

GENDER-RESPONSIVE EVALUATION OF THE “STRATEGY FOR THE PROTECTION AND INTEGRATION OF THE ROMA NATIONAL MINORITY INTO UKRAINIAN SOCIETY UNTIL 2020”

Final Evaluation Report

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Evaluation Management Group

- Ministry of Culture, Youth and Sports of Ukraine (former Ministry of Culture of Ukraine)
- Ministry of Justice of Ukraine
- Ministry of Social Policy of Ukraine
- Office of the Parliament Commissioner on Human Rights

Evaluation Reference Group

- Ministry of Foreign Affairs of Ukraine
- Ministry of Development of Territories and Communities of Ukraine (former Ministry of Regional Development, Construction, Housing and Communal Services of Ukraine)
- Ministry of Internal Affairs of Ukraine
- National Police of Ukraine
- State Statistics Service of Ukraine
- Kharkiv Regional State Administration
- Odesa Regional State Administration
- Zakarpattia Regional State Administration
- Coalition of Roma Non-Governmental Organizations of Ukraine «Strategy 2020»
- International Charitable Organization Roma Women Fund «Chiricli»
- CSO Romano Drom
- CSO Bakhtalo Drom
- CSO Lacho Drom
- CSO Ternipe
- Kharkiv Regional Non-Governmental Organization “Professional League of Social Workers of Kharkiv Region”
- ROMEN Kharkov National-Cultural Association of Roma
- OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR)
- Office of the United Nations High Commissioner for Human Rights (OHCHR) in Ukraine
- International Renaissance Foundation

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ABBREVIATIONS

| | |
|--------------------------|---|
| ATC | Amalgamated Territorial Community |
| CEDAW | Convention on the Elimination of All Forms of Discrimination against Women |
| CoE | Council of Europe |
| CSO | Civil society organization |
| ICERD | International Convention against Racism and Discrimination |
| IRF | International Renaissance Foundation |
| IWG | Interagency working group |
| MoC | Ministry of Culture, Youth and Sports (former Ministry of Culture) |
| MoJ | Ministry of Justice |
| MES | Ministry of Education and Science |
| Minregion | Ministry of Communities and Territorial Development (former Ministry of Regional Development, Construction, Housing and Copmmunal Services) |
| NAP | National Action Plan |
| OECD | Organisation for Economic Co-operation and Development |
| ODIHR | Office for Democratic Institutions and Human Rights |
| OSCE | Organization for Security and Cooperation in Europe |
| SMS | Міжвідомча робоча група |
| The Roma Strategy | Strategy for the Protection and Integration of the Roma National Minority into Ukrainian Society |
| UN | United Nations |
| WG | Work Group |

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INTRODUCTION

1. Background

According to estimates, the number of Roma in Ukraine is between 200,000 – 400,000, in contrast to the official census data from 2001 that included only 47,587 Roma. The highest density of the Roma population is found in Zakarpattia, (42,580), followed by Donetsk (20,000), Luhansk (11,630); Odesa (10,000), Kyiv (6,400), Dnipropetrovsk (6,200), Kharkiv (6,000), Cherkassy (5,140) and Poltava (4,205).¹

The Ukrainian Roma population is very heterogeneous.² Also, their living conditions in a local context depend on the local history and relationship between mainstream and minority community, the local language spoken, or the urban and rural living environment. The local context and situation also has impact on the human rights issues they face within a specific locality or region.

There is no comprehensive or sex-disaggregated data available on the situation of Roma in Ukraine.

However, reports from civil society and human rights monitoring bodies indicate that a part of the Roma population still lacks access to birth certificates and identity documents³, faces difficulties in enjoying the right to equal and quality education and accessing social and health services, is discriminated in the labour market, and faces inadequate and health hazardous housing situation.

Further, Roma in Ukraine are subject to discrimination, hate crimes and racist incidents, including discrimination by law enforcement officials. In this context, Roma women are subject to multiple forms of discrimination, due to ethnicity/race, sex, gender and social status.⁴ Roma men and women who migrate due to seasonal work are in a particularly vulnerable position facing prejudice and inequality in social assistance and humanitarian support, and are often targeted by racially motivated attacks on their temporary settlements.

1. See OSCE/ODIHR, 2014: Situation Assessment Report on Roma in Ukraine and the Impact of the Current Crises, page 11.
2. The biggest communities of Roma in Ukraine are the Servo Roma (sometimes calling themselves "Ukrainian Roma"); muslim Roma who have lost their language used to have strong links with the Crimean Tatars (also called "Tatar Chingine"); muslim Roma who later on settled in the Crimea, speak a so-called "Balkan Group" Romani dialect and call themselves "Kyrymlytica Rom" are now spread all over Ukraine. In Western Ukraine, some groups have lost their language due to the assimilation policy under Habsburgian rule. Many of those also speak Hungarian nowadays. Besides, there are Kalderari and Ursari groups. For further details see: Minority Rights Group Europe (MRGE), 2019: Roma in Ukraine – a Time for Action: Priorities and Pathways for an Effective Roma Integration Policy, p. 5ff.
3. While a number of CSO actors (among others, Roma Women's Fund 'Chiricli', International Renaissance Foundation) underline the vulnerability of Roma in access to birth registration and identification documents, no exact data is available. According to a study commissioned by OSCE ODIHR "(...) adult Roma who had never been registered in state birth registries and often have to initiate complicated judicial procedures in order to obtain late registration in the birth registry books and a birth certificate; Roma and their children who arrived in Ukraine before the 1991 independence but cannot prove they are Ukrainian citizens due to lack of evidence of their permanent residence in Ukraine before 24 August 1991; Roma and other persons who face internal displacement within Ukraine, due to their lack of personal documents or lack of evidence of their registration in the crisis-affected areas and due to the excessive burden of proof required for obtaining personal documents; Roma over 18-years-old without internal passports who are not able to obtain a duplicate of the birth certificate required to apply for a new internal passport" face particular challenges in obtaining documents and, thus, are deprived of enjoying rights and services. See OSCE/ODIHR, 2018: Access to Personal Documents for Roma in Ukraine: More Efforts Needed, p. 8.
4. According to a recent assessment of the Roma Women Fund 'Chiricli' Roma women in Ukraine receive a lower level of education, are affected by higher unemployment rate and have limited employment opportunities, lack personal documents, particularly, birth certificates and face difficulties accessing health care and other social services. For Details, see: Roma Women Fund 'Chiricli', "The Rights of Roma Women in Ukraine", September 2018.

On 8 April 2013, President of Ukraine issued a Decree on the National Strategy for the Protection and Integration of the Roma National Minority into Ukrainian Society until by 2020» (the Roma Strategy) and requested the Cabinet of Ministers to adopt a National Plan on its implementation. On 11 September 2013 the Cabinet of Ministers adopted the National Plan on implementation of the Roma Strategy and appointed the Ministry of Culture as responsible central authority for collecting information on the Strategy implementation and reporting to the Cabinet of Ministers. The Strategy is integrated in the National Strategy on Human Rights and the Action Plan (2016-2020) overseen by the Parliamentary Committee on Human Rights, Ethnic Minorities and International Relations.

To strengthen the interagency coordination in 2015 the Cabinet of Ministers issued a Resolution on Establishment of an Interagency Working Group on Coordination of Implementation of the Action Plan for the Roma Strategy which is headed by the Vice Prime Minister for Social Policy and his/her three deputies – Deputy Minister of Social Policy, Deputy Minister of Culture and a representative of civil society. Later on, the Interagency Working Group established 5 sectoral sub-groups around the priority areas as defined in the Roma Strategy and Action Plan.

In 2019, the Parliament Sub-Committee on Gender Equality and Non-Discrimination of the Parliamentary Committee on Human Rights, Ethnic Minorities and International Relations and the Office of the Parliament Commissioner on Human Rights requested a gender-responsive evaluation of the current Roma Strategy until by 2020 to inform the development of the post-2020 Roma Strategy and the national action plan on its implementation. The central executive bodies (the Ministry of Culture, the Ministry of Social Policy, the Ministry of Justice, etc.) together with the Secretariat of the Interagency Working Group on Roma Strategy Implementation under the Cabinet of Ministers of Ukraine agreed to the proposed evaluation. In addition, representatives of the central executive bodies joined as members of the Evalua-

tion Management Group and the Evaluation Reference group. The Ministry of Culture as a coordinating body for the implementation of the strategy also assisted by providing organizational support (sending relevant invitation letters) and premises for the meetings of the Evaluation Management Group.

The evaluation was supported by UN Women through the project "Gender Equality at the Center of the Reforms, Peace and Security", enabled by the financial support from Sweden, and the Council of Europe.

2. Evaluation Purpose and specific objectives

The main purpose of the evaluation was to assess the progress made by the Government of Ukraine, regional and local authorities and their key partners in the implementation of the Roma Strategy and its Action Plan from 2013 to June, 2019 at the national, regional and local levels. The evaluation was also to look into how the gender responsiveness and impact of policy design, implementation and monitoring on Roma women and men is taken into account and review alignment with national policies promoting gender equality.

Based on the findings of the evaluation lessons were drawn and recommendations formulated for the development of the next post 2020 Roma Strategy and Action Plan in accordance with the European and international standards (e.g. CoE, OSCE, EU, UN), as well as the relevant national legal and policy framework, particularly those on human rights and gender equality.

The specific evaluation objectives included:

- **Assessing the relevance of the priority areas as defined in the current Roma Strategy** (and its translation into the National Roma Action Plan and Regional and National Strategies and Action Plans) – how they relate to the needs of Roma women and men;
- **Assessing the alignment of the Roma Strategy with international and European standards relevant**

for Roma inclusion/improving the situation of Roma, in particular, as set out in relevant UN standards, Council of Europe policy and legal framework, OSCE standards and the EU policy framework and principles;

- **Assessing the alignment of the Roma Strategy and NAP with the national policies on gender equality**, and compliance with the international standards on women's human rights as per Ukraine's state obligations, including with regards to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) etc;
- **Assessing the effectiveness and efficiency in achieving the objectives in all priority areas** as defined in current Roma Strategy and its National Action Plan with a special focus on gender equality and women's empowerment;
- **Identifying the achievements, remaining challenges and current needs of Roma women and men** which should be addressed in the new post-2020 Roma Strategy and Action Plan;

Analyzing the work of the institutional mechanism at national, regional and local levels, its mission, mandate (including monitoring and reporting), authority and capacity for coordinating policies aimed at Roma inclusion in respective line ministries and between national, regional and local authorities, identifying positive practices, lessons learned and gaps and providing recommendations for addressing them in the next phase of the Roma Strategy;

- **Analyzing coordination and participation of international community, national stakeholders and civil society (Roma and non-Roma CSO)** in the

process of development, implementation and monitoring of the Roma Integration Strategy and Action Plans at national, regional and local levels;

- **Identifying areas of the Roma Strategy and Action Plan frameworks that need strengthening** for more effective implementation, monitoring and reporting in the post 2020 period at national, regional and local levels;
- **Documenting lessons learned, best practices and challenges to inform the future work in addressing the gender inequalities and discrimination against Roma women and girls in Ukraine** including those based on the treaty bodies' recommendations to Ukraine, such as CEDAW, Universal Periodic Review etc.;
- Provide key recommendations for the post 2020 Roma Strategy to ensure that it is in compliance with the international human rights treaties on women's human rights and aligned with the national gender equality policies; aligned with the international and EU standards for the promotion and protection of national minorities and Roma inclusion; that it has institutional framework for effective implementation and monitoring as well as that it includes specific gender-responsive measures addressing differentiated needs of Roma women and men, girls and boys in Ukraine.

3. Methodology and implementation

The evaluation was organized using the OECD Development Assistance Committee (OECD/DAC) evaluation criteria applied together with a set of implementation process criteria:

OECD/DAC criteria

Relevance
Effectiveness
Efficiency
Sustainability

Policy design and implementation criteria

- coordination and participation
- coherence and connectedness
- human rights and gender equality criteria: non-discrimination, inclusiveness, empowerment and accountability

Following the objectives, the main evaluation questions were organized according to the above set of evaluation criteria. The evaluation questions and evaluation matrix are provided in Annex 2.

The evaluation was guided by the gender equality and human rights principles, as defined in the UN Women Evaluation Policy and adhered to the United Nations norms and standards for evaluation in the United Nations system.

In order to meet its main purpose, that is, to provide practical support/assistance for the development of the new post 2020 Roma Strategy and plan, the main focus of the evaluation was on drawing insights of what worked well and why, what were the main challenges and barriers in achieving results in some of the areas, and what can be done differently to increase potential for impact and sustainability.

To achieve this, we applied **appreciative enquiry approach** – identifying good practices, constructive learning from challenges and under-achievement by facilitating stakeholders to share their views of what can work better and how. This was combined with highly facilitative approach to get diverse perspectives and views, while using triangulation and validation of findings by crosschecking from different sources of information, as well as by the [established] Evaluation Management Group and the broader Evaluation Reference group to ensure participation of key stakeholders involved in validation of findings.

The evaluation used mixed methods for data collecting to answer the guiding questions. Due to its focus on strategic learning from the implementation of the Roma Strategy and NAP, **the leading methods for data gathering were qualitative**, including in-depth individual and group interviews, facilitated group discussions with representatives of the key stakeholder groups and focus groups with representatives of Roma communities – Roma mediators and Roma women and men from the visited communities. The team also used secondary quantitative data from existing research (government reports, other civil society monitoring reports and other stakeholders'

reports) trying to quantify the available summarized data as much as possible.

The evaluation was implemented between April 22 and the end of June in three phases:

- **The inception phase (April 22 – May 21, 2019)** included documentary review, entry interviews with UN Women and Council of Europe, development of the inception report and validation by the Evaluation Management Group at the on-line meeting;
- **The field mission (20-30 May, 2019)** involved the representatives of central institutions (line Ministries and agencies) through individual interviews and group discussions with each of the five WG for the implementation of the Action plan, individual and group interviews with Roma CSOs, Roma mediators and broader civil society in the area of human rights and gender; group meeting with international donors and development partners, meeting with Roma women, as well as field trips to two selected oblasts – Kharkiv and Zakarpattia to meet with regional and oblast administrations, Roma civil society and Roma women. This phase was finalized by presentation of the initial observations and findings to the Evaluation Reference group, as well as to the Evaluation Management Group;
- **The synthesis phase (June 10 – July 5, 2019)** included a follow-up documentary review of annual reports on the strategy, additional interviews, systematization of data and developing the draft evaluation report.

The final validation phase (August – September, 2019) included consultations with the Evaluation Management Group and the Evaluation Reference Group on the draft report in order to integrate their feedback into the final report. The final report will be presented at a round table with stakeholders which will serve as a starting point for discussions of further development of the new post 2020 Roma Strategy and Action Plan.

In total, the evaluation involved interviews and consultations with 94 people, including:

- 28 representatives of central level institutions responsible for the implementation of the Strategy and/or conducting key activities from the Action plan;
- 17 representatives of regional and local level public administrations in two oblasts – Kharkiv and Zakarpattia, as well as input during the meeting with the Evaluation Reference Group;
- 5 representatives of national oversight bodies, offices and commissions;
- 24 representatives of Roma civil society and Roma women;
- 5 other civil society organizations working in the sphere of human rights and women's rights;
- 15 representatives of international development partners.

4. Limitations

The evaluation of the Roma Strategy and NAP in Ukraine faced the following challenges and limitations:

- The design of the Strategy and Action plan lacked clear definition of desired change, the pathways to achieve this change and the key milestones or results on the way to achieving the objectives of the Roma Strategy. Moreover, the Strategy, the NAP and the reports on them, completely lack any indicators, which poses a challenge for measuring their progress;
- Lack of aggregated data to quantify the findings on the effectiveness of the Roma Strategy and Action Plan implementation for improvement of the situation of Roma women and men: there is no sex-disaggregated data, and the data disaggregated on nationality were very fragmented;
- Comparability of data from different sources and its quantification: this evaluation was focused mostly on qualitative data collecting methods and relied on secondary quantitative data from existing reports of the implementing institutions and outside monitoring reports and analysis. The data from the reporting system on the implementation mechanism were very fragmented by activities and years and had no connection to each other at the Strategy results level. The considerable number of policy monitoring reports of civil society and/or international stakeholders had some aggregated data from samples sufficient to illustrate the issues covered in the relevant reports, but not representative for all the Roma population in the country;
- Very tight timeframe for the field work: during the 10 days of the field mission there were instances when the meetings had to be arranged/rescheduled ad hoc, depending on the busy schedule of the interviewed. In addition, the time allocated for group discussions and interviews was not always sufficient;
- Some key respondents to be interviewed were not available: for example, the key person responsible for the coordination of the Strategy could not be reached for an interview and was only available at the meeting of the Evaluation Management Group; not all chairs of the working group for the implementation of the Strategy were available for a meeting; the representatives of the Ministry of Education and Science did not participate at the planned meeting with the Working Group on Education; the CSO and community representative in Zakarpattia region (Mukachevo) cancelled the meeting one day prior; the representatives of the OSCE Office for Democratic Institutions and Human Rights were unable to take part in planned interviews and could only contribute later via Skype and in writing after the draft evaluation report was already finalized.

CHAPTER 1: RELEVANCE

1.1. Process of the Roma Strategy and Action Plan design

The initiative to develop a National Strategy for Roma Integration was triggered by the EU – Ukrainian visa liberalization process. In 2013 the Ministry of Culture, in charge of religious communities and national minorities, was tasked to take the lead in developing the draft strategy document.

Although Ukraine is a part of the Organization for Security and Co-operation in Europe (OSCE) and the Council of Europe (CoE) – international organizations which have shaped international standards for the protection and integration of Roma – Ukraine at that time was not actively engaged in promoting Roma inclusion policies. However, at a working level they participated in some international expert bodies on Roma integration, for example, in the thematic expert group on Roma (CAHROM) under the CoE. This experience, as well as available online materials on Roma strategies from other European countries served [the administration] as reference sources for developing the Strategy.

According to the chief specialist from the MoC Department of Religions and Nationalities who was responsible for drafting the Strategy, "at that time there was no law in place that would have any kind of programme on culture", therefore, the first draft strategy was based on desk research, information on existing European practices and information and feedback shared by some Roma civil society organization⁵. Following the initial draft, the Ministry of Cul-

ture established a joint working group with the Ministry of Education and Science and engaged other ministries to contribute to the strategy.

Further, as stated by the MoC in the evaluation interviews and confirmed in their comments on the draft report, due to time constraints of the project, no in-depth comprehensive consultations with Roma civil society took place during the development phase of the Strategy. However, following the regulatory procedures, on 27 June 2012, the draft Strategy was posted on the official website of the Ministry of Culture and open for public consultation for one month. However, according to the MoC, no suggestions from the Roma community were received. This rather technical process was criticized by the representatives of civil society who felt that this approach left no time for meaningful consultation and in-depth discussions on the situation of Roma, its underlying causes and possible approaches to addressing problems.

As noted in the comments by the MoC to the draft evaluation report, the development of the Action Plan for the Strategy implementation sought broader in-depth consultations. In June 2013, the Ministry of Culture sent letters to four of the leading Roma organizations⁶ and to the Commission on International Relations and Protection of Rights of National Minorities (an advisory governing body within the Public Council under the Ministry of Culture). These letters contained requests to join in the work and send

5. As noted in the comments to the draft report routinely made by the MoC, the Ministry addressed the All-Ukrainian Union of NGOs "Congress Romen of Ukraine" and the International Charitable Organization "Roma Women's Foundation "Chiricli" with a request to inform them about existing practices or documents of other European countries regarding the legal regulation of the integration process, which proved to be of assistance in this regard.

6. Letters were sent to the Chairman of the Board of the Odessa Regional Roma Congress S.M. Ermoshkin, Vice-President of the International Charitable Organization "Roma Women's Foundation "Chiricli" Z.A. Kondur, Chairman of the Roma Council of Ukraine Y.M. Ivanenko, President of the All-Ukrainian Union of Public Organizations "Congress Romen of Ukraine" P.D. Grigorichenko.

proposals to the Ministry of Culture with suggestions for targeted events with required quantitative and financial indicators. In fact, all these entities provided some suggestions, but without any indicators. While above-mentioned letters are proof of an attempt to seek opinion of Roma civil society, this approach of only formal email communication could not provide for meaningful in-depth consultation process.

Unlike the draft Strategy, several public discussions were held in different formats on the draft Action Plan for the Strategy implementation.

In particular, on 16 July 2013, the draft Action Plan for the Strategy implementation was discussed at the meeting of the Commission on Interethnic Relations and Protection of Rights with the participation of leading Roma CSOs⁷. The draft Action Plan for the Strategy implementation was also posted for one month on the Ministry of Culture official website for public consultation⁸.

In August 2013 further civil society consultation was hosted by the International Renaissance Foundation and involved several Roma NGOs and associations with the purpose of working out consolidated position of Roma civil society on the draft Action Plan. The conference, attended by representatives of national institutions, international actors and Roma civil society⁹, resulted in an outcome document¹⁰ with several general recommendations, including the proposal to create an Interministerial Council for the Strategy implementation.

Despite these efforts for consultation and defining concrete recommendations for the operationalization

of the Action Plan, some respondents also underlined limited capacity of the Roma civil society in 2013-2014 for coming up with consolidated proposals which, at times, resulted in presenting conflicting suggestions. In this regard, the authorities' expectations to gain SMART indicators from civil society was not realistic: on one hand, Roma NGOs had only limited capacity at that time, and, on the other hand, there was no reliable and disaggregated data available on the situation of Roma. Overall, the lack of effective and meaningful consultative process at the stage of designing the Strategy affected the clarity and the quality of the strategy document. Its major flaw emphasized by the majority of respondents, both from institutions at different levels, and from civil society was the lack of overall vision and clarity on objectives for the desired change which, in turn, had an adverse impact on its effective implementation.

1.2. Strategic responsiveness to beneficiary needs, including to Roma women, girls, men and boys

At the time of writing of the Roma Strategy, the only official data available on Roma came from the 2001 census which accounts for 47,600 people that had declared their belonging to Roma minority. Although it is general knowledge that these are not valid numbers and, according to unofficial estimate, the number of people identifying themselves as Roma is believed to be in 200,000 – 400,000 range, yet no further assessment was considered as basis for building the Strategy or Action Plan. Similarly, no sex-disaggregated data was used to inform the Roma

7. National Minorities were represented by the All-Ukrainian Union of NGOs "Congress Romen of Ukraine", the International Charitable Organization "Roma Women's Foundation "Chiricli", the Kyiv National-Cultural Association "Amala" and the City of Lviv Non-Governmental Organization "Youth", cultural and educational society "Ternipe".

8. From July 25 to August 25, 2013,

9. Based on the information provided by MoCand IRF the conference was attended by the Secretariat of the Verkhovna Rada of Ukraine on Human Rights, executive bodies, Roma NGOs, Ukrainian scholars and international experts from the European Commission Delegation to Ukraine, the United Nations Office in Ukraine, the International Organization for Migration, the World Health Organization Office for Interethnic Relations in Moldova.

10. Outcome document of the round table "Discussion of Draft Action Plan on Implementing the Strategy of Social Protection and Integration of the Roma People in the Ukrainian Society by 2020", August 22, 2013.

Strategy development, nor was any specific research done or initiative taken to gather information on the situation of Roma women and girls.

The Strategy refers to Roma nationals as a homogeneous group which reinforces bias against “the Roma” and neglects any gender relevant needs, social and demographic diversity or needs-based approach. The reference to “Roma” does not distinguish between gender, social status, level of integration or heterogeneity of the community, nor the regional or contextual specificities (Roma communities in urban, rural, inclusive or segregated environments). The Strategy formation process did not provide for engagement of the regional authorities in collecting more information from the regional or local levels regarding the Roma population and their needs. The document lacks any information about the socio-economic and human rights challenges that Roma face, which is of importance for a rights-based policy approach.

In this respect, no additional information from civil society, or academia, or the network of Roma mediators who have direct access to local Roma communities in need was utilized. Several respondents, from both public authorities and civil society, expressed opinion that absence of a needs-based approach, realistic data and analysis of the situation of Roma women and men became one of deficiencies of the Strategy building as it led to setting rather general objectives and measures, without strong indicators making a meaningful assessment of progress in the Strategy implementation impossible.

The Regional Action Plans developed in 23 regions, following the National Action Plan, do not refer to sex-disaggregated data, and do not build on a strong needs assessment, either. They also lack clear vision of change and result-oriented objectives. According to some voices from civil society and the findings of the monitoring report of the Ukrainian Parliament Commissioner for Human Rights in 2017, the

Regional Action Plans mirror and copy the National Action Plan without any further reflection of the regional or local contexts or needs analysis.

Some representatives from regional authorities in Uzhgorod were also very critical saying, “*the strategy is not worth the paper it is written on*” which also demonstrated their limited engagement and ownership of the problem. In terms of collecting information on the number and needs of Roma, some of the respondents from local authorities in Zakarpattia said that they usually consult the “Roma leader”. However, as Roma involvement is key, consideration should be given to ways of more inclusive participation and involvement of the broader Roma community. Though a spokesperson for a community may represent to some extent the interests of the community on the whole and provide first-hand information, still this might not necessarily reflect gender-sensitive issues, nor equally represent the interests of women and men. In addition, relying only on consulting the “Roma leader” might reinforce existing internal power structures and limit the ability to get a deeper understanding of the different needs of diverse groups within the community.

The absence of reliable and sex-disaggregated data and needs analysis has been criticized by the international community¹¹ and civil society since 2014, however, authorities have not yet engaged in gathering more reliable and sex-disaggregated data on the situation of Roma in Ukraine for developing the post-2020 National Strategy.

In absence of realistic census data, studies and mapping can serve as a starting point for collecting information for a needs assessment and getting a deeper knowledge. In this respect, pilot mapping of community needs in several regions done by Roma CSOs – “the Roma social passports” – has a great potential if going forward it is strengthened for increased gender-sensitive data and expanded to other regions.

11. See OSCE/ODIHR (2014): Situation Assessment Report on Roma in Ukraine and Impact of the Current Crises, available at <https://www.osce.org/odihr/124494>

Respondents from civil society, the Office of the Parliament Commissioner for Human Rights, the Apparatus of the Government Commissioner on Gender Equality Policy as well as line ministries, showed an increasing awareness that without better understanding of and information about the needs of Roma women and men, as well as further disaggregation and analysis of data on their socio-economic status and other important characteristics, all measures for Roma inclusion policy will remain ineffective.

In particular, over the last three to four years a number of initiatives were undertaken by different stakeholders to gain a deeper understanding of the needs and challenges the Roma community is facing through mapping, targeted assessments and other forms of information gathering or monitoring reports. Some examples include:

- The Office of the Parliament Commissioner for Human Rights (Ombudsman) paid a number of visits to Roma communities in the regions and collected information, including on access to documents or rights of the child. In 2017 the Ombudsman Office also made an assessment report on the Strategy implementation. According to the findings of this report, the Strategy is formal and not responsive to the needs of women and girls;
- In 2017 the OSCE ODIHR published a report on "Access to Personal Documents for Roma in Ukraine: More Efforts Needed" to deepen the knowledge about scope and scale of issues Roma women and men are facing in obtaining civil registration and identity documents;
- The Roma Women's Fund "Chiricli" has advocated for many years for responsiveness of community-oriented programmes and measures to multiple forms of discrimination faced by Roma women. They collected first-hand information on the local situation of Roma women and their experiences through the network of Roma mediators working in different regions in Ukraine. In 2017 "Chiricli" published a report "The rights of Roma Women in Ukraine" providing comprehensive information on the situation of Roma women. The International Renaissance Foundation

has supported a number of reports aimed at giving voice to the interests of Roma with regard to interventions required to improve their situation;

- In 2017 UN Women in Ukraine in a joint initiative with the Verkhovna Rada (Parliament of Ukraine) and the Roma NGO "Chiricli" circulated a questionnaire among 24 regional administrations to assess the gender perspective in the Strategy and Action Plan implementation. The responses of 23 administrations noted the lack of sex-disaggregated data and lack of gender-sensitive approach.

However, understanding of the root causes of Roma women and men situation is still very low. For example, several local officials in charge of implementing the Strategy in the Zakarpattia region did not necessarily think that Roma integration required to address the root causes of inequalities due to ethnic or gender-based discrimination through the use of a rights-based approach. Some felt that the society in general is not yet ready to support gender equality and that more time is needed to overcome entrenched traditional views and patriarchal power structures.

Similarly, Roma community representatives and some Roma mediators admitted that vulnerable Roma women and girls face inequalities due to their ethnic, social status and gender role. As a local councilor from Uzhgorod emphasized in commenting on the lack of representation of women's rights and interests: *"This also has to do with the awareness of Roma women: they have to learn that their role is more than taking care of the house and children"*.

But even if Roma women overcome traditional gender roles and are successfully building up their social and professional position, they still face strong gender biases both, within the community and the mainstream society. Sharing her experience, a Roma woman, who serves as an advisor on education and social development of national minorities to the Chairman of the Regional Council and leads a civil society organization in Uzhgorod explains that *"men also restrain women from communicating their interests"* emphasizing that despite her work and experience *"I often feel that I am not seen as equal"*.

With regard to priority needs, almost all interviewed confirmed that the thematic areas are highly relevant: access to civil registration and identity documents is fundamental to exercise their rights and receive services; other key areas are further investing in early and quality education for girls and boys, women and men, access to social and health services without discrimination, and, in some regions, improving housing conditions. Several Roma women and men of the younger generation also underlined that enhancing public and political participation of Roma and supporting vocational and higher education for Roma students should be a focus of a future, post-2020 Strategy.

1.3. Strategy design: Clarity of vision and strategic linkages

The Strategy, at the level of a decree of the President of Ukraine, frames Roma integration as a *"socially significant issue"* and identifies its purpose as *"protection and integration of the Roma national minority into Ukrainian society by ensuring equal rights and opportunities for its participation in the socio-economic and cultural life of the state, as well as by intensifying cooperation with Roma public associations"*.

Under section 6 of the Strategy, the Government outlines the desired results of the Roma strategy implementation which will help *to create conditions to comply with recommendations of the visa liberalization regime between the EU and Ukraine*, by ensuring integration of Roma, preventing discrimination against Roma and improving the situation of Roma in education, healthcare and housing as well as promoting their employment.

The six identified key areas for interventions to achieve this purpose are (See Annex III: Strategy Objectives and Action Plan measures):

- 1 Legal protection of Roma** (including public participation, raising awareness about rights, preventing discrimination and ensuring access to obtaining personal documents);
- 2 Social protection and employment of Roma nationals** (including access to social services,

awareness campaigns, measures to eliminate employment discrimination);

- 3 Improvement of Roma national's educational level** (including reducing the level of Roma who do not finish school, awareness campaigns among Roma about the importance of education, career counselling to encourage Roma to pursue vocational and higher education);

- 4 Improving the healthcare for Roma nationals** (including awareness campaigns both with Roma to better understand the healthcare system and with health professionals to better understand the culture and issues of Roma, to increase health awareness, especially regarding children, to increase health literacy);

- 5 Improving housing and living conditions** (including participation in preferential loans for home purchase and construction; measures for improving infrastructure in the areas where Roma);

- 6 Meeting the cultural and informational needs of Roma nationals** by promoting the preservation and development of Roma culture and arts, and by assisting in informing public about way of life and cultural identity of Roma nationals through the media.

The National Action Plan is consistent with the structure of the thematic areas in the following aspects (for details see Annex 3):

- 1 General issues** with eleven (11) measures covering awareness campaigns counteracting anti-Roma biases, support activities for ensuring access to personal documents for Roma, including through spreading information, preventive work by law enforcement and social services, and involving Roma representatives in various activities;
- 2 Social protection and employment** with seven (7) measures in areas such as providing social services to Roma families, primarily those with children with engagement of Roma civil society, including religious organizations in providing social assistance to Roma or reducing unemployment among the Roma population;

3 Raising awareness and level of education

with fourteen (14) measures aimed at training teaching staff regarding the Roma specificity, including training teachers in Romani language, increasing number of Roma getting and completing secondary education, including by working with parents to ensure the right of Roma children to education, to improve the access of Roma children to pre-school and out-of-school education, to motivate Roma for vocational and higher education, to monitor attendance at places of learning and care, facilitate participation in extra-curricular activities, etc. ...);

4 Improving the health of Roma with nine (9) activities, in particular, training medical staff regarding Roma specificity, informing Roma about healthy lifestyle, services and schedules of medical institutions, promoting medical examinations, emergency health care and communal health services, ensure immunization or epidemiological oversight, sanitary epidemiological inspections in areas densely populated by Roma;

5 Improving housing and living conditions with four (4) activities, such as adopting housing legislation, providing and spreading information on preferential loans for purchase and construction of housing; land allocation for Roma housing within legislative framework, and including in social housing programs those Roma that are listed in the Housing Registry as people in need of housing conditions improvement;

6 Cultural and information needs with twelve (12) measures targeting, among others, support to Roma cultural centers and art groups, cultural and art activities to preserve ethnic identity, awareness raising campaigns to support protection and integration of Roma, extracurricular education for gifted Roma children in music and vocal art, research of history, culture and language, and the socio-cultural integration of Roma, supporting the publication of "Roma Jurisprudential Bulleting" and Roma-oriented information as well as collections of fairy tales and proverbs in Romani language, support of broadcasts on Roma-related subjects on Regional State Television, etc.

On a positive note, the Strategy lists areas of intervention recognized by national and international stakeholders to be of key importance for promoting equal opportunities and rights for Roma communities, and the National Action Plan is aligned with the thematic priorities, but without integrating a holistic anti-discrimination and gender mainstreaming approach.

However, both the Strategy and the National Action Plan remain on a declaratory level. The Strategy does not entail objectives for change and remains merely a list of proposed activities (e.g., to take measures to prevent discrimination, to render assistance in obtaining documents, to distribute information, promote awareness, etc.). In doing so the Strategy lacks clarity in objectives and results to be achieved. Moreover, measures identified in the Strategy do not reflect how they will sustainably address the root causes of socio-economic inequality and how they will promote equal rights and opportunities of Roma women and men. There is no logical interlinkage between the different areas demonstrating how long-term change can be reached through collaboration and joint efforts of the different stakeholders: for example, it doesn't show how lack of documents might impede access to education, social and health care services, how lack of quality education reduces the equal chances for employment and economic integration later in life, how unemployment creates impoverished conditions, or how poor, segregated and illegal/irregular housing conditions, often linked to marginalization in society, has a negative impact on access to health services or any other services, often reinforcing a vicious cycle of exclusion.

The Strategy and the National Action Plan, for example, emphasize the need to ensure legal protection by providing access to civil registration and identity documents, but without specifying how interrelated obstacles in obtaining documents should be solved in collaboration by the relevant ministries, for example, through a specific working mechanism. Moreover, as the purpose, objectives and measures of the Strategy and National Action Plan are gender-blind, they do not give a notion whether and how the proposed measures are beneficial for Roma women, girls, men and boys.

This generalized approach and lack of clarity on the objectives of the Strategy also relates to implementation of the National Action Plan which does not set out any concrete and measurable results and merely lists similar unspecific and broad measures, mostly at the level of “awareness raising” on certain issues, “distributing materials” and information, “conducting workshops” on a specific topic or “exploring issues (...)”. The way these measures are formulated, they are unlikely to bring about effective change to certain problematic situations, or apply a logical and systematic approach to resolve a certain identified issue.

