EVALUATION OF CROATIAN NATIONAL ROMA INCLUSION STRATEGY

EVALUATION REPORT

by

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ABBREVIATIONS

AP Action Plan for Implementation of the National Roma Inclusion

Strategy

CES Croatian Employment Service
CPII Croatian Pension Insurance Institute

CSO Civil society organization

DAC Development Assistance Committee

EC European Commission

ETTA Education and Teacher Training Agency

EU European Union

GOHRRNM Government Office for Human Rights and Rights of National

Minorities

IOM International Organization for Migration L(R)SGU Local (regional) self-government units MoFEA Ministry of Foreign and European Affairs

MoH Ministry of Health

MoSES Ministry of Science, Education, and Sports

MoSPY Ministry of Social Policy and Youth

MP Member of Parliament

NRIS National Roma Inclusion Strategy for the Period from 2013 to 2020

OECD Organisation for Economic Co-operation and Development

OSCE-ODIHR Organization for Security and Co-operation in Europe Office for

Democratic Institutions and Human Rights

RH Republika Hrvatska (Republic of Croatia)
UNDP United Nations Development Programme

UNHCR United Nations High Commissioner for Refugees

UNICEF United Nations Children's Fund

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SUMMARY OF KEY FINDINGS

Approach

The overall objective of this evaluation is to assess the extent to which the *National Roma Inclusion Strategy for the Period from 2013 to 2020* (NRIS) and the *Action Plan for the Implementation of the National Roma Inclusion Strategy* (AP) for the period 2013-2015 have contributed and/or can be expected to contribute in future to the inclusion of the Romani national minority in the Republic of Croatia. The evaluation has accordingly been designed to collect information and provide recommendations on the basis of which the Government of the Republic of Croatia can take informed decisions on actions necessary to increase the level of inclusion of Roma in Croatia, possibly including (but not necessarily limited to) revision of the AP and/or NRIS.

Combining desk and field research, this evaluation has made use of four mutually complementary research methods:

- 1. Documentary analysis
- 2. Semi-structured interviews
- 3. Focus groups
- 4. Structured observation

Taken together, these methods and the research instruments associated with them provide the components of a methodology which the Government Office for Human Rights and Rights of National Minorities (GOHRRNM) could potentially adapt and apply in future evaluations of NRIS and AP implementation.

Policy framework for inclusion of Roma in Croatia

From Strategy to Action Plan

Croatia's NRIS sets as its general goal "to improve the status of the Roma minority in the Republic of Croatia by reducing the multi-dimensional socio-economic chasm between the Roma and the remaining population and by harmoniously, openly and transparently achieving the full inclusion of the Roma in all segments of society and the community." Toward achievement of this goal, the NRIS includes the following four objectives:

- The creation and development of human capital among Roma by raising levels of education and promoting life-long learning;
- A rise in Roma's economic status through improved access to the labor market, increased opportunities for employment and self-employment, and promotion of fair hiring practices;
- Improvement in Roma's health and social status by ensuring access to quality healthcare and social welfare as well as improved living conditions; and
- Higher social status for Roma stemming from the enjoyment of human rights in general and minority rights in particular as a result of the elimination of discrimination and active social and political participation.

The overall design of Croatia's NRIS takes into account both the *EU Framework for National Roma Integration Strategies up to 2020* and the 2003 *National Program for Roma*, superseding the latter document. In addition to covering the "four crucial areas" of the *EU Framework* (and the Decade of Roma Inclusion) – education, employment, healthcare, and housing – in their own

respective sections, the NRIS also counts among its "primary fields" social welfare; inclusion in social and cultural life; and status solutions, prevention of discrimination, and assistance in the exercise of rights.

Whereas the seven substantive areas covered by the NRIS constitute a reduction relative to the ten of the *National Program for Roma*, the NRIS's 150-plus pages make it more than twice as long as its predecessor. Additionally, the NRIS contains a sub-section on improving the collection of statistical data. Although neither NRIS nor AP includes a separate section on issues of gender, an intention to mainstream such issues is explicit in the NRIS.

The eight areas structuring the NRIS constitute a larger number than that present in the respective strategies of most countries participating in the Decade of Roma Inclusion. Of the 13 countries participating in the Decade which have adopted a strategy, only the strategies of Bosnia and Herzegovina, Montenegro, and Serbia contain more than eight areas. The remaining countries' respective strategies are organized around 5-7 areas.

With regard to thematic coverage, all strategies have in common with Croatia's NRIS coverage of the Decade's four priority areas: education, employment, health, and housing. Ten of the 13 strategies also devote a section to Romani culture, while nine contain a section on (anti-) discrimination. Whereas treatment of social welfare together with or separately from health care varies from one country to the next, Croatia's NRIS stands out for its inclusion of a section focused on statistical data collection.

The structure of the AP generally follows that of Chapter IV.4 of the NRIS, with a section for each of the main strategy areas as well as a section entitled "Improvement of Statistical Data Collection". Included in the AP but not the NRIS, however, is a section entitled "Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities". Thus, whereas the NRIS counts eight strategy areas, the AP covers nine.

Insofar as the number of areas covered in Croatia's AP is not smaller than the number of areas in the strategy on which the AP is based, Croatia's AP differs from the action plans adopted by all other countries participating in the Decade of Roma Inclusion except for Serbia, which is also the only Decade participant with an action plan covering more than Croatia's nine areas (at 13). Other countries' action plans are divided into eight areas or fewer, with all except the Serbian and Spanish action plans organized around 4-6 areas. All action plans include separate sections devoted to education, employment, health, and housing. Of the other areas included in the AP, the one most common in the action plans of Decade participants is culture, which appears in the action plans of seven countries. The sections of Croatia's AP entitled "Improvement of Statistical Data Collection" and "Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities" are unique among countries participating in the Decade.

While the overall goal and objectives of the NRIS are not mentioned in the AP, the goals and objectives for each of the strategy areas are identical across the two documents. At the same time, problems of conceptual clarity apparent in the NRIS are present also in the AP. As a result, it is not always apparent how the various objectives in a given strategy area relate to one another.

Assessing the Action Plan

Issues of conceptual clarity aside, the objectives in each strategy area generally fit the corresponding goal. Additionally, the measures foreseen under each objective generally fit the relevant objective. At the same time, there are cases in which successful implementation of planned measures risks reinforcing and/or promoting segregation between Roma and non-Roma.

In the strategy area "Physical Planning, Housing, and Environmental Protection", for example, the measures planned under the three objectives in the sub-area of physical planning fit the corresponding objectives, the realization of which can in turn be expected to contribute to an improvement in the quality of Roma's material housing conditions. However, the focus of all three objectives on improving existing Romani settlements minimizes their presumable effect on residential segregation and thereby on the inclusion of Roma in the wider society. Similar observations apply to the sub-area "Environmental Protection". Further, the terms in which the two objectives in the sub-area specifically focused on housing are formulated and defined reveal a tension between inclusion and improving conditions in Romani settlements. Thus, whereas Objective 1 is "[t]o improve the housing integration of Roma people in the community" and the definition of this objective includes mention of "anti-discrimination measures", the indicator for this aim is living conditions in Romani settlements. In similar fashion, the definition of Objective 2 in this sub-area ("[t]o ensure housing in appropriate conditions") refers to "implementing desegregation measures", but "the standard and quality of living in Roma settlements" remains as an indicator.

In the strategy area "Inclusion of the Roma National Minority in the Cultural and Social Life", three of the measures planned under Objective 1 risk compromising the "achieve[ment of] a positive perception of the Roma culture and identity within the Roma national minority[,] within the majority population and the society as a whole". More specifically, the establishment in Romani settlements of separate cultural facilities for Roma apparently described in Measure 6.1.2 has potential to reinforce existing segregation between Roma and non-Roma. At the same time, the focus of Measures 6.1.3 and 6.1.4 on traditional Romani culture suggest a conception of culture as a set of traditions frozen in time which could work against the acceptance of Roma as equals by non-Roma living in the present without closer contacts with contemporary Roma.

The design of the AP also raises more immediate practical concerns. One of these is the replication without adjustment of the objectives of the NRIS – which covers the eight-year period from 2013 to 2020 – in the AP, which covers only the first three years of the NRIS's lifespan. This suggests that successful implementation of the AP would completely fulfill the objectives of the NRIS, in so doing calling into question the purpose of generating an action plan for a timeframe different from that of the NRIS. By the same token, it may be taken as a preliminary indication that the AP is too ambitious.

Another practical concern is the overall lack of clarity concerning the timeframe for completing implementation of the measures foreseen in the AP. Concrete deadlines are specified for only 19 of the 128 measures included in the AP, with implementation of the vast majority of measures planned to take place on a continuous basis.

Despite the considerable attention devoted to issues of monitoring and evaluation in the NRIS, the AP falls short of laying the groundwork for tracking realization of its 48 objectives. Of the total of 111 indicators identified in the AP for the objectives, baseline values are given for only 11 of the identified indicators. In practical terms, the absence of baseline data means that realization of the vast majority of the objectives included in NRIS and AP cannot be measured.

Institutional division of labor

Continuing GOHRRNM's previous role in relation to the *National Program for Roma*, the NRIS presents GOHRRNM as playing a largely coordinative role in relation to Strategy implementation. GOHRRNM is also tasked with initiating, coordinating, and carrying out evaluations and revisions, although this role is to be transferred to "another independent expert body" at an unspecified point in the future. Additionally, the NRIS makes GOHRRNM more directly responsible for the implementation of some measures (as well as for monitoring implementation of the same), as well as for organizing tenders and training programs to ensure implementation. In the AP, however, GOHRRNM figures as a responsible institution for 44 of the 128 planned measures, considerably more than another other government body (with the Ministry of Health a distant second at 25 measures).¹

The number of measures assigned to the various administrative bodies implicated in the AP varies widely. Among relevant central-level institutions, the range is from one (GOCNGO, MoEC, and MoENP) to 44 (GOHRRNM). As shown in the table below, which provides an overview of the assignment of responsibility for implementation of the measures of the AP in each strategy area, the range of variation is less among the central-level institutions most directly responsible for three of the four priority areas identified in the EU Framework. In the case of the fourth priority area of the EU Framework, on the other hand – housing – the greatest share of responsibility falls on regional and local self-government units, which are assigned responsibility for 14 of the 15 measures foreseen in the strategy area "Physical Planning, Housing and Environmental Protection". Also noteworthy is the assignment to GOHRRNM of responsibility for the largest number of measures in three strategy areas, while other institutions are assigned similar responsibility for no more than a single area.

Also expected to play a considerable role in implementation and monitoring of the NRIS are regional and local Romani minority councils and representatives. The 34 measures of the AP in which Romani minority councils and representatives appear as implementing agency or participant in implementation is smaller only than the number of tasks assigned GOHRRNM on the one hand and local self-government units on the other. Finally, the NRIS foresees a role for the civil sector, consisting primarily in monitoring implementation of the Strategy and in informing Romani communities about implementation and the results achieved.

¹ The counts of measures presented here include both measures for which the institution in question is identified as implementing agency and measures for which the institution is listed as a participant in implementation.

