and the risk of trafficking and sexual abuse. Within the implementation of the HNSIS, large-scale programmes were launched for improving the education level, employability and employment of Roma women.

Ireland: The National Traveller and Roma Inclusion Strategy (NTRIS) contains a special section outlining three key themes in gender equality:

- ▶ The multiple disadvantages faced by Traveller and Roma women should be addressed.
- ▶ Traveller and Roma women should be supported in key areas including education, employment, and economic development.
- ▶ The incidence of violence against Traveller and Roma women should be addressed.

Regardless of the specific reference to Traveller and Roma women, the Strategy contains no clear targets, indicators, outcomes, timeframes, or associated budget lines, and a ‘whole of Government’ approach that would see its implementation by all state departments with senior level participation has not materialised.

Italy: Gender equality of Roma women is included in the fundamental principle of Italian National Roma Strategy (2.1.2 *Approccio di genere: l’approccio sensibile alle specificità di genere*, p.24).

Poland: Gender equality of Roma women was not explicitly mentioned in previous governmental strategies (for years: 2001-2004; 2004-2013 and 2014-2020). It must be clearly underlined that it was **intentionally omitted on the request of the Roma women community themselves** who were afraid that any “gender oriented” actions might have been perceived by the Roma community as an illegitimate attempt to

change cultural patterns (this problem was discussed with Roma women) and might limit or stop Roma women's civic activity. It was agreed during Roma women's meetings, organized by the Government Plenipotentiary for Equal Treatment in 2011 and repeated at the meeting in 2015.

In the new NRIS for the years 2021-2030, for the first time, Roma women and girls are explicitly defined as one of the target groups – as a group with special needs to be addressed, as a group with higher risk of intersectional discrimination and because of their integration potential. There is also an open catalogue of the activities proposed in the framework of the NRIS.

Slovak Republic: The NRIS 2020 addressed the issue of gender equality in its two Action Plans until 2020 in the fields of: non-discrimination, approaches towards the majority society – Roma Integration Initiative through Communication (Government Resolution No. 424 of 13.09.2017). The Slovakian State supports NGO activities in the area of prevention and elimination of multiple discrimination against Roma, including targeted programmes for women, young people, seniors, people with disabilities, LGBTI and other groups from marginalised Roma communities at risk. It also implements programmes aimed at reducing gender inequalities in the private and public life of Roma. More detailed information concerning projects implemented in Slovakia is provided in the section "Institutional support."

5. Legal and policy documents explicitly addressing roma and traveller women's issues²⁴⁰

Bosnia and Herzegovina

The Gender Action Plan of Bosnia and Herzegovina (GAP BA) 2018-2022 includes Roma women in cross-cutting issues. The framework strategic document provides guidelines for gender mainstreaming within the institutions at all levels of organisation of the BA authorities. The improvement of the position of marginalised groups of women and men (including Roma women) is recognised as a cross-cutting issue in the GAP BA. An aggravating circumstance for exercising the rights is discrimination and exclusivity on several grounds such as gender and age, gender and belonging to an ethnic minority, gender and financial situation, gender and disability, sexual orientation, gender identity and sexual characteristics. While planning and implementing the activities, special attention has been given to specific needs of excluded groups and persons exposed to multiple forms of discrimination, including gender aspects and problems. The plans for greater Roma inclusion in society in Bosnia and

Herzegovina contain a definition from the Uniform Rules for Drafting Legal Regulations in BA Institutions, which states that "terms written in the masculine gender apply equally to men and women."

The "Platform for Promoting the Rights and Position of Roma Women in Bosnia and Herzegovina" has been prepared by non-governmental organisations in cooperation with the Agency for Gender Equality BA/ Ministry for Human Rights and Refugees of Bosnia and Herzegovina, the Gender Centre of the Federation of Bosnia and Herzegovina, the Women's Network of Bosnia and Herzegovina, the Association for Promotion of Roma Education "Otaharin" of Bosnia and Herzegovina, UN Women, CARE INTERNATIONAL, Balkans and KVINNA TILL KVINNA Organisation. The work of this Platform is based on a document which contains an analysis of the general situation of Roma women in Bosnia and Herzegovina and it includes a set of recommendations guiding the various key actors in the formulation of targeted policies, strategies and plans aiming at the advancement of their rights and status of Roma women in the country. Focusing on the gaps in the strategies, plans and policies that have emerged in previous periods due to the inadequate inclusion of the needs and priorities of Roma women in action plans at central and local level, the document aims to support the drafting of the new National Strategy (2020-2024). As an advocacy instrument designed to promote the rights of Roma women at the domestic and international levels, the document seeks to recognise, monitor, and prevent anti-Gypsyism in BA. Through its gender analysis, the Platform first looks at the situation of Roma women in Bosnia and Herzegovina, identifies obstacles faced in their daily lives, both in Roma communities and in society at large, and through their efforts to exercise their rights. The second part of the Platform provides a brief analysis of the situation of Roma women in the areas of housing, employment, health and social care, education, political and social participation, gender-based violence and domestic violence, child and early marriage and relationships, discrimination and combating anti-Gypsyism. Following a gender analysis, each of these areas contains recommendations for measures that, in the opinion and experience of the relevant actors involved in the creation of this Platform, should be included in the next action plan, as well as all strategies and plans to achieve greater gender equality for Roma women and to contribute to the improvement of status and rights of Roma women in BA.

Croatia

The National Policy for Gender Equality for the Period 2011-2015 has dedicated specific attention to the improvement of social status of women members of national minorities, with a focus on Roma women.

240. Information about legal and policy documents has been provided by the survey participants.

In 2018, the Government of the Republic of Croatia adopted the new, updated “Rules of Procedure in Cases of Sexual Violence,” which contain the obligations of the competent authorities and other bodies involved in identifying and combating sexual violence and providing help and protection to persons exposed to sexual violence. These rules regulate the course and content of cooperation between the competent authorities in the treatment of victims of sexual violence. Although the document does not mention Roma women explicitly, it addresses all women of vulnerable groups who have been exposed to sexual violence.