Respondents engaged in this evaluation were overwhelmingly critical of the lack of clarity on the results to be achieved, and the majority of them pleaded for the need to identify measurable indicators in the Action Plan in order to track progress and results. Further, several interviewed stressed the need to address the issue of equal rights and opportunities for Roma women and men from human rights-based and anti-discrimination perspective instead of viewing it as a social issue noting that overall the Strategy is confined to access to basic services without linking it to rights-based approaches.

With regard to measuring progress, the timeline for the majority of the interventions in the Action Plan is not specified and is set as 2013-2020 – same as the general timeline for the Strategy, with only a few exemptions where measures are planned for a specific year. In this respect, one of the most specific measures is to “prepare and engage members of the Roma national minority in the next all Ukrainian population census” at the time planned for 2014 (currently the census is scheduled for 2020).

Following the logic of the Strategy, the National Action Plan also does not contain any gender-sensitive nor gender-targeted measures or specific actions addressing the situation or rights of Roma women and girls.

Since the Strategy was adopted in 2013 Ukraine has undergone major political change:

- Following the events of February 2014 and the conflict in the Eastern part of the country, financial

and human resources of the administrations were limited, and, in addition, the Government and authorities had to deal with other urgencies related to the crisis situations. In particular, the armed conflict and the huge numbers **of internally displaced people from Eastern Ukraine, including Roma women and men**, demanded from the Government to find immediate solutions;

- Moreover, in April 2014, the Ukrainian Government initiated a **decentralization reform** aiming to transfer significant powers and budgets from state bodies to local self-government bodies. These local self-government bodies will be responsible, among others, for school and pre-school education, primary healthcare, cultural institutions, infrastructure (street lighting, roads, cleaning), public order and other issues relevant for the key areas of intervention for Roma integration;

- With regard to challenges facing Roma women and men, tensions are on the rise, **and so is radicalization leading to ethnically motivated hate crimes and racist violence targeting** Roma among other vulnerable groups, and particularly Roma migrating to bigger cities for seasonal work. The majority of respondents highlighted the importance of reflecting on these developments and challenges as well as readjusting the current Strategy and Action Plan accordingly to turn it into a gender sensitive, effective and meaningful policy.

Since 2013, the National Strategy has not been officially updated. However, the increasing number of hate crimes and racist violence committed by radical groups against Roma women and men since 2017, urged adequate institutional response.

The Ministry of Culture emphasized that instances of attacks and intolerant incidents were placed on the agenda of the Interagency Working Group (IWG) second meeting. As a result, the IWG adopted decisions and set out specific tasks for the law enforcement agencies and some regional state administrations to prevent the proliferation of anti-Roma actions. Further, on June 15, 2018, the Ministry of Culture convened a meeting to discuss these developments with representatives of the Ministry of Internal Affairs,

National Police, SSU, the International Charitable Organization “Roma Women’s Fund “Chiricli”, International Renaissance Foundation and the Commissioner for Human Rights of the Verkhovna Rada of Ukraine. An outcome of the meeting was support for the proposal put forward by A. Filipishina, representative of the Ombudsman of Ukraine on Observance of the Rights of the Child, Non-discrimination and Gender Equality to develop an Algorithm for action to protect and assist Roma migrating for seasonal work.

At the level of regions, several of the regional action plans were updated over time. **Zakarpattya**, for example, developed a regional Action Plan in 2013 which was updated in 2018 after the Interagency Working Group for the implementation of the Roma Strategy was setup. In addition, reportedly, following the violent attacks and hate crimes against Roma in the region, which received international attention, the Zakarpattya regional authorities developed a programme “Zakarpattya Roma population” on the integration of Roma.

For example, **in Kharkhiv** the development of the updated regional action plan can serve as a good example of successful collaboration between regional authorities and Roma civil society. Here, the first action plan was developed in 2014 in a “usual bureaucratic way” with little consultation and without knowledge of the Roma community and their needs. However, it was a first step in putting the Roma situation on the agenda of the regional administration. The plan was approved and signed by the Governor.

The local civil society used this opportunity for active advocacy and engagement with the authorities which resulted in updates to the plan in 2016. Now the Regional action plan is being implemented with ongoing consultations, exchange and collaboration between the authorities and Roma civil society. A Roma activist, Nikolay Burlutskiy was appointed to be the adviser to the regional Governor on implementation of the regional action plan. In addition, the civil society of Kharkhiv oblast created a civil society coordination council of 12 NGOs (include 3 Roma NGOs as well as human rights groups, volunteer associations and universities). According to respondents

from both the civil society and the oblast administration, this pro-active approach and continued exchange is more effective for implementing initiatives than “official” formal group meetings.

1.4. Strategic alignment

1.4.1. International and European obligations in the area of human rights and gender equality

Since the early 1990s the international community, European institutions and national states have increasingly recognized the particular challenges facing Roma communities across Europe. It led to adopting regulatory framework in line with the international human rights standards to help improve the situation of Roma women and men, to address widespread discrimination and racism, antigypsyism and anti-Roma violence and promote full integration into mainstream society.

In the context of promoting equal rights and opportunities for Roma, there is a growing awareness that Roma targeted policies do not adequately address the needs of either Roma women or men. In many cases policies, programmes and projects are gender blind. Existing exceptions are usually targeted measures for Roma women in the area of healthcare (e.g. sexual and reproductive rights) or with regard to protection of rights of the child (e.g. education/upbringing, early arranged marriage).

In recent years there has been a growing call from the Roma civil society and, particularly, Roma women to ensure gender mainstreaming and targeted actions to address the needs of Roma women, so that they would benefit from all policies, programmes and projects for Roma communities on equal footing with men.

Within the UN system, the monitoring and treaty bodies take particular note of the situation of Roma women and men and report the observed gaps and violations impeding enjoyment of fundamental human rights.¹² There is also a number of country specific programmes in place that provide technical assistance to governments to ensure access to rights and services for Roma.

Similarly, the CoE and the OSCE over decades have paid particular attention to elimination of widespread racism and discrimination against Roma and promoting their full integration into societies, either through the mandate of their special monitoring mechanisms,¹³ or through providing guidance to national authorities, as well as promoting specific policy frameworks and international standards.

In order to promote non-discrimination and provide equal opportunities for Roma women and men, in the last two decades, a number of specific policy frameworks have been adopted. Among them the 2003 OSCE Action Plan on Improving the Situation of Roma and Sinti in the OSCE Area (OSCE Action Plan) pioneered a comprehensive policy approach recommending action for governments in key areas of concern: protection by legislation and law enforcement, non-discrimination, education, employment, access to social services, public and political participation and promoting full and equal participation of Roma in all policies of their concern. In addition, it gives guidance on how to protect the rights of Roma refugees and displaced persons in conflict or post-conflict situations.

"For Roma, With Roma" approach is recommended as the fundamental principle for policy design. Also, implementing the principles of inclusiveness and active participation is recommended:

The OSCE Action Plan also stresses the need to account for the situation of Roma women and the multiple forms of discrimination they face and proposes systematic mainstreaming of Roma women's issues in all relevant policies. "The particular situation of Roma and Sinti women should be taken into account in the design and implementation of all policies and programmes. Where consultative and other mechanisms exist to facilitate Roma and Sinti people's participation in such policy-making processes, women should be able to participate on an equal basis with men. Roma women's issues should be systematically mainstreamed in all relevant policies designed for the population as a whole."¹⁴.

Similarly, the CoE has adopted a number of Decisions and Recommendations promoting equal rights and non-discrimination of Roma as well as policy recommendations on countering antigypsyism.¹⁵ Moreover, the CoE promotes in particular the rights of Roma women through targeted programs (e.g. Access to Justice for Roma Women), by facilitating coalition building of Roma women throughout Europe (series of International Roma Women conferences) and by mainstreaming Roma women's issues within the Council of Europe Strategy for Gender Equality 2018 -2023.¹⁶

Most important, the European Court of Human Rights has issued landmark decisions on violations

12. Of particular relevance are the following documents: The Universal Declaration of Human Rights (UDHR), the International Convention against Racism and Discrimination (ICERD), the Convention on Civil and Political Rights (CCPR), the Convention on Economic, Social and Cultural Rights (CESCR), the Convention on the Elimination of Discrimination against Women (CEDAW), Convention on the Rights of the Child (CRC).

13. See in particular the regular reports of the CoE Advisory Committee on the Framework Convention on National Minorities, available at <https://www.coe.int/en/web/minorities/ukraine>

14. See paragraph 6 of the OSCE Action Plan on Improving the Situation of Roma within the OSCE Area, Ministerial Council Decision No. 3/03, Maastricht, 1.2 December 2003.

15. See ECRI General Policy Recommendation No. 13 on combating anti-Gypsyism and racism against Roma, available also in English and Ukrainian languages at <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/recommendation-no.13>

16. Details about the work of the CoE Roma and Travellers Team on promoting gender equality for Roma women available at <https://www.coe.int/en/web/roma-and-travellers/gender-equality>

of human rights of Roma women and men underlining the existence of systemic racism and discrimination against Roma persistent in European societies.¹⁷

Given the continued challenges and human rights violations, the international community has repeatedly recommitted its goal to work on full inclusion of Roma. In this context, since the year 2002-2003 a number of governments in Europe have adopted policies and action plans at the national and local levels aiming at Roma integration¹⁸. A prominent example in this regard is the regional initiative, “Decade for Roma Inclusion 2005-2015”, which brought together eleven governments in Central and South Eastern Europe to take a leadership role in adopting national frameworks for policy action which will ensure non-discrimination and equal rights and opportunities for Roma women and men. Though the Decade for Roma Inclusion has not fulfilled its objective, it has brought forward valuable results, in particular, with regard to empowering civil society and enhancing the capacity of local and central level authorities in implementing policies for social inclusion of Roma.

The most recent impetus and reinforcement of the regional initiatives came from the European Union. Within the process of the EU enlargement, particularly with the enlargement rounds in 2004 and 2007, when a number of Central European countries with larger Roma population joined the EU family, the EU member states recognized that urgent actions are

needed to ensure fundamental rights without discrimination to all citizens residing within the EU. In 2011, in response to insufficient progress in effort at Roma inclusion, the European Council adopted the EU Framework for National Roma Integration Strategies (NRIS) up to 2020¹⁹ (the EU Framework for NRIS). Within the EU Framework, all member states committed to adopting National Roma Inclusion Strategies and action plans and reporting on a regular basis on its implementation to the European Commission.²⁰ Besides, the EU Framework encourages member states to address inequality in education, employment, housing and health and combat discrimination and racism against Roma. On a smaller scale, this initiative is also in place in the countries in the Western Balkans under the Roma Integration 2020 programme.

The EU has also increasingly demanded visible action to improve the situation of Roma in the negotiations on the enlargement process with accession or pre-accession countries and supported related efforts through the use of financial pre-accession instruments (such as the Instrument for Pre-Accession Assistance). In the year 2013, the EU recommitted its efforts for Roma integration by adopting the 2013 EU Council Recommendation on effective Roma integration measures in the Member States²¹, which also recognizes the multiple discrimination faced by Roma children and women.

17. For details about the ruling of the ECHR see: https://www.echr.coe.int/Documents/FS_Roma_ENG.pdf; Decisions confirm, among others, police violence and misconduct, violation of reproductive rights of Roma women and, in the case of Ukraine, failure to respect right for home (Burlya and Others vs. Ukraine), November 2018.

18. For details see the OSCE 2008 and 2013 Status Reports on the Implementation of the Action Plan on Improving the Situation of Roma and Sinti within the OSCE, available at <https://www.osce.org/odihr/154696>; information about the Roma Decade and its succession program – Roma Integration 2020, currently carried out in the Western Balkan region, available at: <https://www.rcc.int/romaintegration2020/pages/4/roma-decade-and-the-eu>

19. See Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee of the Regions, a EU Framework for National Roma Integration Strategies up to 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1444910104414&uri=CELEX:52011DC0173>

20. The national strategies and regular reports as well as the communication with the EC is available at https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-and-eu/roma-integration-eu-countries_en#nationalromaintegrationstrategies

21. See Council Recommendation of 9 December 2013 on effective Roma integration measures in the Member States, available at [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013H1224\(01\)&from=en](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013H1224(01)&from=en)

"Combat all forms of discrimination, including multiple discrimination, faced by Roma children and women, and fight violence, including domestic violence, against women and girls, trafficking in human beings, underage and forced marriages, and begging involving children, in particular through the enforcement of legislation. To this end, Member States should ensure the involvement in this exercise of all relevant actors, including public authorities".²²

Moreover, in view of the ending in the year 2020 of the current EU Framework for National Roma Integration Strategies, in February 2019, the European Parliament adopted a Resolution on the need for a "strengthened post-2020 Strategic EU Framework for National Roma Inclusion Strategies and stepping up the fight against anti-Gypsyism"²³ which, among other things, calls on its Member States "to ensure that multiple and intersectional discrimination, gender mainstreaming and a child-sensitive approach are properly addressed in the Strategic EU Framework".²⁴

Following the first European Platform on Roma Inclusion in 2009, the 10 Common Basic Principles for Roma Inclusion were put forward as a practical guide to support policy makers or managers of programmes and projects in delivering successful initiatives aimed at Roma. The principles summarize the criteria which should be intrinsic to policy design, implementation and evaluation in order to enhance performance and outcomes:

1. Constructive, pragmatic and non-discriminatory policies.

2. Explicit but not exclusive targeting.
3. Inter-cultural approach.
4. Aiming for the mainstream.
5. Awareness of the gender dimension.
6. Transfer of evidence-based policies.
7. Use of European Union instruments.
8. Involvement of regional and local authorities.
9. Involvement of civil society.
10. Active participation of the Roma²⁵.

Gender dimension is outlined as one of the 10 principles for Roma inclusion, as well as a crosscutting element to ensure effective design and delivery of policies towards equal participation of Roma men and women in society.

"Principle No. 5: Awareness of the gender dimension: Roma inclusion policy initiatives need to take account of the needs and circumstances of Roma women. They address issues such as multiple discrimination and problems of access to health care and child support, but also domestic violence and exploitation"²⁶.

1.4.2. Alignment with national and international policy frameworks in the field of human rights and Roma inclusion, and coherence with other national reforms

The Strategy in its introduction mentions several relevant international standards forming its legal basis, including, among others, the Universal Declaration of Human Rights (UDHR), the Convention on Civil and Political Rights (CCPR), the Convention on Economic, Social and Cultural Rights (CESCR), the

22. See Council Recommendation of 9 December 2013 on effective Roma integration measures in the Member States, available at [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013H1224\(01\)&from=en](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013H1224(01)&from=en)

23. European Parliament resolution on the need for a strengthened post-2020 Strategic EU Framework for National Roma Inclusion Strategies and stepping up the fight against anti-Gypsyism (2018/2509 (RSP)), available at http://www.europarl.europa.eu/doceo/document/B-8-2019-0098_EN.html

24. Ibid.

25. See: Common Basic Principles on Roma Inclusion, available at <https://publications.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

26. See: Common Basic Principles on Roma Inclusion, available at <https://publications.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

International Convention against Racism and Discrimination (ICERD), the Convention of the Rights of the Child (CRC) the European Social Charter, the Council of Europe Framework Convention on the Protection of National Minorities, and the European Charter for Regional and Minority Languages.

The Ukrainian authorities did not approach the international community (though some of the entities and organizations had a representation in the country) for technical assistance to support the drafting or the consultation process on the Strategy or National Action Plan (e.g. OSCE, CoE). Further, none of the UN bodies present in Ukraine (UNDP, UN OHCHR, UN Women) was consulted during the drafting process.

Though reference is made to the “Law on ensuring equal rights and opportunities for women and men”, the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) is not listed as a basis. There is no reference to relevant OSCE commitments, either.

Along with several other international organizations, the OSCE in the past encouraged Ukraine to improve the current Strategy and National Action Plans. In 2014 the OSCE Office for Democratic Institutions and Human Rights (ODIHR) conducted an assessment and published its findings in the Assessment Report on Roma in Ukraine and the Impact of the Current Crises.²⁷ According to its assessment, the OSCE ODIHR recommended to update the current Roma Strategy and National Action Plan (NAP) based on comprehensive gender-disaggregated data, to ensure a participatory process involving Roma civil society and integration of a strong anti-discrimination approach throughout all strategic priorities and taking into account specific needs of Roma women. In addition, OSCE ODIHR urged the

Ukrainian authorities to add clearly defined objectives, indicators and a realistic budget.²⁸

With regard to the needs of Roma women, the Committee on the Elimination of Discrimination against Women in Ukraine, in its Concluding Observations based on Ukraine’s 8th periodic report published in March 2017, addressed the concerns of Roma women under general recommendations on access to justice, on equality in marriage and family relations, on women in conflict prevention, conflict and post-conflict situations and under the rights of rural women.²⁹ Furthermore, the rights of Roma women and girls were particularly addressed in the context of accounting for the specific needs of internally displaced women facing multiple forms of discrimination and promoting access of Roma girls to education and their retention at all levels of education. As a follow-up, the new State Social Programme on Ensuring Equal Rights and Opportunities for Women and Men, adopted by the Ukrainian Government in April 2018, included a reference to Roma women and girls in two of the 57 recommendations, namely, “to address needs of IDP women, including Roma women, and ensure education for Roma girls”.³⁰

Following the conclusions of the Committee on the Elimination of Discrimination against Women the UN Women increased its support to both, the national and local authorities and the Roma civil society, to increase knowledge and awareness of the rights and interests of Roma women and girls. In 2018, the Ministry of Foreign Affairs in close cooperation with Ukrainian Parliament’s Human Rights Committee, the Office of the Vice Prime Minister for European and Euro-Atlantic Integration of Ukraine and the Roma Women’s Fund “Chiricli”, hosted an international conference on “Realizing the Rights of Roma Women in

27. <https://www.osce.org/odihr/124494?download=true>

28. Ibid, p.6.

29. Committee on the Elimination of Discrimination against Women in Ukraine, “Concluding Observations on the Eighth Periodic Report of Ukraine on the Elimination of All Forms of Discrimination against Women”, March, 2017, available at <http://eca.unwomen.org/en/digital-library/publications/2017/12/concluding-observations-on-the-eighth-periodic-report-of-ukraine>

30. State Social Programme on Equal Rights and Opportunities of Women and Men for the period up to 2021 (2018), see Recommendation 10 p.14 and Recommendation 27 on p. 36, available at <https://www.kmu.gov.ua/en/news/uryadom-zatverdzheno-derzhavnu-socialnu-programu-zabezpechennya-rivnih-prav-ta-mozhlivostej-zhinok-i-cholovikiv-na-period-do-2021-roku>

Ukraine”. It resulted in an Outcome Document with a demand, among others, “to account for the gender dimension, to promote the rights of Roma women, and to measure progress of the Strategy implementation using SMART and time-bound indicators”.

Another relevant policy framework for promoting rights and equal opportunities for Roma women and men is the Action Plan for the implementation of Ukraine’s Human Rights Strategy³¹ adopted in 2015. However, according to respondents from civil society human rights organizations, Roma are not actively involved in the civil society forum for the Human Rights Strategy, nor there is a strong advocacy or monitoring as to what extent the Roma Strategy is implemented. Discussions with the representatives of human rights organizations also showed that Roma rights issues are not broadly mainstreamed within general human rights discourse, but rather seen as a “specific issue”. According to some of them, the complex situation of Roma requires a specific policy aimed at addressing Roma inclusion using rights-based approach.

In particular, representatives of regional and local authorities, Roma communities and civil society underscored the importance of interlinking and mainstreaming actions implemented under the Roma Strategy with the decentralization process. The ongoing decentralization reform both, offers a huge potential and poses a big risk. The potential lies in the fact that competencies and resources can be directed towards increasing the relevance of local needs and implementing needs-based approach in local level policies within the authority of local self-governing bodies. This could also potentially mean higher flexibility and responsiveness to the needs of local Roma women and men. However, there is a risk that the decentralization reform will be carried out without including targeted or mainstream Roma-related measures in the local and regional policies.

Further, Roma mediators, civil society and Roma representatives stressed that some other ongoing

reforms already have adverse impact on local Roma communities. In this regard, concerns were raised about access to healthcare services and promoting access to quality education for Roma children. For example, Roma mediators from Zakarpattia region informed that if people are not registered with a medical practitioner within a deadline they will not be assigned to a physician and might not be able to use the services. In one emergency case the ambulance was called to a patient living in a Roma settlement, but they refused to come saying that first the patient had to see a physician he was assigned to (reportedly, ambulance should respond to emergency calls).

Generally, in order to receive guaranteed medical assistance, a person needs registration at their place of residence and an internal passport to register with a health practitioner. There is low awareness of these new requirements among Roma communities. This, together with the issue of low literacy among some Roma communities, makes it more complicated to fill in the forms and meet the requirements. As a result of the health reform, undocumented Roma have completely lost access to outpatient care.

To overcome these threats, such organizations as the International Renaissance Foundation have been supporting educational activities to raise awareness on the medical reform among Roma women and men, as well as facilitating their contracting with doctors. As was also mentioned by respondents, there are some health practitioners who register vulnerable Roma people even without registration at their place of residence.

As for schooling, according to the reform, children should attend the closest primary school. However, in practice this might limit access to quality education of Roma children from poor marginalized neighbourhoods, as they might be enrolled in a school in close vicinity to their residential area, often of poorer quality, and attended only by Roma children and, thus, de facto reinforcing segregation and marginalization.

31. For details consult the webpage <<https://kmu.gov.ua/ua/npas/248740679>>

CHAPTER 2: EFFECTIVENESS

2.1. Progress in Achieving Results under the Roma Strategy Key Priority Areas and Specific Objectives

One of the tasks of the evaluation was to assess the extent to which the general and specific results as planned in the Strategy and Action Plan were achieved, as well as to identify what worked and why, and what was less effective and why. To fulfill this task, we reviewed the available official reporting data on the Strategy and Action Plan implementation which we triangulated as much as possible with other sources of information – interviews and group meetings, as well as other monitoring and assessment reports related to the implementation of the Strategy.

A major challenge was the issue with both, baseline data and data on actual achievements as well as volume of disaggregated data on beneficiaries of the relevant measures. As stated by the responsible ministries, most annual reports lack statistics on nationalities in Ukraine, which, in its turn, makes it difficult to actually measure the effectiveness of the relevant measures specifically targeting Roma. At the same time, some experts from the oblasts were providing data on the number of Roma covered by their activities, which was mostly based on self-identification. However, as stated by the relevant ministries, this data is non-official. Other related challenge was the quality of reporting and consistency of provided data (fragmented by the different regions and/or over the years) which is further elaborated in the next sections of this report.

Another task of the evaluation was to track gender responsiveness, both in the Strategy design and implementation, but neither the Strategy, nor the Action Plan, nor related practices appeared to use a conscious gender mainstreaming approach. At best, only some interventions and activities are gender targeted. With just a few exceptions, most of the interviewed people did not consider gender

related issues, or how their work promotes or affects equal rights and opportunities for women and men, though, if specifically asked, they acknowledged that Roma women face multiple forms of discrimination or inequality due to their gender, social status and expected gender roles.

2.1.1. Strategic area/objective: Legal protection of Roma nationals

The first strategic area named “Legal protection” includes 6 specific objectives which are supported by 11 actions/measures of the Action plan under a section titled “General issues”.

The six specific objectives are of a very diverse nature, including:

- increased involvement of Roma public associations in decisions related to Roma;
- raised legal awareness of Roma nationals;
- taking measures to prevent discrimination;
- assistance in obtaining personal documents (passports, birth certificates, as well as registration, and other civil status documents);
- extended cooperation with international organizations; and
- foster public tolerance towards Roma.

Based on the findings of the evaluation, **most visible progress was achieved under the objective of obtaining personal documents, in particular, birth registration, as well as the objective for increased involvement of Roma CSOs.**

2.1.1.1. Specific objective: access to personal documents

Resolving the issue of personal documents (civil registration and identification documents³²) is critical for opening access for Roma women and men to all type of public services. Based on the interviews, as well as

civil society and international stakeholders' reports, **there has been visible progress** resulting from work of the **State Registration Service at the Ministry of Justice** under this specific objective **which managed to increase effectively the issuance of documents to Roma, in particular, birth registrations**³². Annual reports on the implementation of the Action Plan for all years did not provide any aggregated data on the statistics of issued birth certificates. However, based

on the interview with the Ministry of Justice official, 2018 only saw registration of 3,180 newborn Roma children.

Some further progress with regard to the issuance of internal passports has been reported. This is also confirmed by the data of the State Migration Service from the annual reports on the implementation of the Roma Strategy and AP (Table 2.1).

Table 2.1. Passports issued to Roma in 2013-2018

| Year | Total number of passports issued to Roma | Oblasts with largest number of passports issued to Roma |
|------|--|--|
| 2013 | 1,531 | Volyn (141) Zakarpattia (1272), Donetsk (110) and Odesa (8) |
| 2014 | 2,248 | Volyn (82 passports), Rivne (9), Kharkiv (139) and Odesa (112) |
| 2015 | 2,143 | No data |
| 2016 | (no data) | (no data) |
| 2017 | 3,222 | Zakarpattia (2,138), Odesa (229), Dnipropetrovsk (253) |
| 2018 | 3,976 | Zakarpattia (2,429), Odesa (449), Kharkiv (142) |

Source: data of the State Migration Service.

As can be seen from the Table 2.1, **the total number of passports issued to Roma has been steadily growing since 2013, and in 2018 it doubled compared to 2013**. As commented by some of the international stakeholders, it can be considered a significant improvement. A factor that also helped in documenting this progress was that in 2014 the SMS included numbers on Roma that received passports in the statistical report PR_3 "Issued passports of a citizen of Ukraine". To monitor progress in future, it is important to collect data also on the total number of applications from Roma, both submitted and turned down.

Progress in issuing identification documents to Roma was also confirmed in the interview with the officials of the SMS regional department in Kharkiv. Due to collaboration established in implementing the

Action plan (especially, with Roma NGOs) they have significantly streamlined their working procedures at the oblast level for issuing passports and identification documents (to the extent possible within the existing provisions and regulations). If in 2018 they issued passports to 169 Roma (adults and children), only in the first four months of 2019 passports were already issued to 78 people.

However, practices among the regions vary, and there is no unified approach yet. Based on information from Roma mediators in Zakarpattia, the issuance of civil registration and identification documents was taking place to a large degree due to free legal aid services provided by civil society with donor support. Under national law, applying for free legal aid at the existing public centers requires an internal passport, therefore, people without ID documents are unable

32. We use the broader term 'personal documents' which encompasses both civil registration documents (birth registration, marriage, death of a person, etc.) and identification documents (internal passport and travel documents).

33. Minority Rights Group Europe (2019): Roma in Ukraine and the Impact of the Current Crises.

to access free public legal aid. However, as many cases can only be resolved in court which requires time and free legal aid, the achieved progress may come to a halt with ending of donor support.

Among success factors that helped progress in issuing civil registration and identification documents were:

- **Intensive cooperation of the responsible institutions at the central and local levels with Roma associations, activists and the international community** – in 2013-2015 there were numerous seminars, workshops, round tables carried out with focus on approaches to the issues of obtaining personal documents, mostly in the framework of various CSOs projects or organized by the international community, in particular, the OSCE Office for Democratic Institutions and Human Rights;³⁴
- **Roma civil society pro-active outreach in Roma communities** to provide information on legal and administrative procedures, as well as free legal aid to Roma women and men to apply for documents. Most of this work was carried out by the Roma mediators, Roma CSOs and human rights lawyers. Based on the annual reports on the Strategy implementation, only in 2014 the International Renaissance Foundation (IRF) funded 12 CSO projects in 7 regions of Ukraine. This enabled local Roma organizations to assist Roma through legal information and counseling, to render assistance in preparing procedural documents, and to interact with the relevant administration. In addition, UNHCR supported free legal aid through local CSO;
- **Proactive approach of administrations**, visits to kindergartens to track the number of children with no birth registration documents, direct fact-finding and monitoring visits to communities (e.g., in 2017 –

2019 the Ministry of Justice (MoJ) conducted quarterly visits to multiple Roma communities in different regions);

- **Peer learning** – an exchange visit to Serbia supported by the international community (UNHCR, OSCE) to learn from their practices of ensuring access to documents for vulnerable Roma women and men, was especially valuable for the MoJ;
- Also, based on the interviews in Uzhgorod and Kharkiv, the SMS office, in addition to the general services open to all citizens including Roma, had **a day dedicated to Roma with more complicated cases which was helpful** in reserving adequate time for resolving these cases;
- **Effective daily collaborative work between the administration, Roma CSOs and Roma mediators** who, as mentioned in the interviews with the SMS departments in Uzhgorod and Kharkiv, provided valuable help in establishing contacts with Roma families and identifying undocumented children.

As noted by all respondents, as well as in existing outside monitoring and analytical reports, despite the progress, **the issue with personal documents continues to pose serious challenges and remains an urgent priority that has to be followed up in the post 2020 Roma strategy and plan.** It must be noted that there is a need for simplifying the procedures of obtaining personal documents for all citizens of Ukraine by making some changes to the general Law regarding issuing passports to citizens of Ukraine, as well as well by amending various administrative regulations and provisions³⁵.

Further improvement of the intersectoral approach and joint work of various institutions will also be needed due to the complexity of the issues with

34. See Summary Report "Expert seminar on access to identification and civil registration documents by Roma in Ukraine", hosted by the OSCE/ODIHR Contact Point for Roma and Sinti Issues in co-operation with the Ukrainian Parliament Commissioner for Human Rights, available at <https://www.osce.org/odihr/211996?download=true>; further see OSCE ODIHR (2018): Access to Personal Documents for Roma in Ukraine: More Efforts are Needed, available at <https://www.osce.org/odihr/387182?download=true>

35. For details see OSCE ODIHR (2018): Access to Personal Documents for Roma in Ukraine: More Efforts are Needed, p. 10 ff., available at <https://www.osce.org/odihr/387182?download=true>

civil registration and identification documents. While there is some progress in the joint work of the MoJ and social services centers in identifying people without documents, so far, no mechanism has been established to ensure a joint approach of the MoJ and the SMS to solve complex issues related to civil registration and identification documents. Also, **amendments to the existing legislation on free legal aid are needed** to allow alternative forms of proof of identity, other than internal passports, that “would provide Roma with enhanced access to free legal aid in cases where applicants are unable to present a birth certificate, passport or other identification document.”³⁶

2.1.1.2. Specific objective: Increased involvement of Roma public associations in decisions related to Roma

According to all stakeholders – both from civil society and public institutions, there is visible progress under this objective. Based on the annual reports of the MoC and the regions, as well as on findings from the interviews, involvement of Roma CSOs took place in several ways:

- **Participation in the Interagency WG as well as in the established in 2017-2018 working groups for the Strategy implementation.** In total, 6 active Roma CSOs in different thematic areas were included in the

5 WG: (“Chiricli”, “Ternipe”, “Romance”, “Chachimo”, “Romani Yag”, “Blago”, Roma Human Rights Center, “Center for the unification and protection of the rights of Roma”, director of the Roma TV program “Romano Jivipen”);

- **Established collaborative work with the local/regional institutions, including participation in various structures** of Minority councils, working groups on implementation of the strategy at oblast levels;
- **Increased partnership with institutions and their involvement in projects initiated and implemented by the Roma CSOs and funded by various outside donors.** An interesting finding is that all these projects are also reported as outputs in the Strategy implementation across all priority areas and specific objectives;
- **Regular public assessments of the Roma Strategy and Action Plan implementation through meetings and/or round tables organized in different oblasts.** As can be seen from the table below, in some oblasts, meetings are held almost annually (Table 2.2.). At many of the meetings, Roma CSOs presented proposals for update of the strategy and plans which, in some cases, resulted in actual update of the local strategies and improvements in their implementation.

Table 2.2. Events conducted to assess the Roma Strategy, 2014-2018

| Year | Meetings and round tables to assess the strategy and AP per oblast |
|------|--|
| 2014 | Vinnitsia oblast; Poltava oblast |
| 2015 | Mykolayiv oblast; Cherkasy oblast |
| 2016 | Zaporizhzhya (1), Mykolayiv (1), Odesa (2), Poltava (1), Kharkiv (2) and Cherkasy (2) oblasts. |
| 2017 | Zakarpattia oblast; Odesa oblast; Cherkasy Oblast |
| 2018 | Mykolaiv, Luhansk, Poltava, Kharkiv and Cherkasy oblasts. |

36. OSCE ODIHR (2018): Access to Personal Documents for Roma in Ukraine: More Efforts are Needed, available at: <https://www.osce.org/odihr/387182?download=true>

The implementation of the Strategy has brought the relations between the public institutions and **Roma NGOs to the next level. One of the findings of this evaluation is that Roma CSOs have a high degree of legitimacy with the public institutions** at central, regional and local levels, and the importance of Roma civil society participation is recognized as a factor ensuring effectiveness of any measure on Roma inclusion.

Based on the field trips to Kharkiv and Zakarpattia oblasts, the regional level institutions highlight the benefits of Roma civil society and mediator's participation and assistance in identifying needs, finding solutions in different areas, such as obtaining documents, social protection, providing real-time monitoring and feedback. As underlined in the interviews with the Kharkiv oblast Center of Social Services for Family, Children and Youth, **the Roma CSOs played a leadership role** in consistently reminding of and putting back on the agenda the Roma issues based on the existing strategy and plan – *“initially, these were just dormant paper documents, but Roma NGOs made them active instruments”*. This led to the update of the Kharkiv Action Plan and its improvement, as well as to progress in a number of areas of its implementation.

There is also clear evidence of the leadership role played by Roma civil society in continuously advocating with central institutions and Parliament for improvement of the Roma strategy and the effectiveness of its implementation, as well as often mobilizing attention and support of international actors. In practice, all the achievements of the Roma CSOs involvement of listed above, as well as the adoption of the Roma Strategy and Action Plan, are a result of their effective advocacy.

At the same time, as noted in the latest civil society report,³⁷ there are a number of shortcomings related to the effective participation of Roma civil society that supported the conclusion of the report that *“the*

Ukrainian authorities have failed to provide Roma communities with a meaningful role in decision-making”. Among the reasons for this conclusion is the lack of meaningful consultative process at the design phase of the Strategy which led to omission of such crucial aspects as work with Roma youth and women in particular, and not having clear focus on human rights and antidiscrimination. In addition, as stated in the report, **a number of provisions of the Action Plan did not provide for the engagement of Roma NGOs in the implementation process**, including activities aimed at organizing national population survey, monitoring social welfare programmes, pre-school education for Roma children, healthcare, housing, crime prevention and public order³⁸.

Based on the interviews with Roma CSOs, **another set of challenges arises from the lack of clarity on the mechanisms for Roma participation, as well as the expectations from this participation:**

- On one hand, in some cases, the institutions place responsibility for the implementation of a number of aspects of the strategy on the civil society, which does not have the resources of the state. Besides, there is no clarity on what happens with the recommendations proposed by CSOs which, together with international actors, developed a number of independent reports with concrete proposals for improvement. We could not find evidence of how those recommendations were used for the update of the National Strategy and Action Plan;
- On the other hand, as underscored by some respondents, Roma NGOs have limited awareness and capacities on all available mechanisms of interaction, e.g., programmes, social procurement, limited capacity to administer budget funds for the needs of Roma communities.