Table S1. Institutional responsibility by strategy area

Strategy area			Measures a responsible	0
	for largest	in strategy	In strategy	Total
	number of	area	area	
	measures in			
	strategy area			
Education	MoSES	14	14	14
Employment and Inclusion in	CES	24	20	23
Economic Life				
Health Care	MoH	22	22	25
Social Care	MoSPY	11	7	18
Physical Planning, Housing, and	L(R)SGU	15	14	33
Environmental Protection				
Inclusion in Social and Cultural Life	GOHRRNM	14	11	44
Status Solutions, Combating	GOHRRNM	20	10	44
Discrimination, and Help in Realizing				
Rights				
Improvement of Statistical Data	GOHRRNM	12	7	44
Collection				
Compliance with International	MoFEA	4	4	5
Standards and Treaties				

The sole monitoring body named in the NRIS is the National Roma Inclusion Strategy 2013-2020 Monitoring Commission. The NRIS makes the Monitoring Commission responsible not only for monitoring implementation of NRIS and AP, but also for preparing revised policy documents (i.e., Strategy and/or AP) for adoption by government.

Application of the framework for inclusion

Development of regional- and local-level implementing documents

Of the 33 units of regional and local self-government required by the NRIS to develop, adopt, and implement action plans for Roma, as of March 2015 only five had done so: Međimurje, Osijek-Baranja, Sisak-Moslavina, and Varaždin Counties; and the City of Zagreb. In addition to these units of regional self-government which followed through on this requirement of the NRIS, one unit of local self-government, the city of Crikvenica, adopted an action plan for Roma even though not required to do so.

All implementing documents adopted at regional or local level cover at least four areas of the NRIS, with all but the action plan adopted in Crikvenica covering six or more strategy areas and Sisak-Moslavina County's action plan covering all eight strategy areas. With the exception of the Crikvenica action plan, among the areas covered are all four areas of the EU Framework (also the priority areas of the Decade of Roma Inclusion): education, employment, health, and housing. Notwithstanding considerable similarities in thematic coverage, however, the volume of the implementing documents and the number of planned measures vary widely.

Data on implementation of action plans adopted at regional and local levels and on budgetary expenditures for this purpose are sparse and fragmented. Among stakeholders interviewed, the dominant view was that the adoption of implementing documents at regional and local levels has not thus far had a significant effect on the situation of Roma in the self-government units covered by the documents.

Communication and coordination

With few exceptions, interviewed stakeholders at central, regional, and local levels as well as representatives of international organizations assessed communication with GOHRRNM in positive terms. At the same time, most stakeholders at central, regional, and local levels noted that they had little contact in relation to Roma with central-level institutions other than GOHRRNM. For their part, representatives of GOHRRNM reported regular consultations with most central-level institutions represented in the Monitoring Commission while characterizing as less receptive institutions not directly involved in the Monitoring Commission or in NRIS design and implementation.

Information gathered during three of the five field visits undertaken in the framework of the evaluation suggests that communication between either local or regional authorities and central-level institutions is sometimes better than that between regional and local authorities. Concerns were also raised about a lack of transparency in funding allocations by the Monitoring Commission, with the paucity of public information on awards by the Monitoring Commission reinforcing such concerns.

All stakeholders expressed critical views about coordination. Whereas coordination between the central level on the one hand and regional and local levels on the other was usually presented as most problematic (and not only in relation to efforts to improve the situation of Roma), coordination among institutions at central level and coordination among institutions at local level were also subjects of criticism. Problems in the fulfilment of GOHRRNM's coordinating role were often attributed to the Office's position in the institutional hierarchy, which is such that it lacks the formal political power needed to make demands on ministries, including but not limited to participation in the monthly interdepartmental operational meetings foreseen in the NRIS but not taking place since 2011. A factor receiving frequent mention in relation to central-level institutions in general was insufficient human resource allocations.

Monitoring and evaluation

Despite the considerable attention to issues of monitoring and evaluation in NRIS and AP, there is no overarching system in place for gathering data on the implementation of planned measures and the realization of strategic objectives. Moreover, interviews with members of the Working Group of the Monitoring Commission as well as with other stakeholders suggest that neither the Commission nor its Working Group is actively engaged in monitoring and evaluation, with the Commission's role to date limited to reviewing reports prepared by GOHRRNM. As of mid-March 2014, the only strategy areas in which data are available for all measures are "Education" and "Compliance of the Programs with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities", with data unavailable for a majority of measures in several other areas.

Concerns about the collection of ethnically disaggregated data received frequent mention at both central and local levels, with health singled out as the area in which reluctance to collect data on Roma as such is most evident. The Croatian Bureau of Statistics was also criticized for effectively acting as a spoiler by monopolizing data collection while hiding beyond data protection regulations in relation to ethnicity, in so doing also neglecting existing informal administrative data collection practices. On the other hand, the absence of a functional monitoring system in general and resistance to collection of ethnically disaggregated data in particular leave room for speculation that institutions are less active in AP implementation than they really are.

Implementation of the Action Plan

<u>Education</u>. Reviewing available monitoring data for 2013 and 2014, it can be concluded that baseline data are available for only 2 out 7 objectives. With a single exception, data on these indicators for 2013 and 2014 are also not provided, meaning that for the majority of objectives it is not possible to measure progress. On the other hand, baseline values on the level of measures are available for all 14 measures of this strategy area, as are data on implementation for 2013 and 2014, which distinguishes education from all other areas of the AP. In the year 2014, there is actually an increase of measures where no further progress can be recorded in relation to the previous year. There are no measures in this strategy areas where progress was made in 2014 but not also in 2013

There is broad (but not unanimous) agreement among interviewed stakeholders that education is the strategy area in which AP implementation has been most successful, with an increase in the number of Romani children enrolled in primary education frequently cited as the greatest example of progress in the situation of Roma in recent years. At the same time, the number of Roma-only classes appears to be increasing in the absence of clear modalities for desegregation, particularly in areas of *de facto* residential segregation. Concerns have also been expressed about the duration and content of pre-primary year programs. Another issue, raised in particular in relation to Međimurje County, is physical access to schools. More specifically, the effects of a lack of public transport connecting Romani settlements to schools are sometimes exacerbated by the condition of social assistance that recipients not own a car. Finally, some interviewed stakeholders pointed to neglect of adult education.

Employment and inclusion in economic life. A review of available monitoring data for 2013 and 2014 indicates that baseline data are available for all except one out of 7 objectives, although in three cases the data provided are incomplete. Based on the data from 2014, progress at the level of outcomes was reached in relation to only two objectives. Baseline data are available for 15 out 24 of measures in this strategy area. In 2014 progress is evident for a majority of measures – 16 out of 24.

The interviews conducted with representatives of institutions in the framework of the evaluation yielded characterizations of employment and inclusion in economic life as one of the two most successful areas of AP implementation (together with education) and as continuing measures from previous policy. Common among stakeholders participating in the evaluation is the view that affirmative action in the area of employment and inclusion in economic life has not been a success.

<u>Health care</u>. Baseline values are available for only one out of seven objectives in this strategy area. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in the area of health care cannot be determined. Furthermore, baseline values on the level of measures are not available for any of the 22 measures, making this strategy area unique in a negative sense.

Of all strategy areas, health care has received the largest volume of criticism for the approach taken to implementation and data collection, with several interviewed stakeholders (mostly but not exclusively from civil society) accusing the Ministry of Health and institutions under it of inertia and ineffectiveness in relation to both. An interviewed representative of a central-level institution with a key role in relation to AP implementation in this strategy area expressed the view that the fulfilment by 2015 of the objectives of the NRIS and AP in this strategy area is unrealistic. This stakeholder also noted that the fulfillment of objectives by 2020 depends in large part on the introduction of health mediators, expected to begin no sooner than 2016.

<u>Social care</u>. Baseline data are not available for any of three objectives in the area of social care. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in the area of social care cannot be determined. At the level of measures, baseline data are available for only three out of the total of 11. However, data for 2013 and 2014 are available for all measures, thus providing new baselines. In 2014, some progress can be tracked in relation to six out of 11 measures.

The interviews conducted in the framework of the evaluation revealed the position of Centers for Social Welfare that the priority placed in the AP on training mediators to improve the availability of social care is problematic because Roma do not view mediators as authoritative. Specifically, social workers' experiences to date suggest that Roma are well aware of their rights in the social welfare system. Moreover, previous experiences in introducing Romani mediators for implementation of measures in the area of family law demonstrated that the mediators were not treated with respect by other Roma. Taking this into account, there is a lack of clarity – apparently stemming from the provisions for mediators in two thematic areas of NRIS and AP – about the number of categories of mediators and the institutions responsible for them.

Physical planning, housing, and environmental protection. In this strategy area, baseline values are not available for any of the seven objectives. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in this area cannot be determined. Additionally, baseline data are available for only three out of the 15 measures in this priority area. While some progress is apparent on all measures in 2013 despite incomplete data in some instances, the data available on implementation in 2014 allow progress to be assessed in relation to only five measures, with progress evident for four.

Views on AP implementation in relation to physical planning, housing, and environmental protection vary widely, even at regional and local levels. Concerns about segregation were widely apparent among interviewed stakeholders at all levels. On the other hand, several interviewed stakeholders presented legalization as the most pressing problem faced by Roma in relation to housing. Although units of local self-government may in certain cases adopt decisions to waive

utilities fees in part or in their entirety, one stakeholder from civil society warned that arrears on utilities mean that an unknown but presumably considerable proportion of the dwellings inhabited by Romani households are not eligible for legalization and lack prospects for becoming eligible in the foreseeable future due to high levels of unemployment and poverty which make payment of arrears unlikely. Information on the practices of individual units of local self-government in this regard are not available at central level.

<u>Inclusion of the Roma national minority in the cultural and social life</u>. Baseline data are not available for any of the three objectives in this strategy area. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in this area cannot be determined. The situation at the level of measures is somewhat better, with baseline values available for six out of 14 measures. In the absence of data for 2014 from GOHRRNM, it is possible only to observe progress in 2013 in relation to seven of the 14 measures in this area.

Several interviewed stakeholders credited AP implementation with increasing societal interest in the situation of Roma through increases in the quantity and quality of media coverage about Roma. One stakeholder characterized this development as the greatest success of AP implementation to date. By way of contrast, another warned that the predominant emphasis placed in the media on Romani cultural identity does little to reduce social distance between Roma and non-Roma. Further, participants in one of the focus groups organized in Romani settlements in the framework of the evaluation reported that Roma are increasingly hesitant to identify themselves as such to non-Roma out of a perception that doing so makes it more likely that they will be subject to discrimination.

Also receiving mixed reviews from interviewed stakeholders were developments in the political representation of Roma. A written response from one central-level institution noted on the one hand increased participation of Roma in regional and local politics while on the other hand pointing to insufficient interest on the part of Roma in active inclusion in political life. While the role of the MP for national minorities was generally presented in a positive light, interviews with stakeholders in Međimurje County provided indications that the sub-ethnic (and to some extent geographic) division between Boyash Romanian- and Romani-speaking Roma is sometimes politicized in ways which have potential to affect negatively relations between Roma in Međimurje County and Romani-speaking political representatives in Zagreb.

While some stakeholders observed progress in the quantity and quality of dialogue between government and Romani CSOs, others claimed that Roma are more often ignored or instrumentalized. Additionally, organizational capacity in general and financial management capacity in particular received frequent mention as a factor limiting not only CSOs' ability to benefit from the increased availability of funding (especially from the EU, but also from state sources as application processes become more complex in an attempt to increase the transparency of funding to CSOs), but also their role in coordination among actors at local level as well as between local and regional levels on the one hand and between local and central levels on the other.