Greece

During the process of drafting the new National Strategy for Roma Inclusion, the General Secretariat for Family Policy & Gender Equality/Ministry of Labour & Social Affairs (responsible for the implementation of the Roma inclusion policies) made recommendations in line with the first axis of the National Action Plan on Gender Equality 2016-2020.

Ireland

Certain positive developments over the past decade have opened new perspectives for fostering equality of Traveller and Roma women. Among them are:

- ▶ The Central Statistics Office has included Travellers as an administrative category in the Census since 2006, and Roma will be included for the first time in Census 2021 (now postponed to 2022 due to COVID-19 pandemic).
- ▶ The Irish Human Rights and Equality Commission Act (2014) has established the Irish Human Rights and Equality Commission and introduced the human rights and equality duty of public bodies.
- ▶ In 2017, Travellers were officially recognised as an ethnic minority.
- ▶ The development of the National Traveller and Roma Integration Strategy (NTRIS) 2017-2021, the National Strategy for Women and Girls 2017-2020 (NSWG), and the National Strategy on Domestic, Sexual and Gender-based Violence (NSDSGBV) 2016-2021 – and for the first time Traveller and Roma women’s inclusion has been taken into account in all of these strategies.
- ▶ The publication of the first Roma Needs Assessment in January 2018 was a major step forward in combating discrimination against Roma in Ireland. For the first time we have a comprehensive picture of life in Ireland for Roma, including the specific needs of Roma women. However, the implementation of the recommendations arising from the Needs Assessment has been very slow.
- ▶ The development of a joint implementation plan for gender actions in NTRIS and NSWG.

However, the implementation plan needs further strengthening with clear gendered targets, indicators, outcomes, and robust resources, as well as prioritisation by key agencies. The plan must be in line with Public Sector Equality and Human Rights Duty under Section 42 of the Irish Human Rights and Equality Commission Act 2014 which mandates all public bodies to promote equality, prevent discrimination and protect human rights.

- ▶ An Action Plan Against Racism is currently under development. This is a positive advancement as Ireland’s previous anti-racism action plan ceased in 2008. Roma and Travellers hope this action plan will address institutional and structural racism, and be afforded a robust implementation and monitoring framework, as well as adequate resources. Roma and Travellers also hope that the document has a strong focus on ethnic and gender stereotyping, gendered racism against Traveller, Roma and other minority ethnic women, and will address the negative media representation and racist hate speech by political representatives, high ranking public officials, and in both new and traditional media.
- ▶ There is a commitment in the Programme for Government to revise and update the Incitement to Hatred Act 1989. This is welcome as Roma and Travellers are subjected to hate speech and crime on a daily basis. Ireland’s first ever National Roma Needs Assessment (2018) identified Roma women as being particularly vulnerable to racist on-street abuse.
- ▶ The National Traveller Health Action Plan is also under development. Pavee Point has worked closely with the Health Service Executive to develop and implement a detailed action plan, based on the findings of All Ireland Traveller Health Study (Department of Health 2010).
- ▶ Harassment, Harmful Communications, and Related Offences Bill is currently being progressed which aims to safeguard and adequately regulate the online sphere and make image-based sexual violence an offence.

Poland

The National Programme for Equal Treatment addresses the situation of Roma women under the priority of Awareness building (Task 5: Promotional activities in the media, social media, aimed at counter-acting discrimination and shaping tolerance) and the Measures of “B. Implementation of social campaigns aimed at encouraging entities to implement projects for the potential and social position of women and girls belonging to the Roma minority” and “F. Actions to strengthen the capacity and social position of women and girls.”

6. Positive practices

The information provided by the participants in the survey revealed that the different states have been and are currently implementing various initiatives to ensure gender equality and to advance the situation of Roma women, in particular. Some of the respondents (Germany,²⁴¹ Norway, Slovakia, Switzerland) stated that the policies and measures designed to foster gender equality in their states do not differentiate between majority and minority (Roma) women. Although mainstreaming women's rights is certainly a positive approach, the question is whether Roma and Traveller women, facing multiple and intersectional challenges, equally benefit from the measures in place if they are not offered additional support to access and/or to use them. At the same time, states have reported a number of initiatives aiming at Roma integration in general, with no differentiation based on sex. Acknowledging the importance of these efforts, the current section aims at highlighting the practices that are specifically targeting Roma and Traveller women or have the potential to foster their equal position within the communities and within the society at large. The examples, presenting different approaches to similar challenges, are outlined under the respective thematic categories.

Institutional support and cooperation

Croatia: The Office for Gender Equality was involved in the development of the Action Plan for the Implementation of the National Strategy for Roma Inclusion 2018 to 2020. The Office supported educational programmes and events aimed at raising awareness of Roma women and the general society about problems associated with various forms of discrimination and violence (for example: a round table "The Position of Roma Women in the Republic of Croatia"; a presentation "Activities to Improve the Position of Roma Women"). The Office of Gender Equality funded "Bolja budućnost," Roma women's organisation website,²⁴² supported a series of events related to the International Roma Day such as: exhibition "Romengo drom – A thousand years of Roma migration," International Roma Day, participated in the final conference on the presentation of project results IPA 2012 project collection and monitoring of basic data for effective implementation of the National Strategy for Roma Inclusion.

241. In 2019, Germany accounted for the implemented measures on gender equality in the "Twenty-fifth Anniversary of the Fourth World Conference on Women and Adoption of the Beijing Declaration and Platform for Action (1995) – Report of the Federal Republic of Germany". All measures are also open to Roma women.

242. Bolja budućnost" Roma women's organisation <https://www.bolja-buducnost.org/>

Finland: A gender perspective has been mainstreamed into Finland's Structural Funds programme projects and they have gender-disaggregated data to support development activities.