At present, Ukraine has a remarkably diverse and engaged Roma civil society with growing capacities to represent their communities and to be an effective

37. Minority Rights Group Europe (2019): Roma in Ukraine and the Impact of the Current Crises, p.46.

38. Ibidem.

partner for the government in Roma inclusion. Roma civil society in Ukraine has greatly evolved, and work on the Roma strategy gave impetus to improved self-organization and building alliances for advocacy and promoting rights of their communities. As an example, NGO coalition “Roma Strategy 2020” created in 2015 brought together 16 Roma NGOs from 11 regions of Ukraine, and there are other regional coalitions. There are experienced and powerful Roma women in Roma civil society that serve as role models for other women and girls. Since 2015 Roma women have also become increasingly involved at local and central levels in advocating for Roma rights in Ukraine and engaging with both – civil society and administrative bodies at local and central levels – to contribute their experience to improving Roma situation. A post 2020 Strategy should further build on this experience, recognize this leadership and, in general, ensure that in consultation the voice and interests of Roma women are heard and represented.

The valuable practice of Roma CSOs involvement needs to be further expanded with some clarification on the mechanisms of their participation within the overall institutional framework for the implementation of the post 2020 Roma strategy and plans. Investments in further capacity building of Roma CSOs in order to effectively utilize different forms of participation will be also important.

2.1.1.3. Specific objective: Taking measures to prevent discrimination against Roma

Fighting discrimination against Roma women and men in society is an underlying aspect of every strategy aimed at Roma inclusion. Lack of understanding of discrimination as one of the main root causes of the exclusion of Roma from the mainstream development was strongly criticized by human rights organizations, the Office of the Parliament Commissioner for Human Rights and Roma CSOs as **one of the main deficiencies of the current Strategy**.

This was also confirmed by thorough analysis of both documents – the Strategy and the Action plan. Though the principle of antidiscrimination is listed

among general principles of the Roma strategy and is included as a specific objective under the broad area of “Legal Protection”, **we could not find any action/measure in the Action Plan for prevention of discrimination** (see Annex 3: Roma Strategy Objectives and Action Plan Measures).

Partially, some aspects of preventing discrimination can be achieved through the other two specific objectives in the Legal Protection area listed below.

2.1.1.4. Specific objective: raising legal awareness of Roma

The implementation of the specific objective “raising legal awareness of Roma” included activities related **to raising awareness of Roma on human rights. This, in principle, can help empower them to assert their rights**. There was a number of activities included by the government in the annual reports on the Strategy implementation, including awareness raising, training, meetings etc.

In fact, most of them were projects led by Roma CSOs with institutions participating on a regular basis or in some cases.

The second envisaged measure, which could also contribute to Roma empowerment, was to prepare members of the Roma national minority for the next all-Ukrainian population census and ensure their participation. But nothing was done as the census was postponed. Currently, a trial census is scheduled for December 2019 to test methods and technologies and prepare for the census in 2020. This opportunity can be used not only to gather more data, but also to engage Roma mediators and civil society to reach out to Roma women and men and inform them about the importance of participating in the census and facilitating the process.

2.1.1.5. Specific objective “promoting public tolerance towards Roma”

The other specific objective “promoting public tolerance towards Roma” is another important aspect of fighting discrimination by changing stereotypes and bias that the majority of population has towards them.

According to the annual reports of the MoC and the regions reports (2013-2018), there was a wide range of activities reported at both central and, mostly, at the regional levels, including central or regional TV and radio broadcasts (speeches, documentaries and presentations which, in many cases, were made by representatives of the MoJ regional departments); educational activities (raising awareness on Roma customs and rights with parents and pedagogical staff, presentations at libraries, as well as training activities (e.g., training program over 3,000 police officers done by the US Department of State).

Based on the outcome of the meeting of the WG on Organization and Information, the main activities held under this objective were mostly initiatives of the Roma Women Fund "Chiricli" whose representative is also the chair of this WG. The Fund prepared promotional materials and wrote scripts for short videos, but due to lack of budget the Ministry of Information was unable to film them.

Budget remained the main problem throughout implementation. To compensate this, the Roma Women Fund "Chiricli" supported some of the planned initiatives out of their own project funds (coming from outside donors): together with the Ministry of Information, "Chiricli" produced a video on national minorities which was provided to the national TV as social advertising. The Fund also prepared a monitoring report on the use of hate speech on the Internet and sent it to the Parliamentary Commissioner on Human Rights; together with the CoE they provided training on unbiased reporting for 150 journalists. "Chiricli" also showed a short video on Roma developed together with the Strasbourg Roma Group.

While all the above broader awareness activities are valuable, **discrimination towards Roma in its worst forms became increasingly visible on the public agenda.** Human rights reports note a rise in violent hate crimes and attacks on Roma settlements, camps or Roma people migrating to bigger cities to find sources of income, as well as the lack of access to justice and increasing feeling of impunity of perpetrators of these crimes. This was also confirmed by the interviews within this evaluation where Roma

CSOs and human rights organizations provided us with a number of examples of lack of effective prosecution and justice.

A new challenge to the effectiveness of the legal protection objective of the Strategy was posed by the question of personal and collective security of Roma women and men.

After the initial attacks on Roma in April 2018, different stakeholders started looking for adequate responses and solutions. The International Renaissance Foundation (IRF) supported two regional pilot initiatives in Lviv and Zakarpattya and the Coalition of Roma Experts "Strategy 2020" in developing algorithms for preventing attacks on Roma settlements. The Ministry of Internal Affairs initiated work of its own Working Group to address these issues in May-June, and the Parliament Commissioner for Human Rights came up with the initiative to integrate these processes by developing a common algorithm for interaction of all structures and institutions in cases of occurrence of the irregular spontaneous Roma settlements. To this end, a working group was set up in Kyiv with different stakeholders involved, including among others, the Ukrainian Helsinki Committee.

Based on the interview with the representatives of the Office of the Parliament Commissioner on Human Rights and the Helsinki Committee, usually it is the police that works with Roma in temporary settlements/camps without engaging the social workers. A strength of the Working Group for the development of the collaboration Algorithm collaborative mechanism) lies in its broader, more diverse composition, including, among others, representatives of CSOs, the Kyiv administration and central authorities.

The goal was to develop a mechanism of interaction in order to prevent negative situations and attacks on Roma by radical groups, as well as to provide basic necessities for the people in the camps (water, garbage collection, providing an opportunity for a medical examination). Besides, there should be also access to services and access to medical examinations for children in particular. The Kyiv authorities said they need additional budget to assist Roma

migrants as this cannot be covered by the local budget. Another problem is that the people in these temporary Roma settlements speak mostly Hungarian and do not know Ukrainian or Russian, or even the Roma language.

As outlined by representatives of UN human rights organizations, the Parliament Commissioner for Human Rights and Roma civil society, **the issues of access to justice, processing cases of hate crimes in a timely manner and ensuring personal and collective security of Roma is an urgent priority that needs to be addressed proactively (not just reactively)** by the Roma Strategy as the main public policy framework for Roma inclusion in society.

2.1.2. Strategic area/objective: Social protection and employment of Roma nationals

The second strategic area is aimed at ensuring social protection and employment of Roma. It has five specific objectives which are supported by six measures as designated in the Action plan.

2.1.2.1. Progress towards the specific objectives for improved social policy ensuring social protection of Roma

Two of the specific objectives are focused predominantly on the area of social protection.

The first of these objectives is **to implement social policy to ensure social protection of Roma nationals, including vulnerable families and disadvantaged individuals, as well as assistance to Roma nationals in finding employment.**

The MoC annual reports of on results of the measure under this objective *"Identifying vulnerable Roma families with children and providing them with social services"* do not contain aggregated data or analysis of achievements, and in many cases, information is provided in regards of the general population, without disaggregation by minority status or gender.

The regional reports provide much more concrete data on the coverage of vulnerable Roma families, which is summarized in the Table 2.3 below.

Table 2.3. Number of vulnerable Roma families with children covered by social services

| Oblasts | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|------------------------|--------------|------|------|------|------|------|
| Cherkasy oblast | 117 | 91 | 49 | 80 | 78 | 890 |
| Chernihiv oblast | | 68 | 49 | | 66 | |
| Chernivtsi oblast | | | | | 3 | |
| Dnipropetrovsk oblast | | | | | 233 | 251 |
| Donetsk oblast | | | 18 | | | 161 |
| Ivano-Frankivsk oblast | | | | | | |
| Kharkiv oblast | 109 | 77 | 102 | 82 | 368 | |
| Kherson oblast | 30 | | | 31 | | |
| Khmelnysky oblast | | | | | 111 | |
| Kirovohrad oblast | 7 | | 2 | | 12 | |
| Kyiv | 1 settlement | | 1 | | | |
| Kyiv oblast | 14 | | | | 97 | |
| Luhansk oblast | 62 | | | | | |
| Lviv oblast | | | | | | |
| Mykolaiv oblast | 229 | 368 | 35 | 72 | 45 | |
| Odesa oblast | 298 | 307 | | 230 | 155 | 164 |

| | | | | | | |
|---------------------|-------------|-------------|------------|-------------|-------------|-------------|
| Poltava oblast | | 91 | 71 | 71 | 116 | |
| Rivne oblast | 18 | 13 | 7 | 12 | 9 | |
| Sumy oblast | 42 | | | | 112 | |
| Ternopil oblast | | | | | | |
| Vinnitsia oblast | 27 | | 7 | 32 | 42 | |
| Volyn oblast | | | | | | 108 |
| Zakarpattia oblast | 1476 | 1327 | 540 | 448 | 596 | |
| Zaporizhzhia oblast | 89 | 100 | 97 | | 4 | |
| Zhytomyr oblast | | | | | 17 | |
| | 2429 | 2442 | 979 | 1058 | 2064 | 1574 |

Source: reviewed regional reports on the implementation of the Roma Strategy and Action Plan (2013 through 2018).

We could not find summarized data in the reporting documents regarding the share of the Roma families covered by social services in the total number of Roma families and individuals in need. However, social services departments in the regions have done enormous work on identifying most vulnerable families. Based on the interviews with the regional department of social services in Kharkiv, we also observed real concern, empathy and desire to assist such families, and, especially, Roma women. *“They are Ukrainian citizens, just like us”*. The Kharkiv oblast Center of Social Services for Family, Children and Youth was especially grateful to Roma mediators for help in identifying and communicating with these families. *“Roma women trust mediators much more than outsiders and, especially, institutions”*.

A major problem was, once again, **lack of documents which is blocking Roma women and men from access to social services**. Intersectoral cooperation between the social services and the MSM regional departments proved to be an effective practice in finding solutions.

The annual reports on the implementation include a number of activities under the second objective for social protection, namely, **to monitor the allocation and use of state social assistance, in particular, upon the birth of a child**. Though there is no aggregated data of results from this activity, the oblasts' reports show that only in a few individual cases the

social allowances for children had been stopped due to violations of the criteria for such assistance.

However, as noted in interviews with regional social services and Roma mediators, the way the monitoring is done is also important, as well as the overall approach and attitude of social workers. **The trust between Roma women and social workers is very important, but also very fragile**. We could witness it at the meeting with Roma women during our visit in a village near Kyiv – they were genuinely afraid of local social workers, and often could not understand why their child social assistance was reduced.

There is a pressing need for training social services staff to work with disadvantaged Roma women and men as well as developing clear standards for this work. Though some activities in this direction were reported, still there is a need of a much more systemic approach.

The annual reports also elaborate on support to vulnerable Roma women and men through mobilizing charitable, public and religious organizations to aid in providing social assistance to members of the Roma national minority.

As for the other specific objective **“to hold systematic awareness campaigns among Roma nationals to prevent violence and ill-treatment in the family and preventing the use of the worst forms of child labour”**, we could not recognize any specifically

designated measures in the relevant section of the Action plan. However, its implementation can be linked with measure 7: "In areas densely populated by members of the Roma national minority, ensure via law enforcement agencies and social services preventive work against child neglect, child homelessness, involvement in criminal and other illegal activities, family violence, drug and tobacco addiction, and alcoholism".

For some reason, this measure is reported under the general issues/measures of the Action Plan (linked to the "Legal Protection" area of the Strategy). Data on achievements is mostly found on level of conducting activities, namely, number of prevention activities, such as unannounced visits, lectures, conversations, family visits, distribution of thematic information materials on the functions and authority of the social services centers, the Department of Justice and the State Migration Service.

All MoC annual reports refer to a number of these preventive measures **as common and/or preventive "raids" conducted** by the relevant authorities and, in most cases, also involving the police (using the same term in Ukrainian). While we assume that this is based on existing provisions for protecting children's rights, at least, from the outside **the use of the term "raid" in connection to Roma minority compact settlements sounds more than negative**. It is also questionable to what extent such approach can contribute to awareness and trust between Roma families and the authorities. It should also be discussed **what type of awareness approaches work better – those based on fear from punitive measures, or on incentives for improvement**.

2.1.2.2. Progress towards results in access to employment

The other two specific objectives are focused on **the access to employment**.

We could not find any actions in the Action Plan under the specific objective **"to take measures to**

eliminate discrimination in the employment of Roma nationals"

The main activities reported in the area of employment relate to distributing information on the services provided by the State Employment Services, as well as measures under the specific objective to "involve Roma nationals in socially beneficial activities/work" through job counselling, motivation to find a job, acquiring skills required in today's labour market or to start a business, as well as participation in job fairs. Data in reports is mostly on the output level (e.g., how many Roma people were reached out by information activities or counseling), but it is very fragmented on outcome level (e.g., how many people found jobs due to this information support). It makes it very difficult to assess the effectiveness of the activities related to access to employment.

The only aggregated data³⁹ could be found in the MoC annual report (2018) which notes that through the effort of the State Employment Service of Ukraine 182 Roma were employed (or 28% from the total of 648 Roma registered with the Service) and 106 more Roma were involved in public works. Employment centres provided career counseling services to 883 persons of Roma nationality. The number of Roma that received professional training / retraining is quite low – only 7 people.

Based on the above data, the effectiveness in the area of access to employment (as progress towards outcomes/results) is still very low. This is also confirmed by monitoring reports of civil society, as well as by the interviews in the framework of this evaluation. As underlined by some of the respondents, unemployment remains a key challenge for overcoming social exclusion of Roma women and men, which calls for further discussions and better strategy.

A serious issue that needs to be addressed is **how to increase the access of Roma and, especially, Roma women to existing opportunities for vocational training** to acquire skills that can make them more

39. This data is what was provided by the State employment service in the report based and what was collected as information from its those of its local departments where accounting of Roma participating was implemented based on their self-identification.

competitive at the labour market. As discussed with the representatives of the local employment service in the town of Marefa, the main obstacle is that to be eligible for such training candidates are required to complete secondary education (or, at least, grade 9), which many Roma and, especially, women who drop out of school at an early age do not have.

A challenge in approaching the issue with adult literacy is the closure of the evening schools as part of the educational reform. This limits the opportunities for Roma women and men to complete necessary level of education they had missed. As suggested both in the interviews and in some of the civil society reports,⁴⁰ a possible solution would be to organize adult literacy courses as an integral pre-phase of retraining. There are also some good practices of CSOs that tested alternative approaches to adult education for Roma women, also organizing parallel activities for their children so that mothers can take a course. Another problem that needs attention is to find solutions for adult education for those only received elementary education.

The problem with adult illiteracy and overall reduced access to employment and incomes of Roma women and men needs in-depth discussions while developing the post 2020 Strategy and plan.

The fifth specific objective in the area of social protection and access to employment was to **ensure interaction between the social service and employment sector employees and the Roma public associations**. In practice, it was aimed at increasing the overall effectiveness of work in the entire area, but we could not find any specific measure assigned to this objective in the Action Plan.

However, **the most successful practices noted** by all respondents were related to such interaction which

resulted from the initiative of Roma civil society and innovative pilot approaches.

1 Community based mapping of Roma and their needs.

The first most successful practice was the pilot project "Social Passport of Roma communities" initiated by the Roma Women Fund "Chiricli" and implemented through local partnerships of Roma CSOs, Roma mediators and the regional departments of social services. During our visit in Kharkiv, virtually all representatives of the oblast administration and regional departments of social services and the SMS were using the "Atlas – Social Passport of Roma communities" as a working document for practical use in their daily work. As it was mentioned by the representatives of the Kharkiv oblast Center of Social Services for Family, Children and Youth, *"now we have a much better notion what the actual situation is like, how many people are there, what their key problems are, and we consult and discuss with the Roma NGOs how to approach them. Such "social needs" passports need to be developed in all oblasts"*.

2 The Roma mediators.

The Roma mediators were unanimously pointed out as an example of good practice by all institutions from different sectors, both at local, regional or central level. Pioneered and expanded by the Roma Women Fund "Chiricli" in the past 10 years and with the support of various donors,⁴¹ the Roma mediators are already a well-functioning and established instrument for better approach to Roma communities in practically all areas – resolving issues of social assistance, housing, women's access to health, reducing school drop outs, conflict resolution and prevention etc.

Highly praised in external evaluations⁴², as well as unanimously recognized as beneficial for more

40. Minority Rights Group Europe (2019): Roma in Ukraine and the Impact of the Current Crises, p. 36.

41. The International Renaissance Foundation, the Global Fund of HIV/AIDS, TB and Malaria, the OSCE as well as the joint programs of the European Commission and the Council of Europe ROMED 1 and ROMED 2.

42. CoE ROMED EVALUATION. Country findings Ukraine. <http://coe-romed.org/sites/default/files/articles/files/Annex%202%20-%20Country%20Findings.pdf>

effective Roma inclusion processes, Roma mediators are still not institutionalized and not included in official profession registries with budget allocations for creation of salaried positions which has been in discussion since 2015, but not resolved to this day. Roma mediators are still operating on a project basis due to efforts of Roma civil society and the support from outside donors, which is highly unsustainable.

3 Innovative pilots in the area of employment.

Another approach named among good and innovative practices is the pilot projects for employment of Roma developed by "Ternipe" – a Roma youth organization in Lviv. They are supported by Minority Rights Group in the framework of the Partnership for all project financed by the EC. In 2018 they conducted training for employment center officers on work with Roma from vulnerable communities. Afterwards, participants of this training managed to place about 55 people in low-skilled jobs.

2.1.3. Strategic area/objective: improvement of Roma nationals' education level

The strategic area of improvement the educational level of Roma has four specific objectives, supported by 10 designated activities/measures in the Action plan.

In our assessment of progress in this area we were limited by just a few interviews with relevant stakeholders⁴³ as well as the fragmentation of existing reporting data.

Based on the annual reports on the Strategy implementation, work on increasing the awareness among Roma communities about the importance of all stages of education involved a number of individual and group meetings with Roma parents to ensure that their children will be enrolled in and attend school. As a result, **there is increase in enroll-**

ment of Roma girls and boys in kindergarten in each reported year, as well as increased registration of Roma school-age children.

However, aggregated data on these achievements is missing, as, according to the comments in each report of the Ministry of Education and Science, there is no statistics based on nationality available in Ukraine. Data on Roma children and students is provided by the experts at the regional level in the oblast's reports, however, as outlined in the Reports of the MoES, this data is considered unofficial. None of the data is sex-disaggregated.

Due to incomplete information,⁴⁴ we could use only information provided by some of the regions in the reports for the implementation of the Action plan. Based on that, **in some of the regions there is a visible increase of Roma school-age children enrolled in schools.** For example, in Zakarpattya the number of these children was 9,393 in 2013 with increase to 10,255 in 2018; in Odessa – it was 1,402 in 2013 with increase to 1,567 in 2018.

According to civil society, there is progress in pre-school education which can be also attributed to a number of projects of local NGOs, such as "Blago" in Zakarpattya, or national level ones, such as the All-Ukrainian "Step by Step" Program. It is noted, however, that the children who received pre-school learning in language and skills tend to lose them very quickly if they end up in segregated schools⁴⁵.

According to the reports from more than 8 regions, **school buses were provided in 2014-2015** for children who live more than 3 kilometers away from school, in some instances sponsored by outside donors. This was a step towards providing Roma children's access to mainstream schools.

43. The planned meeting with the Ministry of Education and Science and the relevant working group did not take place, and in the field trips to the oblasts we could meet with the educational departments only in Transcarpatia.

44. Some of the annexes of the annual reports on the implementation of the Action Plan that were referred to for more detailed data were missing. In addition, some of the regions were not reporting on the number of Roma children at school age that were registered, and those that were reporting were providing on the number of Roma children only for some of the years.

45. Minority Rights Group Europe (2019): Roma in Ukraine and the Impact of the Current Crises.

However, experts from civil society consider that **schools or classes attended only or predominately by Roma pupils (often located close to an area or district with Roma population) and, thus, de facto leading to segregation remains a serious issue that needs to be addressed**. For example, based on data from the annual reports on the implementation of the Action Plan (2018), in Zakarpattia oblast there are 15 schools where share of Roma children is 50-70%, and 8 schools where they comprise more than 70%. As reported by civil society in Uzhgorod, schools predominantly attended by Roma children are of poor quality and do not provide for quality education. There are also concerns that educational reform “The New Ukrainian School” which started in 2017 and requires schools to prioritize enrollment of children in their catchment area, will contribute to this problem, and Roma pupils from larger areas of Roma settlements will not have access to quality education. At the same time, as reported by some respondents, there are still separate classes for Roma children in some schools in places like Kholmok and a number of other smaller towns in Zakarpattia, as well as in Odessa region which is, in fact, a form of actual segregation of students on the basis of their ethnicity.

The reporting documents on the implementation of the specific objective of **“reducing the number**

of Roma nationals who do not graduate from general education institutions” provide information on a series of conducted activities:

- **Some activities are aimed at skills development and advanced training for teachers and improved quality of the educational process** – a methodology and manual for learning Roma language in primary school were developed, various workshops and seminars held, as well as joint work with Roma CSOs, etc.;
- **Other activities focus on school drop-outs prevention** – meetings and work with parents and their children, involvement of children in a variety of extra-curricular activities (sports, competitions, study circles, cultural events, etc.).

The report of the Ministry of Education and Science does not provide neither analysis of the effect these activities produced, nor aggregated data on **the number of children that finished secondary school** which would be the effectiveness indicator for all of the above activities. However, on the positive side, regional departments of education and science in some of the oblasts gather such information. Unfortunately, it is available only for some of the years and provided only by some of the oblasts. Table 2.4. shows the data in this regard for 2017/2018 from 7 oblasts, again, without gender disaggregated information.

Table 2.4. Completed level of education of students of Roma nationality in the 2017/2018 academic year

| Oblast | certificate of basic education | certificate of complete secondary education |
|--------------------|--------------------------------|---|
| Vinnitsia oblast | 17 students | 5 students |
| Zakarpattia oblast | 701 students | 109 students |
| Luhansk oblast | 12 students | 1 student |
| Mykolaiv oblast | 5 students | 2 students |
| Odesa oblast | 89 students | 33 students |
| Sumy oblast | 10 students | 9 students |
| Cherkasy oblast | 30 students | 5 students |

Source: operational data of some departments of education and science of the regional state administrations as provided in the reports on implementation of the Action Plan of the Roma Strategy.

The above data confirms the findings of civil society monitoring and analytical reports that the share of Roma children who complete full secondary education is still disproportionately small as compared to the general population⁴⁶. This share is especially low and, in some regions, completely missing among girls. This was confirmed by a civil servant from Uzhgorod who gave an example on the opportunities for Roma girls to receive a university scholarship as part of promoting higher education for them. The condition for eligibility was to have complete secondary education, but they could not find even one Roma girl who had this level of education. This, again, points to the high drop-out rate and low performance at school, especially, of Roma girls.

According to the interviews with Roma women's CSOs, as well as the findings of civil society monitoring reports, a **serious shortcoming of the Roma Strategy is that it does not address the much higher risk of Roma girls for dropping out of school** due to the practice of early marriages and other gender inequalities related to the traditional understanding of the role of women in some of the Roma communities.

However, even if girls finish their secondary education and do not marry young, their chances for future education and professional realization remain low, due to poverty of their families which cannot support them to continue their studies at universities.

The achievements of the Roma Strategy implementation towards the result "increased access of Roma girls and boys to higher education (vocational or university)" are extremely low. According to the operational data of the regional state administrations provided in the Action Plans' implementation reports, in the 2017/2018 academic year⁴⁷:

- 127 people of Roma nationality studied in vocational schools (101 in Zakarpattia region, 2 in Kyiv

region, 2 in Mykolaiv region, 6 in Kherson region, 8 in Cherkasy region);

- 6 people studied at universities (in Zakarpattia – 4, Sumy – 1, Cherkasy – 1).

The low results and lessons from the implementation of the Roma Strategy in the area of education need a careful review and discussions.

During our meeting with the representatives of the Kharkiv oblast Center of Social Services for Family, Children and Youth they recommended that in approaching work with Roma women and men it is very important to understand their diversity. *"Strategies should consider that Roma are very diverse in origin and level of education. Out of all Roma in Kharkiv about 16% have higher education (specialist's and Master's degree). On the other hand, there are about 17% of Roma who are completely illiterate – they cannot read and write. And in between, there are Roma who have some education, but not enough to get employment, and especially vulnerable are the girls who drop out of school being so young"*.

The future strategy needs to identify the ways to increase the chances of those Roma girls and boys in the middle, whose education is not complete, to move up to the group with higher education, rather than moving down to the group of illiteracy and marginalization. It also has to be determined how to assist those that are illiterate or only have basic education to gradually catch up and, thus, have a better chance to get out of the poverty cycle.

As outlined in the previous section of the report related to access to employment, the adult literacy programs are of critical importance, as well as incentives (support and stipends) for young Roma women and men to continue their education in universities.

46. Ibid.

47. As per the comments of IRF to the draft evaluation report, this data is quite incomplete because it does not cover all the regions, and it does not take into account the statistics of applicants, fellows and alumni of the Russian Federation. However, even if taken into account, the number of Roma who receive or have higher education remains disproportionately small, in comparing with both official and unofficial estimates of the number of Roma in Ukraine.

2.1.4. Strategic area/objective: Health of Roma nationals

The strategy under the objective “improved health of Roma” has 4 specific objectives supported by 9 measures from the Action Plan (see Annex 3: Roma Strategy objectives and Action Plan measures).

The evaluation mission had very limited sources of information to answer the question what progress was achieved towards results in the health area:

- The agenda did not include meetings with the responsible health care departments during the visits to the two oblasts;
- The representatives of the Health Ministry who participated in the discussion of the relevant Work Group were new on the job, as their predecessor

responsible for working with the Strategy, had retired. They had little notion of the Strategy implementation, of what worked and what did not work for Roma inclusion in the area of access to health which, by itself, is proof of fragmented “institutional memory”.

We attempted to triangulate the health strategy design with data available in the official reports the Strategy implementation, with findings from interviews with Roma mediators, Roma CSOs, as well as existing civil society reports and publications related to health of Roma. However, the specific objectives and corresponding measures in the health strategy section are designed in a way that lacks clarity and has serious overlap in types of activities. This, in turn, affected the quality of reporting making it too lengthy, lacking any serious analysis, with same things duplicated under different objectives or measures.

Evaluation mission observations:

During our visit to Zhmivka village of Ivankiv rayon, Kyiv oblast we met with a group of women, most of them under 35, and each of them had more than 3 children. One of them, Olga, was telling us her story of her struggles to survive and take care of her 5 children. *“But Monica, my oldest one is already 19 years old, and she is so different from all of us – she finished school and wants to go to university. Please, help me and tell them she is smart, but I cannot afford sending her to Kyiv”.*

We asked around who can provide stipends for low income children, and it was only the Roma Education Fund. However, they are reducing their internship support to Roma students in Ukraine, and there is a threat that such support will be absent in the future.

Basically, the Strategy and, respectively, the Action Plan envisage four types of interventions:

1 Raising awareness within the Roma communities on health care system (provisions, institutions, ways to access them) and on importance of health (preventive health examinations, healthcare for children, etc.)

There were a number of activities reported (published brochures, educational leaflets distributed in Roma settlements as well as information stands in health care facilities etc., individual and group meetings of health institutions representatives with Roma families).

2 Increasing knowledge and sensitivity of health professionals to patients’ needs (institutions and medical personal) specifically, in Roma situation (culture, traditions, poverty, etc.)

In the area of increased awareness of health professionals on Roma culture and situation, we come across general statements that “medical workers are well informed in this regard”. An interesting fact is that in formulating the measure itself as well as in some of the reports such terms are used as “provide information on the national mentality of Roma”, which looks quite prejudiced/derogative, at least, from the outside.

3 Special focus on children health – by ensuring immunization of children.

In terms of immunization of children, there is a lot of reporting data coming from the regional annual reports. We could not find either aggregation of this data, nor any analysis, though some of the regional health institutions report not only on achievements (number of immunization of both, adults and children), but also on numbers of Roma children and youth who failed to get immunization for different reasons (lack of vaccines, insufficient medical facilities, parents' refusal, etc.). With challenges reported in the previous year, there was no data in the reports from the subsequent years on how these challenges were addressed. Similar reporting on both, immunized and not immunized Roma children, needs to be done on a regular basis in all regions where Roma live.

4 Improved health of Roma through sanitary and epidemiological oversight and examinations and ensuring access to primary care through creating a network of outpatient clinics.

In the area of improved health of Roma (which, in fact, is an outcome indicator for the effectiveness of all the above awareness raising areas/activities) the reporting is very fragmented. There is data on the number of Roma people who underwent preventive screening for TB, or other preventive examinations. But again, data coming from the regional level is not aggregated, and the report on the central level lacks any analysis that can serve to improve the Strategy.

Based on interviews with Roma mediators, Roma CSOs and some of the civil society reports,⁴⁸ the picture of effectiveness of the Roma strategy in the area of health care and, respectively, the situation with access to healthcare and status of Roma women and men is quite alarming:

- **The issues in health care of Roma remain alarming, especially of Roma women and girls, and they**

are not addressed in a systematic way by the activities of the strategy. There is an urgent need to develop specifically targeted programs for addressing the issues of women's health, reproductive health and family planning, as well as for increasing the trust of mothers and Roma families to the health system, especially in view of preventive care;

- **There are still a number of cases of discriminatory attitude and practices in medical facilities** or by medical staff towards Roma women and men, which, in turn, makes them reluctant to seek medical help – which means that awareness of medical staff and institutions on equal rights of Roma for health care is still insufficient. This issue was also outlined in the latest international monitoring reports.⁴⁹ The issue of discrimination is not addressed in a systematic way by the health institutional system;
- **There are serious threats of further reducing the access of Roma women and men to free health care with the primary health care reform and change of provisions for use of family doctors.** Roma who have no personal documents will not be eligible for their services. This issue was also emphasized by other stakeholders, for example, from the Ministry of Social Policy which sent a letter to the Ministry of Health regarding the need to address this new challenge;
- **The issues of health are interrelated with other aspects of Roma exclusion, such as poor living conditions, extreme poverty and low literacy.** They require intersectoral approach in addressing the complexity of the problems. In some instances, at the regional level there were measures taken to address the root causes of some aspects of the poor health in Roma settlements. For example, based on the report from Zakarpattya (2015), purification and decontamination of sources of decentralized water supply was done, as well as construction of new water intakes⁵⁰. But such intersectoral approach is missing the overall approach to the improvement of health in Roma compact settlements.

48. Roma Womens Fund Chiricli/ UN Women (2018). The Rights of Roma Women in Ukraine.

49. "Cause of Action: Reproductive Rights of Romani Women in Ukraine". European Roma Rights Center, 2019. Available at: <http://www.errc.org/reports-submissions/cause-of-action-reproductive-rights-of-romani-women-in-ukraine>

50. In the Irshava district (Sobatin village, Zagaytya, Selce) and Svalyava district.

2.1.5. Strategic area/objective: improvement of housing and living conditions of Roma nationals

The strategy in this area envisages two specific objectives supported by 4 measures in the Action plan. (See Annex 3: Roma Strategy Objectives and Action Plan Measures).

Based on the review of the reports of the Minregion, as well as the oblasts reports (as available), some achievements include **improvement of infrastructure in the settlements** (especially, in Zakarpattya) regarding pavement and road surfaces, improved engineering for service lines and utility systems, water supply and others. As this activity affects mostly compact Roma settlements, regions without such settlements report that problems with infrastructure are absent as infrastructure is the same for the entire population.

Regarding the specific objective of resolving housing issues through preferential loans for housing two main lines of activities are reported – information and awareness on the possibilities provided by these loans, and the actually applying for such loans:

- Based on reported activities, the information on availability of preferential loans was disseminated mostly through publications and presentations in mainstream media, TV or websites of the relevant departments. In very few cases was it mentioned in the reports that the authorities used Roma CSOs for increasing the outreach to Roma communities, especially in compact Roma settlements;
- A number of annual reports from many of the regions state that **they had no applications for such loans submitted by Roma nationals**. This was also confirmed by the representatives of the Ministry for Regional Development participating in the Evaluation Reference Group. A question raised by the interviewed Roma councilor in the Local Council in Uzhgorod is to what extent this mainstream measure is applicable to Roma who have no income; they have been unemployed for a long time and are unlikely to

be able to cover the matching contribution required for these loans.

Reports provide **evidence that only very limited number of Roma could have actual access to social housing**. This stems from the limited availability of this type of housing in some of the regions, which leads to long waiting lists of people in need, as well as the lack of address registration or personal documents, which puts Roma at the bottom of these lists or, worse, off the list.

In terms of allocating land plots to Roma families for housing construction or agricultural needs, there is some progress, however, with missing aggregated data, as well as any analysis of where and why in some oblasts this activity generated more results than in others, it is difficult to assess the level of its effectiveness.

Based on the latest data⁵¹, since January 1, 2019 more than 248 land plots have been allocated to Roma ownership, 81.7 ha in total. According to email communication or actual letters, 119 plots have been allocated with 38 ha in total. This refers to land for individual farming. Other 416 plots of land have been allocated for housing – 58.9 ha in total; 236 plots – for housing construction/residential area general service facilities – 35.9 ha.

While the above data demonstrate some progress, according to civil society (both shared in the interviews as well as present in published civil society reports) **the issue of housing and social infrastructure is much more complicated and is unlikely to be resolved by fragmented measures**. It is linked with the lack of official land registry plan which, in fact, makes compact Roma settlements illegal. In reality, this eliminates any possibility to improve their infrastructure such as water supply, electricity, sewage, or other municipal services (like garbage collection). At the same time, there are settlements, especially in Zakarpattya and Odesa, where the infrastructure is very poor and increases safety and health risks for

51. Provided by the Minregion at the meeting with the Working Group on Housing, during this evaluation.

Roma women, men and children living there. Another piece of the puzzle are the issues related to the entire system of land use regulation, land allocation and construction in Ukraine. Again, issues with lack of personal documents or address registration hinders resolving Roma housing issues through available options. Process of legalization is very complicated. Providing a plot of land is in theory a good solu-

tion, but, according to the law, only vacant land can be allocated. The land plots with Roma houses on them are, in fact, occupied by housing which was not properly registered and legalized in time⁵². However, despite the mentioned difficulties, there are working practices that can show how land allocation, legalization and improving infrastructure can work given there is visionary leadership and political will.

Ms. Tatjana Andrush, head of the village council in Rativisti, explained how she turned an informal settlement inhabited by Roma into legalized part of the village with electricity and water.

Back in 2006, the Roma area in the village faced every problem of an informal settlement. Initially, there was only one electrical transformer not powerful enough for the whole village, which created inter-ethnic tensions. A local philanthropist, former MP, Casil Kovacic, donated funds to improve the infrastructure, and every house of the village, including those belonging to Roma, received updated electrical panels.

„Following this, we started with the legalization process: As per decision of the village council, rights for properties that people occupied were to be officially registered it was decided to establish property rights of houses to the people. In addition, the village council made another decision on allocating land to the people in need. A lot of village residents had no documents, but in case of Roma 100% of them are undocumented. To resolve this, parallel with registering land titles, Roma were also getting support in obtaining ID documents either through court decision or SMS. Again, this was supported by decision of the village council”.