<u>Status solutions</u>, <u>combating discrimination</u>, <u>and help in realizing rights</u>. Baseline data are available for only one of the 10 objectives in this strategy area. Data from 2013 and 2014 further point to

progress toward this objective. No baselines are available for the rest of the objectives in this strategy area, but data for 2013 and 2014 are available also for one other objective, indicating progress here as well. Baseline data are available for eight out of 20 measures in this strategy area. Based on data from 2014, some progress can be tracked on six out of the 15 measures for which data are available. Data for 2014 on implementation of five measures in the sub-area "Combating Discrimination" were not available as of mid-March 2015.

An estimated 1 500 to 3 000 Roma in Croatia face status problems despite the formal existence of mobile teams, status issues are left largely to CSOs, often with the support of international organizations such as UNHCR. Non-citizens living in Croatia who lack a passport from any country face particular administrative difficulties. One the one hand, a passport is required for regulation of status. On the other hand, the embassies of relevant countries in Croatia are not generally equipped to issue passports (the major exception in this regard being Bosnia and Herzegovina).

<u>Improvement of statistical data collection</u>. No baseline data for the four objectives and accompanying measures in this strategy area are available, mostly because the planned activities are new for the period covered by the AP. Progress through 2014 is evident in relation to only two measures in this strategy area.

Available information suggests that there has been only modest progress toward realization of the four objectives in the strategy area "Improvement of Statistical Data Collection":

- (1) Age- and gender-disaggregated statistics on Roma remain rare;
- (2) There is some evidence of improvements in the methodology for collecting data on education, employment, material and social deprivation, poverty rates, and quality of life among Roma;
- (3) There is evidence of resistance to collecting ethnically disaggregated data on health indicators for the Romani population; and
- (4) There is some evidence of improvements in the methods for monitoring the inclusion, participation, and representation of Roma in cultural, political, and social life.

The design of the new forms distributed in early 2015 by GOHRRNM and tailored for each responsible institution for reporting on AP implementation in 2014 appears to provide a basis for improvement in this strategy area, particularly given that representatives of central-level institutions interviewed have not voiced objections to the new design.

Compliance of the programs with international standards and accepted treaties in the area of human rights and rights of minorities. Baselines are available for all four measures in this area. Additionally, the data provided for 2013 and 2014 allow progress to be tracked, with the measures planned in this area generally corresponding to regular activities of the Ministry of Foreign and European Affairs.

The design of the NRIS and the AP conform to the EU Framework for National Roma Integration Strategies up to 2020. On the other hand, the exclusion of Boyash Romanian and Romani from the list of languages covered by the European Charter for Regional or Minority Languages poses a barrier to the exercise of the right to mother tongue education for Roma in Croatia.

Recommendations

While it is already too late to revise the current AP according to the procedures elaborated in the NRIS, a partial revision of the NRIS should be considered. Additionally, the design of the AP for the period 2016-2018 should differ considerably from that of the current AP, taking into account not only the revised NRIS, but also the lessons learned from implementation to date and the findings of this evaluation. Detailed guidelines for approaching both documents and the arrangements for their implementation and monitoring are given below.

Strategic and implementation documents

- 1. Revise selected areas of the NRIS. The strategy areas "Physical Planning, Housing, and Environmental Protection" and "Inclusion of the Romani National Minority in the Cultural and Social Life" should be reworked in order to bring strategic objectives in these areas into line with the overall orientation of the NRIS toward integration. Revisions to the strategy area "Physical Planning, Housing, and Environmental Protection" should take into account good practice from Macedonia in relation to ethnically mixed social housing, as well as (future) experiences from the announced pilot of "intervention plans" in selected war-affected small cities in Croatia (including Beli Manastir and Darda, both with considerable Romani populations), as well as from the implementation of plans for the rehabilitation of areas damaged by illegal construction. Revision of the strategy area "Inclusion of the Romani National Minority in the Cultural and Social Life" should draw on positive examples from Serbia, Slovenia, and Spain, which treat Romani culture as dynamic and varied in their strategic documents for Roma. The occasion of revision should also be used in the other priority areas, in accordance with proposals from the Working Group.
- 2. Make clear and realistic commitments in the next action plan. Taking into account that it is already too late to revise the current AP, efforts should be directed toward applying lessons learned from implementation of the AP to the action plan for 2016-2018. To this end, prioritization among strategy areas should be introduced, with not all strategy areas necessarily included in the action plan. Additionally, there is a need to prioritize *within* strategy areas by assigning concrete timeframes to planned measures which reflect the relative urgency with which the measures should be implemented. Further, conceptual clarity in the statement of objectives should be ensured rather than relying on elaborate and separate definitions. Finally, the next action plan should include clear links between planned measures and the availability of EU funding as specified in the recently approved Operational Programme "Effective Human Resources 2014-2020" and Operational Programme "Competitiveness and Cohesion 2014-2020".
- 3. Reconsider the development of implementing documents at regional and local levels. Given that few units of regional and local self-government have adopted implementing documents to date and that there is little evidence that the measures foreseen in these document have been implemented, a more effective approach might be for the central-level institutions responsible for AP implementation to disaggregate by the measures foreseen in the AP for further disaggregation to local level by regional authorities.

- 4. <u>Increase human resource allocations at central level</u>. The practice common in central-level institutions of making a single staff member responsible overseeing implementation of, monitoring, and reporting on NRIS and AP implementation should be replaced with the establishment of a working group among current staff within each relevant institution with an eye to more even distribution of tasks. Each intra-institutional working group should meet on at least a monthly basis to discuss developments in NRIS and AP implementation.
- 5. <u>Routinize contacts among central-level institutions</u>. Thematic meetings of the Working Group of the Monitoring Commission should be held on a monthly basis, with priority given to issues for the resolution of which inter-sectorial cooperation is necessary.
- 6. Extend the reach of GOHRRNM. The engagement of experts at local level as foreseen in the NRIS has potential to improve communication and coordination between central, regional, and local levels. Partnership with the regional offices of the Ombudsperson institution should also be considered for this purpose.
- 7. Attend to sub-ethnic divisions within the Romani population. While complaints about lack of unity among Roma are sometimes rooted in the inconsistency of valuing pluralism in society at large while expecting minorities to speak with a single voice, politicization of the division between Romani- and Boyash Romanian-speaking Roma has potential to compromise realization of the broader objectives of the NRIS. For this reason, outreach to Boyash Romanian-speaking Romani communities should be increased with an eye to co-opting less constructive attention from (sub-) ethnic entrepreneurs with an agenda not clearly focused on integration.
- 8. <u>Improve Roma's access to EU funding</u>. The increased availability of EU funding resulting from completion of the accession process provides an opportunity both to improve intersectorial cooperation and to build the capacity of Romani CSOs with enduring ties to local communities. Particularly under the European Social Fund, activities to build the institutional capacities and project management competences of Romani CSOs project management should be encouraged for non-Romani organizations implementing project activities targeting Roma, as well as for the information units of ministries part of the operational structure for implementing EU funds. Additional targeted support outside EU-funded projects could be provided by experienced CSOs and by the Government Office for Cooperation with NGOs.
- 9. <u>Harmonize mediation concepts</u>. References to health mediators as best practice are frequent and such mediators accordingly figure as crucial actors in the implementation of specific measures of the AP. Reports from Centers for Social Welfare, on the other hand, indicate that Roma tend to see mediators as lacking the necessary level of authority. This conceptual tension should be resolved through discussion involving at minimum health and social care sectors.

Monitoring and evaluation

10. Ensure collection of ethnically disaggregated data. The reluctance of some institutions to collect data on ethnicity should be overcome by addressing legal concerns directly. To this end, a working group of the Monitoring Commission should be established for this purpose, with the working group including a representative of the Croatian Personal Data Protection

Agency. Additionally, a thematic session of the Monitoring Commission should be prepared with appropriate expert support to demonstrate the feasibility of ethnic data collection in line with EU standards on data protection. An official statement reflecting common agreement within the working group could provide a basis for institutions to use existing technical capacities by expanding their existing internal data systems, thus facilitating systematic data collection and avoiding the parallel monitoring processes currently associated with NRIS and AP.

- 11. <u>Establish baselines</u>. While a revision of the current AP is no longer feasible, measuring progress against the objectives of the current AP (and thus the NRIS) is a precondition for grounding the next action plan. Among possible sources of baseline data for the current AP are the 2011 census and the UNDP/WB/EC Regional Roma Survey 2011. Data from the forthcoming annual report on AP implementation in 2014 could serve as baselines in the next action plan.
- 12. <u>Build capacity for monitoring and evaluation</u>. On the one hand, the capacity of GOHRRNM to engage in monitoring and evaluation in general and to maintain a database on the situation of Roma in particular should be increased by hiring a staff member focused primarily on this area. On the other hand, the capacity of the Monitoring Commission to engage actively in monitoring implementation of the NRIS and the AP should be increased by expanding the membership of the Commission's Working Group to include external experts, at least during the time of preparation of the annual monitoring report. Finally, the members of Romani National Minority Councils should be introduced to the fundamentals of monitoring and evaluation as a basis for soliciting their input on annual reports on action plan implementation.
- 13. Standardize reporting on problems of data collection. Beyond requiring the reporting of data to fill indicators in the AP, reporting forms on AP implementation in 2015 and beyond should require responsible institutions to provide a specific explanation for not providing requested data, choosing among the following pre-developed options: (a) data not available in time for reporting deadline but will become available on a date to be indicated; (b) data has not been collected as planned due to errors in carrying out data collection; (c) the required data cannot be collected by law. On the basis of this information, the Monitoring Committee should take a decision on whether to exclude the indicators in question from further monitoring and/or to propose alternative solutions for the collection of relevant data.
- 14. Improve indicator selection. The indicators incorporated in the next action plan should attend to outcomes as well as to outputs in order to allow assessment of how the implementation of measures affects Roma (rather than only assessment of the degree to which measures were implemented). The selection of indicators should draw on the pilot coordinated by the European Union Agency for Fundamental Rights of the "Structure-Process-Outcome" rights-based indicator model. Only indicators for which baseline values are available at the time of drafting the action plan should be included in the document, with targeted studies to be carried out as necessary in advance of drafting in order to ensure the availability of relevant data. Wherever possible, indicators should include target values in order to make clear the degree of change which can be considered adequate progress.

15. <u>Contextualize monitoring and evaluation</u>. Beyond the quantitative research needed to generate baseline data on the basis of which progress can be measured, qualitative research has an important role to play not only for helping to make sense of quantitative data, but also for orienting future efforts. Particularly relevant for promoting the inclusion of Roma in Croatia are qualitative studies in local Romani communities to assess the broader impact of measures implemented to date and outstanding needs in the substantive areas of the NRIS.

1. INTRODUCTION

1.1. Purpose and structure of the report

The overall objective of this evaluation is to assess the extent to which the *National Roma Inclusion Strategy for the Period from 2013 to 2020* (NRIS) and the *Action Plan for the Implementation of the National Roma Inclusion Strategy* (AP) for the period 2013-2015 have contributed and/or can be expected to contribute in future to the inclusion of the Romani national minority in the Republic of Croatia. The evaluation has accordingly been designed to collect information and provide recommendations on the basis of which the Government of the Republic of Croatia can take informed decisions on actions necessary to increase the level of inclusion of Roma in Croatia, possibly including (but not necessarily limited to) revision of the AP and/or NRIS.