The responsible actors implementing the National Roma Policy cooperate with the relevant authorities and CSOs regarding their actions related to combating discrimination and promoting equality. These include the Non-discrimination Ombudsman, the Ombudsman for Equality, the National Police Board and the Ombudsman for Children. The monitoring of equality and gender impact assessments are also carried out.

Ireland: State funding was provided to gender equality initiatives (with focus on Roma and Traveller women) and developed by communities and NGOs.

Italy: Through a call for tender in 2018, the *Ufficio Nazionale Antidiscriminazioni Razziali* (UNAR) – Department of Equal Opportunities (DEO) promoted the importance of the fight against the intersectional discrimination. In 2019 a young Roma woman was hired as a facilitator at the National Roma Contact Point. An area of particular interest for UNAR is the fight against the intersectional discrimination involving women of Roma and Sinti origin, characterized by significant differences in terms of class, social role, legal status, religion, ethnic origin and victims of double stereotypes. UNAR has promoted publications such as the volumes Roma Women, Roma and Sinti Series (UNAR-ISTISS, 2014).

Poland: During the implementation of the NRIS (2012-2020) the role and special needs of Roma women and girls were recognised, and targeted support was offered to projects submitted by local authorities and focusing on Roma women, for example: "Educational support for young Roma women," "Roma culinary meetings" and "Employment of Roma women."

Romania: The existing national programmes, managed by the National Agency for Employment and the Ministry of Health, aim at increasing employability of Roma women and promoting family planning measures among Roma women and Roma girls. The health mediators' programme, which resulted in the emergence of a new professional category, namely the Roma community nurse, has been recognised as an example of good practice for facilitating access to healthcare.

Slovak Republic: In 2017, the Ministry of Justice supported a total of 4 projects, of which 2 were NGO projects aimed at working with persons belonging to marginalized Roma communities who were at risk of multiple discrimination. The other 2 projects were aimed at raising public awareness of the issue of discrimination against marginalized Roma communities, which were available to the general public.

The same year, the Ministry of Labour, Social Affairs and Family of the Slovak Republic allocated funds from the state budget for support of gender equality. In 2018, the Ministry supported a project through the civic association Sharing, focused on educational activities in cooperation with the civic association EDUMA. Among the project deliverables was a film about gender equality (26 min), in which the basic concepts related to gender issues were explained. In 2019, two additional projects have also been implemented.

The updated action plans of the Strategy of the Slovak Republic for Roma Integration envisaged the provision of financial support for the establishment of silver clubs and activities of women of silver age. In 2017, the Office of the Plenipotentiary of the Government of the Slovak Republic for Roma Communities supported 5 projects aiming at the establishment of silver clubs for women in marginalized Roma communities and at supporting their social and cultural needs.

Participation

Bosnia and Herzegovina: The Council of Ministers has established a Council for Roma. 11 out of the 22 members of the Council are representatives of Roma non-governmental organisations. The principle of gender equality has been applied in the selection. The involvement of Roma women aims not only at the enhancement of their participation, but also at bringing in the perspective of Roma women in the discussions and to enhance the protection of their rights.

Croatia: The Government Office for Human Rights and Rights of National Minorities in cooperation with the Government's Office for Gender Equality, organised a round table on the "Status of Roma Women in the Republic of Croatia" and involved participation by active, mostly young, Roma women and the Gender Equality Ombudswoman's Office. The occasion was also used to set up their informal network.

Through an open competition within the framework of the "Making the Most of EU Funds for Roma" initiative, scholarships were awarded to young Roma for internships in bodies, institutions and organisations dealing with EU integration processes in the Western Balkans. The programme allowed three institutions – the Government Office for Human Rights and Rights of National Minorities, the United Nations Development Programme Office and the Zagreb's Faculty of Humanities and Social Sciences/ "Step by Step" Public Open University – to hire three young Roma (one male and two female) for the period of one year.

Greece: The General Secretariat for Family Policy and Gender Equality at the Ministry of Labour and Social Affairs, implementing the National Action Plan on

Gender Equality (2016-2020), involves Roma women and girls in the processes of the design and implementation of gender equality policies in Greece.

Italy: With the establishment of the National Platform on Roma and Sinti Communities (RSC)- an operational tool for dialogue between the Government, central public administration, non-governmental organisations, and the RSC in 2017, a participatory governance system was launched. The Platform gathered 79 associations from all over the national territory, which expressed their interest to join, and the RSC Community Forum composed of 25 associations. Specific attention was placed on the participation of women and girls in the National Platform.

Capacity building and empowerment

Croatia: A multi-module programme to build up the capacity and support of young Roma people in taking an active role in the development and implementation of projects in their communities was launched by a consortium of three partnering organisations – the Centre for Peace, Legal Advice and Psychosocial Assistance of Vukovar, the Volunteer Centre of Osijek and the Roma Youth Organisation (ROM). The initiative was supported by the "Making the Most of EU Funds for Roma" initiative of the Open Society Foundations and the Government Office for Human Rights and Rights of National Minorities. The implementation began in 2015, involving ten young Roma women and men from all over Croatia. Five more modules were organised in 2016.

Fostering community activism of both Roma men and women has been the goal of a seminar organised in 2016 by the Government Office for Human Rights and Rights of National Minorities within the frameworks of the project National Roma Platform "Living Equality." The seminar and the discussion gathered about twenty young Roma women and men from all parts of Croatia. Aiming to build the capacity of young Roma men and women for community activism and action, the seminar focused on the implementation of the National Roma Integration Strategy at local level in the areas of education, employment, health and housing and on the identification of the needs of young people belonging to the Roma national minority.

Better Future Association of Roma Women in Croatia and Gačanka Association implemented the project "ROMA LI: Capacity Building of Local Government and Establishing a Young Roma CSO in the County of Lika-Senj for Improved Access to Human Rights" in partnership with the GTF Initiative for Sustainable Growth. The project's objective was to strengthen and improve the visibility of Roma minority interests by building the capacity of young Roma of Lika-Senja and raise awareness about the importance of cooperation between Roma community, majority population and institutions.