Based on the interviews with representatives of the Minregion, a serious challenge is that the Roma Strategy is not supported by any public funding. Some of the regions in difficult economic situation cannot afford to allocate needed resources for resolving the Roma housing issue. In addition, it was also reported that the communication with Roma communities is very difficult. Based on the reports as well as on interviews, the Strategy under the area of housing did not provide for adequate involvement of Roma civil society, which would be helpful in increasing outreach and improving communication with Roma communities.

Overall, the progress of the Strategy in the main objective in this area – improved infrastructure and housing of Roma – remains low. According to respondents, there is an urgent need to redesign this part of the Strategy based on a more strategic and collabora-

tive approach. In some regions, e.g. Zakarpattya, the housing issue has to be dealt with on a priority basis as in larger irregular Roma settlements poor housing conditions have negative impact on health and safety of their residents, which often perpetuates the vicious cycle of exclusion and poverty.

2.1.6. Strategic area/objective: Satisfaction of the cultural and informational needs of Roma nationals

This strategic area has two specific objectives supported by 11 measures in the Action Plan (Annex 3).

We have very limited information on this area from the field work. There were no specific meetings with stakeholders engaged in the cultural activities at the central or regional levels. The meetings with the MoC were focused on the policy coordination of the overall strategy and Plan. We also did not get much

52. Minority Rights Group Europe (2019): Roma in Ukraine and the Impact of the Current Crises, p. 49.

feedback on the implementation in this area from respondents from other sectors, nor from civil society. The only remaining source of information available to us was the official annual reports. This makes it impossible to assess the progress towards results under the objectives, as we could not triangulate or validate data from other sources.

Based on the quick review of the reports, a lot of activities seem to have been implemented as planned in the area of support for Roma culture and art and publicizing information on life and cultural identity Roma through the media. Like in the other areas, reporting does not provide any analytical aspects, just enumeration of conducted activities.

A noteworthy aspect is that **only in this area there are some specific numbers mentioned regarding allocation of support, both financial and in-kind**. Financial support was not significant (in the range between 5,000 – 14,600 UAH) and was used for a variety of events, such as the International Roma day, some music festivals or support to art groups.

From the integration point of view, the informational activities, including various presentations in the media, TV shows, and publications, covered subjects on Roma culture and identity and also presentation on their rights. It can contribute to raising awareness about Roma and fostering respect for their rights. Other activities, such as including Roma art groups and Roma children in other all-Ukrainian cultural festivals or local mainstream cultural events also has the potential for impact in developing more acceptance and tolerance among other segments of the population.

2.2. Addressing gender inequalities and discrimination against Roma women in Ukraine: lessons, best practices and challenges

The effectiveness of the Strategy implementation in addressing the gender inequalities and discrimination against Roma women is extremely low. Based on the findings of this evaluation, this is rooted in a variety of reasons:

- **There is very little knowledge and understanding of the social structure of traditions and norms within the Roma communities and, respectively, on perceived role of women** in the family and in the community, which is very diverse according to the type of community and family;
- **While Roma women, like all the Roma communities, face exclusion in all its aspects, they also have limited opportunities to exercise a basic right – the right of choice for a different future.** This is especially true in more disadvantaged and traditional communities, where women have no right of choice regarding their reproductive health, family planning, they drop out of school due to early marriages and have limited opportunities to close gaps in their education later in life, which, in turn, reduces any chance to get out of the poverty cycle and have employment and incomes;
- The fact that Roma women and girls face multiple forms of discrimination due to their ethnicity, social status and gender, both within their community and wider society, is not recognized in the Strategy nor in the National and Regional Action Plans;
- **The Strategy lacked serious consultation and analysis on the situation of Roma women, and included no consultations with their representatives** – civil society organizations or Roma mediators on designing more gender responsive approaches that will be able to generate more results for empowerment of Roma women and girls;
- As a result, **the Strategy has no specifically targeted actions that address the needs of Roma women and lacks gender responsiveness in the general measures** aimed at resolving issues of Roma inclusion in different sectors like health, education, housing, employment or in functional areas like Roma participation. None of the general approaches applied during the implementation of the Strategy are based on analysis of how they would affect the situation of women and empower them to have access to fundamental rights.

Due to the above shortcomings, it is very difficult to define which practices used in the implementation were most gender sensitive. None of the reported data is sex-disaggregated.

Based on the interviews and research findings of this evaluation, **the majority of the identified best practices and approaches to gender equality and empowerment of Roma women were not applied in the activities held by the institutions.** They come from pilot projects initiated and implemented by civil society. The extent to which these projects became part of the Strategy implementation through increased partnership and cooperation between Roma CSOs and the implementing institutions at different levels, was a factor that contributed

to attempts to introduce more gender responsive approach and increase effectiveness.

Based on the opinion of the majority of the interviewed, engaging Roma mediators is among the best practices addressing gender equality. Out of the 54 mediators that received training by Roma Women Fund "Chiricli" in the framework of the CoE and EC Joint program ROMED in 2015, at least 2/3 were Roma women. As underlined in the external evaluation of the ROMED program⁵³, the network of mediators led by the Roma Women fund "Chiricli" were the main group advocating at the national level the importance of bringing the best European practices of gender inclusion into the Roma strategy.

During the six months from October 2015 to March 2016, the network of 40 mediators covered **34,683 Roma representatives**, which includes **7,144 families**, of which **11,125 are women**, **7,890 – men** and **15,668 -- children**. Each month mediators provide services to around 200 to 300 Roma IDPs.

The most popular services include:

- Assistance with applications for IDs and residence registration;
- Court appeals;
- Access to local state financial subsistence and services
- Information about social protection and basic rights;
- Assistance with social housing and employment;
- Educational support to improve school attendance;
- Access to healthcare for diagnosis and access to hospitals.

The same evaluation report provides impressive data on usefulness of Roma mediators in engaging Roma women and girls in the inclusion measures for increased access to a variety of services.

Recognition of the importance of Roma mediators in the effective outreach to Roma women was confirmed by the respondents of this evaluation as well. We could also observe the trust of women to the local Roma mediator who was accompanying us during a meeting with Roma women in a community

near Kyiv. Mainstreaming Roma mediators as part of the public policy for Roma inclusion has a lot of potential to make interventions in all sectors more meaningful to the needs of Roma women.

Other good practices coming from CSOs' experience are projects and work of local organizations on pre-school education (as already mentioned, excellent work of the organization "Blago" in Zakarpattia) or proven approaches to adult education by other organizations in the same oblast.

53. CoE ROMED EVALUATION. Ukraine Country Findings report, available at:
<http://coe-romed.org/sites/default/files/articles/files/Annex%20%20-%20Country%20Findings.pdf>

Proper lessons and conclusions on effective approaches can be drawn from the projects implemented with the support of the International Renaissance Foundation. Based on the interviews with its representatives, the foundation has supported over 60 different project initiatives on addressing issues of Roma rights and Roma inclusion in society. A very interesting new pilot project that has just been launched is an effort to support the creation of Roma women self-help groups in disadvantaged communities.

Learning from the various practices tested by Roma civil society and mainstreaming them together with Roma civil society through the measures in the next post 2020 Roma Strategy will help increase its potential for better effectiveness. A facilitating factor for identifying what works and developing it as strategy measures is the fact that the Roma Women fund "Chiricli" with their extensive experience in work towards Roma women's empowerment in Ukraine is a part of the Interagency Work Group for the Implementation of the Roma Strategy.

CHAPTER 3: EFFICIENCY OF COORDINATION MECHANISMS, ALLOCATED FINANCIAL AND HUMAN RESOURCES

3.1. Efficiency of the institutional coordination mechanism

3.1.1. The evolution of the institutional coordination

After the adoption of the Roma Strategy in 2013, the Ministry of Culture was mandated to coordinate the implementation of the Roma Strategy and Action Plan. However, the Roma Strategy as adopted does not elaborate more on the coordination mechanism within its mandate and responsibilities.

The Action Plan, adopted 6 months later, defines the responsibilities for the implementation of the strategies and outlines under each activity the institutions in charge – relevant ministries and other central executive authorities, as well as state administration, Kyiv and Sevastopol state municipal administrations, and the National Academy of Science. It also stipulates that each year, by 1st of February they are to submit implementation reports to the Ministry of Culture for their joint report submission to the Cabinet of Ministers of Ukraine by 1 March.

In the first two years, the absence of strong co-ordination mechanisms as well as lack of authority and capacity of the agencies implementing the Strategy and Action Plan at the central and local levels were pointed out as a critical challenge to the effectiveness and potential for impact by both the international community and the Ukrainian civil society.

Since 2015 several steps for improving the coordination institutional mechanisms were undertaken.

On 25 of November, 2015 the Cabinet of Ministers issued a Resolution to set up an "Interagency Work-

ing Group on Implementation of the Action Plan of the Strategy for Protection and Integration of the Roma National Minority in Ukrainian Society for the Period up to 2020" (hereafter – the Interagency Working Group to steer and oversee the Ukrainian Roma Strategy implementation.

The mandate of the Interagency Working Group (IWG) is to coordinate, monitor and prepare proposals to improve the effectiveness of the implementation of the Action Plan, thus **acting as a temporary consultative and advisory body** to the Cabinet of Ministers of Ukraine, which monitors the status of implementation of the Strategy, analyzes the causes of non-fulfillment of tasks and makes suggestions on the correction of the situation.

The Interagency working group is led by the Vice Prime Minister for Social Policy (Vice PM Rozenko) and his/her three deputies (the Deputy Minister of Culture, the Deputy Minister of Social Policy, and a representative of the Roma civil society (currently Zemfira Kondur, the Roma Women Fund "Chiricli"). The group consists of:

- **representatives of six ministries at the level of their deputy ministers** (MoH; Minregion; MoES; MoIA; Ministry for Foreign Affairs and Ministry of Justice);
- **representatives of five key central institutions at executive level – Deputy Chairman/ Head** (the State Statistics Service, the State Geocadaastre, the State Committee for Television and Radio Broadcast, the State Migration Service);
- **Deputy chairmen of oblast administrations, Kyiv city state administration;**

- the Deputy Chairman of the State Employment Service;
 - Representative of the Verkhovna Rada Committee on Human Rights, National Minorities and International Relations (by consent);
 - Representative of the Commissioner of the Verkhovna Rada of Ukraine on Human Rights (with consent);
 - People's Deputies of Ukraine (by consent);
 - Representatives of public associations and non-governmental organizations.
- During its first meeting in 2016 the *Interagency Working Group took a decision to create five Permanent Working Groups (WG) aimed at improving the coordination for the effective implementation of the measures* under different objectives of the Roma Strategy. The WG were established throughout 2017 and until April 2018. The Table 3.1 below lists the five working groups by the date of their establishment and outlines their chairs and composition.

Table 3.1. Composition of the permanent Working groups on the implementation of the Roma Strategy

| Work group/chair | Date of establishment | Members/ composition |
|--|-----------------------|---|
| Permanent Working Group on Education and Culture | 16.01.2017 | <p>Chaired by the Deputy Minister of Education and Science</p> <p>29 members including:</p> <p>MoES (3, including Deputy Minister); MoC (2); Secretariat of the Interagency working group (2); Scientific Institution "Institute for the Modernization of the Content of Education" (2); Oblasts' administrations(10); Representative of the Commissioner for Observance of Children's Rights, Non-Discrimination and Gender Equality, Commissioner for Human Rights (1); Representatives of the NGO (9)</p> |
| Permanent Working Group on Organizational and Informational Support of Interdepartmental Working Group | 11.04.2017 | <p>Chair: Roma Women's Fund "Chiricli"</p> <p>9 members including:</p> <p>MoIA (1); State Committee for Television and Radio Broadcasting (1); Representative of the Commissioner for Observance of Children's Rights, Non-Discrimination and Gender Equality, Ombudsman (1); Head of the Department of Religions and Nationalities of the Department of Internal Policy of the Department of Information and Internal Policy of Donetsk Oblast State Administration (1); The media (3); Roma NGOs (Chiricli) (2)</p> |
| Permanent Working Group on Access of Roma to Housing | 13.09.2017 | <p>Chair: Deputy Minister of Regional Development, Construction and Housing and Communal Services</p> <p>36 members including:</p> <p>Minregion (5); MoC (1); State Service of Ukraine on Geodesy, Cartography and Cadastre (1); Deputy of Uzhgorod City Council (1); Representatives of the NGO (5); Oblasts' administrations (23)</p> |

| | | |
|--|------------|---|
| Permanent Working Group on Social Security and Health | 05.06.2018 | Chair: Deputy Minister of Social Policy 17 members including: MoSP (7); State Employment Service (2); MoH (1); Representatives of the NGO (7) |
| Permanent Working Group on Law Enforcement and Migration | 10.07.2018 | Chair: Deputy Minister of Internal Affairs 32 members including: MoIA (2); Ministry of Information Policy (1); MoC (2); MoSP (1); National Police (4); State Migration Service (3); Department of Justice (2); Security Service of Ukraine (2); Representative of the Parliament Commissioner for Human Rights (1); Verkhovna Rada of Ukraine (1 Deputy + 1 assistant); National Academy of Internal Affairs (1); Kyiv city administration (2); Secretariat of the Interdepartmental working group (2); CoE (2); Roma NGO (4) |

Respectively, working groups on the implementation of the regional Roma Strategy Action Plans were established at the level of oblast administrations, including representatives of relevant departments and local Roma civil society. We could not find systematized data on how many oblasts actually established official working groups, or they rather existed as informal interaction on to the implementation of the regional Action Plans.

3.1.2. Assessment of the effectiveness and efficiency of the established coordination mechanism

In general, the coordination of the implementation of the Strategy and Action Plan was initially hampered by lack of clarity in the strategy about an implementation and coordination body as well as ownership and capacity required for a rather complex and inter-sectional policy document. It took around four years before the current coordination structure was established, which is also partly due to the extensive advocacy of CSO, international attention and concerning developments threatening personal safety of Roma women and men (series of hate crimes and violence).

On the positive side, the overview of evolution of Roma Strategy coordination structure provides evidence of **increased efforts in creating institutional mechanisms that have the potential, if well utilized, to ensure effectiveness of its implementation:**

- **The Interagency Working Group** is led by the Vice Prime Minister and involves representatives at high executive level from all line ministries, relevant state institutions, regional governance, as well as Roma civil society. If matched with strong leadership, it has **the potential for ensuring oversight for the implementation and update of the Roma inclusion policy frameworks.** In order to enhance gender responsiveness of the implementation of the Roma Strategy and Action Plan and its alignment with mainstream gender equality policies, this body would benefit from co-opting a representative from the Government Commissioner on Gender Equality;
- **The established five Work Groups** have diverse composition and consist of key stakeholders of importance for the implementation of the array of actions under the different areas, which provides **the potential for effective intersectoral cooperation in addressing and learning from measures in identified strategy priorities.** A positive moment is that the members of these working groups represent both, the decision-making level, as well as operational and expert level; the groups also include relevant institutions at the central level, as well as representatives of the oblast administrations and civil society;
- **Emerging conditions ensuring the participation of representatives of Roma CSOs, including organizations of Roma women** is a significant step towards

institutionalization of the dialogue with civil society as an equal partner in policy making and implementation. One of the three deputy chairs of the Interagency Working Group is Zola Kondur who is leading the Roma Women Fund “Chiricli”, which is a great opportunity to voice the interests of Roma women. Roma CSOs representatives were also included as members in the five working subgroups for the implementation of the strategy. Some of them are members of the Coalition of Roma Non-Governmental Organizations of Ukraine “Strategy 2020”.

However, the majority of respondents consider that **this coordination mechanism did not operate effectively enough, which turned into one of the challenges for effectiveness of the Roma Strategy implementation**. The main concerns shared in the interviews can be grouped as follows:

1 Lack of shared understanding about the nature and roles in policy coordination.

In terms of policy coordination, the majority of stakeholders were very critical of the performance of the Ministry of Culture (MoC) as a designated coordinator of the Roma Strategy implementation. For some respondents this was a natural choice, as it is the only Ministry officially dealing with the national minorities in Ukraine. But a number of other Ministries and institutions were questioning this choice, as the MoC has a mandate in the area of culture, and the problems of Roma relate to other areas that are more in the competence of other ministries.

At the same time, as noted by some of the respondents, the complexity of the issues of Roma inclusion cannot be a responsibility of one ministry only, even if it has competence in more than one area of the strategy. Effectiveness of finding solutions for the multiple social exclusion challenges that Roma women and men face requires multisectoral interventions and they, in turn, require good policy coordination.

Based on the interviews with the representatives of the responsible department in the Ministry of Culture, they are only in charge of the Strategy coordination, not of its implementation. The document was adopted at the level of the Cabinet of Ministers, and

they are responsible for its implementation. MoC views its role as reporting coordination and certain monitoring functions.

However, as noted by other stakeholders, **it is important to have clarity on what would effective policy coordination mean** – whether it is just technical compilation of submitted reports, or something more – including **certain facilitative leadership** to ensure that the strategy implementation is going in the right direction, requesting quality reporting on progress towards results, assisting in the analysis of the outcomes in the different areas, as well as taking into consideration critical feedback from outside monitoring reports and effectively communicating it to the Cabinet of Ministers; providing recommendations for updates of certain measures that do not generate desirable results or of the overall strategy and plans to ensure future impact.

According to the majority of the interviewed stakeholders, the Department of Religions and Nationalities at the MoC does not have the human resources and capacities to provide for such policy coordination. Besides, vertical coordination and drawing attention of the Cabinet of Ministers to the Roma Strategy as a priority requires certain positioning and sufficient authority of the designated Ministry to be heard at this level. The majority of respondents do not see this capacity as being one of the MoC strengths.

We could not find any evidence of how the Cabinet of Ministers was engaged in the oversight of the Strategy, including a question of accountability for non-achievement of results in certain areas. None of the interviewed commented on this. Nor there are any feedback comments or recommendations from the Cabinet of Ministers after the acceptance of the annual reports.

From this perspective, the majority of respondents underlined that **there is a need to change the policy coordinator** of the strategy entrusting it to another ministry or an institution at the level of the Cabinet of Ministers, which will have more authority, better understanding of the policy coordination

task and, respectively, capacity to implement it. It is also important that the coordinating institution have good knowledge and understanding of the areas of Roma inclusion based on applying rights-based approaches and non-discrimination. Various suggestions in this regard are listed in the recommendation part of this report.

2 Unclear mandate and authority of the Interagency Working Group (IWG) Secretariat.

Based on the information provided by the MoC, the IWG's Secretariat was set up as a temporary advisory body in 2017 in accordance with paragraph 6 of the Regulation on the Ministry of Culture of Ukraine and paragraph 12 of the Regulation on the Interagency Working Group to ensure the organizational and informational activities of the Interagency Working Group.

In accordance with the Regulation on the Secretariat, approved by the MoC,⁵⁴ the main task of the Secretariat is to ensure the organizational and information activities of the Interagency Working Group. As further defined in the same Regulation, the Secretariat has an extensive list of other tasks. More specifically this list includes:

- participation in the preparing and organization meetings of the Interagency Working Group and its draft decisions;
- preparing and submitting to the Secretary of the Interagency Working Group information materials on the implementation of the Interagency Working Group decisions;
- developing proposals for improvement of the plan of actions for the implementation of the Strategy for Protection and Integration into the Ukrainian society of Roma national minority for the period up to 2020;
- providing monitoring of the implementation of the Action Plan for the Strategy for Protection and

Integration into the Ukrainian society of Roma national minority for the period up to 2020 (hereinafter – the Action Plan);

- participation in processing and summarizing of materials obtained from monitoring the Action Plan implementation and submitting proposals to the Secretary of the Interagency Working Group on improving effectiveness of its implementation;
- interaction with the permanent working groups established within the Interagency Working Group, preparation and submission to the Secretary⁵⁵ of the Interagency Working Group of information materials on their activity;
- organizing activities and events to discuss and identify mechanisms for resolving topical issues of ensuring integration of the Roma national minority into Ukrainian society;
- ensuring distribution of decisions, notices and other materials on the content of the Interagency Working Group activity to the members of the Interagency Working Group and to the institutions and organizations involved in the implementation of the Action Plan;
- preparing information on activities and decisions taken by the Interagency Working Group for publishing on the MoC website and publicizing it in other acceptable and legal ways.

In its work, the Secretariat interacts and cooperates with executive authorities, local self-government bodies, Roma NGOs, human rights defenders and other non-governmental organizations.

Multiple aspects of the tasks assigned to the IWG Secretariat were summarized in the annual report on the Strategy implementation (2017) as follows:

- strengthening of interaction and communication mechanisms of the Action Plan;

54. Order No. 328 of 18.04.2017

55. The Secretary of the IWG was the head of the Ministry of Culture's Department for Religions and Nationalities, which is responsible for the coordination of the implementation of the Strategy.

- conducting analytical work on the implementation of the Action Plan;
- establishing an effective system for responding to acute social phenomena / challenges in the Roma environment.

Following the above decisions, in 2017 a team of two people (one Roma national and one non-Roma) was hired and paid by the International Renaissance Foundation (IRF). They were provided with office space at the MoC as it was the Ministry tasked with the coordination of the Strategy implementation. The idea behind the IRF support was to provide time and resources to assist the agenda of the IWG and the five working groups to do the monitoring and communicate effectively with the heads of the subgroups. It was also anticipated that the Secretariat needs to be proactive in setting the agenda of the groups, as well as to serve as a platform for civil society feedback on emerging issues or on the strategy implementation.

However, the effectiveness of the implementation of all of the above tasks and expectations from the work of the IWG Secretariat faced a number of challenges. Based on the analysis of the opinions expressed by different stakeholders, most of **these challenges are rooted in the ambiguity of the understanding of the role and mandate of the Secretariat and, respectively, different interpretations of effectiveness of their work.**

More specifically, established as a temporary advisory body to help the effective work of the IWG, the Secretariat has tasks of a diverse nature – organizational, informational, monitoring and analytical. These tasks should inevitably relate to the strategy coordination, which is assigned to the relevant department at the MoC – Department of Religions and Nationalities. At the same time, as stated in the comments of the Ministry of Culture to the draft report, it is not the responsibility of the Secretariat to support work of Department of Religions and Nationalities.

General outlines of work of the Secretariat (quoted above from the reporting documentation) state that it needs to conduct analytical work on the implementation of the Action Plan. It would be only natural if

such analytical work would also support the learning process on the Strategy implementation and, respectively, reporting on achieved progress. At the same time, annual reporting on the implementation of the Action Plan is done by a designated expert in the Department of National Minorities and Religious Communities (the one who wrote the Strategy and Action Plans documents). Some ministries heading the relevant WG expressed dissatisfaction with the performance of the Secretariat because *“it is not making inquiries to the deputy ministers on the results of the groups and ministries’ work. As the Ministries have a lot of current tasks at hand, they need to be reminded about the tasks on Roma issues”*. At the same time, the Roma Secretariat has no authority to request reports from the ministries, and all proposals or work of the Secretariat has to be approved by the Head of the MoC Department of Religions and Nationalities.

In addition, the staff of the Secretariat, though hosted in the premises of the MoC department, it is not part of it. It has to report for its work to the Renaissance Foundation, as well as to the Secretary of the IWG, who, in fact, is the head of the Department of Religions and Nationalities of the MoC.

Last but not least, the infrastructure of the Secretariat is poor: it is based in one room in the ministry, has a laptop provided by the Renaissance Foundation, but no scanner or reliable Internet connection (when visiting the RC they did not have the Internet for two days), which is not conducive for efficient information sharing.

Overall, based on provided information and the interviews, while in the quoted above Regulation the Secretariat has clearly assigned numerous tasks, in fact, it remains unclear who sets the agenda of the and modus operandi for the Secretariat and what their accountability line is. Do they report to the Interagency Working Group? The chairs of the five working groups? The Ministry of Education tasked with the coordination of the Roma Strategy and Action Plan implementation? And/or the IRF which, in fact, is their employer? Within its short existence, the Secretariat had assisted in organizing WG meetings, con-

ducting monitoring visits to the regions, gathering data as well as some training organized by the CoE to increase the capacity for Strategy the implementation at the regional level. More recently, the Secretariat started to work on creating an interactive map of Roma NGOs in Ukraine, thus to support networking, information sharing and collaboration between different stakeholders. As shared by the Secretariat in the interviews, their long-term vision is that this map should turn into a web-based communication platform on Roma Strategy Implementation for Roma NGOs, including Roma women NGOs, government structures, regional and local authorities.

The staff of the Secretariat (2 persons – one Roma, one non-Roma) has definitely built up their capacity and accumulated useful experience, also assisted by the experts in the Department of Religious and Ethnic Affairs of the MoC, as well as by the IRF. As shared in the interviews with different respondents, such secretariat is needed, but as part of institutional set up it should have much more clarity in lines of accountability and, especially, in how it is connected to the processes and structures of policy coordination of the Roma Strategy and Action Plan implementation, which is further discussed in the next sections of the report.

3 Missing clarity on the priority role of the Working Groups.

As outlined in the previous section of the report, the 5 Permanent Working Groups are very “young” as they were created in the period of 2017-2018. Each of them has had 2-3 meetings since they were set up.

As explained by some of the respondents, the initial idea was that they should become platforms for more focused inter-sectoral discussions on different thematic priorities as defined in the Strategy, and for seeking adequate solutions, which will be then proposed to the bigger Interagency Working Group.

But in practice, **there was no clear vision and shared understanding about the objective and mandate of the groups**. As said by some of the participating members of the WGs, *“the first meetings came with many ideas, but no shared understanding of the pur-*

pose of work. There was no factor to provide for leadership and to foster work of the groups on the practical level”. The evaluation mission also could not find any document which would provide some kind of “terms of reference” for the roles and tasks of these groups.

Based on the meetings with all WG (except the one on Education and Culture), in order **to increase the effectiveness of these groups’ work** it will be important to have discussions on their priority role, needs, emerging problems and solutions from an intersectoral point of view, and to provide recommendation to the IWG on whether they should provide assistance at the regional level or develop initiatives on their own.

Some other challenges are related to the **imbalanced division of responsibilities among the group members and expectations from their input**. As shared by the Roma Women Fund “Chiricli”, in some cases the WGs expects from participating members of civil society to perform tasks that are unrealistic in the sense that they go beyond the responsibility and capacity of civil society. One of the examples was the demand of the Ministry of Internal Affairs that “Chiricli” hold a campaign on IDs. As shared by “Chiricli”, *“it is not realistic to expect that a CSO organization should take the responsibility and have the resources to perform this task. It is a responsibility of the Ministry of Internal Affairs and the State Migration Service. We cannot replace the work of the institutions”*.

This example raises a broader question about understanding of the responsibilities for Roma inclusion. While the Roma civil society is definitely an interested party and advocate for that, and is developing models for approaching problems and issues, the ultimate responsibility for effective Roma inclusion lies with the state institutions, as they are the ones with the mandate and resources to provide effective services to all Ukrainian citizens (including Roma). It cannot be anticipated that Roma CSOs can substitute the state institutions and provide sustainable models, including outreach campaigns on different issues. These issues have to become part of the working approach and the budget of the relevant institutions, which can be done in partnership with civil society.

Lack of budget has blocked a number of initiatives discussed inside the groups (for example, putting into practice concepts developed for national awareness campaign within the Group on Organizational and Informational Support).

In other cases, participating Roma CSOs or outside sources had to provide budget so that good practice within working groups can be sustained. One of examples is a good practice of the WG on housing which introduced monitoring fact-finding trips to the regions by the Minregion. It became possible because it was also supported by the Alliance of Cities (a project of CoE and the Roma Women's Fund "Chiricli". The Alliance made visits to Kharkhiv, Uzhgorod, Odessa, was in contact with local authorities and housing departments and visited some informal Roma settlements.

Despite of the above challenges, the Work Groups in the different thematic areas of the Strategy started meaningful processes and discussions. Some examples provided at the meetings with the WGs include:

- The Permanent working group on law enforcement and migration had discussions and works closely to create draft Algorithm of actions of executive and local self-government bodies aimed at preventing conflicts on ethnic grounds, harmonizing the requirements of public security and order and interests of social groups in identifying irregular settlements of Roma community. It is currently working on a draft Algorithm developed by experts of the Ukrainian Helsinki Human Rights Union. Their approach is being finalized with involvement of the MoC, the MoSP, the Ministry of Justice, the National Police, public organizations of the Roma – the Law Center, the Roma of Ukraine society "Ternipe", the International Charity Organization Roma Women's Fund "Chiricli";
- The permanent WG on social protection and employment discussed the threat to the access to free health care of Roma women and men arising from the health reform in regard of primary health care and registration with family doctors. The MoSP leading the WG sent a letter to the Ministry of Health

in this regard. In addition, as shared by the representative of the State Employment Service, they are planning to take action to mainstream the pilot practice of the Roma CSOs and develop methodological recommendations on the employment of Roma with the participation of representatives of the State Employment Service;

- Members of WGs, e.g. representatives from the Minregion, or Ministry of Justice started to conduct visits to the regions, in order to learn about the local situation, meet with Roma people and identify issues relating to their competence (access to housing, access to birth registration).

All respondents consider that the thematic Work Groups are important and need to continue, but in an optimized way based on clear terms of reference and work plans.

3.2. Monitoring and reporting mechanisms: efficiency and effectiveness

3.2.1. Reporting process and lines of accountability

Reports on the implementation of the Strategy and the Action Plan are prepared regularly on annual basis. Preparing annual reports on the Action Plan implementation, as well as preparing and sending letters (requests) to the executive authorities, other institutions and organizations as specified in the Strategy implementation plan, and regional administrations regarding the need for timely provision of information materials on the implementation of the Action Plan, is carried out regularly and exclusively by a relevant employee of the MoC. These letters/requests are sent in December-January each year. Each central body prepares an annual report on its activities and sends it to the Ministry.

At the level of district and regional state administrations different structural units are responsible for implementing different tasks of the Action Plan (depending on their field of work). The relevant structural units of district and regional state administrations prepare their block of information on the Action Plan implementation, which is then summarized and submitted to the MoC mainly by cultural units.

The MoC receives most reports from central and regional executive authorities in February of each year. The designated expert at the Department of National Minorities and Religious Communities is responsible for the preparation of the consolidated report. The final version of such report is usually ready in March-April every year.

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The national report is directed to the Vice Prime Minister and posted on the website of the MoC. But, as already said earlier in the evaluation report, we could not find evidence for any communication or feedback on the received reports from the office of the Vice Prime Minister, nor from the meetings for discussing progress towards the objectives of the Strategy. Therefore, there is no lessons learned from experience or discussion on what works and how to apply working practices.

At the regional level, these reports are also forwarded to the responsible deputy governors. In some regions, these reports are also posted on the websites of regional administrations. As outlined in previous sections of the evaluation report, there had been some meetings to discuss the effectiveness of the Strategy implementation, but they were usually initiated by Roma community organizations as part of their participation and advocacy for improvement of the policy framework for Roma inclusion. In some cases, for example, in Kharkiv where we went with a visit, this has led to update of the regional action plan.

We could not find any evidence (from the interviews or documentation) that the annual reports had been a subject of detailed discussions of the thematic Work Groups or the Interagency Work Group for the implementation of the Roma Strategy and Action Plan.

3.2.2. Quality of reporting

Based on the request of the Evaluation Management Group, as well as to be able to track the effective-

ness of the Roma Strategy implementation, we went deeper into looking at the quality of the reporting on the implementation of the Roma Strategy and Action plan. We have reviewed over 350 pages of annual reports for 2013-2018 that came from all levels of the implementation, subsequently summarized by the MoC and published on its website.

Some aspects of the lack of aggregated data as well as quality of reporting had already been outlined in the 'Effectiveness' chapter of this report. Based on the research of the available reports, the following aspects of their quality can be summarized.

There was no guidance (on certain questions of format of reporting) provided at the policy coordination level. When asked who was providing guidance or analyzing quality of reporting, the responsible expert of the MoC answered: *"We've never had such inquiry"*.

In absence of the system of clearly defined objectives, results and indicators, the reports are submitted as text without any structure. The numbered list of activities as presented in the Action Plan is the only existing reporting structure. Thus, all reporting was done on output level – either what was done (e.g., meetings, publications, presentations etc.), through rarely answering the question "what now?", or how the activities resulted in change towards the objectives of the Strategy.

You can find anything in the reports: information about the events, the number of representatives of the target group covered by these events and, in some cases, outcomes of the activities. **The problem is that this data is not unified, it is not collected in the same way in different locations and there is no consistency in reporting over the years** that can provide evidence for whether or not the relevant issue was followed up on or resolved. For example, one year it is reported that a certain event is planned, but in most cases, the report for the next year has no information about conducting it and its results.

Another difficulty in tracking effectiveness of the implementation is **the complexity of diverse approaches to collecting information, taking into account characteristics of the national minority.**

Only in certain regions, primarily in Zakarpattya, Roma are identified in the sectoral statistics. Therefore, the numerical data are episodic and incomplete. There are many cases where results on the Strategy implementation are reported as general activity (as part of the overall work of the relevant institution), providing numbers for the entire population (including Roma).

In terms of gender responsiveness, as already outlined in different sections of this report, the biggest challenge is that data is not gender disaggregated which makes it impossible to assess what effect the implementation had on the situation of Roma women.

There is practically no analytical component in the reports, since, in absence of reliable information on the numbers of the target group, it is impossible to draw conclusions about what part of it is covered by certain measures, and whether there is a positive trend. Thus, the reports are documents where all the information on Roma, available to the central and local executive authorities, is collected. At the same time, no research or analysis is carried out in the process of preparing reports.

A number of respondents from the national, regional and local levels expressed **frustration about this formal reporting and questioned its meaningfulness**. As one civil servant from local authorities put it, *“we had to report on the implementation of the Action Plan every three months – and as there are no indicators or guidance on what to report, we just reported on anything, e.g. events, or families visited....”*.

Others claimed that there is **no quality control on what is being reported and no institutional oversight**, leaving the impression that there is no ownership and no responsible behaviour towards implementing the Strategy and its overall objective.

Last but not least, **the majority of the reported activities are part of the regular activities of the relevant line Ministries and their regional departments**. It would be great if it meant that Roma women and men were already completely mainstreamed into the sectoral policies. However, as already stated earlier in the report, this is not the case. Many of the

stakeholders agree that there is an urgent need for initiatives, specifically targeting the needs of Roma women and men and empowering by providing access to fundamental rights.

Such targeted initiatives focused on the burning issues of overcoming Roma exclusion are predominantly projects of Roma or pro-Roma civil society.

An interesting finding is that these are also reported as part of the achievements and implementation of the Government's Strategy for integration of Roma in society.

The issues with the process and quality of reporting again raises the question of the effectiveness of the policy coordination, which, according to respondents, should include not only technical compilation of texts from different reports, but guidance on and analysis of the quality of reporting, as well as developing a system of reporting data use for strategic learning and update to increase potential impact of the planned measures for the implementation of the Roma strategy.

We could not find enough evidence of the existing structured monitoring system to track the implementation of the strategy:

- At the state and regional levels there are no monitoring plans of the Roma Strategy implementation. As already mentioned, monitoring is episodic, depending on the personal interest of the official who can initiate this monitoring process, and depending on the intensity of the advocacy efforts of Roma public organizations;
- Monitoring visits to the regions were carried out by the Working Group on Housing Issues; however, their focus was on the living conditions of the Roma population rather than on the effectiveness of the Action Plan implementation;
- Roma CSOs are part of the Intersectoral working group and subgroups, but these groups do not monitor the Roma Strategy implementation of the. Roma civil society conducts different research, and outside monitoring of the Roma strategy implementation;

- The only Ministry that reported that it conducts regular monitoring in the regions to track results and challenges was the Ministry of Justice. As shared in the interview with them: *"The Strategy gives us an opportunity for targeted monitoring and providing targeted services"*.