As foreseen in both NRIS and AP, the current assessment has been commissioned as a midterm external evaluation with an eye to identifying trends and difficulties in realizing the objectives set in NRIS and the AP. The period covered by the evaluation is April 2013-October 2014, with the evaluation carried out during the first quarter of 2015.

The structure of the report reflects the overall objective of the evaluation. The analysis presented throughout the report also acknowledges the key evaluation criteria of relevance, effectiveness, efficiency and sustainability. These are based on OECD's DAC (Development Assistance Committee), which became to represent the best practice in structuring evaluation research and organizing its findings.

Following a description of the design of the evaluation, the report provides an overview of the policy and institutional framework for the inclusion of Roma in Croatia. More specifically, this section offers an examination of the NRIS and AP, attending to relations between the two documents and the provisions of the AP by strategy area in addition to arrangements for monitoring and evaluation. Additionally, this section provides a comparison of the overall design of the NRIS and AP to the strategic and implementing documents adopted by other countries participating in the Decade of Roma Inclusion. The assessment of the overall design of these documents in this section of the report corresponds to the DAC evaluation criterion of relevance.

In the various subsections of Section 3, the DAC evaluation criteria of effectiveness, efficiency, and sustainability are addressed. This section is devoted more broadly to the ways in which NRIS and AP have been applied for improving the inclusion of Roma in Croatia. The section begins with an examination of the extent to which units of regional and local government have drafted, adopted, and implemented implementing documents as stipulated in the NRIS. Here, particular attention is given to relations between the implementing documents adopted at regional and local levels on the one hand and NRIS on the other. Also presented is available information on implementation of these documents and of budgetary expenditures for this purpose.

The level of efficiency in managing implementation is addressed in Section 3.2, which focuses on communication and coordination. This part of the report consists of an analysis of roles

played by the Government Office for Human Rights and Rights of National Minorities (GOHRRNM) and other key stakeholders in implementation of NRIS and AP. This subsection also includes an analysis of the extent to which the institutional framework provides a basis for synergies among stakeholders, and staffing arrangements in relevant institutions. The criterion of efficiency is still in focus in Section 3.3, which assesses activities related to monitoring and evaluation of NRIS and AP. Section 3.4 examines the implementation of the measures foreseen in the AP in each strategy area, attending at the same time to the most significant results and failures as well as to the factors behind them. In this way, the criterion of effectiveness in reaching set objectives and goal is directly addressed. The analysis of sustainability of achieved results; and prospects for fulfilment of the objectives set in NRIS and AP is also embedded in the analysis contained in Section 3.4. Where relevant good practice exists in other countries participating in the Decade of Roma Inclusion, a brief description is included at the end of each thematic sub-section of Section 3.4.

The final section of the report draws conclusions and identified lessons learned from the evaluation, assessing the prospects for fulfilling the objectives of the AP by the end of 2015 as well as the need for revisions to NRIS and/or AP. Additionally, this section offers a set of recommendations to the Government of the Republic of Croatia for addressing observed shortcomings in realization of the objectives set in NRIS and AP.

1.2. Methods of work

Combining desk and field research, this evaluation has made use of four mutually complementary research methods:

- 5. Documentary analysis
- 6. Semi-structured interviews
- 7. Focus groups
- 8. Structured observation

Taken together, these methods and the research instruments associated with them (see Annex 4) provide the components of a methodology which the Government Office for Human Rights and Rights of National Minorities (GOHRRNM) could potentially adapt and apply in future evaluations of NRIS and AP implementation.

Documentary analysis. The documentary analysis undertaken in the framework of the evaluation served to provide an overview of published data and, in so doing, to orient the other activities of the evaluation. Given the focus of the evaluation, the central documents analyzed were NRIS and the AP. Also covered by the analysis are reports prepared by civil society, government, and international organizations on the design and implementation of these two documents. A list of sources consulted is given in Annex 7.

Semi-structured interviews. The purpose of the interviews undertaken as part of the evaluation is to gather detailed qualitative information on application of the framework for inclusion of Roma in Croatia from the stakeholders most directly involved in the design and/or implementation of NRIS, AP, and/or action plans adopted at local and/or regional level. The main stakeholder categories targeted by the semi-structured interviews are accordingly civil society organizations (CSOs); government institutions (at central, regional, and local levels);

and international organizations. A total of 50 stakeholders were interviewed in the 29 interviews conducted in the framework of the evaluation, with all but two interviews held faceto-face. For a list of interviews by category, please see Annex 3.²

Questions by e-mail. For stakeholders with whom it was not practical to conduct an in-person interview for reasons of availability, distance, or level of involvement in the design and/or implementation of strategic and/or implementing documents, the evaluation team sought input on the basis of a small set of questions distributed via electronic mail.³ Additionally, follow-up questions were sent by e-mail to two stakeholders who had previously participated in a group interview in order to solicit concrete information on the implementation of specific measures foreseen in the AP.⁴

Focus groups were organized in order to gather information from members of local Romani communities. Selected in consultation with GOHRRNM and UNDP, the communities targeted are located in Beli Manastir, Čakovec, Rijeka, Sisak, and Zagreb, as these are areas with larger Romani populations. Additional criteria for the selection of communities included coverage by implementation documents adopted at regional level for inclusion of Roma and recent experience with interventions aimed at improving infrastructure in Romani settlements. While the selected communities are predominantly urban (the main exception being Čakovec, and partly Sisak), the overall selection provides broad representation of the diversity of Croatia's Romani population. A total of 40 members of local Romani communities took part in the five focus groups organized in the framework of the evaluation.

Structured observation was planned in the same local Romani communities in which focus groups were conducted. The reason for making use of this method in combination with focus groups is to supplement the rich qualitative information provided by members of local Romani communities with general information on the physical location of and infrastructure and housing conditions in Romani settlements. In the end, however, it proved impractical to conduct structured observation in Beli Manastir due to the schedule of the other field research activities, while the conditions in the visited settlement in Rijeka due to inclement weather on the day before visit prevented structured observation there.

² The core interview guide is given in Annex 4.

³ For a sample set of questions distributed via electronic mail, please see Annex 4.

⁴ Responses to questions by e-mail were received from the Council for National Minorities, as well as from the Ministries of Administration; Culture; Entrepreneurship and Crafts; Interior; Justice; Labor and Pension System; and Science, Education, and Sports,

⁵ The main questions raised in the focus groups are presented in Annex 4.

⁶ See Annex 4 for the observation grid used in Romani settlements.

2. THE FRAMEWORK FOR INCLUSION OF ROMA IN CROATIA

2.1. Documents

Croatia's NRIS sets as its general goal "to improve the status of the Roma minority in the Republic of Croatia by reducing the multi-dimensional socio-economic chasm between the Roma and the remaining population and by harmoniously, openly and transparently achieving the full inclusion of the Roma in all segments of society and the community" (Government of the Republic of Croatia 2012: 36). Toward achievement of this goal, the NRIS includes the following four objectives:

- The creation and development of human capital among Roma by raising levels of education and promoting life-long learning;
- A rise in Roma's economic status through improved access to the labor market, increased opportunities for employment and self-employment, and promotion of fair hiring practices;
- Improvement in Roma's health and social status by ensuring access to quality healthcare and social welfare as well as improved living conditions; and
- Higher social status for Roma stemming from the enjoyment of human rights in general and minority rights in particular as a result of the elimination of discrimination and active social and political participation (Government of the Republic of Croatia 2012: 36).

The overall design of Croatia's NRIS takes into account both the *EU Framework for National Roma Integration Strategies up to 2020* and the 2003 *National Program for Roma*, superseding the latter document (Government of the Republic of Croatia 2012: 35; see also European Commission 2011; Vlada Republike Hrvatske 2003). In addition to covering the "four crucial areas" of the *EU Framework* (and the Decade of Roma Inclusion) – education, employment, healthcare, and housing – in their own respective sections, the NRIS also counts among its "primary fields" social welfare; inclusion in social and cultural life; and status solutions, prevention of discrimination, and assistance in the exercise of rights (Government of the Republic of Croatia 2012: 35; cf. European Commission 2011: 4). In addition to the respective sub-sections devoted to each of the primary fields, Chapter IV.4 of the NRIS also contains a sub-section on improving the collection of statistical data. Whereas the seven substantive areas covered by the NRIS constitute a reduction relative to the ten of the *National Program for Roma*, ⁷ the NRIS is 150-plus pages make it more than twice as long as its predecessor.

Although neither NRIS nor AP includes a separate section on issues of gender, an intention to mainstream such issues is explicit in the NRIS: "Elements tied to the promotion of the human rights of women and gender equality, equal employment opportunities, gender-sensitive education, equality in decision-making processes in political and public life and elimination of violence against women were integrated into the Strategy's objectives and measures" (Government of the Republic of Croatia 2012: 36). The NRIS has been assessed positively for this approach, with the European Roma and Travellers Forum's (2015: 9) regional analysis of gender in the National Roma Integration Strategies noting with approval "a record 204 uses of the word women, and a

⁷ The substantive areas covered by the *National Program* are "Inclusion of Roma in Social and Political Life"; "Preservation of Roma's Traditional Culture"; "Status Issues"; "Fighting Discrimination and Legal Aid"; "Education"; "Health Care"; "Employment"; "Social Care"; "Protection of the Family, Motherhood, and Youth";

and "Spatial Planning". Additional sections are devoted to harmonization with international agreements and to monitoring implementation. See Vlada Republike Hrvatske (2003).

whole section on reproductive health as well as an entire section on Roma women." In similar fashion, Crowley et al. (2013: 34) state that "[i]n this, the Croatian NRIS can be considered one of the good practices in the EU" (Crowley et al. 2013: 34). Consistent with the approach to issues of gender taken in the NRIS, the AP also emphasizes the need to attend to improving the situation of Romani women in particular in addition to the situation of the Romani population in general in various places of the sections "Health Care", "Social Care", and "Status Solutions, Combating Discrimination, and Help in Realising Rights" (Government of the Republic of Croatia 2013: Sections 3, 4, 7).

General criticisms of Croatia's NRIS raised by the European Commission (2014: 13-14) focus on monitoring and evaluation, funding, and the role of regional and local authorities in relation to implementation. Taking into account that the NRIS was drafted with the explicit intention of supplementing it with an action plan (Government of the Republic of Croatia 2012: 2), the points raised by the EC are more appropriately examined in relation to the AP than to NRIS. Critical views about the NRIS expressed by interviewed stakeholders, on the other hand, ranged from claims that the new strategy was "too small a step forward", through a lack of information on the situation of Roma in each of the strategy areas, a shortage of opportunities for comment on drafts, failure to take into account feedback delivered from implementing institutions on a final draft, and insufficient Romani involvement in design, to concerns about a proliferation of strategic documents resulting in a lack of clarity about responsibility for funding and implementation caused in part by the appearance of the same measures in multiple strategies.

The eight areas structuring the NRIS constitute a larger number than that present in the respective strategies of most countries participating in the Decade of Roma Inclusion. Of the 13 countries participating in the Decade which have adopted a strategy, only the strategies of Bosnia and Herzegovina, Montenegro, and Serbia contain more than eight areas. The remaining countries respective strategies are organized around 5-7 areas.

With regard to thematic coverage, all strategies have in common with Croatia's NRIS coverage of the Decade's four priority areas: education, employment, health, and housing. Ten of the 13 strategies also devote a section to Romani culture, while nine contain a section on (anti-) discrimination. Whereas treatment of social welfare together with or separately from health care varies from one country to the next, Croatia's NRIS stands out for its inclusion of a section focused on statistical data collection.