Fostering Roma women's empowerment through education, training, increased experience and awareness, work experience, improvement of socio-economic position and legal employment was the aim of the project "Roma with Roma for a Better Tomorrow." It was designed and implemented by a Roma women's civil society organisation to contribute to the improvement of the conditions and quality of life of the socially disadvantaged Roma population in Darda, Bolman and Jagodnjak.

Estonia: Since 2017, Roma youth and Roma women are the main target group of the Estonian Roma Platform project. Trainings are offered to Roma youth with a prevalence of young Roma women.

Hungary: A subproject focused on strengthening Roma women's communities has been implemented within the framework of the national programme for segregated areas. This subproject offers Roma women the opportunity to play community-building roles beyond their traditional family roles, which can improve their personal situation both as women and Roma. The project is co-financed by the European Union.

Justice

Czech Republic: Important legislative amendments in the past several years have had a positive impact on gender equality, and therefore, on Roma women. To address one of the major challenges to Roma women's integration, efforts to pass a law on compensation for forced sterilisation were made in 2015, but they were unsuccessful. In 2020, an amended bill will be requested.

Training of public officials

Greece: Training seminars are offered for the staff of the General Secretariat for Family Policy and Gender Equality at the Ministry of Labour and Social Affairs and its structures. The seminars deal with "offering support services to women victims of gender-based violence" and with "counselling on labour issues for women" and are held in collaboration with the Training Institute of the National Centre of Public Administration and Local Government (INEP). The collaboration between the two institutions is continuous and takes into consideration the training needs and issues arising from the direct work of the staff with the target groups.

Awareness raising

- ▶ Croatia: "Raising Awareness of Human Rights among Women Belonging to National Minorities" is a special priority axis of a NGO grant scheme for projects focused on the protection of, respect for and promotion of human rights of the Government Office for

Human Rights and Rights of National Minorities. Through it, a project idea of OLJIN ("Education for Love and Nonviolence") Association aimed at raising the awareness of Roma women about their rights through stories and puppet shows.

Greece: Awareness raising of Roma women has been among the goals of the General Secretariat for Family Policy and Gender Equality at the Ministry of Labour and Social Affairs and its structures. One of the implemented initiatives was a public awareness campaign including seminars, conferences, publication of informational material in several languages (Greek, English, French, Albanian), TV and radio spots, cultural events, publicity on public transport, press releases, a webpage (www.womensos.gr), a Facebook page, and banners in webpages. Funding has been secured so that the structures and actions of the above described programme operate on a long-term basis.

Romania: The National Agency for Equal Opportunities is preparing a national campaign to raise awareness about domestic violence and violence against women with a focus on the provision of information and education to Roma women to improve their access to legal protection measures against domestic violence, social services, medical services, health services, community health assistance services and education. The campaign's activities will be carried out at local community levels, involving representatives of public institutions and organizations. The national campaign will also include a national media campaign for raising awareness on the discrimination of Roma women. The initiative will be implemented within the framework of a national project in support of the implementation of the Istanbul Convention, which was launched in 2019.

Entrepreneurship and employment

Croatia: Fostering entrepreneurship skills of Roma women has been the focus of several initiatives implemented in Croatia, including the project "Romona – Roma Women Entrepreneurship Incubator" that was managed by the City of Čakovec as part of the IPA 2011 programme. The project was implemented by the Council of Europe with the active involvement of the Government Office for Human Rights and Rights of National Minorities. A social entrepreneurship training initiative was supported by the United Nations Development Programme (UNDP) Office in the Republic of Croatia supporting young Roma women from the Kuršanec settlement.

Hungary: The "Chance for Women programme" aimed at the provision of training followed by employment of unemployed Roma women in public services (in social and child welfare/child protection systems). The programme involved 1,026 target group members at 66 employment sites nationwide. 802 people graduated either as child and youth supervisor, or as social

caregiver and nurse. Currently, 385 people (80% of which are women) are employed. The programme was co-financed by the European Union.

Education

- ▶ **Bulgaria:** Since the beginning of the 2017/2018 school year, a mechanism for joint work of institutions for enrolment and retention in the education system of children and students in compulsory pre-school and school age, including Roma children and students, has been in place. Over 1000 teams have been formed with representatives of various institutions – teachers, directors, social workers, police officers, municipal officials, health and educational mediators, civil society representatives. The mechanism is focused not only on enrolment of children, but also on the provision of support to them. The role of the appointed educational mediators, well accepted by the communities, is to work with parents and to persuade them to let their children go to school. The setup of the mechanism and the appointment of the mediators also help to prevent early school leaving of Roma girls and foster gender equality with respect to Roma women.

Croatia: The Roma Heart Association of Roma Women, acting in partnership with Jagodinjak Primary School, Darda Primary School, and the Kašmir Association of Roma Women from Belišće, implemented the project “Education Towards Human Rights.” Its objective was to promote equal opportunities in access to education for preschool and school-age children and to develop cooperation between associations, schools, and parents in the integration of Roma children in the educational system.

The “Empowering Roma parents to support upbringing and education of their children” project mainly involved Roma women with the aim to increase their capacities in parenting and provision of quality support to their children once they enroll in elementary school. The organised workshops within the framework of the programme brought together Roma and non-Roma parents and children to enable the development of intercultural competence and to foster the interest of the target group in the education of their children (including daughters).

Hungary: The project “Bari Shej – Big Girl – Fata Mare” is focused on increasing the chances of further education of Roma girls (aged 10-18) through the provision of complex services with the help of mentors. The aim of the programme is not only to reduce early school leaving, promote further education and establish employability, but also to address issues that determine the quality of life and particularly affect Roma women. Healthy family life and risks to which Roma girls are exposed, such as early marriages, trafficking

and prostitution, domestic violence are specifically addressed by the programme. The 24-month project aims at involving at least 1,800 disadvantaged young girls. The programme is co-financed by the European Union.