The main monitoring of the achievements and non-achievements of the Roma Strategy has been done from the outside:

- External reports are prepared by Roma civil society organizations in the framework of various projects and presented at round tables and other events, including meetings of the relevant parliamentary committee, parliamentary hearings, and conferences. Many of them have provided a lot of important and meaningful recommendations since 2014, but we could not identify how these recommendations were taken into account and used to update the Strategy and Action Plan, especially at the national level (which never happened);
- The monitoring of the strategy implementation was also carried out at the initiative of the Office of the Parliament Commissioner of Human Rights. It also regularly carries out monitoring visits to the regions. For example, throughout 2018 and in the first quarter of 2019 such visits were made to the Zakarpattia, Volyn, Kharkiv, Zaporizhia, Donetsk and Odessa regions. Citizens' appeals were also monitored. In total, the Ombudsperson's office conducted 48 monitoring visits over this period. The results of the visits were presented at the round table in April 2019;
- Also, monitoring visits were carried out by representatives of the CoE Office within the framework of the project "Protection of national minorities, including Roma, and minority languages in Ukraine";
- As already described in the 'Relevance' section of the report, other international organizations, sometimes, together with local Roma organizations, conducted overall situation analysis or issue-based assessments (e.g., OSCE ODIHR made a 'Situation Assessment Report on Roma in Ukraine' and the 'Impact of the Current Crises'; UN Women together

with the Roma Women's Fund "Chiricli" – assessment report of the situation with the rights of Roma women);

- As already mentioned earlier in the report, all the above outside monitoring efforts have generated useful information on the situation of Roma, as well as recommendations on improvement of the Strategy implementation for increased effectiveness and relevance to the needs of Roma women and men. However, the evaluation could not find sound evidence of how it was integrated into the monitoring and learning system of the relevant central administrations responsible for the policy coordination and/or for the implementation of the different segments of the Action Plan.

3.3. Efficiency of financial support and resources allocation – lessons for sustainability

The Strategy documents refer to the state budget and local budget as sources of funding for its implementation but without giving a financial analysis on how much money would be required. The same applies to the Action Plan, and, respectively, to the regional action plans for the Roma Strategy implementation.

Lack of budget for the implementation of the Roma Strategy and Action Plan remained one of its major shortages. All reported activities are done as part of the mainstream work of the ministries as well as the regional administrations, with no specific earmarked annual budget lines for work on the strategy. Financial support for the initiatives specifically targeting Roma men and women comes mostly from the alignment with projects of Roma CSOs or other international actors providing for capacity building and other technical assistance.

There is no financial reporting about the strategy implementation which makes it difficult to assess the overall financial allocations coming from these sources. Based on the narrative activity reports, there are very insignificant funds allocated to support cultural events or Roma art groups. Only some

regions allocated small funds for the implementation of the regional Action plan (e.g., Uzhgorod – about 75 000 UAH).

The lack of budget support so far has been one of the main barriers to the future sustainability of the achievements, as well as for ensuring further progress towards the objectives of the Roma Strategy.

With the decentralization in the country, it is anticipated that the responsibility for funding Roma strategy should be transferred to the oblast administrations and, increasingly, to the ATCs. While in principle **budgets of regional and local programs can be used, this needs to be regulated in the design and responsibilities of the mechanisms for the strategy implementation.** It will also require a thorough analysis of the needs of Roma women and men, increased understanding of inclusion policies and, respectively, capacities to implement them, especially at the local level. Some respondents from civil society proposed to make use of the experience of gender budgeting, and in places with considerable minority population – to introduce minority sensitive budgeting as well to ensure that at least some part of the needs of minorities is covered by local budgets (e.g., legalization of housing, building infrastructure, etc.).

As shared in the interviews with oblast administration (Kharkiv), there is no budget allocated specifically for the Roma plan itself, but that does not mean that there is no budget available at all – there are also regional and local thematic funds to be used. Their priority goals are usually general, including, for example, social issues. However, so far, they are not effectively utilizing existing opportunities. Social projects can be utilized for Roma – Roma NGOs need to submit applications. Also, it is necessary to increase the Roma CSOs' capacity to work with budget funds (applying, providing activities and reporting: both program and financial reports).

Allocation of human resources has been quite insufficient. The strategy should budget for and support its coordination mechanism. At the central level, this includes support for the needs of the Work groups, monitoring and assessment, commissioning analysis on issues of importance, as well as supporting work of the Secretariat. So far, these have been supported only by outside sources, but this is not a sustainable solution in the long run.

The same applies to the regional level – a good practice of appointing advisors on minority issues (so far done mostly on volunteer basis) needs to be envisaged as a budget line in support of the strategy. It is critical that the Roma mediators are institutionalized and mainstreamed, which will require allocating budget for this within the overall budget of the Roma Strategy – including designated budget funds for their salaries, as well as budget to ensure their ongoing training.

Last, but not least, the strategy should envisage budget for systematic training programs for different public servants at the national, regional and local levels to ensure that they have the needed capacities to implement Roma inclusion policies. This will help to mainstream application of the human rights and gender equality principles as an essential part of public administration practices of good governance at different levels.

If the Inclusion of Roma women and men is a priority for the Ukrainian Government, the best indicator for its political commitment is the allocation of budget to support the needed processes and results towards the objectives of the Roma Strategy.

CHAPTER 4: CONCLUSIONS AND LESSONS FORWARD

4.1. Conclusions: Did the Roma Strategy implementation contribute to the improvement of the situation of Roma in Ukraine?

Despite the numerous challenges and deficiencies accompanying the design and the implementation of the Roma Strategy and Action Plan, based on the opinions shared by respondents and the analysis of findings of this evaluation, **the following positive progress towards the overall objective of equal integration of Roma nationality into the Ukrainian society can be outlined:**

- **The adoption and work on the implementation of the Roma Strategy put the issues of Roma on the political agenda of central and local institutions.** For the first time the multiple social exclusion challenges faced by Roma women and men in the areas of social protection and employment, education, housing and living conditions, health and cultural identity, as well as the need of raising awareness and reducing anti-Roma sentiments and bias in the society were put together as a priority that needs to be addressed by the Ukrainian Government;
- The implementation of the Roma Strategy involved all line Ministries and regional administrations and became **the "training grounds" on the complex and interrelated issues faced by Roma women and men;**
- **This resulted in increased understanding of the need of intersectoral and collaborative approaches and mechanisms to identify working solutions in different areas** like access to personal documents, resolving housing issues, the linkage between education and employment, etc. Evidence for increased recognition of the need for intersectoral approaches came from the interviews with respondents from cen-

tral government, but what's even more important – from representatives of regional and local administrations which are at the frontline of working with Roma communities. However, as outlined by them, the application of such intersectoral approaches is not an easy task, and it requires capacities for its effective application. There are initial attempts, but they are still insufficient to provide for sustainable solutions;

- **The main achievement of the strategy is that it raised the legitimacy of Roma civil society as a key partner of Government for implementation of Roma social inclusion policies.** Practically all stakeholders from institutions we met with at the central, regional and local level consider that the participation of Roma CSOs and representatives is a critical factor for the effectiveness of the implementation. As outlined by a representative of oblast administration, *"It is of primary importance to have Roma CSOs as our partners, and if there are no such organizations – to support creating Roma community organizations. Without them issues cannot be resolved as they are the bridge to the community, know its needs, and people trust them much more than the authorities";*
- **Partnership with Roma CSOs, Roma mediators and Roma representatives was underlined by all stakeholders as a key success factor for the effectiveness of the Roma Strategy implementation.** Roma civil society came with resources – knowledge of communities, strategic and advocacy capacities in the area of human rights, pilots of well working practices for resolving Roma issues in different areas, as well as funds raised from outside donors for these pilots. This was also confirmed by the review of effectiveness towards results under the different strategy's objectives. Effectiveness was higher in the areas where Roma CSOs and mediators were involved in a more structural way;

- **The Roma civil society took the opportunity for pro-active participation in work on the Strategy and Action Plan which resulted in their increased capacity in advocacy, implementation and monitoring to improve the situation of Roma community and fight discrimination.** Presently, a number of representatives of Roma civil society organizations and coalitions are working locally or nationally with respect and consideration for local voices advocating for the rights of their communities as well as supporting practical implementation of public policy and reporting on its progress.

In terms of actual results and positive impact on the situation of Roma women and men, the best summary came from an interview with Roma mediators, ***"There are no systemic changes yet. There are only small steps taken, and not necessarily by the state but rather by the Roma civil society, Roma mediators and religious associations"***.

Based on the review of the effectiveness of the activities under the different priority areas, the following conclusions on the progress towards results can be outlined:

- **The implementation of the strategy in partnership with the Roma civil society has contributed to starting some processes with initial visible results** – increasing the issuance of personal documents, especially birth certificates, better social assistance coverage, increased attendance of pre-school educational facilities and primary school enrollment, recognition and support of Roma cultural identity. But all these processes are still incomplete and need further work to be sustained;
- **Progress was much lower and lacks tangible results in other areas, such as: increased access of Roma girls and boys to higher education (vocational or university), resolving housing and infrastructure issues, access to health care, increased rate of employment and income, as well as fighting discrimination, public bias and prejudice;**
- The process of implementation with all its achievements and non-achievements **opened the debate on the actual root causes for Roma exclu-**

sion and surfaced the need for increased focus on fighting any form of discrimination, racism and ethnically motivated attacks and violence. This was a subject of numerous outside monitoring reports of civil society and international stakeholders, as well as of the Parliament Commissioner on Human Rights. This, together with the increased pressure to respond to the growing violence and hate crimes against Roma, led to search and development of new algorithms of issue-based collaboration in addressing the new threat to personal and collective security of migrating Roma within Ukraine.

Among **the main factors for success** outlined by respondents are:

- **The Roma CSOs and their consistent advocacy for putting the Roma strategy in practice** by monitoring the human rights situation of Roma, including women and girls, by initiating a number of projects at the local level, building up pilot practical experience for Roma inclusion in early education, support in obtaining documents, access to social and health services, outreach and information including that on Roma culture, education and awareness raising by local, regional and central administrations;
- **The Roma mediators**, which contribute to the adequate outreach to Roma communities and especially Roma women, while building trust to the measures taken, thus increasing their potential for impact;
- **Personal commitment and motivation of a number of public servants in administrations** at the central, and, especially, regional level which we could observe during the interviews and meetings.

The main factors for non-achievement of results or under-achievement relate to the deficiencies of the Roma Strategy and the Action plan design, low status and priority of its implementation as evidenced by lack of budget and clear lines of accountability.

With very few exceptions, all stakeholders from both central and regional state institutions, the offices of the Parliament Commissioner on Human Rights and the Government Commissioner on Gender Equality Policy, as well as from civil society (Roma CSOs,

human rights and women CSOs) consider that the strategy as designed does not provide for effectiveness of its implementation. Based on the opinions expressed in the interviews and assessments in reports⁵⁶:

- **The main deficiency of the Roma Strategy was that it was developed top down without realistic data, sufficient consultations and in-depth analyses** of the context, needs of Roma women and men, types of interventions that had been tested and may work if mainstreamed. Due to the time pressure to meet the EU requirements, the document was designed on the level of individual experts, without broader consultation with various stakeholders, and, especially, Roma civil society. Process of consultation requires time and, respectively, preparation for informed participation. Roma civil society did not succeed, either (due to time constraints and lower advocacy capacity at the time), to come up with consolidated proposals for the strategy;
- **Lack of data and baseline information on the situation of the Roma that could allow proper problem analysis and formulation of needs-based and realistic objectives to be addressed by the Strategy and Action plan.** Profound baseline, clear objectives and realistic time-bound measures with clear assignment of responsibilities are essential for preparing grounds for financial assessment and realistic budgeting;
- **This resulted in the Strategy (the framework of desired change) and Action Plan (the road map of achieving desired change) viewed by almost all respondents as formal and poorly designed documents with vague descriptions and formulations.** The Strategy lacks vision of the desired change and, respectively, has limited clarity of objectives, with no defined expected impact. The Action Plan is practically a list of activities, without any link between them, no clarity on results and no indicators to show progress towards these results. With missing clarity on results of the Action plan, the implementation was transformed into an activity framework rather than a strategic framework. The regional plans, especially at the initial stage, were copy and pastes of the national Action Plan, without taking into account local specifics and problems;
- **Lack of leadership and effective oversight as well as weak policy coordination** of the established institutional mechanism resulted in poor outcomes in fostering continuous engagement and collaboration of administrations at all levels for effective interventions targeting Roma inclusion in key areas of the Strategy;
- Another serious challenge was **the limited capacity at central, regional and local levels** in regard of results-based management and understanding of complexity and inter-dependence of the vicious cycle of exclusion and discrimination facing Roma women and men;
- Another important shortcoming **was the low priority of the Strategy and Action Plan in the policy and commitments to implementation.** The documents did not have the status of a state program which, by default, should have performance indicators and budget allocation for implementation. This was caused by the above-mentioned gaps in data on the situation of Roma, as well as lack of comprehensive consultative process at the stage of the Strategy design. Instead, it was replaced by vague formulations of the desired change and pathways to achieve it which, in turn, made it impossible to define indicators for progress towards achieving the objectives;
- **Lack of budget allocation** had an adverse effect on the achievements of results. In addition, low status of the strategy as a parallel activity with no budget "blurred" specific binding obligations of the responsible institutions regarding its implementation. This made the implementation dependent on the good will of individuals (experts in different departments or ministries) rather than on policy oriented to systemic structural change;

56. Practically all civil society reports are critical to the design of the strategy. The same applies to the monitoring reports of the Ombudsman on Human Rights in 2017 and 2018.

- Another negative factor was the **lack of coherence and alignment** of the Strategy with other relevant national policies and reforms, including policies promoting equal rights and opportunities for women and men and the decentralization reform.

4.2. Lessons Forward

RELEVANCE

Responsiveness to the needs of beneficiaries

The Strategy for the Protection and Integration of Roma and its Action Plan were developed within a short time period to meet the conditions under the Ukrainian-EU visa liberalization process.

Limited available resources, weak expertise and absence of consultation with lead international human rights organizations, line ministries and human rights organization, including Roma organizations, led to a rather bureaucratic process which affected the quality of the Strategy and the Action Plan for its implementation.

As a result, the Strategy and its objectives are not informed by realistic and gender-disaggregated data, or by needs-based analysis or mapping of the situation of Roma women, girls, men and boys in Ukraine. It failed to recognize the human rights challenges facing Roma and the multiple forms of discrimination facing Roma women and girls, as well as the heterogeneity of Roma in Ukraine, including regional context, group affiliation, social status, or living in urban, rural, inclusive or segregated conditions.

Data being a weak point, the quality of the Strategy and the Action Plan was affected which led to setting very general objectives phrased as measures without clear indicators making the assessment of progress in implementation of the Strategy's objectives very challenging.

On a positive note, despite the constraints in time and resources, most of the respondents agreed that the Strategy and Action Plan do name in general the priority needs which should remain at the center of future intervention: education, employment, health

and housing and improved access to civil registration and identity documents as an urgency to ensure legal protection for Roma women and men. In addition, culture is added as an area of intervention promoting preservation and protection of classical minority rights.

However, none of the thematic areas are gender mainstreamed, nor are they gender targeted which would have been beneficial in promoting equal rights and opportunities for Roma women. Also, a future Strategy should go beyond framing Roma as a social issue and define objectives from an effective rights-based approach and, additionally, applying a holistic anti-discrimination approach in all areas.

Respondents of the evaluation, particularly those from regional and local levels, felt that the Strategy needs to be contextualized and flexible to be easily adapted to new developments and challenges. This might require amendments to the objectives of the Strategy and the activities under the Action Plan.

Given the tremendous challenges and developments Ukraine underwent since 2014 and increase in hate crimes and racist violence targeting Roma women and men reported since 2017, the representatives from civil society as well as human rights agencies underlined the need to also respond to the situation of displaced Roma women and men, to address widespread discrimination and racism against Roma in society, to find adequate solutions and protect vulnerable Roma seasonal migrants (usually Roma from Western Ukraine) who live in temporary makeshift camps. The lack of legal literacy among the most disadvantaged families and existing discriminatory attitudes were also raised as a major concern. Furthermore, the younger generation of Roma civil society in particular, underlined the need to add Roma public and political participation to empower Roma in representing their interests and engage them in promoting change for their communities.

With regard to translating the National Strategy/ Action Plan to the regional and local levels, respondents consider that there is a need to adapt it to specific contexts, e.g. the situation of many Roma

in Zakarpattia can be very different to the situation and needs of vulnerable Roma in Odessa, Kharkiv or Kyiv regions.

In order to enhance gender responsiveness, the evaluation shows that there is a need for training for both central and regional authorities as well as civil society and Roma mediators to ensure that promoting equal rights and opportunities in the design of strategic objectives and actions for their implementation is already reflected in the design and consultation phase.

Inclusiveness/Participation/Collaboration

The process of developing the Strategy in 2013 showed that further active outreach and consultation with all relevant stakeholders, including regional and local authorities and human rights organizations as well as Roma civil society, is essential for increasing ownership and creating meaningful interventions. It requires sufficient time, transparent process and adequate resources.

A number of international organizations have put forward operational recommendations on how to improve the Strategy and Action plans and solve certain issues. These recommendations have to be reviewed and integrated in work on drafting the new Strategy/Action Plan and its institutional mechanism for coordination of the policy implementation at the central level.

Also, central or regional and local levels must be more pro-active in seeking collaboration with relevant international Organizations (CoE, OSCE, UN) which can provide expertise for alignment of the Strategy and Plan or technical assistance for the process, including on how to enhance gender sensitive needs analysis and Strategy design.

Alignment with international and national legal frameworks and policies

The Strategy mentions key international Human Rights conventions which are ratified by Ukraine, but misses the important international standards for improving the situation of Roma, such as the 2003 OSCE Action Plan on Improving the Situation

of Roma and Sinti. Similarly, relevant national legislation which forms its legal basis (e.g. Constitution, law on gender equality, etc.) is quoted but rather in a declaratory way.

These key principles need to be translated into the Strategy's objectives, vision and concept (rights-based approach, holistic anti-discrimination approach, gender mainstreamed and/or targeted approach).

In terms of alignment with other strategies and State programmes, the implementation of the Roma Strategy is an objective of the Action Plan of the Human Rights Strategy, while Roma women issues are to some extent included in two of the recommendations of the National Gender Action Plan. However, strong advocacy for the Roma Strategy seems to be missing as a part of the Human Rights Strategy, as well as Roma civil society active engagement in the broader civil society coalition.

In addition to focus on a Roma targeted approach (Roma Strategy), mainstreaming Roma women issues within other relevant State Strategies and Programmes, for example, the Gender Equality Programme, will enhance gender responsiveness and promote equal rights and opportunities for women and, particularly Roma women. Responses to the evaluation questions urged for strong alignment of the Strategy and Action Plan with the ongoing decentralization reform in order to effectively bring it to the regional/local levels as well as to mainstream its goals in the relevant elements of the decentralization, for example, ensure enhancing access to quality primary level education for vulnerable Roma, or avoid segregation in Roma-only schools, overall enhance access to education and enhance retainment of Roma girls in schools, etc. as well as increase access to vulnerable Roma to healthcare services or ensure access to reproductive rights of Roma women and girls without discrimination.

EFFECTIVENESS

The Government Strategy and Action Plan aimed at Roma inclusion have the potential to become a platform for a new level of constructive dialogue between the authorities and Roma CSOs, recognizing

the Roma civil society actors as main partners. In particular, central, regional and local administrations underlined that participation of Roma is of critical importance as they are the bridge to the community and have the trust of Roma people.

This dialogue evolved over time, and since 2017 Roma NGOs have been participating in all designated working groups for the implementation of the Roma Strategy, as well as at regional and local levels; in some places Roma representatives are consulted and recognized for their expertise and successful engagement. This turned into a factor that fostered the Strategy implementation, also including the fact that Zola Kondur representing the interests of Roma women CSOs became the Vice Chair of the Interagency Working group as well as Chair of the WG on organization and information. Supporting the participation of Roma women in the political process needs to be further expanded.

In this respect, the Roma mediators, the majority of which are Roma women, received appreciation and recognition from the administrations at all levels and have the trust of Roma women and men. Although recognized by all respondents as a well working practice that has a positive impact on increasing access to information and services of Roma women and men, the Roma mediators are yet not institutionalized. Their existence depends only on project support which is not sustainable. Institutionalizing them by giving a professional status to the role of Roma mediators should become a priority in order to keep their extensive experience and ensure sustainability.

At the same time, the use of the mediators by itself cannot be the only solution for the complexity of problems of social exclusion that Roma women and men are facing. They are just a piece of the puzzle in seeking effective approaches for equal integration of Roma in society. In this respect, the success of the future Strategy for Roma inclusion will depend on comprehensive knowledge and adoption of effective models for Roma empowerment and inclusion, developed by diverse pilot programmes of civil society with the support of the international community. Much more in-depth discussions among the relevant insti-

tutions and civil society are needed in this respect in order to systematize learning based on these models which will help their institutionalization.

An example of successful legalization and upgrading of irregular Roma housing in Zakarpattia (Rativsti) demonstrates that key for achieving sustainable results is strong leadership and support, including by mainstream society. Understanding Roma integration as benefit for the whole society and investment into building a more stable and democratic society is fundamental for creating change.

Increasing the capacity of both administration and civil society for joint work in identifying approaches for resolving existing problems is another important lesson of the Strategy implementation. In this process, engagement of the international organizations has shown successful practices in increasing the capacity of administrative staff (training and knowledge exchange through peer learning visits).

Some lessons drawn from the recognized best practices in the Strategy implementation by both administration and civil society, as well as the donor community:

- **Increased outreach to enable birth registration of Roma women and men by the Ministry of Justice.** In this area the collaboration between the Ukrainian Parliament Commissioner for Human Rights and the OSCE ODIHR in 2015, 2017 on access to civil registration and identity documents inspired administrative changes, and sharing regional experiences of similar situation from other parts of Europe also gave a deeper understanding of the issue and increased capacity of civil servants. In addition, civil society and free legal aid services have done a tremendous work in advocating for Roma rights and the need to issue personal documents to Roma;
- **Increasing direct firsthand experience of central level administration regarding Roma women and men and their needs,** including actual visits to the places where they live. E.g., the Ministry of Regional Development, Construction and Housing and Communal Services, or a representative of the Ministry of Justice now regularly visit different regions to familiarize

themselves with the situation of Roma at local level and identify possible challenges to overcome.

- **Empowered Roma CSO, including youth organizations, in monitoring and advocacy for the rights of Roma women and men.**

The civil society, including many Roma women, used the momentum of the Strategy for effective advocacy and for initiating projects supported by the donor community. This way they have gained tremendous experience and increased their capacity. They have also made use of trainings and knowledge transfer, offered by international community, and deepened their understanding of Roma rights in Europe. While this represents progress, now it's the public authorities that must follow-up by taking training and participating in proposed conferences, work-shops or peer-learning. Central, regional and local authorities must take stronger ownership of the Strategy and Action Plan and actively engage using their experience to ensure meaningful implementation of activities, monitoring and reporting.

- **"Social Passport – Roma community mapping"** piloted by Roma Women's Fund "Chiricli" in Kharkiv, Donetsk, Odessa and Zakarpattia regions, serve as an excellent example of a needs-based mapping exercise implemented in partnership between Roma civil society and regional social service centers. It could be replicated and amended to ensure a gender responsive approach and serve to inform the new Strategy/ Action Plan at the regional and central levels.

- **Investing in early education facilities has shown to bring longer term sustainable impact.** The organization "Blago" in Urzhgorod and other civil society organizations successfully demonstrated that children from socially vulnerable background – despite all difficulties – can be prepared for attending public mainstream school. Such pre-school learning methodology and pre-school educational facilities can be replicated all over Ukraine, for example, as a key measure to implement the strategy goal of enhancing access to quality education for Roma children.

- **The creation of a local initiative group of active Roma women and men to interact with local authorities in Merefa** (Kharkiv) has led to increased trust

with local authorities finding joint solutions and improved collaboration. Creating such groups at the ATC level can assist Roma participation and more effective Roma inclusion policies at the local level.

- The "Working Group on the Development of the Draft Algorithm of Action for Executive Bodies and Local Self-Government, aimed at Conflict Prevention on Ethnic Grounds, Harmonization of Public Security and Order, and Interests of Social Groups in Detecting Temporary Settlements of the Roma Community" has started effective work in identifying **inter-sectoral approaches to ensure security**, prevent potential attacks and provide access to basic services. It has demonstrated good will, drive for change and willingness to adapt to current priorities and challenges.

INSTITUTIONAL MECHANISM: POLICY COORDINATION, MONITORING AND REPORTING

The current institutional mechanism for coordination of the Strategy and Action Plans implementation evolved in stages in the course of four years. Being under the auspices of the Cabinet of Ministers and involving high executive level representatives of key line ministries, state agencies, governors of oblasts, as well as the increased involvement of Roma civil society – all this together forms an institutional framework that could enable effectiveness of the Strategy.

Recognizing that these institutional structures have the potential to provide leadership and institutional interaction needed to meet the complexity of tasks of the Roma inclusion Strategy, it did not manage to utilize it effectively due to lack of clarity and shared understanding of the mandate, the lines of accountability and level of engagement (including with budget commitments); limited result-driven dialogue and cooperation for defining solutions to observed challenges, as well as for establishing clear work objectives to be achieved within a certain timeframe. Reporting remained formal and remained merely on activity level without follow-up or goal to achieve a set of results towards the planned objectives.

Due to the Action Plan's weakness due to lack of indicators and low quality of reporting, it is almost impossible

to measure progress against a certain baseline. The reported activities for the Strategy implementation are very fragmented, in the sense that they lack a certain logic and follow-up action demonstrating how a certain goal is achieved over time. In order to address this in future, clear gender-sensitive indicators and objectives have to be established and timelines have to be set and checked on regular basis. This could be reviewed, for example, by the working groups while a competent authority also must do quality control as well as quality and gender responsiveness monitoring and evaluation. It might also require investing in capacity building of central and local administrations in results-based management, understanding of human rights-based policy implementation, including strengthening capacity on implementing Roma inclusion and gender equality policies.

The institutional mechanism needs to be improved, including by ensuring quality in reporting and adopting a results-based work method.

Roma integration requires complex intersectional collaborative response and mobilization of resources across the line ministries. This response will be effective if it is based on clear vision for change, desired results, and comprehensive monitoring and evaluation system to track progress towards this change – gender disaggregated indicators, ways of gathering information and purpose of use of this information.

EFFICIENCY

The Roma Strategy and Action Plan implementation at central and local levels had no earmarked budget, except for some insignificant funding provided for cultural activities and for the strategy implementation in a few regions. Allocation of human resources has been also insufficient. Lack of budget and inadequate allocation of human resources has turned into the main barrier both for the Strategy's effectiveness and the sustainability of results.

A major lesson for the new Roma Strategy and Action plan is that they have to be based on financial analysis of the budget needs for its effective implementation and to be linked with the targeted national programs in different sectors, as well as with the priorities for the local development strategies.

Effectiveness and efficiency depend on the adequate allocation of human resources. The Strategy should budget and support required human resources for the effective implementation at the central, regional and local levels. It also needs to envisage specifically allocated budget for mainstreaming the Roma mediators (salaries and training) as well as for the implementation of systematic training programs for public servants in different sector to ensure adequate application of the human rights and gender equality principles of in their work with Roma women and men.

CHAPTER 5: RECOMMENDATIONS

5.1. General recommendations on the overall focus and approach of the new Roma Strategy to increase its relevance and effectiveness

1 The majority of stakeholders both from central and local institutions, as well as from civil society consider that **the Roma Strategy is still highly relevant and needed as a separate and comprehensive policy framework** to meet the multiple discrimination, marginalization and social exclusion challenges that Roma women, men, girls and boys face. The problems of vulnerable Roma women and men are multiple and complex, they are interrelated and require a focused intersectoral response. If they are left only as a part of mainstream programs without a targeted policy, the impact towards integration of Roma women and men will be reduced.

2 The new Roma Strategy needs to be guided by a clear overall strategic framework including: vision about the desired social change, clearly defined strategic objectives and results and, respectively, outcome indicators, while certain flexibility should be given to ensure that local particularities and needs are prioritized for the interventions in regional action plans.

3 Based on the accumulated experience, as well as the contextual changes, **the content of the current Roma Strategy and Plan needs a serious redesign through the lense of human rights and gender equality**. Human rights, including the rights of Roma women and girls, have to become the starting point in clarifying the objectives and results of desired change, as well as of all activities that are anticipated to contribute to this change. More specifically, the overall Roma strategy and the local plans for its implementation need to:

- **have a clear focus on overcoming discrimination** in particular indirect, institutional and structural as one

of the root causes for the exclusion of Roma women and men from equal participation in mainstream development, also taking into account the increased radicalization and hate crimes against Roma that have affected their personal security and safety;

- **pay attention to the multiple forms of barriers and discrimination faced by Roma women and girls** when designing targeted policy measures for the inclusion of Roma communities or aligning them with broader mainstream policies on gender equality and human rights, as well as with the on-going sectoral reform processes;
- **apply human rights-based approach** to overcoming exclusion of Roma women and men in the design of all measures for the implementation of the Roma Strategy.

4 International standards of Roma inclusion, non-discrimination and gender equality must become the guiding principles in defining the Strategy's objectives and the Plan's measures. As recommended by the stakeholders, it will be important to develop shared understanding of key concepts – what is meant by protection, Roma inclusion, what is integration and how it relates to empowerment and rights of both Roma women and men. The EU's 10 common principles of Roma inclusion can serve as a good practical basis for these discussions.

5 The discussion on the set of measures under each objective should consider the three Roma inclusion interrelated areas as set in the EU policy frameworks and lessons from their application:

- **Roma empowerment** (Roma women and men's awareness and access to fundamental rights, information and public services, as well as individual or organized participation in decisions that affect their lives);

- **Inclusive institutions and processes** (awareness, capacities and practices of applying rights-based approaches to development and non-discrimination as part of the good governance principles);
- **Non-discriminatory society** (awareness and acceptance of diversity and rights of minorities, as well as public support to rights-based inclusive public policies).

6 The new Strategy and Plan development and their regular update should be based on sound equality analysis. This needs to include gender analysis, risk assessments, socio-cultural and political analysis of the root causes of the key problems of Roma women and men, boys and girls in the different local contexts where they live. This will help to better understand the needs of Roma communities, in all their heterogeneity and, respectively, – to improve design and delivery of a needs- and evidence-based policy.

7 The 2020 Census should be used effectively to gather more data on Roma women and men in cooperation with Roma civil society. It will be essential to collaborate with the State Statistics Office in the preparation of the trial census foreseen for the end of 2019 and test how in particular the outreach and inclusion of Roma in a vulnerable situation might work. Roma mediators and Roma civil society need to be included in training and information outreach to Roma households to increase their participation in the census and to get more accurate and gender-disaggregated data.

8 Replicate in all regions the good practice of community-based data gathering done by Roma CSOs, especially the “Social Passport – Roma community mapping”. It will be important to add a stronger gender analysis. Such mapping can inform the design of the Strategy and regional plans and will also increase the capacity at the regional and local levels for evidence-based policy formulation, planning and budgeting.

9 Foster the strategic application of intersectoral approach by expanding the good practice of creating collaborative mechanisms/ algorithms for

the priority crosscutting issues and specific measures in the different sectors.

10 The new Strategy needs to be effectively aligned with mainstream policies and programmes in different sectors, as well as in the area of human rights, non-discrimination and gender equality.

- **The new Strategy needs to correlate with the ongoing decentralization process** and reforms in the country – this requires serious analysis of how the decentralization process, including the on-going reforms in education, healthcare and other important areas will affect the Roma communities.

- **Linkage of the Roma Strategy and Plan with key sectoral policies** will also contribute to mainstreaming the issue of improving the situation of Roma women and men and, respectively, will allow to activate funding from existing and new national programs to address the specific needs of Roma women and men, boys and girls.

- **Increased alignment with the national policies on human rights and gender equality** will help to mainstream the needs and measures for empowerment of Roma women in the new post 2021 Gender Equality policies, which are in the process of drafting the policy concept and the next plan for the implementation of the National program for gender equality will be developed in 2020.

11 The new strategy needs to adopt a comprehensive monitoring and evaluation system with gender-disaggregated baselines, indicators and targets (as well as the annual benchmarks) to strengthen the accountability of the Strategy implementation. The emphasis should be on monitoring results and impact of the intervention towards the objectives, rather than reporting only on activities. It will be important to ensure the beneficiaries perspective by involving Roma women and men in the monitoring. The system also needs to include clear procedures of taking into account monitoring and evaluation results to readjust work and, where required, to redirect policies.

5.2. Strengthening specific areas of the current Roma Strategy and Plan to enhance their effectiveness

Below we have outlined the key recommendations based on proposals of the participants in this evaluation, as well as the analysis of recommendations from various outside monitoring and research reports. Annex 5 provides more detailed summary list of general and operational recommendations from different reports that can serve as a basis for the focused discussions in the process of the drafting the new Roma Strategy and Plan.

5.2.1. Redesign of the Legal Protection/General Issues section based on prioritization of key cross-cutting issues that need to be addressed

The 'Legal Protection' section of the current Strategy and the related to it 'General issues' set of measures in the Action Plan need a thorough redesign based on prioritization of key issues that prevent the equal integration of Roma women and men in society.

Based on the proposals from the interviewed stakeholders as well as civil society and international actors' monitoring reports, the following main priority issues need to be included as specific objectives and measures:

1 Increased access to personal documents, birth certificates and registration as prerequisite for access to all fundamental rights and basic services

Access to personal documents as a precondition to exercise basic rights is considered as a priority issue by all participants in this evaluation. Finding solutions for this issue requires a set of measures with clear targets and creating a collaborative mechanism to address the complexity of needed legislative and regulatory changes, legal assistance to Roma women and men without documents, as well as incentives. The main suggestions from respondents include:

- **Establish an expert body for co-coordinating the efforts for solving problems of Roma women and men related to access to personal documents.** It

needs to include the responsible central institutions, Roma representatives and civil society, legal experts, the Office of the Ukrainian Parliamentary Commissioner for Human Rights as well as practitioners from the oblast level dealing with issuing of documents as well as lawyers/human rights defenders and legal counselors who can provide feedback on the feasibility of the suggested changes.

- **Build upon and expand the good practices in the field of birth registration**, based on increased understanding of the complexity of inter-generational issues facing Roma and, particularly, Roma women, increased proactive outreach and engagement of administration, as well as learning from working approaches in other European countries.

- **Simplify procedures of issuing personal documents for all Ukrainian citizens, including the Roma national minority.** Use the existing good expertise and experience of the SMS regional departments and human rights lawyers in approaching the obstacles faced by Roma women and men as a basis to develop proposals for required changes in the law related to civil registration and passports, as well as in the package of legal and procedural acts that affect the entire process.

- **Put in practice the provisions of the Odessa Declaration.** Ensure free legal aid and organize mobile teams of lawyers assisted by Roma mediators or CSOs to help Roma women and men on-site to meet the necessary requirements for preparing documents.

- **Introduce exemption from court fees or SMS fees** for processing identification documents for vulnerable population (including Roma).