⁸ Some interviewed stakeholders, however, expressed satisfaction with the processes by which NRIS and/or AP were generated.

⁹ The countries participating in the Decade of Roma Inclusion which have adopted a strategy for Roma are Albania, Bosnia and Herzegovina, Bulgaria, Croatia, the Czech Republic, Hungary, Macedonia, Montenegro, Romania, Serbia, Slovakia, Slovenia and Spain. Slovenia differs from the other countries which have adopted a strategy in that it is an observer rather than a full member of the Decade. The other observers in the Decade – Moldova, Norway, and the United States – have not adopted a strategy on Roma.

¹⁰ See Ministry for Human and Minority Rights (2012); Ministry of Human and Minority Rights (2010); Vijeće Ministara Bosne i Hercegovine (2005).

¹¹ See Government of the Republic of Albania (2003); Government of the Republic of Slovenia (2010); Government of Romania (2011); Government of the Slovak Republic (2012); Government of Spain (2012); Minister for Human Rights (2009); Ministerstvo za trud i socijalna politika (2014a); Ministry of Public Administration and Justice (2011); National Council for Cooperation on Ethnic and Integration Issues (2012).

From Strategy to Action Plan

The structure of the AP generally follows that of Chapter IV.4 of the NRIS, with a section for each of the main strategy areas as well as a section entitled "Improvement of Statistical Data Collection" (Government of the Republic of Croatia 2013). Included in the AP but not the NRIS, however, is a section entitled "Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities" (Government of the Republic of Croatia 2013: Section 9). As explained by GOHRRNM staff, this section is a vestige of Croatia's previous National Program for Roma and therefore does not correspond to a single section of the NRIS, which covers similar content under various headings (see Government of the Republic of Croatia 2012: Chapter II; Vlada Republike Hrvatske 2003: Section III). Thus, whereas the NRIS counts eight strategy areas, the AP covers nine. Additionally, the AP contains an unnumbered halfpage section entitled "Methodology of the Monitoring of the Action Plan Implementation" which consists of excerpts from the chapter of the NRIS on monitoring (Government of the Republic of Croatia 2013: 126; cf. 2012: Chapter V). More significant than differences between AP and NRIS, however, are the corresponding differences between the AP and the Action Plan of the Decade of Roma Inclusion for the Years 2011 and 2012. In addition to its coverage of the four priority areas of the Decade (i.e., education, employment, health, and housing), the previous Action Plan's 41 measures make it an ostensibly less ambitious document than the AP with its total of 128 measures (Government of the Republic of Croatia 2013; Office for National Minorities of the Republic of Croatia 2011).

Insofar as the number of areas covered in Croatia's AP is not smaller than the number of areas in the strategy on which the AP is based, Croatia's AP differs from the action plans adopted by all other countries participating in the Decade of Roma Inclusion except for Serbia, which is also the only Decade participant with an action plan covering more than Croatia's nine areas (at 13). Other countries' action plans are divided into eight areas or fewer, with all except the Serbian and Spanish action plans organized around 4-6 areas. All action plans include separate sections devoted to education, employment, health, and housing. Of the other areas included in the AP, the one most common in the action plans of Decade participants is culture, which appears in the action plans of seven countries. The sections of Croatia's AP entitled "Improvement of Statistical Data Collection" and "Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities" are unique among countries participating in the Decade.

While the overall goal and objectives of the NRIS are not mentioned in the AP, the goals and objectives for each of the strategy areas are identical across the two documents. In this sense, there are no problems of compatibility between NRIS and AP. On the other hand, problems of conceptual clarity apparent in the NRIS are present also in the AP. For example, Objective 1 in the strategy area of education is "[t]o increase the quality and efficiency of education of Roma children, and to ensure the acquisition of the necessary knowledge and skills which will enable

¹² See Government of Bulgaria (2005); Government of the Czech Republic (2005); Government of the Republic of Hungary (2007); Government of the Slovak Republic (2011); Ministarstvo za ljudska i manjinska prava (2012); Ministerstvo za trud i socijalna politika (2009; 2010); Ministry for Human Rights and Refugees (2010; 2013); Ministry of Health, Social Policy and Equality (2010); Ministry of Human and Minority Rights (2010); Ministry of Labor, Social Affairs and Equal Opportunities (2009). Romania and Slovenia have not adopted separate action plans for realization of the goals set in their respective strategies on Roma, but both strategies contain information on planned measures (see Government of the Republic of Slovenia 2010; Government of Romania (2011)).

personal growth of the pupils, as well as to help them complete primary education with the aim of continuing their education, and to reduce the gap between the educational achievements of the Roma children compared to the average level of educational achievements of all pupils in the national primary education system" (Government of the Republic of Croatia 2013: 7). Objective 3 in the same strategy area reads as follows: "To equalize the inclusion of members of the Roma national minority in primary education compared to the enrolment average of the primary education on the national level (to reach the inclusion level of 98%) and to equalize the completion rate of Roma children with the national completion rate in the primary education system (to reach the completion rate of 95%)" (Government of the Republic of Croatia 2013: 11). Insofar as both objectives relate to reducing the gap between Roma and non-Roma in relation to participation in and completion of primary education, it is not immediately clear how the two differ. Turning to the definitions offered below the respective aims, however, it becomes clear that Objective 1.1 concerns the development of a system of support to educational institutions in order to enable them to better meet Roma's educational needs, whereas Objective 1.3 focuses on more direct forms of "support to children, families and educators" (Government of the Republic of Croatia 2013: 7, 11).

If a lack of clarity in relations among objectives can sometimes be resolved by referring to the additional definitions provided below the respective objectives, however, this is not always the case. In the strategic sub-area of realizing rights, for example, Objectives 1 and 2 are "[t]o increase the availability of free legal aid to Roma persons pursuant to the Free Legal Aid Act" and "[t]o increase the visibility of free legal aid instruments" (Government of the Republic of Croatia 2013: 111). While these two objectives seem self-explanatory as do their mutual relations, a third objective seems to combine these two without going further: "[t]o increase the level of the availability of free legal aid to Roma people, especially in cases in which they are suspected victims of discrimination, by increasing the availability of aid in realizing rights, and by increasing the visibility of free legal aid" (Government of the Republic of Croatia 2013: 113). Here, the additional definition of the objective 1 is of little use, such that it remains unclear what Objective 3 contains that is not already covered jointly by Objectives 1 and 2.

Beyond issues of conceptual clarity, the design of the AP raises more immediate practical concerns. As noted by representatives of international and civil society organizations as well as of GOHRRNM, the objectives of the NRIS, which covers the eight-year period from 2013 to 2020, are replicated without adjustment in the AP, which covers only the first three years of the NRIS's lifespan. This suggests that successful implementation of the AP would completely fulfill the objectives of the NRIS, in so doing calling into question the purpose of generating an action plan for a timeframe different from that of the NRIS. By the same token, it may be taken as a preliminary indication that the AP is too ambitious, supporting the contention of representatives of GOHRRNM that the measures contained in the AP cannot be fully implemented or its objectives fulfilled by 2015.

A related practical concern is the overall lack of clarity concerning the timeframe for completing implementation of the measures foreseen in the AP. Concrete deadlines are specified for only 19

¹³ "This aim presupposes access not only to courts, but to all bodies established under public law. In order to increase the visibility of free legal aid, measures that include informing the public at contact points in counties, posters distributed to social care centres, CPII, CES and at information counters will be implemented" (Government of the Republic of Croatia 2013: 113).

of the 128 measures included in the AP, with implementation of the vast majority of measures planned to take place on a continuous basis. No timeframe is indicated for five measures foreseen in the area of healthcare and for six measures planned for improvement of statistical data collection (Government of the Republic of Croatia 2013: Sections 3, 8).

Assessment of the Action Plan by strategy area

As is fitting for an action plan, the nine strategy areas around which the AP is organized are divided into goals and objectives, with a set of measures elaborated for each objective. The two exceptions to this generalization are Section 8 ("Improvement of Statistical Data Collection"), which includes objectives but no stated goal, and Section 9 ("Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities"), in which measures are listed without prior division into objectives or stated goal. All other strategy areas are divided into 3-10 objectives, with 1-10 measures under each objective. All in all, the AP's 128 measures are divided among 48 objectives.

Generally, notwithstanding the issues of conceptual clarity discussed earlier in this section, the objectives in each strategy area fit the corresponding goal. Additionally, the measures foreseen under each objective generally fit the relevant objective. At the same time, there are cases in which successful implementation of planned measures risks reinforcing and/or promoting segregation between Roma and non-Roma. Such cases are discussed below in the sub-sections "Physical Planning, Housing, and Environmental Protection" and "Inclusion of the Roma National Minority in the Cultural and Social Life".

Education

The strategy area of education consists in the AP of a total of 14 measures under seven objectives, which fit with the overall goal "[t]o improve access to high-quality education by including education and care provided in early childhood, but also to improve the primary, secondary and university education, with special emphasis on removing any possible segregation in schools; to prevent early interruption of education, and to ensure a smooth transition from school to employment" (Government of the Republic of Croatia 2013: 6). Additionally, the measures planned in this area fit the corresponding goals. In attending explicitly to quality education, Croatia's NRIS distinguishes itself from the majority of Member State responses under the EU Framework (Friedman 2013: 10). Another positive feature of this section of the NRIS relative to other submissions in response to the EU Framework is the inclusion of an objective focused on increasing the number of adult Roma who complete training programs aligned with the demands of the labor market (Government of the Republic of Croatia 2012: 49; see also Friedman 2013: 13-14). While the European Commission (2014: 13) points to a need for more attention to desegregation, as well as for a more detailed timeframe for the implementation of measures in this area, the Roma Education Fund praises the NRIS section on education for a shift from providing separate classes for Roma with insufficient command of Croatian language and/or lacking preschool education to an integrative approach aimed (among other things) at the elimination of Roma-only classes by 2020 (Dvornik et al. 2014: 17, 25).

Employment and Inclusion in Economic Life

¹⁴ Other Member States devoting space to discussion of this theme are Bulgaria, Hungary, Italy, Romania, Slovakia, Slovenia, and Sweden (Friedman 2013: 10).

The European Commission (2014: 13) observes a lack of detail in the timeframe for the measures foreseen in the area of the NRIS "Employment and Inclusion in Economic Life", also mentioning the need for clear budget allocations and "result indicators based on targets" in this area. While these are not clearly fair criticisms of a strategic document (as opposed to an implementation document), the issues raised receive attention in the current report in relation to the AP. The European Commission's (2014: 13) call for attention to discrimination in the labor market, on the other hand, is arguably more appropriate in light of the absence of objectives involving employers (see also Franc et al. 2010: 36). At the same time, however, it is important to note that Measures 2.4.2 and 2.6.2 target employers (Government of the Republic of Croatia 2013: 34, 38).

Employment and Inclusion in Economic Life is the strategy area of the AP with the largest number of planned measures: a total of 24 measures under 7 objectives. The overall goal of this area is simple and clear: "To reduce the gap between the Roma national minority and the majority population on the labour market" (Government of the Republic of Croatia 2013: 21). As in the strategy area of education, the objectives are suited to the overall goal. Planned measures also generally fit the objectives under which they appear, with the possible exception of Measure 2.1.1, which focuses on empowering and motivating Roma to enter the labor market. While the objective under which this measure is planned is "[t]o increase the level of social inclusion of the Roma population through strengthening for the inclusion in the labour market", the measure seems to fit better with Objective 6 in this area: "To increase the motivation level of members of the Roma national minority for the inclusion in the labour market".