Norway: “School Guidance for Roma Pupils the City of Oslo” aims to improve pupils’ learning outcomes, reduce absenteeism, and increase the number of children who complete primary and lower secondary education. The school guidance programme was expanded with more employees in 2019.

Switzerland: The Swiss Confederation’s Action Plan provides for the cantons and municipalities to establish distance education programmes for families with a mobile lifestyle. This measure is expected to have a positive impact on the attainment levels, on the reduction of the drop-out rates and potentially on the further professional training. The programme aims at enabling the economic independence of the communities and the reduction of their dependence on social assistance.

Healthcare

Bulgaria: Annually, the Ministry of Health funds health-activities for people with no health insurance – emergency care, preventive examinations and obstetric care for women, long-term treatment of premature infants and children with disabilities, psychiatric care, programme on rehabilitation of women with breast cancer, transplantation of organs, tissues and cells, assisted reproduction, medical devices for interventional treatment of cerebrovascular diseases, provision of blood and blood products, etc. The National Programme on the Improvement of Maternal and Child Health 2014-2020 provides health services, which are paid from budget of the Ministry of Health and are accessible to all citizens, regardless of their health insurance status.

Croatia: The project ‘Health Education of Roma in Osijek-Baranja County’ aimed to educate and raise awareness of the Roma population about family planning, reproductive health, and measures for safe motherhood. Increasing the health-awareness of the pregnant and parturient women was expected to have a positive impact on reducing their resistance towards medical examinations.

Ireland: The first Traveller Primary Healthcare Project was established by Pavee Point in 1994. There are now approximately 27 Primary Health Care for Traveller Projects (PHCTPs) operating across the country, 10 of which fall under the Eastern region. These Projects respect and acknowledge the distinct culture and identity of Travellers and bridge gaps between Traveller community and health service providers. The Projects support the delivery of more equitable, sustainable and cost-effective health care.

PHCTPs strive to go beyond 'provision of information,' enabling the community to take ownership of situations and participate in the search for solutions. The measure of success, in other words, is not only an improvement in the community's 'health status,' but the extent to which the community is empowered to recognise inequity and negotiate solutions going forward. The PHCTPs advocate for the development of a truly intercultural health service which comprises targeted and mainstream measures and acknowledges power differentials and structural racism in mainstream health service provisions.

The projects are Traveller women led, as they are trained as Community Health Workers (CHWs). The ongoing professional development of CHWs is part of this empowerment process, as is the work itself. In assisting the community on the ground CHWs become advocates, using insights gleaned from fieldwork to participate in decision making processes at local, regional and national level.

Pavee Mothers' has been developed by Traveller women for Traveller women. The awareness raising initiative provides support to the target group via:

- ▶ A printed information pack that is not literacy based
- ▶ A Traveller friendly website that can be easily used on a mobile phone
- ▶ A text message campaign that provides support to new Traveller mothers

Social services

Czech Republic: The Act on Providing Care of Children in a Children's Group, adopted in 2016, directly addressed the need to expand the range of accessible, good quality, and locally available children day care services in support to families. Currently, there are over 1,000 children's groups operating, which provide care for approximately 16,000 children and 98 micro-nurseries providing care for almost 700 children. These services are important for women's equal participation in the labour market and influence the gender pay gap in the long term.

A new paternity leave entitlement came into effect in the Czech Republic in 2018, passed as an amendment to the Sickness Insurance Act. It allows fathers to take a 7-day leave at any time in the 6 weeks following the birth, adoption or fostering of the child. A long-term care entitlement was also introduced by the Act. The amendment entitles a person, who needs to take care of a family member, to a paid leave of up to 90 days. The increase of the parental leave allowance by 36% in January 2020, also improved the living conditions of families with children.

Poland: In 2019, the Act on additional parental benefits (Dz.U. z 2019, poz. 303) entitled mothers of four or

more children, who had never chance to seek employment, to retirement benefits. Although the primary beneficiaries of this measure are Roma women, it is an example for a mainstreaming policy that fosters gender equality and the economic position of women.

Prevention of violence and protecting victims of violence

Czech Republic: To support the victims of domestic and gender-based violence, free phone lines providing 24/7 services and new specialised therapeutic centres covered by public healthcare insurance have been established. Awareness-raising campaigns to inform the target groups about available support services (especially during the COVID-19 pandemic) have been run by the government. Additionally, information has been distributed via the government's social media, communication channels of selected stakeholders and organisations, and banners have been put up in public transport vehicles. Following the adoption of the Act on the Liability for Offences and Proceedings Relating Thereto in 2016, perpetrators of intimate violence may be ordered to take part in appropriate training on anger management or violent behaviour. Programmes for working with perpetrators of domestic and gender-based violence have therefore been developed as well.

Greece Adopted in 2010, the National Programme on Preventing and Combating Violence against Women was the first comprehensive and coherent national action plan against all forms of gender-based violence, which targets all women regardless of their origin and status. Within this programme, a network of 62 structures has been established and operates for women victims of gender-based violence. The structures include a national helpline, 42 Counselling Centres and 20 Shelters throughout Greece.

The national low-cost 24/7 SOS telephone helpline 15900 and e-mail address sos15900@isotita.gr (both bilingual Greek and English) are confidential and staffed by gender-trained counsellors. The structures provide free services, including psychosocial support, legal counselling, emergency shelter, legal aid in cooperation with local Bar Associations, and counselling in labour issues.

In addition to safe accommodation to women victims of violence and their children, access to health services and the enrolment of children in schools is facilitated. In designing and delivering these services, due consideration is given to the different social, ethnic, and cultural backgrounds, faiths, states of health, and so on. Among the tasks of the structures is also networking with local agencies and relevant associations to have a joint communication and public awareness programme. During the current period, the target group of all services has been expanded to include women victims of multiple discrimination (refugees, single parents, Roma, women with disabilities, etc.).