2 Protection from discrimination and enhanced personal security of local Roma communities

In addition to the overall focus on human rights and antidiscrimination, the majority of the respondents as well as monitoring reports suggest including specific objectives and measures which were absent or not well formulated in the old document in the following aspects:

- **Increased access to justice by ensuring timely and proper investigation and prosecution of hate crime**, hate speech and other forms of bias-motivated crimes and violence targeting Roma women and men and Romani settlements, in line with national and international law.
- **Expand the capacities of police, judges and prosecutors on responding, investigating and prosecuting hate crimes** by systematic mainstreamed programmes for training in human rights and anti-discrimination, as well as by introducing trust building measures between them and the local Roma communities.
- **Enhance the capacity of the law enforcement bodies on gender-related security aspects** and multiple forms of discrimination faced by Roma women, to increase the adequacy of their responses to gender-based and domestic violence, trafficking in human beings and violation of rights related to early arranged marriages.
- **Develop consistent strategy for increased public awareness on human rights and overcoming existing bias and stereotypes** including on-going campaigns aimed at different target audiences, media projects and training journalists in the area of human rights, inclusion and diversity, demonstrating successful examples of positive role models showing Roma as equal citizens contributing to society.

3 Increased Roma participation in the design, implementation and monitoring of the decisions that affect their life

- Develop and implement provisions for **participation of Roma women and men in the public councils at central, regional and local levels**.
- **Introduce the position of Roma minority advisors at the regional and local levels** as part of the public administration and pay attention to balanced representation of Roma women and men by ensuring that Roma women are empowered to take up this position.

- **Support initiatives that focus on Roma youth by raising awareness and capacity for engagement and participation**. This will provide for sustainability of Roma participation by creating a new generation of Roma men and women with a new set of values that includes understanding of the need for education, human rights and the ability to voice the interests of Roma. Support to Roma youth can be aligned with existing mainstream youth policy at national and local levels which have many useful initiatives where Roma youth development can be included.
- **Work in collaboration with international stakeholders and donors to enhance the political participation of Roma** by initiatives for capacity building for candidates and elected representatives, raising community awareness on the right to vote to have increased Roma representation in electoral process. A special effort needs to be made to increase the political participation of Roma women which will require consistent work to overcome internal and external prejudices about the role of Roma women in society. This work should also include addressing the concerns and problems raised and recommendations given by several OSCE/ODIHR Electoral Observation Missions and other international bodies on the participation of Roma in elections⁵⁷.

4 Increased implementation capacities at the local level to enhance local interactive leadership for change in the area of Roma inclusion

- **Strengthening the capacities at the local level** (especially of the amalgamated territorial communities in view of the increased delegation of powers at their level) in the areas of understanding, visioning and programming for local Roma inclusion processes is an urgent priority to ensure successful implementation of the Roma Strategy. As it was mentioned in one of the interviews with local level administration, "In order to solve problems we do not need just a strategy on paper, we need the right competences to create change!".

57. The OSCE/ODIHR reports on elections observation missions are available at <https://www.osce.org/odihr/elections/ukraine>

- **Targeted and systematic capacity building must** to include building knowledge and skills of local authorities on human rights and gender/diversity program development and management, as well as guidelines and assistance in applying collaborative and intersectoral approaches to Roma inclusion. As suggested by some of the respondents, these capacity building programs can be developed together with the Institute for Public Policy, with the assistance of international organizations and civil society, as well as using platforms like the Association of Cities of Ukraine and the Association of Oblast Councils of Ukraine.

5 Institutionalization of effective working models for empowerment of Roma women and men, developed by civil society

- **Introduce systematic policy learning from emerging practices of civil society for Roma inclusion to stimulate their translation into public policy measures.**

As part of the process for the development of the new Strategy, organize a series of round tables with the participation of relevant institutions and representatives of civil society to present and discuss approaches and models for Roma empowerment in different aspects of Roma inclusion. In-depth discussion on emerging good practices will require good preparation on behalf of civil society to present what and why works and what is the feasibility of translating these models into public policy. Discussions together with the institutions will be very helpful in this direction as well as broader – for better focusing the measures in the Action plan for the implementation of the new Strategy.

- **Adoption of Roma mediators as an interim part of the public policy for Roma inclusion.**

The Roma mediators (as already well-known useful practice for increased access of Roma women and men to social services, health, education, housing, employment, conflict resolution) need to be included into the Occupation Classification List, so that their work is budgeted and paid from public sources. Institutionalizing the position of Roma mediators needs a

careful review to identify more flexible options to meet the provisions on the educational level required for social workers. The criteria regarding a university level of education will drastically reduce the eligibility of existing Roma mediators and the potential new ones.

Adopting the Roma mediators as part of the public policy for Roma inclusion in the different sectors should also include provisions for a supporting system of regular training and constant upgrade of their skills, with increase of understanding of gender equality principles, policies and approaches among them. In addition, Roma mediators with only lower level of education can be motivated by incentives to continue their studies – for example, in the areas like of social work, or healthcare as nurses and doctors, or teachers, etc.

6 Increased Roma women empowerment and participation

Promotion of gender equality and human rights of Roma women should become an important cross-cutting priority of the next Roma Strategy and the local implementation programs (as proposed by respondents in this evaluation as well as in the Outcome Document and the concluding observations of the Committee on the Elimination of Discrimination against Women on the eighth periodic report of Ukraine (2017) and its multiple recommendations to address the needs of Roma women).

The new Strategy requires alignment with the national gender equality policy frameworks, including the National Action Plan on the implementation of recommendations provided in the Concluding Observations of the UN Committee on the Elimination of Discrimination against Women to the eighth periodic report of Ukraine on the implementation of the CEDAW and the State Social Programme to Ensure Equal Rights and Opportunities for Women and Men.

For this purpose:

- Design and monitoring of measures under the different objectives of the Strategy need to be based on **gathering and analysis of gender disaggregated data** (as a baseline of the current situation and as data from measured indicators);

- The initiatives under the different priority areas of the Roma Strategy need to ensure **gender mainstreaming** (ensuring that rights of both men and women, men and boys are taken into account), **as well as specifically targeted approaches to the needs of Roma women**;
- The Strategy needs to include **targeted components for Roma women empowerment** by support to initiatives that create capacities and provide examples of new positive models among Roma women in the area of education, professional realization and participation showing that there can be a different way of personal and community development;
- **Gender-responsive budgeting** currently introduced by the government with the lead of the Ministry of Finance and the Ministry of Regional Development, Construction and Housing and Communal Services, can be also introduced to Roma Strategy to address the differentiated needs of Roma women and girls, particularly at the local level through the measures included in the local plans supported by budgets;
- **To ensure increased gender responsiveness of the Roma Strategy it is recommended that an expert group on gender and Roma women empowerment be established.** It will be tasked to provide expert advice on approaching the issues of Roma women under the different Strategy's objectives and areas, developing specific initiatives for Roma women empowerment and assisting the gender responsive monitoring of the strategy. It will consist of representatives of Roma women (Roma CSOs, Roma mediators), UN Women and the other development partners, representatives of the Commissioner on Gender Equality Policy;
- **There is also a need for better collaboration between Roma women's CSOs and mainstream gender and women's organizations** to include in the monitoring the implementation of the recommendations of the Committee on the Elimination of Discrimination against Women on the situation of Roma women and to develop recommendations to alert the relevant institutions, and to jointly advocate for needed change.

5.2.2. Increasing the effectiveness of the interventions for access to different fundamental rights

1 Access to quality education to ensure future professional realization and income

While building upon the achievements of the current Strategy and Plan implementation, further strengthening of the potential for impact of the education-related measures requires **a more consistent strategy for increasing the educational outcomes of Roma students throughout the different stages of the educational process**, as well as linking it with the possibility for better realization on the labour market. Some of the proposals in this direction include:

- **Investing in early pre-school education of Roma girls and boys in order to ensure their equal start at school.** Initiatives need to include intensive work with parents, where outreach for and education of Roma mothers is essential;
- **Scaling-up of well working practices of early education for Roma children developed by civil society**, like the Roma-led organization "Blago" in Uzhgorod which has pioneered successful programs supporting early education for Roma children from impoverished and segregated neighbourhoods and successfully prepares them to meet the criteria for enrolling in mainstream schools. Such initiatives empower children and communities and give them the chance for a decent future, besides, this initiative promotes inclusive education and desegregation, and counters negative bias;
- **Reducing school dropouts, especially of Roma girls** through work with parents to raise the awareness on the benefit of education for their children, regular monitoring of school attendance and extra-curricular activities;
- **Ensuring access of Roma children to quality education by elimination of the still existing practice of segregated schools** or Roma-only classes and the tendency of reinforcing this practice as a result of the catchment area provisions in the current educational reform in Ukraine. Expand the pilot practice of covering school transportation where needed for Roma pupils;

- **Providing incentives for teachers** by access to training and professional development in the area of intercultural education, and also, as suggested by some respondents – salary increase for teachers working in deprived and vulnerable population areas;
- **Providing incentives to Roma youth – both Roma boys and girls – through scholarships** to continue their education in universities and/or vocational institutions to get higher education;
- **Developing and implementing programs to address adult illiteracy and filling the gaps in education, especially of young Roma mothers** who dropped out of school due to early age marriages. Without such specifically targeted efforts they risk to remain out of the labour market in the long term, which will perpetuate the model of social exclusion and poverty with their children as well;
- All initiatives in the area of education will have much more impact if implemented in **partnership with Roma CSOs and with involvement of Roma mediators**.

2 Increase the focus on access to employment and income as a critical area for overcoming social exclusion and marginalization

There is a need for more in-depth discussions on approaching the problems of unemployment of Roma women and men. In addition to the existing measures, **overcoming unemployment can be strengthened by applying integrated approaches**:

- While building upon accumulated experience, increased efforts are needed to enhance the employment opportunities for Roma men and women by ensuring **their access to various forms of vocational training, qualification programs linked with opportunities for finding jobs or start their own businesses**;
- **Addressing adult literacy issues requires a collaborative approach and mechanism** of collaboration between the MoSP, the MoES, the Employment services, as well as the Roma mediators and CSOs. In this regard, it will be important to identify concrete algorithms to resolve the problem of employment for

those who only have primary education and those with no documents, as well as of Roma women who dropped out of school at an early age;

- **The approach to overcoming poverty through income generation needs to be more strategic.** In addition to social assistance support for finding jobs, more entrepreneurial strategies can be considered, aligning them with measures for economic development in the regions and introducing incentives, such as skills development and access to affordable loans for Roma business start-ups, for existing businesses to hire Roma people, creating social enterprises, or optimizing income generation through agricultural farming.

3 Access to healthcare

- **The new Strategy should address the new challenges arising from the health care reform and the requirements for accessing primary healthcare and family doctors.** Specific procedures need to be developed to raise awareness among Roma population, provide assistance for needed documents, as well as increased capacity of primary doctors and nurses is required to work with Roma communities;
- **The Strategy should have provisions ensuring protection from discrimination**, including gender-based discrimination. This will require both preventive measures (overcoming the prejudice of medical staff regarding work with minority communities by providing training on non-discrimination), as well as close monitoring and taking punitive measures in cases of practices of discrimination on ethnic grounds;
- In addition to existing measures for prophylactic exams and immunization, the new Strategy needs to **consider including the issues of reproductive health of women and family planning**. At present the MoH is developing the Concept of Reproductive Health, and it is important to include in its specific activities for the Roma population and especially for Roma women;
- In terms of Roma girls' empowerment, it will be important to consider including initiatives for

increased health literacy on the risks that early pregnancies pose both for the mothers and the babies. Raising awareness of young girls and boys as well as overcoming the existing norms for early marriages and pregnancies, especially in traditional communities, needs to be done in cooperation with Roma civil society and Roma mediators;

- All activities in the area of improved access to health services will benefit from the **effective use of the Roma mediators.**

4 Access to affordable housing and adequate infrastructure and living conditions

Civil society and international stakeholders' reports as well as the respondents (especially from Zakarpattia) put forward as a matter of urgency the need of resolving the housing situation, especially for compact or irregular Roma settlements. Proposals in this direction include:

- **Legalization of the land lots and irregular residential areas based on simplified procedures**, in order to include the Roma settlements into the local cadastres and infrastructure development, as well as providing them with access to public services;
- **Developing collaborative mechanism to increase the outreach and ensure accessibility of mainstream housing subsidy programs to Roma families;**
- **In view of the decentralization process, concrete plans to improve housing conditions of compact settlements have to be developed as part of the local development strategies**, including by upgrading settlements with adequate infrastructure (sanitation, sewage system and water supply) or providing alternative housing;
- **Providing adequate housing for displaced Roma persons needs to be a priority;**
- **Building upon the established collaborative procedures** for increased protection of Roma communities, who migrate within Ukraine, including ensuring their access to basic services and infrastructure, as well as child protection.

5.3. Ensuring sustainability of the new post 2020 Roma Strategy and Plan

The main recommendations from respondents for ensuring the sustainability of the implementation and results of the new post 2020 Roma Strategy relate to the **need of changes of its format and status, which, in turn, will ensure budget allocations.** More specifically:

1 The Roma Strategy and, respectively, the Plan for its implementation must have a different document format. The main proposals can be grouped as follows:

- The best option will be if the Roma Strategy becomes **a State targeted program approved by the law**, which, following their requirements, will have specific indicators to measure results, as well as allocated budget;
- Other respondents consider that not to lose the momentum it will be better at this stage if the Strategy is developed as **a policy framework approved by the Cabinet of Ministers**, as getting approval on the status of a national program at the legislative level may take 2-3 years – a delay which will negatively affect the situation of Roma.

2 Even if the Strategy does not have the status of a State targeted program, respondents both from central level, as well as from civil society suggest that **the document should have clear objectives, results, indicators, as well as budget.** By analogy, the model of the state social program on ensuring equal rights and opportunities for women and men and its national action plan can serve as an example.

3 As proposed by stakeholders from the public administration at the oblast level, it will be very important to ensure that **the Roma Strategy is a multi-layered policy framework** combining objectives and measures at central, regional and local levels clearly reflecting the new decentralized structure of the amalgamated territorial units:

- Most important is to **ensure mainstreaming of Roma Strategy objectives in different parts of the decentralization plan.**
- At oblast level, the next document needs to be a **complex program aligned within the regional development strategy and, respectively, – with its budget lines** where the measures for Roma need to be integrated. It also needs to be approved by the Oblast Council which votes the budget (not just signed by the Governor).

4 Budget allocation is critical for the effectiveness and sustainability of the Strategy implementation results. Some of the proposals on approaches to budget allocation include the following:

- In the new Roma Strategy and Plan **cross references can be used with existing or new emerging national programs and their budget lines;**
- **Help for budget calculations** can be requested from Science-expert Department of the Parliament, as well as from the Ministry of Finance, which should also approve this document;
- The new Strategy envisages that the Minregion should recommend to **the local authorities to develop local target programs (with allocated budgets)** on Roma issues, based on the National Strategy.

5 Strengthening of partnerships with and among local stakeholders – local administration, departments of sectoral institutions, as well as Roma civil society – will be critical for the success and sustainability of the strategy:

- An urgent priority that will ensure sustainability is recommended in the previous sections measures for **targeted capacity building of the local level administrations;**
- There is a need **to invest in the sustainability of Roma civil society (including Roma women NGOs and groups) to expand its capacity as an important and equal partner** of government and institutions at different levels for the implementation of the Roma inclusion strategy;

- This will require **allocation of financial support from diverse donors, including from national and local budget sources.** Design of local and national funds in support of CSOs for Roma inclusion needs to envisage support not only for implementation of activities, but also for covering part of their organizational and capacity development costs.

5.4. Improving the effectiveness of the institutional mechanism for coordination and implementation

1 According to the majority of respondents, the institutional mechanism for policy coordination of the Strategy implementation needs a **serious change and redesign.** There were a number of opinions expressed on **who should be in charge of policy coordination.** They can be grouped in the following options:

1) If the strategy remains under the MoC, there is a risk that the implementation remains weak, as some of the interviewed expressed opinion that the Ministry has no authority beyond its own scope, and there is a risk that the management of the Strategy and Action Plans can remain a formalistic reporting exercise without competent quality control and strategic guidance, as well as without adequate human and financial resources;

2) Shifting the responsibility for the coordination to another Ministry. Different respondents suggested that either the MoSP or the Ministry of Justice should be in charge of the Roma Strategy and Action Plan, as most of the actions and results fall within the competence of the MoSP, or can be thematically aligned with the National Human Rights Strategy and Action Plan, administered by the Ministry of Justice. However, as outlined by respondents, the choice of the coordinating Ministry and its main competence areas will define how the priority problems of Roma are perceived: as meeting basic needs and assistance, or as human rights;

3) Another suggested option is to have a specialized Commissioner on the issues of minorities with a capable secretariat. Some respondents expressed

this would serve to ensure a human rights-based approach, which is critical to inspire for change;

4) Entrusting the coordination to the newly announced State Service on Ethnic Policy and Freedom of Conscience at the level of the Cabinet of Ministers, which was just established based on the Department on National Minorities within the MoC (the current policy coordinator of the Strategy). According to opinions, shared at the meeting of the Evaluation Management Group, this option has a number of advantages:

- It has the potential to allocate targeted human resources – create a designated Roma department consisting of three people, its sole function being the coordination of the Strategy implementation, as well as its monitoring, evaluation and reporting;
- If it has a clear mandate and status, it can add perceived importance to the Strategy and help better intersectoral coordination;
- The leadership by the Vice-Prime Minister has the potential for increased accountability in delivering results (allocation of required resources, oversight, inter-sectorial coordination, strong interest in regular monitoring and reporting).

2 Regardless of which option of the policy coordinating central institution will be chosen, **the effectiveness of the policy coordination at the central level will depend on:**

- **The clarity of the mandate of policy coordination – is it just a technical coordination or policy coordination?** The responsible institution must have the required authority and capacity for leadership to set tasks for the other institutions and authorities, to request information, as well as to assist in the analysis of the outcomes towards the objectives;
- **Defining clear parameters of the oversight by the Cabinet of Ministers** in terms of requesting accountability and improvement of the Strategy implementation;
- **The capacity of the responsible institution for the effective Roma inclusion policy coordination**

that would combine results-based expertise with knowledge on human rights and gender equality, as well as a sound understanding of the concepts of Roma inclusion and rights-based approaches for their applications.

3 The established working groups at the central level, ensuring intersectoral oversight and approach, need to continue with improved functioning based on:

- clarity and shared understanding of their mandates and priority roles;
- clearly defined leadership and authority of the WG's Chairs/Vice chairs;
- adapted size and terms of reference for a more pro-active and results-oriented working method.

4 Working groups for the implementation of the local targeted programs need to be established at the level of the oblasts, and, where needed, at the level of the amalgamated territorial communities.

5 The institutional mechanism needs to continue and further strengthen the good practice of Roma civil society participation of at central, regional and local levels. Some more specific recommendations from respondents include:

- Designated mechanisms for Roma participation at the different levels should have clear description of the role of Roma activists and NGOs, their involvement and the support for this involvement;
- Consultation with civil society and, particularly, Roma civil society has to be transparent, account for the heterogeneity and ensure a gender/age balanced and geographical representation. Equally important is that Roma CSOs with needed expertise and recognized record of work in the thematic areas of the strategy objectives participate in the institutional implementation mechanisms;
- The selection of representatives of Roma civil society organizations for participation in the working groups as experts, or as participants in a broader consultative process needs to be based on clear and transparent criteria.

5.5. Recommendations for the post 2020 Roma Strategy design process

5.5.1. How should the process of drafting the new ones be organized?

1 Assign leadership for the drafting process and utilize a multisectoral management group to define a timeline and process for drafting the new strategy document and action plan.

2 Agree on a set of high-level experts, both from institutions and from civil society, to inform and drive the process, including ensuring alignment with gender equality policies, human rights agenda and decentralization process.

3 The drafting process should also build on expert knowledge of public officials at local, regional and central levels and be inclusive of Roma women and men as participants, who have expertise and good working practices in the respective field to offer, possibly ensuring gender, geographical and age balance (inclusive of Roma youth).

4 Initiate the drafting by developing vision for change with increased focus on human rights and empowerment by:

- Presenting the evaluation report and outlining key questions for the new concept of the post-2020 strategy;
- Conduct workshops to have a facilitated discussion regarding the guidelines on human rights approach and practical application of key principles, such as the EU 10 common principles for Roma inclusion which will result in developing a shared vision for desired change and key objectives;
- Organize mapping of needs of Roma women and men in the remaining regions, following the methodology and approach, applied by "Chiricli" and its pilot "Social Passports of Roma communities";
- Make use of the existing working groups on the Strategy to develop key objectives/areas and key outcome areas/results.

5.5.2. Tentative timeframe of the strategy development process

Following the review and adoption of the evaluation findings by the end of August/beginning of September the drafting process for a new strategy should commence. **Its time frame needs to ensure enough space for consultation** with civil society, expert bodies, international community and relevant line ministries and public administration at local, regional and central level.

At this stage we recommend four phases of the design process:

Phase one of the process September – December 2019 including:

- conceptual work on the strategy as a framework document, defining the overall human rights and gender-sensitive approach and visions of the policy document, the key objectives/areas, the key outcomes areas/results (like for example – decreased drop out of school; increase of Roma pupils in mainstream school, regularization of informal housing, etc.);
- and in parallel, conducting gender-sensitive Roma community mapping exercise (expanding the Social passports) and situation analysis in at least 6 more oblasts (or all oblasts) – so that there is a representative sample of types of regional situations of Roma women and men;
- engaging in cooperation with the State Statistics Office to ensure that the pilot census in Kyiv region is used for testing how data on vulnerable Roma women and men can be gathered, including through training of mediators and hiring them for doing outreach to communities and support pilot census. This is done in order to prepare for a potential census in 2020 and ensure that vulnerable Roma women and men are accounted for.

Phase two from January – March 2020 should entail:

- concrete work at the oblasts level, by making use of collected gender disaggregated data, social

passports and gender sensitive needs analysis to develop (based on the strategy framework) regional strategic plan aligned with local development policies. This process should allow for expert meetings and for broader consultation with civil society including Roma civil society (ensuring participation of both Roma women and men).

III Phase three April – May 2020 should serve to:

- aggregate the proposed in the targeted programs actions under the leading objectives of the strategic framework and developing a national action plan – bottom up;

- develop more concrete gender sensitive indicators under the different areas that will serve for the monitoring of effectiveness and efficiency of applied processes across the different regions.

IV Phase four June – December 2020:

- Prepare for the adoption of the strategy and action plan at all levels (local, regional, central);
- Conduct budget assessment and indicate required budget and local, regional and central level budget for the implementation of the strategy and action plan;
- Adopt the strategy and action plan.

ANNEX 1: LIST OF PARTICIPANTS

I. Representatives of central level institutions

MoC

| | | |
|----|---|--|
| 1. | Yurash Andriy – Director of National Minorities and Religious Department | Meeting Evaluation management group |
| 2. | Rymar Svitlana – Chief Specialist of the Department of Interaction with National minorities | Meeting Evaluation management group; interview |
| 3. | Khodakivskyi Volodymyr – Head of the Department for Interaction with National Communities of Ukraine and Foreign Ukrainians | Interview |
| 4. | Yakovenko Volodymyr – Coordinator of the Roma Secretariat | Interview, WG discussions |
| 5. | Tetiana Kurach – Coordinator of the Roma Secretariat | Interview |

Ministry of Justice

| | | |
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| 6. | Shapotko Yevheniy – Expert of Human Rights Directorate, | Meeting Evaluation management group |
| 7. | Dubykivska Iryna – Chief of Department of State Registration of Civil Condition Acts, Ministry of Justice | WG group interview |

State Migration Service

Sirenko Tatyana, Chief Specialist, Department of Citizenship, Passportization and Registration

WG group interview

MoSP

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| 8. | Oleksandra Churkina – Deputy Minister of Social Policy | interview |
| 9. | Sultan Valentyna – Chief Specialist of the Main Department on Integrated Social Services | Meeting Evaluation management group |
| 10. | Roy Maryna – Chief Specialist of Gender Equality | Meeting Evaluation management group |
| 11. | Chornii Yurii – Head of the Directorate Expert Group on Combating Human Trafficking | Meeting Evaluation management group |
| 12. | Saienko S.P. – Chief Specialist | WG group interview |
| 13. | Hlachynda V. – Deputy Head of Department of Public Employment Service | WG group interview |
| 14. | Vovk Volodymyr – Deputy Director of Department | WG group interview |

MoH

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| 15. | Palepukha A. – Advisor to the Ministry of Health of Ukraine Ministry of Health of Ukraine | WG group interview |
| 16. | Mishchenko O. – Chief Specialist, Ministry of Health of Ukraine | WG group interview |

MoIA

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| 17. | Kalugin Edward – Chief Specialist of the MIA's Office for Human Rights Monitoring | Meeting evaluation reference group |
| 18. | Borodych Natalia – Chief of the Human Rights Monitoring Department | |
| 19. | Bohdan Vasyl – Deputy Head of Department, National Police of Ukraine | Meeting evaluation reference group |
| 20. | Tarasenko Konstantyn – National Police of Ukraine | Meeting evaluation reference group |
| 21. | Koshel Karina – National Police of Ukraine | Meeting evaluation reference group |

MFA

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| 22. | Rilinska Yuliia – Secretary of the Human Rights Department | Meeting evaluation reference group |
| 23. | Zhorniak Iryna – Advisor to the Minister | Meeting evaluation reference group |

Minregion

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| 24. | Zarya Andriy – Deputy Head of Division for Monitoring of Operation and Maintenance of Housing stock, Department of Utilities and Housing Stock | Group interview |
| 25. | Helesku Kateryna | Meeting evaluation reference group |
| 26. | Mozharovska Olha – Chief Specialist of State Service on Geodesy | WG group discussion |

State Statistics Service of Ukraine

| | | |
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| 27. | Karmazina Olha – Department of State Services Accounting | interview |
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II. Other national level oversight bodies

| | | |
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| 28. | Suslova Iryna – Parliamentary, Head of Sub-Committee of Gender Equality and Non-discrimination, Parliament Committee on Human Rights, National Minorities and Trans-national Connections | Meeting evaluation management group; interview |
| 29. | Nahnybida Olha – Parliamentary Assistant | Meeting evaluation management group; |
| 30. | Kozub Lidiia – Representative of the Ombudsperson for Human Rights and Equality, Secretariat of the Ombudsperson | Meeting evaluation management group; interview |
| 31. | Parubok Viktoriia – Deputy Chief of Preventing and Combating Discrimination Department, Secretariat of the Ombudsperson | Meeting evaluation reference group; |
| 32. | Halyna Zhukovska – Apparatus of the Government Commissioner on Gender Equality Policy | Meeting evaluation management group; interview |

III. Regional and local level institutions

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| 33. | Kret Nadiia – Chief Specialist, Headquarters of Culture, National Minorities, Religions and Protection of Cultural Heritage of Odesa oblast | Meeting evaluation reference group |
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| Kharkiv | | |
| 34. | Chirik Olena – Deputy Head of Kharkiv Department of State Migration Service, Chief of Citizenship, Passports and Registration Unit | interviews |
| 35. | Inga Pantsyr – Main Specialist of Citizenship, Passports and Registration Unit, Kharkiv Department of State Migration Service | |
| 36. | Gaga Kiknadze – Press-Secretary of Kharkiv Department of State Migration Service | |
| 37. | Khvatynets Olena – Director of Kharkiv Oblast Center of Social Services for Family, Children and Youth | |
| 38. | Vartsabiuk Natalia – Deputy Director of Kharkiv Oblast Center of Social Services for Family, Children and Youth | |
| Merefa ATC authority | | |
| 39. | Deputy Head of the ATC on Social Issues | Group discussion |
| 40. | Representative of the Department of Education | |
| 41. | Representative of the Employment Service | |
| 42. | Merefa ATC Social Work Specialist | |
| Uzhgorod | | |
| 43. | Alexander Bilak, Deputy Mayor, Uzhgorod | interviews |
| 44. | Yuri Mandich, Elected Roma Local Councilor, Member of the Budget Committee, Local Council Uzhgorod | |
| 45. | Eleonora Kulchar, Advisor on Education and Social Development of National Minorities of the Chairman of the Regional Council, Roma mediator and head of the NGO Blago | |
| 46. | Sascha, representative from the Telmana settlement | |
| 47. | Tatjana Andrus, Head of the Rativtsi village council | |
| 48. | Natalia Muhomedyanoca, Head of City Education Department, Uzhgorod | |
| 49. | Yosip Rezosh, Head of Regional Administration's Department on National Minorities and Religious Affairs | |
| 50. | Oksana Babunich, Head of the Department of Culture at the Regional Administration | |
| IV. Civil society stakeholders | | |
| Roma NGOs, Roma mediators, Roma women | | |
| 51. | Kondur Julian – Project Coordinator, Chiricli | Group discussions; interview |
| 52. | Zhukovska Angelina – Project Coordinator, Chiricli | Group discussions; meeting evaluation reference group |
| 53. | Dorokhina Ludmila – Roma mediator, Chiricli (Kirovograd oblast) | Group discussion |

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| 54. | Zolotarenko Valentina – Roma mediator, Chiricli (Kyiv oblast) | Group discussion; interview |
| 55. | Darina Gorvat – Roma mediator Uzhgorod (Radvanka district) | Group discussion; interview |
| 56. | Nataliya Kovalchuk Roma mediator, Uzhgorod (Telmana and Piregovo) | Group discussion |
| 57. | Kazanskaya Aliona – Roma activist | Group discussions |
| 58. | Vadym Matushenko – Roma NGO “Romen fellowship” | interview |
| 59. | Ivan Matushenko – Roma NGO “Romem fellowship” | interview |
| 60. | Lola Kulchar, Head of Charity fund “Blago”, Uzhgorod | interview |
| 61. | Mykola Burlutskiy – Head of Roma NGO “Chachimo”, Kharkiv; Advisor to the Kharkiv Oblast Governor on Roma Issues | Interviews; group discussion |
| 62. | Pekarynina Orysia, Human Rights Lawyer of Roma NGO “Chachimo” | Group discussion |
| 63. | Anzhela Dubrova, Roma woman representative in the Meref’s Roma Initiative Group | Group discussion |
| 64. | Roma woman representative of settlement, Uzhgorod | Group discussion |
| | Group meeting with 10 Roma women in Zhmi- ivka village of Ivankiv rayon, Kyiv oblast | Group discussion |

Human rights and women’s CSOs

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| 65. | Golub Olexandra – Head of Women’s Rights League | Group discussion |
| 66. | Anosova Yulia – La Strada-Ukraine | |
| 67. | Selivanenko Volodymyr – Education Programs’ Coordinator, Amnesty International | |
| 68. | Martynenko Oleh – Analyst of Helsinki Human Rights Union | |
| 69. | Isaenko Ihor – Head of Internal Policy and Communication Department of Kharkiv Oblast Administration | |

V. International development partners

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| 70. | Agren Maria – Deputy Head of Mission, Embassy of Finland | Group discussion |
| 71. | Loza Dmytro – Project Officer, Royal Norwegian Embassy in Kyiv | Group discussion |
| 72. | Kondur Zemfira – Project Officer, Council of Europe | Group discussions; interview |
| 73. | Tiilikainen Katja – Gender Adviser, Council of Europe | Group discussion |
| 74. | Divinska Anastasiia – UN Women Representative | Group discussions; meetings EMG and ERG |
| 75. | Meshcheriakova Halyna – UN Women Programme Coordinator | Group discussions |
| 76. | Ponomarov Serhiy – Director of the Roma Program International Renaissance Foundation | Evaluation reference group; interview |
| 77. | Lopenko Viola – Roma Educational Program Manager International Renaissance Foundation | Evaluation reference group; interview |

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| 78. | Kuzmina Nataliia – Human Rights Officer, Office of the United Nations High Commissioner for Human Rights Monitoring Mission in Ukraine | Group discussion |
| 79. | Kuzmenko Lidia – Associate Legal Officer, United Nations High Commissioner for Refugees | |
| 80. | Zhluktenko Varvara – National Communications and Outreach Officer, International Organization for Migration | |
| 81. | Kolyshko Svitlana – Project Officer, UNDP | |
| 82. | Gailan Laura – JPC, UNDP | |
| 83. | Dan Doghi, Chief of the Contact Point for Roma and Sinti Issues, OSCE Office for Democratic Institutions and Human Rights | Written contribution/ answers to questions |

ANNEX 2: DETAILED GUIDING EVALUATION QUESTIONS AND OVERALL EVALUATION MATRIX

I. GUIDING EVALUATION QUESTIONS FRAMEWORK

| Evaluation criteria | Main questions | Sub-questions |
|--|---|---|
| A. RELEVANCE | | |
| Strategic responsiveness to beneficiary needs | 1. How well do the Strategy objectives correspond to the needs and priorities of the direct beneficiaries (Roma women and men, boys and girls)? | 1.1. How were the Roma Strategy and the NAP informed about the needs of Roma women and men, boys and girls? What type of: analysis and available data (disaggregated by gender), informed the decisions on priorities and planned measures? 1.2. How well were the needs of Roma communities, and specifically of Roma women and girls prioritized? 1.3. To what extent the measures in the NAP as designed are adequate to address root causes of inequalities (including the gender ones)? Is there shared understanding about these root causes? 1.4. Is there a vision for the strategic linkage and complementarity between the measures in the different sectors and levels of interventions? 1.5. How well did the Roma Strategy and NAP adapt to the subsequent contextual changes (changes in beneficiaries needs, country context, in policies, etc.)? |
| Strategic alignment | 2. Are the Roma Strategy and NAP aligned with other national strategies, policies and international and European obligations in the area of human rights and gender equality? | 2.1. How do the Roma Strategy and NAP align with the national, European and international (UN, OSCE, CoE) strategic plans, framework and obligations in the field of human rights and Roma inclusion? 2.2. How do the Roma Strategy and NAP align with the strategies and commitments in the field of women's rights and gender equality? To what extent gender equality policy is embedded in the Roma Strategy and NAP? To what extent mainstream gender policies also consider the needs of empowerment of Roma women? 2.3. What is the policy coherence with the decentralization process and the other on-going mainstream reforms in the different sectors (like education, health care, social services) which are of importance for effective implementation of the Roma Strategy and NAP? 2.4. To what extent are the Roma Strategy and NAP in coherence with other relevant national policies, such as the Human Rights Strategy, policies on Social Inclusion or Poverty Reduction? |

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| Inclusiveness and participation | 3. To what extent key national partners were involved in the conceptualization and design of the Roma Strategy and NAP? | <p>3.1. Who and how participated in the development of the Roma Strategy, of the NAP and respectively – of the regional action plans (where they exist)? How was the process facilitated?</p> <p>3.2. Were there consultative processes with key stakeholders – Roma NGOs, broader civil society, regional and local authorities? And was there any consideration to ensure that the interests of Roma women or women in general were represented in the consultation process?</p> <p>3.3. How was the International Community involved in the consultation and drafting process?</p> <p>3.4. How did collaboration with Roma civil society evolve over time? What were the key factors helping or hindering this involvement?</p> |
| Lessons and recommendations | 4. What are the main lessons and recommendations for the process of drafting the post 2020 Roma Strategy and NAP? | <p>4.1. Are the key objectives of Roma Strategy still relevant? What needs to change in the new post-2020 Strategy to increase its relevance? What kind of analysis need to inform these changes?</p> <p>4.2. Based on the experience with the design of the current Roma Strategy and NAP how should the process of drafting the new ones be organized? Who needs to be involved and how?</p> <p>4.3. How to improve the institutional mechanisms and consultation with Roma CSO at the national, regional and local levels (authority, timing)?</p> <p>4.4. Is there a need for better focus, prioritization and defining the linkages between the measures in the different sectors and levels of interventions, as well as with the mainstream reforms?</p> <p>4.5. What are the best ways to increase the gender responsiveness and to address strategically the needs of Roma women and girls?</p> |
| B. EFFECTIVENESS | | |
| Extent of achievement of results towards the objectives | 5. What is the progress towards the achievement of the expected general and specific results as planned in the Roma Strategy and NAP? | <p>5.1. Which were the most significant results achieved in the Roma Strategy and NAP implementation between 2013-June 2019: under which priority areas and at what level (national, regional, local)?</p> <p>5.2. Which of the measures and activities were most gender sensitive and contributed to the empowerment and better situation of Roma women and girls?</p> <p>5.3. Which factors contributed to the achievements observed? What else will be needed to sustain these achievements so that they contribute to the long-term change of the situation of Roma women and men, girls and boys?</p> <p>5.4. Which of the planned results were not achieved and why? What were the key factors for non-achievement of results?</p> <p>5.5. Which of the areas with lack of results are blocking the overall impact of the implementation of the Roma Strategy and NAP?</p> |
| Lessons forward | 6. What are the main lessons from the implementation of the current Roma strategy and NAP that can serve the drafting of the new ones? | <p>6.1. Which are the areas of the current Roma Strategy and NAP that need strengthening to increase their potential for their impact in the next planning period?</p> <p>6.2. Are there good practices of approaches and initiatives developed by civil society and other stakeholders that can be scaled up and mainstreamed in the new Strategy and NAP?</p> |

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| Monitoring and gathering evidence for results and reporting | 7. How effectively does the government monitor the Roma Strategy and NAP performance and results? | <p>7.1. What are the monitoring and reporting mechanisms in the framework of the Roma Strategy and NAP to measure progress towards results? Who and how does the monitoring and reporting? Is there capacity for that – what is in place and what is missing?</p> <p>7.2. How appropriate, gender sensitive and useful are the measures, indicators, activities and timeframe described in the Roma Strategy and NAP in assessing the progress?</p> <p>7.3. Are there indicators? If yes, are targeted indicator values realistic, gender sensitive and can they be tracked? If not, what were the main obstacles for developing them?</p> <p>7.4. How are Roma NGOs and particularly Roma women's groups involved in the monitoring and reporting?</p> <p>7.5. How were the findings and recommendations from the monitoring reports of civil society and international actors considered by the relevant institutions involved in the implementation and/or coordination of the Roma Strategy and NAP?</p> |
| Lessons forward | 8. How to increase the effectiveness of strategic performance and results monitoring? | <p>8.1. How to address the limitation of availability of data (ethnically and gender disaggregated)?</p> <p>8.2. Who and how should be involved in the monitoring and reporting?</p> <p>8.3. How to increase the capacities for results-based monitoring at the national, regional and local levels and its use for increased effectiveness towards the achieving the objectives of the Roma Strategy?</p> |
| Institutional capacities and their influence on effectiveness | 9. To what extent the capacity of government actors at different levels and the established coordinating mechanisms have influenced the effectiveness of implementation? | <p>9.1. Which capacities of government actors (at the national, regional, local levels) have contributed to the achievement of results?</p> <p>9.2. What capacities are missing or need to be further developed, and how these capacity gaps have affected the performance of the Roma Strategy and NAP?</p> <p>9.3. How effective was the established institutional mechanism for policy coordination for Roma inclusion within respective line ministries and between authorities from national, regional and local level? Were its mission, mandate and authority clear? Did it have enough policy coordinating capacity – what worked well and what were the gaps?</p> <p>9.4. Is there a clear understanding of the roles and responsibilities by all parties involved? Was the participation of key stakeholders to support the achievement of the objectives of the Roma Strategy and NAP well-articulated?</p> <p>9.5. Were the activities adequately distributed among different implementing partners and stakeholders?</p> |
| Lessons forward | 10. How the institutional set-up for policy coordination can be improved to increase strategic coherence and alignment? | <p>10.1. Is there a need for redesign of the institutional mechanism for policy coordination of the implementation of the Roma Strategy and NAP (also in view of participation of CSO and gender representation)?</p> <p>10.2. What will be the best options for improvement of the institutional set-up and what is their feasibility?</p> <p>10.3. What type of resources (human, financial, support for capacity building) will be needed?</p> |

C. EFFICIENCY**Allocated resources vs. results achieved**

11. Have resources (financial, human, technical support, etc.)

- 11.1. What funds were made available on annual basis in 2013-2019 for the implementation of the Strategy and NAP (from what sources, at what levels and for which priorities/objectives and measures?)
- 11.2. Were there sufficient human resources allocated at the national, regional and local levels?
- 11.3. Were there any efforts made to coordinate and secure donor funding (e.g. communication about progress, plans and fundraising efforts)?
- 11.3. What technical support was provided and was it used efficiently?
- 11.4. What were the main constraints (e.g. political, practical, and bureaucratic) identified in the implementation of the different actions and what level of effort was made to overcome these challenges?