Health Care

In relation to the section of the NRIS on healthcare, the European Commission calls for "[m]ore developed specific measures within an integrated approach" (European Commission 2014: 13; cf. Bagić et al. 2014: 65). The corresponding section of the AP seems to respond adequately to this call, with the definitions of three of the seven objectives (Objectives 1, 2 and 7) including reference to coordination with other sectors. Moreover, the total of 22 measures in this section fit their respective objectives, which in turn fit with the general aim of "improv[ing] the health care of the Roma population, as well as the quality and availability of health care" (Government of the Republic of Croatia 2013: 41). In terms of the total number of planned measures, Health Care is second only to the strategy area of Employment and Inclusion in Economic Life.

Social Care

The goal of the strategy area "Social Care" is "[t]o reduce poverty in the Roma population and to improve the quality of social services and services in the community" (Government of the Republic of Croatia 2013: 61). The total of 11 measures planned in this area fit with the three objectives under which they are grouped. The fit between the objectives and goal for this strategy area is also unproblematic.

Physical Planning, Housing, and Environmental Protection

A total of 15 measures are planned in the strategy area of Physical Planning, Housing, and Environmental Protection. The measures fall under seven objectives, of which three relate to physical planning and two each to housing and environmental protection. The overarching goal for this strategy area is "[t]o improve the housing quality of the Roma population" (Government of the Republic of Croatia 2013: 74).

As noted by the European Commission (2014: 13) as well as by Mikić and Babić (2014: 29), the approach taken in this strategy area tends to neglect *de facto* residential segregation as a problem. Thus, the measures planned under the three objectives in the sub-area of physical planning fit the corresponding objectives, the realization of which can in turn be expected to contribute to an improvement in the quality of Roma's material housing conditions, but the focus of all three objectives on improving existing Romani settlements minimizes their presumable effect on residential segregation and thereby on the inclusion of Roma in the wider society. Similar observations apply to the sub-area "Environmental Protection".

The sub-area specifically focused on housing is more problematic than the other two sub-areas in this section. Here, while the planned measures appear to fit the corresponding objectives, the terms in which the two objectives in this sub-area are formulated and defined reveal a tension between inclusion and improving conditions in Romani settlements. Thus, whereas Objective 1 is "[t]o improve the housing integration of Roma people in the community" and the definition of this objective includes mention of "anti-discrimination measures", the indicator for this aim is living conditions in Romani settlements (Government of the Republic of Croatia 2013: 79). In similar fashion, the definition of Objective 2 in this sub-area ("[t]o ensure housing in appropriate conditions") refers to "implementing desegregation measures", but "the standard and quality of living in Roma settlements" remains as an indicator (Government of the Republic of Croatia 2013: 80). On the other hand, the measures planned under this objective appear to fit the objective.

Inclusion of the Roma National Minority in the Cultural and Social Life

Croatia is one of six EU Member States to include in its NRIS a thematic section addressing issues of culture.¹⁵ The strategy area "Inclusion of the Roma National Minority in the Cultural and Social Life" includes 14 measures under three objectives. The goal for this strategy area is "[t]o empower members of the Roma national minority for participation in the social, cultural and public life in order to reduce the gap between members of the Roma national minority and the rest of the population" (Government of the Republic of Croatia 2013: 86).

While the objectives fit the goal for this strategy area and most of the planned measures fit the objectives under which they are placed, three of the measures planned under Objective 1 risk compromising the "achieve[ment of] a positive perception of the Roma culture and identity within the Roma national minority[,] within the majority population and the society as a whole" (Government of the Republic of Croatia 2013: 87). More specifically, the establishment in Romani settlements of separate cultural facilities for Roma apparently described in Measure 6.1.2 has potential to reinforce existing segregation between Roma and non-Roma. At the same time, the focus of Measures 6.1.3 and 6.1.4 on traditional Romani culture suggest a conception of culture as a set of traditions frozen in time which could work against the acceptance of Roma as equals by non-Roma living in the present without closer contacts with contemporary Roma (see Government of the Republic of Croatia 2013: 88-89). Additionally, the construction of a "Roma cultural centre" in Zagreb as the central institution for Romani culture is identified in both NRIS and the AP (Objective 6.1) as a "special priority", but there is no measure in the AP corresponding to this declared priority (Romsko nacionalno vijeće 2013: 3).

¹⁵ The other EU Member States which devote a section of their respective NRIS to culture are Albania, Bulgaria, Hungary, Serbia, and Spain.

Status Solutions, Combating Discrimination, and Help in Realising Rights

As is the case with the section of the AP related to housing (Section 5), the objectives corresponding to Section 7 ("Status Solutions, Combating Discrimination, and Help in Realising Rights") are further divided among status solutions (three objectives), combating discrimination (four objectives), and help in realizing rights (three objectives). The total number of measures planned in this strategy area is 20. While some duplication among objectives with small numbers of measures under them suggests a potential for consolidation in future strategic and/or implementing documents, the planned measures fit their respective objectives, the realization of which would in turn contribute to the broader goal for this strategy area: "A completely (100%) regulated status in accordance with the legal framework (citizenship or permanent residence) of Roma people with a strong connection with the Republic of Croatia (or ex-Federal Republic of Croatia) up to 2020, with a significant support of the competent authorities" (Government of the Republic of Croatia 2013: 96).

Improvement of Statistical Data Collection

The strategy area "Improvement of Statistical Data Collection" includes a total of 12 measures under four objectives. Perhaps not surprisingly, the objectives and the measures planned under them focus on the collection of data on the situation of Roma in the other strategy areas in such a way as to lay the groundwork for statistics disaggregated by age, ethnicity, and gender while protecting personal data (Government of the Republic of Croatia 2013: 115-116). While no broader goal is stated in the section, the realization of the objectives that would come from successful implementation of the measures foreseen under them could be expected to contribute to successful monitoring of the outputs and outcomes of AP implementation.

<u>Compliance of the Programmes with International Standards and Accepted Treaties in the Area of</u> Human Rights and Rights of Minorities

Whereas the section of the AP devoted to data collection lacks a stated goal toward which realization of the objectives can be expected to contribute, Section 9 of the AP includes neither an explicit goal nor stated objectives for the four planned measures (see Government of the Republic of Croatia 2013: 124). Assuming that the title of the section adequately captures the goal of the included measures, however, the fit between measures and (implicit) goal is unproblematic.

Arrangements for monitoring and evaluation

Notwithstanding the criticism from the European Commission (2014: 13-14) that "[t]he strategy would benefit [...] from a robust result-oriented monitoring and evaluation system", Croatia's NRIS stands out among targeted strategies taking into account the EU Framework for its high level of attention to monitoring and evaluation (see Friedman 2013: 9). Not only is a chapter of the NRIS devoted to establishing a framework, mechanisms, and an institutional division of labor for assessing progress in implementation, but improving data collection is also treated as a strategy area in both NRIS and AP. Moreover, information on the availability of baseline data improves from NRIS to AP.

The chapter of the NRIS entitled "Framework for Monitoring Progress" opens with an inventory of indicators to be used for monitoring the impact of measures undertaken "in the four key areas of Roma inclusion: education, employment, health and housing" (Government of the Republic of

Croatia 2012: 120-121). Noting that "[t]he Strategy provides for the establishment/organisation of a more comprehensive data collection system to cover all areas of its implementation", the NRIS points to the need to adjust data-gathering practices in such a way as to enable the generation of data disaggregated by age and gender as well as by ethnicity (Government of the Republic of Croatia 2012: 121). The NRIS also identifies activities necessary in order to create conditions for meaningful monitoring. These are mapping disadvantaged micro-regions and segregated or marginalized neighborhoods and adopting at central level provisions and mechanisms for the collection of appropriately disaggregated data (Government of the Republic of Croatia 2012: 121).

Consistent with these provisions, the NRIS contains four objectives related to data collection and monitoring the implementation of relevant measures:

- (1) Ensuring collection of age- and gender-disaggregated statistics on Roma;
- (2) Improving the methodology for collecting data on education, employment, material and social deprivation, poverty rates, and quality of life among Roma;
- (3) Improving the methodology for collecting data on health indicators for the Romani population; and
- (4) Improving the methods for monitoring the inclusion, participation, and representation of Roma in cultural, political, and social life (Government of the Republic of Croatia 2012: 121-123).

These four objectives are reproduced in Section 8 of the AP ("Improvement of Statistical Data Collection") (Government of the Republic of Croatia 2013: 114-122). Whereas the NRIS provides definitions as well as information on indicators, some baseline values, data sources, and implementing agencies for each of these objectives, the AP further outlines measures corresponding to each objective. Out of the 12 measures planned in this area, the only one with a one-time deadline earlier than 2015 is an analysis of the participation of Roma in regional- and local-level representative bodies relative to Roma's proportion of the general population in the corresponding administrative-territorial units, scheduled for the second and third quarters of 2013 (Government of the Republic of Croatia 2013: Measure 8.4.1). Monitoring the provision of social care by local self-government units and cooperation in such monitoring with relevant institutions (including Romani councils or representatives) are scheduled to be implemented on an ongoing basis (Measures 8.2.4 and 8.2.5), while the creation of monitoring forms for the collection of data disaggregated by age, ethnicity, and gender as well as the establishment within GOHRRNM of a database on the situation of Roma (Measures 8.1.1 and 8.1.2) are left for 2015, as is generating an atlas of micro-regions (Measures 8.2.6). No deadline is specified for the remaining six measures.

In addition to regular monitoring and annual reporting on its implementation, the NRIS provides for evaluations approximately every 1.5 years. The first such evaluation, a mid-term evaluation planned "by roughly mid-2014", is to be conducted with an independent expert and to involve Romani civil society organizations as active participants, with trends to be identified on the basis of "available primary data and focused pilot surveys" (Government of the Republic of Croatia 2012: 126). A second evaluation is foreseen for the second half of 2015, toward the end of the period covered by the AP.

Beyond mention of the need for a "middle-term and external evaluation" in the section "Methodology of the Monitoring of the Action Plan Implementation", the AP includes three more

specific uses of these evaluations. The first of these is as a source of data in relation to fulfillment of the first objective in the area of education, which refers to reducing the gap between Roma and non-Roma in academic performance in primary education and to completion of primary education as a basis for further education (Government of the Republic of Croatia 2013: Objective 1.1). A mid-term evaluation in 2015 (as opposed to the previous year, as stipulated in the NRIS) is also identified as a source of data on implementation of a measure for increasing the frequency with which Roma and Romani culture are presented in broadcast media (Measure 6.1.5). Finally, a mid-term evaluation is identified as the (sole) source of data on fulfillment of the third objective in the area of inclusion of Roma in cultural and social life, which focuses on strengthening Romani organizations (with an emphasis on Romani women's organizations) "for advocacy and problem solving in the Roma and wider community" (Objective 6.3).