Ireland: The Pavee Point Violence Against Women (VAW) Programme provides a Traveller and Roma analysis of gender-based violence (GBV). It maps out the specific issues and barriers that Traveller and Roma women face in relation to domestic and sexual violence and develops responses to violence against Traveller and Roma women by working with communities, service providers and policy makers.

Arising from the National Traveller and Roma Inclusion Strategy (NTRIS), a three-year pilot programme to address domestic and sexual violence in the Traveller community is currently being funded by Tusla Child and Family Agency. This pilot project uses community development principles as its approach in preventing DSGBV in the community and is currently in its second year. There is a specific budget line for this pilot project. However, the pilot is significantly underfunded: it is restricted to four local geographical areas only and employs 4 Traveller women on mere 12 hour/week contracts on a minimum salary scale.

Romania: Starting in 2019, the National Agency for Equal Opportunities is implementing a national project as a strategic action meant to support the Romanian authorities to adopt a coordinated approach in addressing the challenges raised by the implementation of the Istanbul Convention, aiming to reducing domestic violence and violence against women.

The 6 main outputs of the project are:

1. Romanian institutional set-up in the field of domestic violence and violence against women evaluated
2. Training provided on judiciary and law enforcement intervention methods
3. Specialized social services of domestic and gender-based violence supported
4. Counselling services for perpetrators of domestic or gender-based violence established
5. Victims of sexual violence supported
6. Awareness raising campaigns on domestic and gender-based violence conducted

The improvement of the multiagency judiciary and law enforcement intervention methods is realized by organising multidisciplinary training sessions for judges, prosecutors, police officers and forensics, regarding the key elements in cases of domestic violence and violence against women, while taking into account the specific particularities of ethnic minorities, such as Roma women.

Mainstreaming

Greece: The 2019 Law for substantive gender equality and sexual and gender-based violence has introduced for the first time the notions of gender mainstreaming and of gender budgeting into a legislative text. In

fact, all basic notions, mechanisms, institutions, and stakeholders are explicitly clarified with the aim to enable the adequate implementation of the principle of gender mainstreaming and to prevent and combat violence against women.

Specific articles of the Law elaborate on the social dialogue, the drafting of “Equality Plans” in the workplaces by employers, and the establishment of Equality Signs and Gender Awards for enterprises that adopt gender equality corporate policies as a reward for their engagement in favour of equal treatment and equal opportunities for their employees. The use of gender-neutral language in official documents is incorporated as a distinctive task of the public administration.

The principle of gender mainstreaming is set in the fields of health and social solidarity (e.g. special attention to the status and the needs of vulnerable groups of women, including Roma women and girls), while a special leave of seven working days is attributed to female employees who attend prescribed programmes of medically supported fertility.

In the fields of mass media and advertisement special provisions are activated against gender stereotypes and discriminations.

Finland: The Advisory Boards on Romani Affairs and Roma organisations have made a commitment to the promotion of equality between women and men in their activities. The principle of mainstreaming a gender perspective must be applied in all of their activities and in the design, preparation, decision making, implementation and impact assessment of any planned action and policies. Gender mainstreaming requires that public officials, project actors and Roma to know how to incorporate relevant information and views into their own activities, expertise and professional practices.

Norway: In 2015, the Prime Minister apologised for the racist exclusion policy pursued by Norwegian authorities towards the Norwegian Roma before, during and after World War II and promised collective reparations. The Roma Culture and Resource Centre (*Romano Kher*) was opened in 2018 as a result of the collective reparations. Norwegian Roma participated in the decision-making processes concerning the operation of the centre. The centre is a place where Roma acquire knowledge and new skills and where Roma children can play and learn. The Roma Culture and Resource Centre is also intended to provide a meeting place between Roma and the majority population. Many of those who work at the centre are from Roma backgrounds. The centre houses a bridge-building service for Roma, assisting Roma in their dealings with the public sector, and arranging courses for and giving talks to public agencies. The centre also runs its own online TV channel, Nevimos Norvego, producing content in both Norwegian and Romanes.

7. Roma and Traveller women's organisations and organisations working on Roma and Traveller women issues in council of europe member states – non-exhaustive list

The current section presents a non-exhaustive list of Roma and Traveller women's organisations and of organisations which have been working with Roma and Traveller women's issues in Council of Europe member states. Some of these organisations are either lead by Roma and Traveller women or run projects for empowering Roma and Traveller women. The list is based on information provided by member states in response to the survey and on Roma and Traveller women's participation in the meetings of the Council of Europe's Dialogue with Roma and Traveller civil society. Three of the respondent countries (Greece, Norway and Switzerland) have reported that no organisation with a focus on Roma women rights is publicly known. Greece has pointed out their intention to initiate a process of mapping Roma women's organisations in the country with the aim of creating a network of Roma women and identifying new potential intercultural mediators. Some of the respondents (e.g., Estonia, Czech Republic, Italy) highlighted that although there are no Roma women organisations focused exclusively on Roma women, a number of NGOs have programmes targeting the advancement of their situation.

The survey also revealed that Roma women need support to become active civil society members and leaders. The fact that in some states the public authorities are not aware of the existence of Roma women NGOs indicates either that such are missing or that they are not active, visible or well connected with the state authorities. Another interesting point is that most of the Roma NGOs are led by Roma men. Poland is an illustrative example, where out of 100 registered Roma organisations (63 of which active partners to the Ministry of Interior and Administration), only 2 place a special focus on Roma women's issues and only 15 out of 100 are chaired by Roma women.