D. SUSTAINABILITY**Leadership, political commitment. Technical capacities and partnerships**

12. What is the likelihood that the benefits from the Roma Strategy and NAP will be maintained for the post 2020 Strategy and NAP drafting and implementation?

- 12.1. To what extent the Roma Strategy and NAP succeeded in building individual and institutional capacities of rights-holders and duty-bearers?
- 12.2. Do national/local institutions demonstrate leadership, commitment and technical capacity to continue working on the implementation of the post-2020 Roma Strategy and NAP?
- 12.3. Are there effective partnerships established?
- 12.4. Do key national partners, including women's movements and women's organizations etc., have a voice and influence in the implementation of Roma Strategy and NAP?
- 12.5 To what extent the national mechanism/structure has the financial and human capacities to maintain the achieved results?

Financial viability

13. To what extent the Roma Strategy and NAP is specifically reflected in the national budget?

- 13.1. What have been the concrete allocation from the national budget for the implementation of the measures from the NAP?
- 13.2. What have been the budget allocations for the implementation of the measures by the regional and/or local authorities – a/ from the national budget?; b/ from the regional/local budgets?
- 13.3. Were there financial contributions to the implementation of the Roma Strategy and NAP from other sources?

Lessons forward

14. How to ensure sustainability when drafting the new post 2020 Roma strategy and Plan

- 14.1. How to ensure adequate and strategic allocation of resources for the next Roma Strategy and Plan?
- 14.2. What is realistic to expect as local budget support to the measures in the NAP (in the framework of the process of decentralization) and what support needs to be envisaged in the national budget?
- 14.3. Which are the key partnerships that need to be strengthened and or developed to ensure that the new Strategy and NAP will have positive impact on the situation of Roma men and women, boys and girls?

II. EVALUATION MATRIX

| Evaluation criteria | Main questions | Indicators for positive direction | Data collection methods and sources |
|--|---|--|---|
| A. RELEVANCE | | | |
| A1. Strategic responsiveness to beneficiary needs | 1. How well do the Roma Strategy objectives correspond to the needs and priorities of its direct beneficiaries (Roma women and men, boys and girls)? | <p>Priorities of the Roma Strategy result from assessment and gender sensitive analysis of the needs of Roma women and men, girls and boys which are well understood and prioritized</p> <p>The actions of in the NAP address the root causes of inequalities (including the gender ones) which are well understood by all parties involved</p> <p>Strategic linkage between the different sectors actions and levels of interventions is in place</p> <p>Changes in the context are carefully analyzed and policy implementation is well adapted to new emerging needs</p> | <p>Analysis of the Roma Strategy and NAP documents; review of civil society and international partners monitoring reports</p> <p>Interviews with central institutions</p> <p>Group discussions with civil society, with working groups in different sectors</p> <p>Group discussion with international partners</p> <p>Feedback on beneficiary needs – focus groups with Roma women, meetings with Roma men and women during the field visits</p> |
| A2. Strategic alignment | 2. How well do the Roma Strategy and NAP aligned with other national strategies, policies and international and European obligations in the area of human rights and gender equality? | <p>Roma Strategy and NAP are interconnected with other national, EU and international policy frameworks in the area of human rights and Roma inclusion</p> <p>Gender equality policy is well embedded in the Roma Strategy and NAP aligning its implementation with national strategies and international commitments for gender equality</p> <p>Risk assessment of other mainstream policy and reform processes' effects on Roma women and men, girls and boys (decentralization, reforms in education, health care, social services) conducted resulting in shared mitigation strategies</p> <p>The Roma Strategy and NAP are coherent with the National Human Rights Strategy and policies on Social Inclusion or Poverty Reduction</p> | <p>Review of strategic documents related to national strategies and international and European frameworks on human rights and gender equality</p> <p>Interviews with human rights and gender related oversight bodies</p> <p>Group discussion with human rights, gender and women's organizations</p> |
| A3. Inclusiveness and participation | 3. To what extent key national partners were involved in the conceptualization and design of the Roma Strategy and NAP? | <p>Well designed and facilitated consultative processes with key stakeholders – Roma NGOs, Roma women, broader civil society, regional and local authorities, as well as with the International community was conducted</p> <p>There is increased partnership with Roma civil society</p> | <p>Group discussion with Roma NGOs</p> <p>Group discussions with human rights and women's civil society organizations</p> <p>Interview with the Renaissance foundation</p> |

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| A4. Lessons and recommendations | 4. What are the main lessons and recommendations for the process of drafting the post 2020 Roma Strategy and NAP? | Key stakeholders discuss and have shared understanding of the main lessons from the Roma Strategy implementation and provide recommendations for improving the process and design of the new post 2020 Roma Strategy, also ensuring its gender responsiveness | Interviews with central institutions and oversight bodies Group discussion with Roma NGOs Facilitated workshop with the evaluation reference group |
| B. EFFECTIVENESS | 5. What is the progress towards the achievement of the expected general and specific results as planned in the Roma Strategy and NAP? | Planned actions have led to visible results at national, regional and local levels towards improving the situation of Roma women and men, girls and boys by increasing their opportunity to practice their civic and human rights and equal participation in society Non achievement of results is discussed and lessons for improvement are extracted | Review and analysis of planning and reporting documents (of the interagency Group, of each of the five working groups) Interviews with central institutions and oversight bodies; Group discussions with each of the five working groups of the interagency Group |
| B1. Extent of achievement of results towards the objectives | | | |
| B2. Lessons forward | 6. What are the main lessons from the implementation of the current Roma strategy and NAP that can serve the drafting of the new ones? | There is shared understanding of the gaps and needs for improvement of the different areas of the current Strategy and NAP Good practices of approaches and initiatives developed by civil society and other stakeholders are analyzed and considered for scaling up in the new Roma strategy | Group discussion with Roma NGOs and mediators Field visits/two regional case studies; meetings with oblast administration Feedback from Roma communities during the field visit Facilitated discussion with the evaluation reference group |
| B3. Monitoring and gathering evidence for results and reporting | 7. How effectively does the government monitor the Roma Strategy and NAP performance and results? | There are clearly defined indicators with well targeted, realistic and gender sensitive values which can be tracked for data generation to inform the policy update processes Institutional capacity for results-based monitoring is increased Roma NGOs and Roma women's groups are involved in the monitoring and reporting. Their findings and recommendations are taken into account into the policy process | Review and analysis of reporting documents; Interviews and group discussion with central institutions Meetings with oblast and local level administration during field visits Group discussions with Roma NGOs and mediators |
| B3-1. Lessons forward | 8. How to increase the effectiveness of strategic performance and results monitoring? | Possibilities for overcoming the lack of data (ethnically and gender disaggregated) are jointly discussed to develop policy alternatives Capacities for interactive and collaborative results-based monitoring and reporting is in place | Group discussion with international partners; interviews and group discussions with central institutions Group discussion with civil society (Roma NGOs, human rights and women's NGOs Facilitated discussion with the evaluation reference group |

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| B4. Institutional capacities and their influence on effectiveness | 9. To what extent the capacity of government actors at different levels and the established coordinating mechanisms have influenced the effectiveness of implementation? | There are increased institutional capacities of government actors (at national, regional, local levels) to address the issues of Roma inclusion institutional policy coordination mechanism for implementation of the Roma inclusion policies is with clear mission, mandate and authority Good interaction among central institutions, and between the authorities from national, regional and local level based on clarity and shared understanding of their roles and responsibilities | Interviews with central level institutions and oversight bodies Group meetings with the NAP's implementation working groups Group discussions with civil society (Roma NGOs and Roma mediators, human rights and women's NGOs) |
| B4-1. Lessons forward | 10. How the institutional set-up for policy coordination can be improved to increase strategic coherence and alignment? | Policy coordination institutional mechanisms are well resourced with sufficient human and financial resources and capacity building support Civil society and women, especially Roma women are well represented, with clear roles and functions | Group discussion with international partners Facilitated discussion with the Evaluation reference group |
| C. EFFICIENCY | 11. Have resources (financial, human, technical support, etc.) been allocated strategically to achieve the Roma Strategy and NAP results? | There are sufficient financial and human resources allocated at the national, regional and local levels for the implementation of the Roma Strategy. Additional funding is also attracted from other sources to ensure implementation Political, practical, and bureaucratic constraints are discussed and acted upon in an efficient manner | Review of policy and reporting documents Desk research of monitoring reports of civil society and other international actors, as well as group meetings with Roma NGOs Findings from the field visits to two regions Group meetings with the 5 working groups for the NAP implementation |
| C1. Allocated resources vs. results achieved | | | |
| D. SUSTAINABILITY | 12. What is the likelihood that the benefits from the Roma Strategy and NAP will be maintained for the post 2020 Strategy and NAP drafting and implementation? | National and local institutions demonstrate leadership, commitment and technical capacity to maintain and build upon achieved results Established partnerships with different stakeholders and especially with civil society are effective and will be sustained in the future Women's movements and Roma women's organizations have a voice and influence in the policy process | Interviews and group meetings with representatives of central and local level institutions Group meeting with Roma NGOs and mediators Group meeting with women's organizations Interviews with Roma women's organizations |
| D1. Лідерство, політичне прагнення. Технічні можливості і партнерські зв'язки | | | |

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| D2. Financial viability | 13. To what extent the Roma Strategy and NAP is specifically reflected in the national budget? | The Roma Strategy and NAP is supported with adequate concrete allocation from the national and local budgets | Evaluation reference group |
| D3. Lessons forward | 14. How to ensure sustainability when drafting the new post 2020 Roma strategy and Plan | There is clear strategy and plan to ensure sustainability of consistent actions in the area of Roma inclusion | |

ANNEX 3: ROMA STRATEGY SPECIFIC OBJECTIVES AND CORRESPONDING ACTIVITIES FROM THE ACTION PLAN

In the course of the analysis of the effectiveness of the implementation of the Roma Strategy, the evaluation team developed this table as a working document to track the consistency between the specific objectives under each of the strategic areas in the strategy document with the listed activities in the Action Plan for its implementation.

The formulation of the objectives and activities are taken directly from the official documents in their English version. The activities follow the original numbers as listed in the Action Plan.

| Strategy area 1) as regards the legal protection of Roma nationals: | |
|---|---|
| Action Plan section: General issues | |
| Strategy specific objectives | Action plan – activities* *(activities are numbered as in the Action Plan) |
| 1.1. to involve representatives of Roma public associations, in accordance with the established procedure, in the resolution of public life issues, namely to work out and discuss relevant draft acts and decisions affecting the situation of the Roma national minority; | Activity 10. Ensure cooperation between executive authorities and Roma public associations as regards the life-sustaining activity of the Roma minority. Activity 11. To involve Roma public associations in the public assessment of the effectiveness of actions regarding the implementation of the Strategy. |
| 1.2. to raise Roma nationals' legal awareness; | Activity 2. Carry out awareness-raising activities for members of the Roma national minority to raise awareness of human rights. Activity 9. Prepare and involve members of the Roma national minority in the next all-Ukrainian population census. |
| 1.3. to take measures to prevent discrimination against Roma nationals; | No activity/measures found in the Action Plan to address this objective |

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| 1.4. to render assistance in the receipt of documents confirming identity and citizenship, and certificates for the state registration of instruments of civil status by Roma nationals who legally reside in Ukraine; | <p>Activity 3. Ensure joint meetings between representatives of the State Registration Service and State Migration Service with representatives of Roma community associations to address the issue of registering members of the Roma national minority, and issuing Ukrainian birth certificates and passports.</p> <p>Activity 4. Assist in obtaining identity documents and papers confirming citizenship, birth certificates and certificates for the state registration of instruments of civil status by members of the Roma national minority legally residing in Ukraine.</p> <p>Activity 5. Initiate the registration of Roma nationals who have received a document confirming identity and citizenship</p> <p>Activity 6. Issue and distribute in areas densely populated by members of the Roma national minority informational materials on the procedure for obtaining documents confirming identity and citizenship, birth certificates and certificates for the state registration of instruments of civil status.</p> |
| 1.5. to extend cooperation with international organizations for the protection of Roma nationals; | Activity 8. Attract experts and the technological capacity of international organisations to fulfill the tasks of integrating members of the Roma national minority into Ukrainian society. |
| 1.6. to promote the formation of a tolerant attitude towards Roma nationals in society; | Activity 1. Carry out an awareness campaign for counteracting the biased attitude towards members of the Roma national minority. |
| does not relate to any of the objectives under the Strategy's legal protection area; but listed as activity under the general issues in the Action plan | Activity 7. In areas densely populated by members of the Roma national minority, ensure via law enforcement agencies and social services preventive work against neglect, child homelessness, involvement in criminal and other illegal activities, family violence, drug and tobacco addiction, and alcoholism. |
| Strategy area 2) as regards the social protection and employment of Roma nationals: | |
| Strategy specific objectives | Action plan – activities |
| 2.1. to implement social policy to ensure the social protection of Roma nationals, including families with children, orphans, children deprived of parental care, children in difficult living conditions, retirees and single disabled and homeless persons, as well as assistance to Roma nationals in finding employment; | <p>Activity 12. Ensure the identification and coverage of Roma families with children in difficult living conditions by social services.</p> <p>Activity 13. Monitor the allocation and use of state social assistance, in particular, upon the birth of a child.</p> <p>Activity 14. Contribute to the involvement of charitable, public and religious organisations before the provision of social assistance to members of the Roma national minority.</p> <p>Activity 15. Raise awareness of social services provided by the State Employment Service in areas densely populated by the Roma national minority.</p> |
| 2.2. to hold systematic awareness campaigns among Roma nationals to prevent violence and ill-treatment in the family, and abuses in the worst forms of child labour; | No specific activity found in the relevant section of the Action Plan; but Activity 7 listed under the General issues section can fit in here |

2.3. to take measures to eliminate discrimination in the employment of Roma nationals;

No specific measure found in the Action Plan

2.4. to involve Roma nationals in socially beneficial activities;

Activity 16. At the written request of members of the Roma national minority, ensure in their densely populated areas vocational guidance to help motivate finding employment, acquiring skills for relevant occupations and specialties on the labour market, as well as awareness campaigns on starting their own business.

Activity 17. At the request of Roma public associations, facilitate:
the involvement of members of the Roma national minority in job fairs;
the employment of Roma national minority graduates who have completed their education in higher educational institutions in areas densely populated with Roma nationals;
the employment of Roma national minority graduates from general, vocational and higher educational institutions in public and other temporary jobs.

2.5. to ensure interaction between social service and employment sector employees and Roma public associations;

No specific measure found in the Action Plan

Strategy area 3) as regards the improvement of Roma nationals' education level:

Strategy specific objectives

Action plan –activities

3.1. to increase awareness among Roma nationals through public associations, the instructional staff of educational institutions, and the officials of local executive authorities on the importance of preschool, general secondary, vocational and higher education institutions for children;

Activity 18. Ensure the instructional staff of general educational institutions, representatives of education authorities of local state administrations and local self-government bodies, and public associations carry out explanatory work on the importance of education, especially for children and young people, among members of the Roma national minority.

Activity 22. Carry out activities to increase the number of Roma children from three to six years old attending pre-school educational institutions.

Activity 23. Ensure the registration of Roma school-aged children to maximise their involvement in the educational process.

3.2. to facilitate interaction between the instructional staff of educational institutions and Roma public associations;

Activity 24. Ensure ongoing workshops for the staff of general education institutions attended by members of the Roma national minority.

3.3. to take measures to reduce the number of Roma nationals who do not graduate from general education institutions;

Activity 20. Explore issues related to the preparation and publication of study guides for general education institutions attended by members of the Roma national minority

Activity 29. Explore the need to train Roma language teachers.

Activity 30. Improve the skills and experience level of the teaching staff of general educational institutions attended by Roma pupils.

Activity 21. Explore the possibility of providing Roma pupils with free transport in areas densely populated by members of the Roma national minority who reside more than three kilometers from the nearest general educational institution.

Activity 24. Monitor Roma pupil attendance of general education institutions and take measures in terms of the parents or persons responsible for their upbringing to ensure they are systematically attending class.

Activity 25. Carry out activities to increase the number of Roma pupils attending general education institutions.

Activity 26. Facilitate the involvement of Roma pupils in extracurricular, out-of-school activities, specialised competitions, sporting events, clubs, etc.

Activity 28. Utilise school psychologists to administer psychological assistance to Roma pupils to successfully adapt them to the educational process.

3.3. to carry out vocational guidance to encourage Roma nationals to pursue vocational and higher education;

Activity 27. Improve the profiles of school labour training in general education institutions attended by Roma pupils, giving due consideration to traditional Roma crafts.

Activity 31. Establish vocational guidance to encourage members of the Roma national minority to obtain vocational training and higher education.

Strategy area 4) as regards the health of Roma nationals:

Strategy specific objectives

Action plan – activities

4.1. to distribute information among Roma nationals about the healthcare system and the procedure for seeking treatment in healthcare institutions;

Activity 35. Ensure the distribution of information on the whereabouts of healthcare facilities, the procedure for their access and use of their services among members of the Roma national minority.

Activity 36. Facilitate access among members of the Roma national minority to medical examinations, and the provision of in-patient treatment and emergency medical care in public and communal health facilities.

Activity 38. Provide mandatory tuberculosis screenings in areas densely populated by members of the Roma national minority.

4.2. to provide information to the employees of healthcare institutions about Roma traditions, culture, housing and living conditions in order to take such information into account when providing medical assistance to Roma nationals;

Activity 32. Provide information to employees of state health care institutions on the national mentality of members of the Roma national minority.

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| 4.3. to draw special attention to the health of Roma children; | Activity 37. Ensure the immunisation of members of the Roma national minority in compliance with the vaccination calendar. |
| 4.4. to advocate for a healthy lifestyle and health improvements among the Roma; | <p>Activity 33. Conduct explanatory work in areas densely populated by members of the Roma national minority on a healthy lifestyle, the need for preventive examinations, and the importance of timely and proper treatment.</p> <p>Activity 34. Ensure placement in healthcare facilities and the dissemination in areas densely populated by members of the Roma national minority of handouts, leaflets, stands, etc. on the promotion of a healthy lifestyle.</p> <p>Activity 39. Ensure the implementation of state sanitary and epidemiological oversight, as well as sanitary and epidemiological examinations in areas densely populated by members of the Roma national minority, with the involvement of representatives from Roma public associations.</p> <p>Activity 40. Ensure the availability of primary care through the establishment of a network of outpatient clinics in accordance with the standards approved by the Ministry of Health.</p> |

Strategy area 5) as regards the improvement of housing and living conditions of Roma nationals:

| Strategy specific objectives | Action plan – activities |
|---|---|
| 5.1. to take measures on the improvement of social infrastructure in areas of Roma national residence; | Activity 41. Use legislation to contribute to the solution of issues regarding the provision of members of the Roma national minority with housing; the improvement of housing, living conditions, social infrastructure, appropriate communications, and the improvement of areas where they have a dense population. |
| 5.2. to assist the Roma in resolving housing issues in accordance with the legislation, participation in preferential loans for the purchase and construction of housing; | <p>Activity 42. In areas densely populated by members of the Roma national minority, ensure the dissemination of information on programmes for preferential loans for the purchase and construction of housing.</p> <p>Activity 43. Assist in allocating, in accordance with the legislation, land plots for the construction of individual housing (cooperative) and private farms to members of the Roma national minority.</p> <p>Activity 44. In accordance with legislation, encourage involvement in the framework of the social housing programme of members of the Roma national minority and who are in the housing register.</p> |

Strategy area 6) as regards the satisfaction of the cultural and informational needs of Roma nationals:

| Strategy specific objectives | Action plan – activities |
|------------------------------|--------------------------|
|------------------------------|--------------------------|

| | |
|---|--|
| 6.1. to promote the preservation and development of Roma culture and arts; | <p>Activity 45. Facilitate the establishment and operation of Roma cultural centres in areas densely populated by members of the Roma national minority.</p> <p>Activity 46. Support Roma art groups.</p> <p>Activity 47. Ensure the involvement of Roma art groups in national and regional cultural and art events with the participation of national minorities.</p> <p>Activity 48. On preferential terms and in state-owned and communal premises and buildings, assist Roma public associations and Roma art groups hold cultural and arts activities, and awareness campaigns on the rights and meeting the ethno-national needs of members of the Roma national minority.</p> <p>Activity 50. Facilitate the formation and operation of the extracurricular education and leisure studio for musically gifted Roma children in fields such as choreography and musical and vocal art, in the Transcarpathian Regional Palace of Children and Youth Creativity.</p> <p>Activity 51. Promote the involvement of Roma amateur groups in international cultural and art activities.</p> |
| 6.2. to assist in the dissemination of information on the life and cultural identity of Roma nationals in the media | <p>Activity 49. Assist in holding:</p> <ul style="list-style-type: none"> • cultural and arts activities to preserve the ethnic identity of the Roma national minority; • awareness campaigns on issues of ensuring the protection and integration of members of the Roma national minority into Ukrainian society. <p>Activity 52. Research the history, culture, language and socio-cultural integration of the Roma national minority.</p> <p>Activity 53. Contribute to the publication of Romskyi Pravoznavchyi Visnyk («Roma Jurisprudential Bulletin»), the Romenvad Scientific Journal («Roma-oriented information»), and collections of fairy tales and proverbs in the Roma language.</p> <p>Activity 55. Prepare and broadcast on the Odessa Regional State Television and Radio Company a 15-minute programme dedicated to Roma topics as part of the Inter Odesa TV programme.</p> <p>Activity 56. Assist in covering the life-sustaining activities of the Roma national minority, and activities to ensure its protection and integration into Ukrainian society through state-owned audio-visual media.</p> |

ANTICIPATED RESULTS (AS DESCRIBED IN THE STRATEGY DOCUMENT)

Implementation of the Strategy shall help:

- create conditions to comply with recommendations on the liberalisation of the visa regime between the European Union and Ukraine;
- ensure integration of the Roma national minority into Ukrainian society;
- prevent discrimination against Roma nationals;
- improve the educational level among Roma nationals;
- improve the health of Roma nationals;
- improve the housing and living conditions of Roma nationals;
- promote the employment of Roma nationals.

ANNEX 4: SUMMARY LIST OF RECOMMENDATIONS COMING FROM KEY REPORTS FROM INTERNATIONAL COMMUNITY AND CIVIL SOCIETY BETWEEN 2014-2018

Based on the review of seven key monitoring, analysis and assessment reports done by civil society or international stakeholders, down below we have summarized excerpts from their recommendations according to the evaluation criteria of this evaluation. This

was a working document for the evaluation, but we attach it as it can be very useful in the more detailed discussions in the follow up process of the development of the post 2020 strategy.

- OSCE ODIHR (2014): Situation Assessment Report on Roma in Ukraine and the Impact of the Current Crises
- OSCE/ODIHR (June, 2018): Access to Personal Documents for Roma in Ukraine: More Efforts Needed
- Sub-committee on gender equality and non-discrimination, Committee on Human Rights, National Minorities and Interethnic Relations Committee on Human Rights, National Minorities and Interethnic Relations of the Verkhovna Rada of Ukraine, UN Women Ukraine, OHCHR/HRMMU Ukraine (November, 2018): OPERATIONAL RECOMMENDATIONS to the Outcome Document of the International Conference, Realizing the Rights of Roma Women in Ukraine, 17-18 October 2018, Kyiv, Ukraine
- COALITION OF ROMA NGO IN UKRAINE "STRATEGY 2020": Roma Rights in Ukraine: Problems, Challenges, Perspectives
- Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy
- ERRC, Roma Women Fund "Chiricli" (2016): Written Comments of the European Roma Rights Centre and the International Charitable Organization Roma Women Fund "Chiricli" Concerning Ukraine For Consideration by the Committee on the Elimination of All Forms of Discrimination against Women

Roma Women's Fund Chiricli/ UN Women (2018). The Rights of Roma Women in Ukraine

RELEVANCE

OSCE ODIHR (2014): Situation Assessment Report on Roma in Ukraine and the Impact of the Current Crises

- Collect comprehensive gender disaggregated official data on the number of Roma in Ukraine, as well as on their socio-economic situation. The data should be collected on the basis of voluntary self-identification and used to inform the development of national and regional policies targeted at improving the situation of Roma in the country.
- Review and amend the national Strategy and NAP in close consultation with Roma civil society and in line with the 2003 OSCE Action Plan on Improving the Situation of Roma and Sinti in the OSCE. The revised Strategy and NAP should recognize the discrimination that Roma face in all areas of life (including in education, employment, housing and health) and should pay particular attention to the needs of Roma women.
- Clearly-defined objectives, indicators and a realistic budget should also be included in the Strategy.

Sub-committee on gender equality and non-discrimination, Committee on Human Rights, National Minorities and Interethnic Relations Committee on Human Rights, National Minorities and Interethnic Relations of the Verkhovna Rada of Ukraine, UN Women Ukraine, OHCHR/HRMMU Ukraine (November, 2018): OPERATIONAL RECOMMENDATIONS to the Outcome Document of the International Conference, Realizing the Rights of Roma Women in Ukraine, 17-18 October 2018, Kyiv, Ukraine

Promoting gender equality, human rights and protection of national minorities, including rights of Roma women

1 We underline that gender equality is key for advancing development, peace and security and acknowledge that Roma women face multiple forms of discrimination and that change requires both, mainstreamed and targeted policies and prac-

tical actions to end inequality and ensure full enjoyment of equal rights and opportunities.

2 We recognize that considering the great diversity of population in Ukraine, the overall institutional attention to minority issues is currently insufficient and the efficiency of the cross-sectoral cooperation and coordination, as well as a capacity of the existing national institutional institutions addressing Roma integration, in particular of the Ministry of Culture and the Interagency Working Group on Coordination of Implementation of the Action Plan for Roma Strategy, are limited.

3 We recommend to authorities at all levels promoting full implementation of anti-discrimination legislation and laws providing protection of rights of minorities as key recovery and transition agenda in Ukraine.

4 We recommend relevant authorities addressing prejudice and discriminatory practices of staff in public administration, law enforcement and judiciary with investing in their education and enhancing their capacities for professional, gender sensitive and human rights compliant behaviour.

5 We recommend national authorities the development and implementation of a nation-wide awareness raising campaign promoting human rights of Roma women and men targeting a range of audiences to address and counter the prejudices, stigma and discrimination of the majority population towards Roma women and men and work with media for promoting respect of human rights, inclusion and diversity, highlighting the good practices and positive role models.

6 We recommend that line ministries, regional and local authorities are inclusive to the needs and pay attention to multiple forms of discrimination faced by Roma women when implementing mainstream policies promoting gender equality, in particular the State Social Programme on Equal Rights and Opportunities, the National Action Plan for the Implementation of the Recommendations of the Concluding Observations of the United Nations Committee

on the Elimination of Discrimination against Women and the National Action Plan on the Implementation of the UN Security Council Resolution 1325 on Women, Peace and Security.

7 We commit working on full inclusion, participation and representation of Roma women in policy making, implementation and evaluation on matters of their concern and for this purpose support the creation of a robust representative body of Roma women to voice their interests and concerns.

8 We call the respective authorities ensuring effective integration of the recommendations by the UN Treaty Bodies, particularly those of CEDAW and International Convention on the Elimination of Racial Discrimination (ICERD) and by regional organizations, including the Council of Europe (CoE) and the Organization for Security and Co-operation (OSCE) on the national gender equality policies and improving the situation of Roma in the sectoral reforms, regional and local strategies, programmes and plans. To host national, regional and local debates to disseminate the findings and discuss them with local authorities and civil society.

9 We recommend strengthening the participation of Roma women in monitoring the implementation of CEDAW and ICERD and invest in awareness raising of rights holders about international human rights instruments promoting non-discrimination and gender equality and build capacity of Roma women to submit civil society reports to the Committees of UN human rights treaty bodies. In this respect include Roma women representation in state delegations.

Promoting targeted policies for Roma inclusion and rights of Roma women

1 We urge the Government of Ukraine for an improved post-2020 Roma Strategy building on international standards and taking into account existing good practices promoting Roma inclusion. In particular we recommend to meet existing recommendations of international human rights institutions and to ensure that Roma policies are promoting gender equality and rights of Roma women.

2 We recommend the Government of Ukraine identifying an adequate and capable national institution and inter-ministerial body to oversee the implementation of the Roma Strategy, to ensure cross-sectoral coordination and monitor and evaluate the implementation of Ukraine's international commitments. The national institution has to have authority, clear mission and mandate as well as adequate human and financial resources. It should also have authority for oversight of responsible executive institutions and structures for implementation of the national Roma Strategy.

3 We recommend national, regional and local level authorities ensuring adequate resources for the implementation of the Roma Strategy from the national, regional and local budgets.

4 We urge the Government of Ukraine setting up an evidence-based policy approach, grounded on the analysis of sex disaggregated data by regions. We also propose a gender-responsive and human rights-based evaluation of the Roma Strategy to inform the development of the post-2020 Roma Strategy and action plan. Roma targeted policies and programmes have to ensure a gender mainstreaming and targeted approach responding to the needs of Roma women.

5 We commit supporting and recommend initiatives to ensure nation-wide participatory approach involving all stakeholders – national, regional and local authorities, civil society organizations, including Roma women's groups – in development of the post-2020 Roma Strategy.

COALITION OF ROMA NGO IN UKRAINE "STRATEGY 2020": Roma Rights in Ukraine: Problems, Challenges, Perspectives

The Government of Ukraine

- Amend the National Strategy and Plan of Implementation in response to the current state of the human rights environment for the Roma population in Ukraine.

- Evaluate the annual implementation of the Strategy, focusing not only on state reports but also on the views of non-governmental organizations working in the field of Roma rights.
- Conduct an all-Ukrainian population census, and provide support for the collection of disaggregated statistics on the Roma population.
- Develop and disseminate guidelines among government agencies to ensure documents and public materials do not contain derogatory language or stereotypes.

Local authorities

- Develop annual action plans for implementation of the Strategy, including deadlines, responsible departments and services and indicators for implementation, with a clear system in place to monitor progress.
- Develop partnerships with civil society organizations that protect Roma rights to design targeted mechanisms for Roma, including an external evaluation of the implementation of the Strategy.

Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy

Data collection

- Support accurate and disaggregated data collection on Roma to inform policy-making: The absence of reliable information on the specific needs of different Roma, including undocumented groups and internally displaced persons (IDPs), should be remedied through surveys, mapping and assessments undertaken with the close involvement of Roma community representatives and NGOs.
- Measures to ensure inclusion of Roma in 2020 census are essential: one of the key barriers to gathering the necessary statistical information to develop effective inclusion policy lies in the low recording of Roma in census information, in part because fear of discrimination means many Roma do not identify themselves. Planning for Roma inclusion in the census needs to start immediately, with a decentralized

awareness raising campaign in Roma communities, training for census officials on inclusive practice and the direct involvement of Roma intermediaries (such as counsellors, mediators and NGOs) in the census process.