Integrally connected to the planned evaluations is the possibility of revising NRIS and AP: "Revision will cover the National Strategy and its Action Plan and will take place in cases where the reports suggest that any of the planned objectives or measures fails to produce the expected results or cannot be implemented" (Government of the Republic of Croatia 2012: 126). The regular revision process is initiated based on evaluation findings and coordinated by GOHRRNM, which also revises the document during the third quarter of the year in question (Government of the Republic of Croatia 2012: 127). Prepared by the Monitoring Commission, the final draft of the revised document is submitted to the Government for adoption in the fourth quarter of the year in question. Mention of periodic revision of NRIS and AP appears also in the section of the AP entitled "Methodology of the Monitoring of the Action Plan Implementation", albeit with fewer details than in the NRIS. Additionally, the NRIS (but not the AP) provides for extraordinary revision initiated by the Monitoring Commission, with the process in this case requiring an official request for amendment of specific measures which includes a rationale based on concrete data (Government of the Republic of Croatia 2012: 127).

Despite the considerable attention devoted to issues of monitoring and evaluation in the NRIS, the AP falls short of laying the groundwork for tracking realization of its 48 objectives. Of the total of 111 indicators identified in the AP for the objectives, baseline values are given for only 11 of the identified indicators. Of these, six refer to objectives in the strategy area Employment and Inclusion in Economic Life, two to Education, and one each to Healthcare; Physical Planning, Housing, and Environmental Protection; Status Solutions, Combating Discrimination, and Help in Realizing Rights. No baseline values are given for indicators identified in the strategy areas of Social Care; Inclusion of the Romani National Minority in Cultural and Social Life; Improvement of Statistical Data Collection;¹⁷ or Compliance of the Programs with International Standards and

¹⁶ "The process of routine revision of the Strategy or Action Plan is initiated by the Committee for the Monitoring of the Implementation of the National Strategy for Roma Inclusion from 2013 to 2020" (Government of the Republic of Croatia 2013: 127)

¹⁷ Whereas the baseline value given for all measures foreseen in Section 8 of the AP is zero, the AP also notes the absence of baseline data for the two objectives corresponding to improving the methodology for collecting data on poverty, material and social deprivation, education, employment, and quality of life among Roma on the one hand; and on the health situation of the Romani population on the other (Government of the Republic of Croatia 2013: Objectives 8.2 and 8.3). No sources of baseline data are identified for the remaining two objectives (i.e., 8.1 and 8.4), which relate to ensuring gathering of statistical data on Roma disaggregated by age and gender while protecting personal data, and improving methods for monitoring Roma's inclusion, participation, and representation in cultural and political life.

Accepted Treaties in the Area of Human Rights and Rights of Minorities. In practical terms, the absence of baseline data means that realization of the vast majority of the objectives (i.e., 100 of the 111) included in NRIS and AP cannot be measured.

Table 1 below provides an overview of the baseline data included in the AP for the objectives of NRIS and AP. As can be seen, the relevance of the data to the objectives varies. In the case of Objective 2.5, for example, participation in informational activities on self-employment need not lead to self-employment (see Government of the Republic of Croatia 2013: 35-36). In similar fashion, participation in workshops on active job-seeking skills does not provide a measure of Roma's motivation for inclusion in the labor market toward fulfilment of Objective 2.6 (see Government of the Republic of Croatia 2013: 37). Overall, however, the data in the table provide a basis for measurement lacking for all other indicators in the AP.

Table 1. Baseline data provided for Action Plan objectives

Strategy area	Objective	Indicator	Baseline value
1. Education	4. To abolish all classes attended exclusively by Roma children by 2020	Number of classes attended solely by Roma pupils	50 (2012-2013)
	7. To increase the inclusion of adult Roma in literacy, education, and training programmes	Rate of inclusion of members of the Roma national minority included in adult education programmes, lifelong learning education programmes and vocational training programmes compared to the total Roma population	311 Roma (of whom 155 women) completed relevant programs in 2012
2. Employment and Inclusion in Economic Life	1. To increase the level of social inclusion [] through strengthening for inclusion in the labour market	Rate of inclusion of the Roma population in the labour market, by age and gender, compared to the total number of members of the Roma population with the working ability	34.91% of work-capable Roma aged 15-64 and 23.79% of work-capable Roma aged 15-24 employed in 2011 ¹⁸
	2. To increase the competitive strength and employment rate of younger members of the Roma national minority	Employment of young Roma compared to the rate of youth employment in the Republic of Croatia for the reporting period, broken down by nationality	270 young Roma employed through CES co-financing scheme in 2011
	3. To increase the competitive strength and	Roma women employment rate compared to the employment rate of women in the Republic of Croatia	138 Romani women employed through CES co- financing scheme in 2011

 $^{^{18}}$ The figures disaggregated by gender are 41.06% of men and 24.08% of women aged 15-64 and 31.06% of men and 12.96% of women aged 15-24 (Government of the Republic of Croatia 2013: 23).

	employment rate of Roma women		
	4. To increase the competitive strength and employment rate of long-term unemployed members of the Roma national minority	Rate of long-term unemployed members of the Roma community compared to the rate of employment of the total number of long-term unemployed persons, broken down by gender	90 long-term unemployed Roma employed through CES co-financing scheme in 2011
	5. To increase the rate of formal self-employment of members of the Roma national minority	Rate of employment of unemployed Roma persons through self-employment compared to the rate of formal employment of the majority population, broken down by gender	43 unemployed Roma (of whom 7 women) included in CES group information activities on self-employment in 2012
	6. To increase the motivation level of members of the Roma national minority for the inclusion in the labour market	Number of Roma involved in workshops	393 unemployed Roma (of whom 155 women) took part in workshops on active job-seeking skills in 2012
3. Health Care	2. To increase the availability of health services to the Roma population	100% availability of health services to the Roma population [] until 2020 achieved	In 2011, 36% of Roma had not been able to access needed health services at some point during the previous 12 months
5. Physical Planning, Housing and Environmental Protection	1.1. To ensure the physical planning documentation for Roma settlements	Number of settlements legalised so that they are in accordance with the physical plans	25 physical plans including follow-up activities for legalisation created for 17 locations inhabited by Roma created from 2004 to 2012
7. Status Solutions, Combating Discrimination,	1.2. To inform and encourage members of the Roma community on the full cooperation in procedures for the resolution of their status	Number of resolved status issues compared to the number of requests, broken down by ethnicity, gender and age	In 2012, 25 requests received for citizenship on grounds of naturalization, 20 persons granted citizenship, 9 citizenship

and Help in		guarantees issues, 12
Realising Rights		requests denied

If the absence of baseline data prevents measurement of progress toward the objectives of NRIS and AP, it also leaves room for speculation about the appropriateness of the objectives and, in so doing, for dubious generalization about Roma. To take a concrete example, Objective 2 in the strategic sub-area of environmental protection is "[t]o inform the Roma national minority of environmental protection and means of its implementation", with the associated indicator "[i]ncreased level of knowledge on environmental protection and of the ability of independent planning and project implementation" (Government of the Republic of Croatia 2013: 84; cf. 2012: 88). Despite an explicit indication that relevant baseline data are not available, both NRIS and AP refer to an "unsatisfactory level of knowledge" among Roma in relation to environmental protection. Without the necessary data, such claims risk reproducing stereotypes.

For other objectives, baselines refer to sources of data which did not exist when NRIS and AP were drafted. In the strategy area "Inclusion of the Roma National Minority in the Cultural and Social Life", for example, Objective 2 refers to increasing the inclusion of Roma in general and Romani women in particular in public and political life (Government of the Republic of Croatia 2013: 89). Here, however, not only is no baseline value available, but the GOHRRNM database specified as a source of data for this indicator did not exist as of March 2015. In broadly similar fashion, Objective 3 in the same strategy area focuses on strengthening Romani organizations for advocacy and problem-solving, but the baseline study to which it refers has not been undertaken (Government of the Republic of Croatia 2013: 93-94). Moreover, the sole data source specified for this indicator is the first mid-term evaluation.

In some instances, the problem of missing baseline data is compounded by an apparent lack of ambition in provisions for future data collection. Objective 3 in the strategy area of Social Care provides an illustration of such compounding. This objective is "[t]o empower the local Roma community for recognizing the risk of exposure to human trafficking, sexual abuse and other types of violence, with special emphasis on women and children". The indicator identified for this objective is the proportion of the Romani population as a whole and the proportions of Romani women and children acquainted with instances of human trafficking, sexual abuse, and other types of violence, as well as with the mechanisms for protection against these forms of violence. While this complex indicator is arguably better divided into at least two separate indicators (i.e., awareness of cases of human trafficking, sexual abuse, and other types of violence; and familiarity with the mechanisms for protection against human trafficking, sexual abuse, and other types of violence), this is less problematic from the standpoint of monitoring progress of AP implementation than is identifying as sole data source surveys in Romani settlements for which the deadline for completion is 2015 (Measure 4.3.1). Thus, not only is there no baseline value for this objective, but no data on its realization are to be expected within the lifetime of the AP.

Additional problems with the arrangements for monitoring and evaluation relate to the selection of indicators (Škrbić 2014: 2). Whereas some indicators tend toward formalism in focusing on regulations, others focus on relatively minor tasks of relevant bodies. Overall, there is a shortage of indicators which would assess not only whether the measures foreseen in the AP were implemented (i.e., outputs), but also how the implementation of these measures actually affects the situation of Roma (i.e., outcomes and impact). Some stakeholders characterized this state of affairs as an attempt by institutions to avoid responsibility for bringing concrete changes.

2.2. Institutions

Overall institutional division of labor

Continuing GOHRRNM's previous role in relation to the *National Program for Roma* (Narodne novine 2012: Article 2), the NRIS presents GOHRRNM as playing a largely coordinative role in relation to Strategy implementation, including "encouraging the relevant bodies to implement measures", as well as "maintaining partnership with both Roma and international communities" (Government of the Republic of Croatia 2012: 128). GOHRRNM is also tasked with initiating, coordinating, and carrying out evaluations and revisions, although this role is to be transferred to "another independent expert body" at an unspecified point in the future (Government of the Republic of Croatia 2012: 140). Additionally, the NRIS makes GOHRRNM more directly responsible for the implementation of some measures (as well as for monitoring implementation of the same), as well as for organizing tenders and training programs to ensure implementation (Government of the Republic of Croatia 2012: 128). In the AP, however, GOHRRNM figures as a responsible institution for 44 of the 128 planned measures, considerably more than another other government body (with the Ministry of Health a distant second at 25 measures) (Government of the Republic of Croatia 2013).¹⁹

The NRIS identifies the following roles for governmental administrative bodies:

- Adopting medium-term policies and tools and partnerships for their implementation;
- Preparing action plans in line with objectives and measures of NRIS;
- Drawing annual priority lists and proposing budgets necessary for realization of priorities;
- Implementing measures of NRIS and AP within their areas of jurisdiction;
- Annual reporting on implementation of specific measures;
- Contributing to interdepartmental coordination, including but not limited to participation in monthly interdepartmental operational meetings; and
- Supervising and coordinating measures implemented at local level (Government of the Republic of Croatia 2012: 124-125, 128-129).

Beyond these broad commonalities, the number of measures assigned to the various administrative bodies implicated in the AP varies widely (Government of the Republic of Croatia 2013). Among relevant central-level institutions, the range is from one (Government Office for Cooperation with NGOs, Ministry of Entrepreneurship and Crafts, and Ministry of Environmental and Nature Protection) to 44 (GOHRRNM). As shown in Table 2 (below), which provides an overview of the assignment of responsibility for implementation of the measures of the AP in each strategy area, the range of variation is less among the central-level institutions most directly responsible for three of the four priority areas identified in the EU Framework. In the case of the fourth priority area of the EU Framework, on the other hand – housing – the greatest share of responsibility falls on regional and local self-government units, which are assigned responsibility for 14 of the 15 measures foreseen in the strategy area "Physical Planning, Housing and Environmental Protection". Also noteworthy is the assignment to GOHRRNM of responsibility for the largest number of measures in three strategy areas (i.e., Inclusion in Social and Cultural Life; Status Solutions, Combating Discrimination, and Help in Realizing Rights; and Improvement of

¹⁹ The counts of measures presented throughout this section include both measures for which the institution in question is identified as implementing agency and measures for which the institution is listed as a participant in implementation.