Albania

Institute of Romani Culture in Albania – IRCA
Address: Str. Myslym Shyri – S. Pitarka 24/b P.O. Box 154, Tirana 1001, Albania
Website: <https://irca.al>

Union for Development and Integration of Roma Minority in Albania "Amaro Drom"
Address: Skender Veliu Rr. Sulejman Pasha, Lagj. 4, P.2, Shk. 3 Tirana Albania
Website: <http://amarodrom.al>
Contact: amarodrom@albaniaonline.net

Austria

Association "Vivaro"
Website: <https://www.vivaro.at/>
Contact: office@vivaro.at

Association "Romano Centro"
The Association has a special programme for Roma women; it offers consulting services
Address: Hofmannsthalgasse 2, Local 2, 1030 Wien, Austria
Website: <https://www.romano-centro.org/>
Contact: lili.marinkovic@romano-centro.org

Romblog.at
Website: <https://www.romblog.at>
Contact: gilda@romblog.at

Bosnia and Herzegovina

Roma Women's Network "Uspjeh"
Website: <https://www.zrm-uspjeh.ba/index.php/bs/>
Contact: <https://www.zrm-uspjeh.ba/index.php/bs/kontakt>

An informal network of organisations dealing with the issue of Roma women. It was founded in 2010 on the initiative of the Roma Women's Association "Bolja Budućnost" from Tuzla. The members of the network are:

UŽR "Bolja budućnost", Grad Tuzla
Website: <http://www.bolja-buducnost.org>
Contact: <https://www.bolja-buducnost.org/index.php/bs/>

ORIV "Budi mi prijatelj", Visoko
Website: <http://www.budimiprijatelj.org>
Contact: ugbudimiprijatelj@gmail.com

Centar za majke "Nada", Kakanj
Contact: urczmnadakakanj@hotmail.com

UR "Romska djevojka-Romani ćej", Prnjavor
Contact: uromskadjevojka@hotmail.com

UR "Romkinja", Bijeljina
Contact: urromkinja@gmail.com

Bulgaria

Roma Women's Association „Hayachi“, Novi Pazar
Contacts: hayaci@abv.bg (Tel: +359896706322)

Health and Social Development Foundation
Website: www.hesed.bg
Contact: mail@hesed.bg

Integro Association Bulgaria
Website: <https://integrobg.org/>
Contact: info@integrobg.org

Center for Interethnic Dialogue and Tolerance Amalipe
Website: <https://amalipe.bg/>
Contact: office@amalipe.com, center_amalipe@yahoo.com

Association National Network of the Health Mediators
Website: www.zdravenmediator.net
Contact: info@zdravenmediator.net

Croatia

Association of Roma Women of Croatia Better Future (Udruga žena Romkinja Hrvatske "Bolja budućnost")
Website: <http://www.uzrh-bb.hr>
Contact: uzrh.boljabuducnost@yahoo.com

Association of Roma Women Roma Heart (Udruga žena Romkinja "Romsko srce")
Website: <https://www.facebook.com/Udruga-%C5%BEena-Romkinja-Romsko-srce-296671939813/>
Contact: Facebook; Tel: +385 31 745 158

CESI – Center for Education, Counseling and Research (CESI – Centar za edukaciju, savjetovanje i istraživanje)
A feminist organization that advocates for advancement of women in the Croatian society. The Organization has implemented projects focused on Roma women employment in cooperation with the Association of Roma Women of Croatia 'Better Future'.
Website: <http://www.cesi.hr/>
Contact: cesi@cesi.hr

Union of Roma Associations Kali Sara (Savez Roma u Republici Hrvatskoj "Kali Sara")
The largest umbrella organisation of Roma in Croatia, active in all areas relevant to improvement of Roma position, such as poverty fighting, education, housing, health, cultural autonomy, including Roma language and historical memory
Website: <http://kalisara.hr/>
Contact: kalisara@kalisara.hr

Czech Republic

Slovo 21, z.s.
Within the organization there is a Manushe women's group dedicated to the emancipation of Romani women, their empowerment and community work.
Website: <https://www.slovo21.cz>
Contact: slovo21@centrum.cz

Jako doma – Homelike, o. p. s.
The organization provides support to homeless Roma women
Website: <http://jakodoma.org>
Contact: jidelna@jakodoma.org

IQ Roma servis z.s.
Address: Vranovská 846/45, 614 00 Brno, Czech Republic
Contact: IQRS@IQRS.CZ
Website: <http://www.iqrs.cz/en>

NGO Group of Women Harmed by Forced Sterilization in the Czech Republic
Elena Gorolová Email: elena.gorolova@seznam.cz

Romea.cz
Roma NGO and journalism website publishing also in English
Address: Korunní 127, 130 00 Praha 3
Contact: romea@romea.cz
Website: <http://www.romea.cz>

Estonia

Roma Association ROMANEDROMA /European Roma Forum in Estonia (ERFE MTÜ)
The organization works on various Roma-related issues.
Contact: romanedroma@gmail.com

Finland

Christian Roma Women's Association Kromana ry
A nation-wide Roma women's organisation, founded in 2006
Address: Rantakuja 4, 24800 Halikko
Contact: 046 520 6004

Fintiko Romano Forum (FRF)
The National Roma Forum of Finland was established in 2007 at the national meeting of the Finnish Roma organizations. It has 31 members which are registered Roma organisations.
As a national organization FRF is the central federation of the Roma organizations in Finland and voices out its member organizations' as their common voice both on the national and international level.
Address: Palkkatilankatu 1-3 liiketila 5, 00240 Helsinki 3q
Website: <https://www.romanifoorumi.fi/>
Contact: info@romanifoorumi.fi

Romano Missio ry
Romano Missio is a national child welfare and social service organization running also projects and service centres for Roma women. It also produces Christian and educational services for the Roma in cooperation with the Evangelical Lutheran Church of Finland, united Christians, municipalities, state and Roma organizations. Romano Missio is the oldest national Romany organization, established in 1906.

Address: Keskustoimisto Romano Missio ry., Vilppulantie 2 C 4, 00700 HELSINKI
Website: <http://romanomissio.fi/english/>
Contact: toimisto@romanomissio.fi

The Finnish Roma Association (Suomen romaniyhdistys ry)
National Roma association established in 1967 and working especially with Roma Youth issues, Roma elderly, housing, employment, education, language, anti-discrimination, social justice and health care related issues.
Address: Kuortaneenkatu 13, 5krs 00520 Helsinki
Website: <https://www.suomenromaniyhdistys.fi/>
Contact: info@suomenromaniyhdistys.fi

France

Collectif National Droits de l'Homme Romeurope (C.N.D.H.R)

Umbrella organisation of 45 member organisations founded in 2000 and helping immigrant Roma.