- Develop a better understanding of the social, economic and cultural variety within the Roma population, as well as the specific challenges experienced by certain groups such as women, children and migrants: as Roma communities in Ukraine are highly diverse and face a variety of contexts depending on region, educational level, access to documentation and other factors, any policies aimed at promoting Roma inclusion need to recognize and reflect these differences.

EFFECTIVENESS

OSCE ODIHR (2014): Situation Assessment Report on Roma in Ukraine and the Impact of the Current Crises

- Create an effective interministerial co-ordination mechanism for the implementation of the Strategy and NAP, and ensure the close participation of Roma, including Roma women, in the implementation and evaluation of the Strategy and NAP.
- Maximize ownership of Roma in all policies affecting them at the national and local levels.
- Provide civil registration documents and, in particular, birth certificates to all Roma without documents. Documents should be provided by law and without discrimination, and procedures to obtain documents should be simplified to remove obstacles and avoid burdensome processes.
- Ensure that all Roma children have access to quality education and abolish the practice of segregating Roma children in Roma-only classrooms or schools.
- Build trust and understanding between the police and Roma, including by implementing training programmes on anti-discrimination and community policing, and conduct awareness-raising activities on the situation of Roma to counter prejudices among

law enforcement officials. Ensure that all instances of violence against Roma, including between February and August 2014, are effectively investigated by the Ukrainian authorities and that those responsible are prosecuted.

With regard to displaced Roma in Ukraine

- Promote a tolerant environment for displaced persons and refrain from any negative portrayals of displaced persons or groups.
- Recognize the particularly vulnerable situation that Roma face in displacement due to a lack of civil or residence registration documents, as well as their marginalized position in society.
- Establish a legislative framework for providing protection and assistance to all internally displaced persons (IDPs) in line with international standards, and create effective mechanisms for its implementation.
- Provide shelter and humanitarian assistance to all IDPs without discrimination, including to displaced Roma and, if required, identify durable solutions, including access to adequate housing and employment, health care and basic education, with due consideration of the specific needs of men and women.
- Facilitate the voluntary return of Roma IDPs without discrimination.
- Conduct outreach activities to Roma communities to inform them of existing assistance schemes and humanitarian support for displaced persons.
- Include Roma civil society and community representatives in consultations and needs assessments on the protection of displaced persons and ensure their active participation in outreach to their communities.
- Ensure that displaced Roma children have access to education.

OSCE/ODIHR (June, 2018): Access to Personal Documents for Roma in Ukraine: More Efforts Needed

A. General recommendations related to Roma access to personal documents

The Ukrainian authorities should reiterate their commitments and the political will at all levels (central, regional and local) to take a more active approach towards the problem of the lack of personal documents among Roma by:

- (a) amending the Strategy for the Protection and Integration of the Roma National Minority into Ukrainian Society by 2020 with clear benchmarks, measures and activities necessary for the improvement of Roma access to personal documents in Ukraine;
- (b) setting up a strong, effective mechanism for implementation of the Strategy and the coordination of the activities aimed at solving the remaining challenges related to Roma access to personal documents;
- (c) working more actively with the representatives of civil society and Roma activists to find systemic solutions for effective measures and activities aimed at solving remaining challenges Roma face in accessing their personal documents;
- (d) working more actively with international organizations and the international donor community to find systemic solutions for implementing effective measures and activities aimed at solving the remaining challenges Roma face in accessing their personal documents;
- (e) allocating sufficient funds for immediate assessment of the needs of Roma without personal documents and the specific challenges they experience in that regard, mapping of the remaining challenges and cross-cutting issues (i.e. discrimination of Roma women, early and child marriages, home births, internal displacement, etc.);
- (f) unifying administrative practices among the regions of Ukraine in the issuing of internal passports on the one hand, and sharing good practices related to Roma access to personal documents and birth registration among civil servants and other relevant stakeholders on the other;

(g) more actively seeking the technical, financial and other support of the international community and other relevant stakeholders for this issue.

B. Changes to legislation and regulations

The Ukrainian authorities should also consider amending the existing laws and regulations that impede Roma access to personal documents, particularly the following:

(a) introduction of amendments to Article 14 of the Law of Ukraine on Free Legal Aid by adding a category of beneficiaries who do not need to prove their monthly wages – based solely on their claim for the establishment of the fact of birth;

(b) introduction of amendments to the existing Law of Ukraine on Free Legal Aid in order to specifically allow alternative forms of evidence of identity beyond internal passports that would provide Roma with enhanced access to free legal aid in cases where applicants are unable to present a birth certificate, passport or other identification document;

(c) improvement to the deployment of the capacities of local civil society organizations and activists in providing Roma with the legal aid necessary for access to personal documents;

(d) introduction of amendments providing that alternative forms of proof of identity besides the internal passport are to be accepted, such as extracts or copies (duplicates) in the absence of original identity documents in civil or administrative procedures for obtaining personal documents or for the establishment of the fact of birth, pursuant to the relevant laws;

(e) exemption from fees for the administrative and/or court procedures related to establishment of the fact of birth, identification of a person, and obtaining a passport or a duplicate of a passport (if lost or stolen);

(g) introduction of obligatory written decisions on rejection of applications for birth registration, obtaining internal passports or registration of residence;

(h) abolition of fines in cases when applicants fail to obtain personal documents in accordance with the law;

(i) simplification of administrative procedures, particularly those related to the identification of a person before the State Migration Service (SMS);

(j) simplification of procedures for civil registration and procedures for obtaining personal documents by introducing specific procedures in cases when applicants are illiterate or unfamiliar with specific legal requirements in their cases, including a relative of the applicant or third person being allowed to write the applicant's explanation instead of requiring involvement of a licensed lawyer for the same purpose;

(k) introduction of identity witnesses as a minimum evidentiary standard for the establishment of the applicant's identity in the procedures for obtaining internal passports;

(l) registration of residence for Roma living in tabors 1 and informal housing;

(m) introduction of local mobile units, consisting of representatives of the Roma community, civil society, the SMS and the office of registration of civil status acts, for providing free legal aid and other assistance for Roma without personal documents.

C. Establishing an expert body for co-ordinating efforts for solving problems Roma face in relation to access to personal documents

Based on the conclusions and recommendations of the expert seminar held in Kyiv in 2015,² the SMS and the Department of State Registration and Notary of the Ministry of Justice of Ukraine should create an expert body consisting of representatives of all the relevant stakeholders at the central and regional level, Roma representatives and civil society, legal experts, the Office of the Ukrainian Parliamentary Commissioner for Human Rights and representatives of the relevant international organizations.

This expert body should be tasked with:

- providing the relevant authorities with guidelines for conducting the assessment of the needs of Roma without personal documents, mapping the scope of the problem, and analysing the international and national legal framework applicable in the area of access to personal documents for Roma in Ukraine;

- developing specific proposals for legislative changes based on the results of the activity described above;
- developing specific guidance to unify existing administrative practices, such as manuals, guidelines and instructions for resolving cases when standard evidence is not available;
- developing and implementing a training curriculum for civil servants (particularly civil servants from the SMS and the Department of State Registration and Notary) and judges dealing with applications for personal identification and civil registration documents;
- raising awareness about the importance of effective procedures for resolving each individual case related to access to personal documents;
- guiding the information, outreach and awareness-raising campaigns for Roma without personal documents in Ukraine;
- facilitating communication, co-ordination and co-operation among different stakeholders coming from the central, regional and local level as well as civil society, the Roma community and international organizations;
- consulting the relevant authorities in cases when standard evidence for obtaining internal passports and birth registration is not available;
- setting up a mechanism for the collection of disaggregated data on Roma without personal documents in Ukraine;
- setting up a reporting and evaluation mechanism for measures and activities aimed at providing Roma with identification documents and birth registration.

D. Outreach, awareness-raising and information campaigns

The Ukrainian authorities should also initiate a nationwide awareness-raising and information campaign on the importance of obtaining identification and civil registration documents, and especially registration at birth.

This campaign should be:

- developed in close co-operation with Roma community representatives and civil society organizations;
- target both the Roma and the non-Roma community, as well as public officials, civil servants and judges;
- particularly target the vulnerable populations among the Roma community (Roma women, displaced Roma, stateless Roma, etc.);
- target patterns of discrimination and prejudice against the Roma community and promote positive examples and success stories about Roma access to identification documents and birth registration.

In addition to the awareness-raising and information campaigns, the Ukrainian authorities should also introduce a nationwide system of trainings and capacity building activities for civil servants and the judiciary.

Ukrainian authorities should also pay particular attention to recent developments that may affect Roma access to personal documents, such as:

- the ongoing reform of the identification management system;
- the specific situation of Roma displaced persons from Eastern Ukraine and Crimea and the challenges they face in obtaining or restoring their documents and accessing basic economic and social rights and services;
- the particular issues Roma women and girls face related to access to identification documents and birth registration, such as early and child marriages, home births and the lack of medical assistance and birth registration in such cases; and
- other relevant cross-cutting issues, such as discrimination and prejudice towards Roma in Ukraine and the social exclusion and deep poverty that Roma without personal documents in Ukraine experience.

E. Co-ordinating efforts for solving problems Roma face in relation to access to personal documents at regional and local level

In their efforts to resolve challenges that Roma without identification documents and birth registration experience in each region, the regional and local authorities should:

- (a) provide reports to the central authorities about specific issues and challenges Roma in their region experience in relation to access to personal documents and initiate the creation of technical bodies for the implementation of the measures and activities provided by the future expert body;
- (b) map existing stakeholders at regional level and include them in the work of the technical group of experts responsible for the implementation of the measures and activities aimed at resolving remaining problems;
- (c) set up a technical co-ordination body with the task of:
 - initiating and implementing information, outreach and awareness-raising campaigns among Roma without personal documents;
 - co-ordinating efforts at the local and regional level aimed at resolving problems Roma experience in their access to personal documents;
 - reporting to central authorities on the implementation of the measures and activities aimed at resolving the problems Roma without personal documents experience in their access to personal documents.

Regional and local authorities should also:

- (a) genuinely consult the Roma community, including Roma women, and the representatives of civil society about the best possible approaches towards this issue and include them in the work of the above-mentioned technical co-ordination body;
- (b) allocate funds for the implementation of measures and activities aimed at resolving remaining challenges;

(c) develop joint projects and programmes with local civil society organizations and activists and proactively seek funds for the implementation of these projects and programmes;

(d) immediately explore the technical and other resources that could be deployed to implement measures aimed at resolving the remaining challenges and, where necessary, introduce local focal points (Roma co-ordinators) in each administrative body responsible for Roma access to personal documents;

(e) explore innovative approaches for information and awareness-raising campaigns for local Roma communities.

Sub-committee on gender equality and non-discrimination, Committee on Human Rights, National Minorities and Interethnic Relations Committee on Human Rights, National Minorities and Interethnic Relations of the Verkhovna Rada of Ukraine, UN Women Ukraine, OHCHR/HRMMU Ukraine (November, 2018): OPERATIONAL RECOMMENDATIONS to the Outcome Document of the International Conference, Realizing the Rights of Roma Women in Ukraine, 17-18 October 2018, Kyiv, Ukraine

Promoting targeted policies for Roma inclusion and rights of Roma women

1 We recommend the Government of Ukraine identifying an adequate and capable national institution and inter-ministerial body to oversee the implementation of the Roma Strategy, to ensure cross-sectoral coordination and monitor and evaluate the implementation of Ukraine's international commitments. The national institution has to have authority, clear mission and mandate as well as adequate human and financial resources. It should also have authority for oversight of responsible executive institutions and structures for implementation of the national Roma Strategy.

2 We recommend national, regional and local level authorities ensuring adequate resources

for the implementation of the Roma Strategy from the national, regional and local

3 We recommend to the Government of Ukraine to undertake a cost- and benefit- analysis (considering the aging population, costs of unemployment, etc.) supporting arguments for stimulating increasing political will for advancement of human rights of Roma women and men

4 We recommend relevant authorities at national, regional and local level empowering Roma women by strengthening and supporting coalition-building of civil society and particularly Roma women networks within the country and cross-border. In this respect the international ex-change and cooperation by Roma women supported by CoE (<https://www.coe.int/en/web/portal/roma-women?desktop=true>) and other initiatives serve as a good example of net-working, knowledge sharing and joint advocacy.

Ensuring access to rights and social services

Personal and identification documents

1 We urge national and local authorities, in particular the Ministry of Interior State Migration Service and Ministry of Justice taking responsibility and addressing without delay, lack of personal and identification documents, legal status/citizenship faced by vulnerable Roma women and men to ensure them access to rights and services as citizens of Ukraine.

2 We recommend the Ministry of Interior, Ministry of Justice and other relevant authorities to build on the good co-operation with the OSCE/ODIHR and UNHCR and follow-up on the agreed steps between institutions as outlined in the "Odesa Declaration" from 2017 (<https://www.osce.org/odihr/347251>), particularly to swiftly establish a task-force to simplify and accelerate access to personal documents.

3 We recommend the Ministry of Justice, international partners and the civil society organizations to launch an awareness-raising and information campaign on the importance of obtaining identity and civil registration documents targeting Roma and particularly Roma women and other vulnerable communities.

4 We recommend strengthening co-operation between authorities and civil society, in particular between the regional departments of the Ministry of Justice and local communities and civil society to identify girls and boys without personal documents and facilitate their swift registration/identification.

5 We recommend other regional authorities building on the outreach practices conducted by the regional department of Ministry of Justice in Odessa region and replicate this good practice to other regions in Ukraine to facilitate birth registration of Roma girls and boys.

6 We recommend relevant regional and national departments of Ministry of Justice and State Migration Service of the Ministry of Interior ensuring quality monitoring of interventions at regional and local level and improve data in this regard.

7 We recommend the Government of Ukraine amending the law on court fee for free procedure to obtain the personal and identification documents for undocumented people (cancellation of court fees for consideration of cases confirming of facts of birth/residence in Ukraine).

8 We recommend providing free legal aid for vulnerable Roma women and men without personal documents and allow for alternative forms of evidence of identity to clarify the legal status of a person.

9 We recommend including an identification procedure to the Civil -Procedural Code of Ukraine.

10 We propose improving the electronic exchange and establish referral system between the State Migration Service and the Ministry of Justice on cases of late registration of birth, issuance of birth certificates/and its duplicates in case of loss.

11 We recommend introducing Statelessness Determination Procedure for stateless persons as proposed in the draft law No.9123.

12 We recommend national and international humanitarian aid services ensuring support

for displaced Roma women and men from conflict region and for their registration of personal and identity documents including for access to humanitarian aid without discrimination.

Education/training

1 We call upon the Ministry of Education and relevant regional authorities and schools for immediate action to eliminate the practice of segregated schools or Roma-only classes with poor quality and bad hygiene standards and ensure accessibility to mainstream education, including by covering school transportation for Roma pupils from distant residential areas in local/municipal budget.

2 We recommend the Ministry of Education and relevant regional and local authorities for full implementation of the recommendations of the Committee on the Elimination of Discrimination against Women addressing access to education for Roma girls with targeted policies, programmes and projects and ensure targeted programmes to enhance equal and quality education for Roma girls within a new post-2020 Roma Strategy.

3 We recommend the Ministry of Education, universities and institutions for higher education replicating other working examples in Europe and Ukraine promoting education of Roma children, including providing for affirmative action and scholarships for Roma students in higher education or promoting early education for 3-5 years old Roma children and raising support and awareness for the benefit of education within local Roma communities.

4 We recommend the Ministry of Education, universities and other educational institutions investing in higher education of Roma girls and women as key for their full and effective participation in public and political life.

5 We recommend investing in literacy training of adult Roma women and men.

6 We recommend the Ministry of Social Policy developing and implementing practical measures providing Roma women with opportunities at

the labour market by availing high quality training and life-long learning, language classes and leadership training.

7 We recommend to the Ministry of Social Policy and Ministry of Health institutionalizing the positions of Roma mediators and make use of this service to improve access of Roma communities to rights and services, including increasing awareness about the benefit of education, promote information to employment opportunities, to support Roma women's access to reproductive and health rights and support improving housing.

Health

1 We recommend the Ministry of Health and relevant regional and local authorities collecting data on the health situation of communities disaggregated by sex, age, ethnicity to ensure evidence-based development of health policies, regional and local programmes which are responsive the needs of the beneficiaries.

2 We recommend the Ministry of Health and relevant regional and local authorities reducing health risk living environment of communities by analyzing infrastructure facilities and ensuring that development programmes include investment for improving sanitation facilities and access to clean water. Further, develop and launch awareness raising activities on health risk environment targeting women.

3 We propose to the Ministry of Health and relevant regional and local authorities conducting programmes increasing general education on sexual and reproductive health for Roma communities, as well as the dedicated awareness and education programmes for young Roma girls and women, to inform about risks of young pregnancy and promote health education for young mothers and infants.

4 We urge the Ministry of Health and health care providers for immediate action addressing discriminatory practices against Roma women in the health sector institutions, including segregation in maternity wards and promoting prophylactic health examinations for Roma women and girls (e.g. gene-

cology, mammography), as well as the obstetrician care during the pregnancy.

5 We recommend the Ministry of Health and relevant regional and local authorities enhancing access to health care and reproductive rights for Roma women and girls including through providing preventive measures, counselling on reproductive health and information on risks of early marriage. In this respect local authorities in cooperation with civil society should conduct awareness raising activities and information on the requirement to comply with minimum marriage age for Roma young women and young men in communities.

6 We recommend improving access to health services and particular to sexual and reproductive rights of Roma women and girls through dedicated health centres at local level.

Housing

1 We recommend the Ministry of Regional Development and Ministry of Finance that the decentralization reform agenda integrates access to affordable housing and basic infrastructure facilities for vulnerable Roma communities, particularly to female headed households, people with disabilities, large families etc. These policies and programmes have to be supported by the development and implementation of regional/local development strategies and respective budget allocations.

2 We recommend the Ministry of Regional Development and local authorities building on other regional experiences in Europe for legalizing informal residential areas in order to ensure access to adequate housing conditions, infrastructure and services to vulnerable Roma.

Promoting political rights and leadership of Roma women

1 We recommend the Government of Ukraine enhancing effective participation of Roma women in all aspects of public life directly affecting them in accordance with the Framework Convention for the Protection of National Minorities (FCNM), Article 15.

2 We recommend the Government of Ukraine enhancing Roma women's leadership and participation in the development, implementation and evaluation of a national Roma Strategy at national, regional and local level.

3 We recommend relevant national, regional and local authorities increasing Roma women participation in Roma related policies by proactively supporting the creation of a robust representative body of Roma women to consult and represent the voice of Roma women and participate in policy development implementation and evaluation of matters of their concern.

4 We recommend the Government of Ukraine enhancing effective participation of Roma women, in all areas of public policy at national, regional and local level and invest in professional training and Roma women's leadership skills and disseminating success stories of Roma women. In this regard build on other European experiences for strengthening Roma women's networking, peer advice, mentoring and capacity building of Roma women.

5 We recommend national, regional and local authorities promoting specific initiatives to train Roma women, including with awareness raising and information campaigns to stimulate Roma women's participation in public and political life as voters, candidates and partners in governance issues.

6 We recommend political parties to be inclusive to the participation of minority representatives and offering traineeship/internship scheme in the Ukrainian parliament for enhancing Roma women's political participation.

7 We recommend political parties and schools for public policies providing training for Roma women to become leaders for public policy and party candidates and offer opportunities to practice achieved skills.

8 We recommend promoting Roma women's political participation by introducing temporary special measures for Roma women at all governmental levels (through political parties' active

engagement policies, investing in young Roma to join to youth party groups, zip candidate lists).

9 With regard to the on-going decentralization reform process, we recommend enhancing Roma inclusion in local decision-making and consultative processes as well involvement of local authorities in the Roma inclusion process.

10 We recommend relevant national and local authorities in view of the upcoming elections in 2019 and 2020, undertaking concrete measures to protect and enhance the right of Roma women and men to participate as voters and candidates in the elections and to address the on-going challenges that render Roma communities especially vulnerable to vote-buying and vote manipulation.

11 We commit to support increasing efforts for capacity-building training programmes designed to equip Roma local representatives, including Roma women, with the skills and knowledge necessary to make the most of the elected office.

12 We recommend to national human rights institutions facilitating partnerships and collaboration between local civil society organizations and Roma women for joint advocacy initiatives promoting gender equality and human rights.

13 We recommend to relevant authorities and civil society actors involving also Roma men in programmes' and training workshop on eradication of discrimination against Roma women.

Promoting protection and security of local communities

Access to justice

1 We recommend promoting access to justice, with regard to protection from discrimination and abuse (administrative or physical) and with regard to preventive measure and reparations/repair of abuses.

2 We recommend the Ministry of Interior investing in establishing trust relations between law enforcement and local communities and particularly Roma women. In this regard establish a dedicated unit for access to justice for Roma women.

3 We urge relevant authorities and judicial structures to ensure accountability and timely investigation and prosecution of hate crimes and target both consequences of perpetrator's actions and their motivation.

4 We recommend the Ministry of Interior and law enforcement ensuring accountability as part of trust building measure and make use of existing good practices in this regard from other countries, including United Kingdom where police practices include revisiting affected community and inform about the progress on investigation, and engage in dialogue with local community to solve practical matters.

5 We recommend enhancing cooperation between police and other institutions (educational authorities, social services, justice, health, local authorities, NGOs) as preventive measures and to address matters at early stage.

Training

1 We recommend the Ministry of Internal Affairs of Ukraine intensifying its efforts in building trust and understanding between the police and Roma, including by implementing training programmes on anti-discrimination and community policing, such as the OSCE ODIHR training program on "Effective and Human Rights-Compliant Policing in Roma and Sinti Communities". The ODIHR curriculum of the training programme should be integrated in the regular training for law enforcement officials.

2 We recommend relevant authorities including police academies and training institutions and National School of Judges in Ukraine the training of police, judges and prosecutors on responding, investigating and prosecuting hate crimes (e.g. investigators and judges where appropriate should refer to the article 161 of the Criminal Code of Ukraine – violation of the equality of citizens depending on their race, nationality or attitude to religion and apply it during the conducted investigation).

3 We recommend the National School of Judges in Ukraine conducting trainings for judges for increasing awareness on international human rights commitments on the elimination of racial

discrimination and discrimination against women and the respective national legislation.

4 We commit/recommend building on international support and continue trainings and awareness raising of law enforcement on security issues facing Roma communities and building on dialogue with Roma communities to create greater synergies and sustainable results in addressing the needs and challenges faced by Roma women and men.

5 We recommend the Ministry of Interior, police academy and training institutions for police enhancing capacity of the law enforcement bodies on gender-related security aspects and multiple forms of discrimination faced by Roma women, to informing on adequate responses to gender based and domestic violence, trafficking in human beings and violation of rights related to early arranged marriages.

6 We recommend the Ministry of Justice enhancing capacity of lawyers and advocates from legal aid centres for increasing their understanding of human rights and multiple forms of discrimination faced by Roma and particularly Roma women.

7 We recommend national human rights institution in cooperation with media and civil society conducting awareness raising activities for media on ethical gender-sensitive reporting and counter hate speech, hostile and pejorative reporting and portrayal of Roma women and men in media.

8 We recommend the Ministry of Justice improving access to justice for Roma women through support in getting legal information, free legal aid and judicial remedies, addressing gender stereotypes, and changing practical implementation and court practice.

9 We recommend the Ministry of Interior and police schools increasing representation of Roma women and men in the police corps by replicating good practices from other European countries, for example through outreach activities for attracting Roma female and male high school students in the police academy or by hosting preparatory workshops for minority candidates or mentorship programmes

to attract Roma to join law enforcement bodies. In this respect, the Ministry of Interior is recommended to assess obstacles facing Roma and particularly Roma women to enter the police corps and take actions to address those.

Analysis

1 We encourage relevant authorities gathering sex-disaggregated data on vulnerability of Roma women to domestic and gender-based violence and implement counselling programmes for Roma women victims of domestic or gender-based violence. Furthermore, implement awareness-raising campaigns aimed at prevention of gender-based violence among Roma communities, including by engaging men to combat violence against women.

2 We recommend the Ministry of Interior building on the findings and recommendations including gender specific aspects of the OSCE/ODIHR study on safety and security perception of Roma women and men in Transcarpathia, Odessa and Kharkiv regions of Ukraine (publication upcoming) in raising awareness and building knowledge of the law enforcement and communities and identifying ways for improving the relation and trust between communities and police.

COALITION OF ROMA NGO IN UKRAINE "STRATEGY 2020": Roma Rights in Ukraine: Problems, Challenges, Perspectives

National Police

- Clarify processes to prevent discriminatory profiling and arbitrary detention of Roma and similar groups.
- Implement a mechanism for preventing ethnic profiling in police activities.
- Provide regular training for police officers on the development of a tolerant attitude towards representatives of minorities and the prevention of racism and xenophobia.
- Ensure proper investigation of all crimes committed on the basis of intolerance against minorities.

- Develop strategies to prevent and respond to incidents of targeted violence against Roma and other minorities.
- Establish a partnership between police and Roma NGOs to effectively identify and address rights violations.
- Use the experience of implementing EU programs to strengthen the level of Roma confidence in law-enforcement agencies.

Local authorities

- Establish the post of a designated Roma adviser in regional and district state administrations to support the development of inclusive policies and service delivery.
- Put measures in place to prevent and respond quickly to the development of tensions between communities, especially in regions where there is a high probability that these will lead to targeted violence.

Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy

Access to justice

- Ensure hate crime, hate speech and other forms of bias-motivated crimes targeting Roma are properly investigated and prosecuted, in line with national and international law: in particular, authorities should take steps to ensure that discriminatory violence is not classified under lesser charges such as 'hooliganism'.
- Ensure thorough and speedy investigation of incidents of violence and intimidation of Roma and Romani settlements, including prosecution of perpetrators and restitution for victims. Police, prosecutors and officials are fully accountable for the failure to identify, investigate and convict those accused of carrying out these acts. Effective prosecution and investigation is necessary to end a de facto culture of impunity against perpetrators of anti-Roma hate crimes.
- Harmonize the existing legal framework to clearly delineate civil, administrative and criminal liability, enforcement mechanisms and institutions, in line

with relevant international human rights standards: in particular, Article 161 of the Criminal Code of Ukraine must be amended to remove the lack of clarity regarding liability for discrimination on the one hand and incitement of hatred on the other. Substantive articles of the Criminal Code of Ukraine pertaining to general violent crimes, including crimes against property, should explicitly provide for an aggravated punishment when violence was motivated by bias.

Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy

Documentation

- Prioritize the provision of identity documentation and proof of citizenship to Roma and other groups at risk of statelessness through a free, easily accessible and non-discriminatory application system: authorities should establish a clear administrative procedure of identity and citizenship verification and issuance of documents to undocumented Roma, free from administrative fees and unrealistic burdens of proof.
- Address the barriers that undocumented Roma and others without documentation face in securing health care, education and other public services: lack of access to documentation is particularly concentrated among the poorest and most marginalized Roma, such as migrants, IDPs and those in remote rural areas, reinforcing their destitution. Authorities should therefore ensure that these basic rights are available to all, regardless of their documented status.

Education and vocational training

- Promote equitable, accessible and non-discriminatory education for Roma children: authorities should increase educational outcomes among school-age Roma by addressing the complex financial, social and geographic barriers that prevent many, particularly girls, from accessing their right to education. This can best be achieved through close cooperation with Roma NGOs and community members.
- Ensure the current educational reforms in Ukraine promote inclusion for Roma: Ukraine authorities need

to acknowledge and take substantive measures to end the practice of de facto segregation policy for Roma children in amongst many schools and education authorities. In particular, measures are urgently needed to prevent the recent educational reforms on catchment area requirements inadvertently reinforcing segregation of Roma children.

- Support vocational training and literacy programmes for adult Roma: lack of access to education and high levels of illiteracy among older Roma continue to undermine their life prospects and employment opportunities. This legacy of discrimination needs to be addressed through a carefully designed programme of skills development and outreach among Roma communities.

Livelihoods

- Take steps to address the multiple drivers of discrimination that concentrate Roma disproportionately in poorly paid and dangerous informal labour: in addition to addressing the many barriers to employment, from discrimination and poverty to illiteracy and lack of documentation, authorities should also take steps to prevent exploitation, health hazards and other risks in informal labour.
- Strengthen security for Roma migrant workers from human rights abuses, including attacks on informal settlements and camps: migrant Roma have been particularly targeted by far-right groups and while more effective police protection is needed to prevent further incidents, particularly given the complicity of local officials in some attacks, authorities should also ensure safe and accessible accommodation to improve security for migrant populations.

Housing

- Address as a matter of urgency the adverse housing and living conditions affecting Roma communities, including lack of access to adequate and affordable accommodation: at present, high housing prices, discrimination and a lack of social housing stock force many Roma into informal, makeshift settlements. As housing subsidy programmes are failing to reach many of the most excluded Roma, more

targeted and culturally appropriate systems of support are needed.

- Prioritize the registration and servicing of 'undocumented houses', a situation that particularly affects Roma households: as many Roma houses, even those built decades ago, are not formally registered they are excluded from access to clean water, sanitation, waste disposal and other important services, a situation that locks them into a cycle of poverty and ill health. Authorities should remove discriminatory barriers to registration to ensure that the rights of residents in these houses are officially recognized.

Participation

- Establish clear consultative mechanisms for Roma representatives, activists and community members at national, regional and local levels to engage in policy design and implementation: this is especially important when the decisions in question directly affect them. Authorities should ensure that programmes and service provision in education, health and other sectors draw meaningfully on the perspectives and preferences of local Roma.

EFFICIENCY

Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy

Funding and budgetary allocations

- Establish adequate funding is in place, ringfenced for Roma and other highly marginalized populations, to support adequate and inclusive service provision for all: given the current move towards greater decentralization, it is essential that the central government takes steps to establish additional budgetary support for poorer regions in Ukraine to guarantee funding allocations for Roma and other impoverished or discriminated groups.
- Incorporate more detailed and specific indicators in post-2020 Roma integration strategies: a lack of measurable indicators has undermined effective implementation of the 2020 Strategy. Improved

budgeting for integration strategies needs to be linked to detailed indicators of progress and achievement. Indicators should also be de-centralized and appropriate to regional and local contexts.

ERRC, Roma Women Fund "Chiricli" (2016): Written Comments of the European Roma Rights Centre and the International Charitable Organization Roma Women Fund "Chiricli" Concerning Ukraine For Consideration by the Committee on the Elimination of All Forms of Discrimination against Women

The ERRC and Chiricli urge the Committee to recommend to the Ukrainian government the following measures as necessary to be implemented in the shortest time possible in order to redress the worrying situation of Romani women in Ukraine:

- To ensure protection from discrimination for Romani women in maternity wards and medical establishments;
- To ensure access to free medical services for vulnerable individuals, in particular disadvantaged Romani women;
- To ensure provision/ support for acquiring of identity documents, including birth certificates for vulnerable Romani women;
- To establish accessible mechanism for reporting discrimination based on ethnicity and gender;
- To ensure equal access to quality education for Roma children, in particular Romani girls;
- To take preventive measures for school dropouts among Roma pupils, in particular Romani girls;
- To develop and implement measures to improve literacy among the adult Roma population, reduce dropout rates among students of Roma children;
- To establish women's groups to improve self-awareness and empower young Roma women, who face many forms of discrimination. In addition, to provide young Roma women practical assistance with employment, education;
- To develop special employment programs for Romani women;

- To improve housing conditions and infrastructure in Roma settlements;
- To provide support for Roma women victims of domestic violence;
- To collect comprehensive gender disaggregated official data on the number of Roma in Ukraine as well as on their socio-economic situation in cooperation with Roma NGOs if necessary;
- To review and amend the NAP and regional Action Plans in close consultation with Roma civil society and in line with the international standards (with clear measures, results and indicators);
- To conduct regional thematic visits on education, employment, housing and health, civil registration documents and, in particular, passports and birth certificates, Romani women's and youth issues;
- To institutionalize the Roma health and social mediators;
- To provide proper information to IDPs, including Roma displaced persons, about the procedure for obtaining a certificate of registration as an IDP and its practical value;
- To build trust and understanding between the police, local and national authorities and Roma, through providing training programmers on antidiscrimination, mediation, conducting awareness-raising campaigns like DOSTA!, Roma Pride or other.

Roma Women's Fund Chiricli/ UN Women (2018). The Rights of Roma Women in Ukraine

Based on the analysis of the progress on the implementation of the Strategy and NAP reported by the 23 State Regional Administrations the Verkhovna Rada Sub-Committee on Gender Equality and Non-Discrimination in partnership with UN Women Ukraine and Chiricli, have prepared the list of proposals for the revision of the NAP and the regional plans and programs for the implementation of the Strategy by introducing the following measures:

- To ensure gender mainstreaming and promoting gender equality in all programs and projects targeting

Roma in Ukraine and particular the national and local policies, e.g. the Strategy

- To recognize the particularly vulnerable situation that Roma women face because of the intersecting discrimination due to the additional factors, such as sex, ethnicity, age, disability, displacement due to a lack of civil or residence registration documents, as well as their marginalized position in the society
- To provide Roma women with protection from discrimination in maternity hospitals and health facilities
- To provide socially disadvantaged citizens access to free medical services, especially for Roma women in disadvantaged conditions
- To ensure the issuance/support for obtaining civil registration documents, including birth certificates by all Roma without documents, paying particular attention to Roma women
- To establish an accessible mechanism for providing protection from and reporting on the discrimination based on ethnicity and gender
- To ensure equal access to quality education for Roma children, in particular Roma girls; in the event of a break in education, to create opportunities for the renewal of the educational process
- To develop and implement measures to increase literacy among the Roma women and men, and to reduce school dropout rates among Roma children
- To introduce women's self-awareness/help groups to empower young Roma women who encounter with multiple forms of discrimination. In addition, to provide young Roma women with practical help with employment, education and change in their qualifications, help in opening their own small businesses
- To provide support to Roma women – survivors of domestic and other forms of gender-based violence, conduct awareness about prevention outreach activities to Roma communities to inform them of existing assistance schemes and support for survivors
- To collect gender disaggregated data on the number of Roma in Ukraine, as well as their socio-

economic status, if necessary in cooperation with Roma CSOs

- To conduct regional thematic monitoring visits on education, employment, housing, health care, state registration of civil records documents, in particular passports and birth certificates, Roma women's and youth issues
- To integrate existing programs of Roma medical intermediaries into national government programs and institutionalize the profession of Roma intermediaries
- To provide relevant information to IDPs, including Roma IDPs, regarding the procedure for obtaining a certificate of registration as an IDP and its practical value
- To build trust and understanding between the law enforcement, local and national authorities and the Roma, through training programs on issues combating discrimination, mediation, conduct campaigns to raise awareness.

SUSTAINABILITY

Minority Rights Group Europe (2019): Roma in Ukraine – A Time for Action: Priorities and Pathways for an Effective Integration Policy

- Ensure financial sustainability and the expansion of the role of Roma mediators and CSOs as key intermediaries and agents of delivery for Roma integration policy: the most positive examples of integration policy since 2013, have been led by Roma civil society actors, however these have largely been reliant on foreign or inter-governmental donors. In particular, Roma mediators have been proven to have had a substantial impact in the areas of education, health, documentation and conflict resolution. Recognition of the role of Roma mediators, with an official qualification, is an urgent priority and long term sustainable funding for mediators should form a key component of any post-2020 strategy.

ANNEX 5. LIST OF REVIEWED LITERATURE

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