Address: 59 rue de l'Ourcq, 75019 Paris

Website: <https://www.romeurope.org/cndh-romeurope/>

Contacts: through website form or tel. 06 35 52 85 46.

Germany

Roma women network Romane Romnja, Köln

Website: <https://www.facebook.com/Romane-Romnja-Aktivit%C3%A4ten-1418212828442205>

Contact: romane.romnja@yahoo.de

Greece

Association of Roma Women of Dendropotamos, Thessaloniki

Part of the Lighthouse of the World which is a non-profit organization established in 2004 in one of the most challenging districts of Thessaloniki, called Dendropotamos. The organization is a personal initiative of Father Athinagoras Loukataris and operates as a Roma minor protection center. The aim of the organization is to provide any kind of support to underage minority groups or young people facing social exclusion

Address: Τσιμισκή (Tsimiski)10, 546 24, Thessaloniki, Greece

Website: <http://www.farostoukosmou.gr/>

ELPIDA –Roma Women's Association of Drosero

Contact: sullogoselpida@gmail.com

Website: www.drosero.com

Hungary

Colourful Pearls Association (Színes Gyöngyök Egyesület), Pécs

Website: <http://szinesgyongyok.hu>

Contacts: elnok@szinesgyongyok.hu

21st Century Roma Women's Association (XXI. századi ROMA NŐK Egyesülete)

Website: <http://21szromanok.simplesite.com/>

Contact: 21szromanok@gmail.com

Somnakuno Drom Roma Női Civil Egyesület

Website: <https://www.facebook.com/Somnakuno-Drom-Roma-N%C5%91i-Civil-Egyes%C3%BClet-111485257293467/>

Contact: somrakunodromnce@gmail.com

Ireland

Pavee Point Traveller and Roma Centre

A national NGO committed to the attainment of human rights for Irish Travellers and Roma. Since its beginning, Pavee Point has always had a particular focus on Traveller women's rights and inclusion. This has led to an ongoing focus in the work with and

for Traveller and Roma women and to the development of national initiatives, including the National Traveller Women's Forum (1988) and the Violence against Women Programme (1998).

Website: <https://www.paveepoint.ie/contact-us-getting-here/>

Contact: info@pavee.ie

National Traveller Women's Forum (NTWF)

NTWF is a national non-governmental membership organisation established in 1998 which aims to raise awareness of the issues affecting Traveller women, and to work towards ensuring these issues are recognised and reflected in policy development.

Website: <https://www.ntwf.net/>

Contact: info@ntwf.net

Italy

Roma Women Network ROWNI

Website: <https://sites.google.com/site/rowniromawomennetworkitaly/>

Contact: Facebook; rowni@tiscali.it

North Macedonia

ROMA S.O.S.

Contact: snesime@yahoo.com

Roma Women and Youth Association "Luludi"

Contact: inesamet@yahoo.com

Poland

Organisations led by Roma women, as of 2020:

Art Foundation "JAW DIKH" (Fundacja Sztuki "JAW DIKH")

Contact: jawdikh@gmail.com

Association of Integration SAWORE (Integracyjne Stowarzyszenie SAWORE)

Contact: awachowicz.sawore@gmail.com

Roma Radom Association "ROMANO WAŚT" (Radomskie Stowarzyszenie Romów "ROMANO WAŚT")

Contact: romanowast@gmail.com

Roma Education Association HARANGOS (Romskie Stowarzyszenie Oświatowe HARANGOS)

Contact: harangos@o2.pl

Romania

E-Romnja Association

Website: <http://e-romnja.ro/>

Contact: office@e-romnja.ro

Roma Center for Social Intervention and Studies

Website: www.romanicriss.org

Contact: office@romanicriss.org

Romano ButiQ Association

Website: www.romanobutiq.ro

Contact: Facebook

Desire Foundation

Website: <http://www.desire-ro.eu/>

Contact: desire_cluj@yahoo.com

Democratic Federation of Roma consisting of the following organisations:

- ▶ Roma Center "Amare Rromentza"
- ▶ Community Development Agency "Together"
- ▶ Roma Party Pro Europa, Association "Sastipen"
- ▶ Romano ButiQ Association with Matias Association (Jilava)
- ▶ Roma Cultural Center Association «O Del Amenca "
- ▶ Civic Union of Young Roma in Romania – UCTRR
- ▶ Roman organizations C.R.I.S.S. – Roma Center for Social Intervention and Studies
- ▶ ArtisRoma Association, ARTROM Association
- ▶ Roma Education Fund Romania Foundation
- ▶ Roma Association for Integration through Sustainable Rural Development
- ▶ "Gi Rromano / Suflet Rromano" Association (Harghita)
- ▶ "PROETNICA" Association for Social Inclusion
- ▶ "Young Rome" Association (Maramures)

Slovak Republic

Quo Vadis o.z.

Website: www.quovadisoz.com

Contact: +421 45 5366 847

In Minorita

Website: www.inminorita.sk/ / <https://www.facebook.com/inminorita/>

Contact: Facebook

Union of Roma Mother Centers

Community Center for Minorities, Veľký Krtíš

Civic Association of Roma Women LUCIA, Košice

Roma Women's Network

Kosovo*

Voice of Roma, Ashkali and Egyptians (VoRAE)

Contact: v.batalli@vora.org

Website: <https://www.vora.org>

* All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nation's Security Council Resolution 1244 and without prejudice to the status of Kosovo.

Empowerment, as a capacity of a person to control one's own life, results from the interplay of a complex set of factors. Are Roma integration policies ensuring efficient protection of Roma and Traveller women's rights (with a focus on multiple and intersectional discrimination) and are they enabling development of the full potential of stakeholders?

www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.