Statistical Data Collection), while other institutions are assigned similar responsibility for no more than a single area.

Table 2. Institutional responsibility by strategy area

Strategy area	Institution responsible	Total no. of	Measures assigned to responsible institution	
	for largest	measures	In strategy	Total
	number of	in strategy	area	
	measures in	area		
	strategy area			
Education	MoSES	14	14	14
Employment and Inclusion in	CES	24	20	23
Economic Life				
Health Care	МоН	22	22	25
Social Care	MoSPY	11	7	18
Physical Planning, Housing, and	L(R)SGU	15	14	33
Environmental Protection				
Inclusion in Social and Cultural Life	GOHRRNM	14	11	44
Status Solutions, Combating	GOHRRNM	20	10	44
Discrimination, and Help in Realizing				
Rights				
Improvement of Statistical Data	GOHRRNM	12	7	44
Collection				
Compliance with International	MoFEA	4	4	5
Standards and Treaties				

With regard to the units of regional and local self-government in areas with considerable Romani populations, the NRIS states, "The extent of their involvement in the implementation of measures contained in the Strategy will largely determine both the results and effects of those measures" (Government of the Republic of Croatia 2012: 129). The roles assigned regional and local authorities accordingly include the following:

- Mapping the Romani communities on their territories;
- Developing, adopting, and implementing action plans (municipal, city, and county) for Roma;
- Forming regional and local commissions for monitoring NRIS implementation;
- Establishing support and information centres ("info centres") to assess needs, coordinate between Romani communities and government institutions, and monitor implementation of relevant measures;
- Cooperating with Romani minority councils and representatives; and
- Collaborating with central institutions on implementation of measures defined by NRIS (Government of the Republic of Croatia 2012: 124-125, 129-130).

Insofar as the requirement to develop, adopt, and implement their own action plans applies to all regional and local self-government units where the Romani population is legally entitled to elect its council or representative, a total of 33 units of local or regional self-government are affected

by this requirement (Government of the Republic of Croatia 2012: 129-130; Mikić and Babić 2014: 27 fn 27). Consistent with the emphasis on the role of regional and local self-government units in the NRIS, this category of actor is assigned a role in relation to 38 measures of the AP, with local (as opposed to regional) self-government units tasked separately in another eight measures (Government of the Republic of Croatia 2013).

Noting that regional and local Romani minority councils and representatives are expected to take active role in implementation and monitoring of NRIS, the Strategy also points to the to strengthen Romani minority councils and representatives "so as to enable them to fully perform their function of advisory bodies" (Government of the Republic of Croatia 2012: 125, 131). In the AP, Romani minority councils and representatives are assigned a role in relation to a total of 34 measures, a smaller number only than the number of tasks assigned GOHRRNM on the one hand and regional and local self-government units on the other (Government of the Republic of Croatia 2013).

In addition to the tasks assigned institutions at central, regional, and local levels, the NRIS foresees a role for the civil sector. This role consists primarily in monitoring implementation of the Strategy and in informing Romani communities about implementation and the results achieved (Government of the Republic of Croatia 2012: 131). As in the case of Romani minority councils, the NRIS calls for education to ensure that Romani organizations have the capacity necessary for them to perform their role.

Institutional arrangements for monitoring and evaluation

The sole monitoring body named in the NRIS is the National Roma Inclusion Strategy 2013-2020 Monitoring Commission (Government of the Republic of Croatia 2012: 123). As discussed in Section 2.1, the NRIS makes the Monitoring Commission responsible not only for monitoring implementation of NRIS and AP, but also for preparing revised policy documents (i.e., Strategy and/or AP) for adoption by government (Government of the Republic of Croatia 2012: 126-127). These roles appear also in the expanded list included in the government decision establishing the Monitoring Commission, together with proposing measures for advancing implementation of NRIS and AP; drafting recommendations, opinions, reports, and directives related to Strategy implementation; monitoring budgeting and expenditures for Strategy implementation; and distributing funding for solving problems and improving living conditions of the Roma (Narodne novine 2013a: Article II). The same government decision sets the composition of the Monitoring Commission as follows:

- A deputy prime minister, who chairs the Commission;
- The parliamentary representative of the Romani national minority as deputy chairperson of the Commission;
- One representative each of the Ministries of Construction and Spatial Planning; Health; Labor and Pension System; Regional Development and EU Funds; Science, Education, and Sports; and Social Policy and Youth;
- A representative of GOHRRNM; and
- Seven Roma representing the National Coordinating Body of Romani Minority Councils, the councils themselves, and Romani civil society organizations (Narodne novine 2013a: Article III).

The decision also provides for the participation of non-members of the Monitoring Commission in the work of the Commission as needed and stipulates that the Commission may establish working groups (Narodne novine 2013a: Articles III, VI); one such group was formed in 2014. An amendment to this decision adopted in 2014 expanded the Monitoring Commission to include a representative of the Ministry of Interior (Narodne novine 2014: Article II).

Consistent with the provisions of the NRIS and the government decision establishing the Monitoring Commission, the Commission is mentioned in the AP in relation to the process of routine revision of NRIS and AP (Government of the Republic of Croatia 2013: 127). The Monitoring Commission also figures among the institutions tasked with implementation of a measure of the AP focusing on providing support to CSO initiatives dealing with the protection of Roma's human rights (Government of the Republic of Croatia 2013: Measure 7.2.1.4).

In addition to its role as a participant in the Monitoring Commission, GOHRRNM is tasked with coordinating the appointment of the Commission's members nominated by the National Coordinating Body of Romani Minority Councils, Romani minority councils, and Romani CSOs (Narodne novine 2013a: Article III). The NRIS and AP further assign GOHRRNM responsibility for appointing an expert team to develop a methodology and reporting format for monitoring of NRIS implementation by all responsible institutions (Government of the Republic of Croatia 2012: 124; 2013: 127).

Whereas GOHRRNM is tasked in the NRIS with gathering, processing, and reporting data from other institutions on NRIS implementation, government administrative bodies responsible for particular measures are tasked with collecting data for agreed indicators and providing an annual report on implementation of relevant measures (Government of the Republic of Croatia 2012: 124-125). At regional and local levels, the NRIS foresees the establishment of monitoring commissions in regional and local self-government units with sizeable Romani populations (Government of the Republic of Croatia: 124). The participation of local Romani communities in data collection and monitoring is to be secured by establishing support and information centres at micro-regional level (Government of the Republic of Croatia: 124-125). While the AP contains no mention of regional-or local-level monitoring committees, four measures planned in the area of health foresee a role for support and information centers in providing needed data (Government of the Republic of Croatia 2013: Measures 3.2.1, 3.4.1-3.4.3).

3. APPLICATION OF THE FRAMEWORK FOR INCLUSION

3.1. Development of regional- and local-level implementing documents

Of the 33 units of regional and local self-government required by the NRIS to develop, adopt, and implement action plans for Roma, as of March 2015 only five had done so: Međimurje, Osijek-Baranja, Sisak-Moslavina, and Varaždin Counties; and the City of Zagreb.²⁰ In addition to these units of regional self-government which followed through on this requirement of the NRIS, one unit of local self-government, the city of Crikvenica, adopted an action plan for Roma even though not required to do so (see Gradsko vijeće Grada Crikvenice 2014).

As shown in Table 3 below, all implementing documents adopted at regional or local level cover at least four areas of the NRIS, with all but the action plan adopted in Crikvenica covering six or more strategy areas and Sisak-Moslavina County's action plan covering all eight strategy areas. With the exception of the Crikvenica action plan, among the areas covered are all four areas of the EU Framework (also the priority areas of the Decade of Roma Inclusion): education, employment, health, and housing.

Notwithstanding considerable similarities in thematic coverage, however, the volume of the implementing documents and the number of planned measures vary widely. With regard to the former, the range is from four pages (Osijek-Baranja County) to 83 pages (Međimurje County). Similar in volume and organization to Međimurje County's action plan is the implementing document produced in Sisak-Moslavina County, with both documents produced with support from UNDP and OSCE-ODIHR (through the EU-funded project "Best Practices for Roma Integration"), as well as from GOHRRNM. As for the number of activities planned for implementation, the range among all regional- and local-level implementing documents is from 18 (Crikvenica) to 93 (Međimurje County). Although the current evaluation did not include an analysis of the objectives and measures included in regional and local-implementing documents, an interviewed representative of local administration questioned the relevance of the action plan adopted at regional level.

Data on implementation of action plans adopted at regional and local levels and on budgetary expenditures for this purpose are sparse and fragmented. A representative of regional administration interviewed in the framework of the evaluation attributed this state of affairs to the excessive number of and the lack of prioritization among measures in both county and national action plans for Roma. As a result, the measures implemented are those which would be implemented even in the absence of the NRIS, with reporting to central level amounting to *ad hoc* placement of activities under the areas of the NRIS. Further, the interviewed representative of a city which has not adopted its own implementing document stated that the reports submitted by the city to GOHRRNM misrepresent activities implemented by a local social care as City initiatives. For their part, the interviewed representatives of a county which has not adopted its own implementing document stated that county authorities had not structured their activities around the NRIS. Although Osijek-Baranja County stands out for the level of detail and regularity of its reports on implementation, even these documents do not provide measure-by-measure

²⁰ See Skupština Međimurske županije (2013); Skupština Osječko-baranjske županije (2012; 2013a); Skupština Sisačko-moslavačke županije (2013); Skupština Varaždinske županije (2013); Gradska skupština Grada Zagreba (2013).

information on implementation and funding (see Skupština Osječko-baranjske županije 2013b; 2015).

Among stakeholders interviewed, the dominant view was that the adoption of implementing documents at regional and local levels has not thus far had a significant effect on the situation of Roma in the self-government units covered by the documents. This absence was generally attributed to insufficient funding provisions, or lack of prioritization, in effect resulting in duplication of efforts with the already existing national strategic framework (including NRIS and AP). An apparent exception in both regards is Osijek-Baranja County, where representatives of regional administration pointed to improvements in primary school enrolment and access to health insurance as a result of implementation of County action plans and expressed optimism that the current annual plan will be realized insofar as it is based on existing funding. Additionally, a representative of local administration in Sisak attributed changes in the educational situation of Roma there to implementation of the implementing document adopted by Sisak-Moslavina County, also noting that the city funds a Romani assistant from its own budget.

Whereas members of the Working Group of the Monitoring Commission attributed the modest effects of regional- and local-level implementing documents on the situation of Roma to a lack of engagement on the part of regional and local authorities, a representative of regional administration criticized the NRIS for delegating tasks without also providing the funding needed to complete them and blamed this arrangement for conflicts among municipalities. A representative of local administration noted a lack of local capacity for NRIS implementation while pointing to incompatibility between local priorities and the priorities of the implementing document adopted at regional level resulting in neglect of the local Romani settlement by county policy. A representative of another local administration confessed to not reading NRIS or AP until the days immediately preceding the interview undertaken in the framework of the evaluation. Additionally, a local civil society activist presented as ironic that her organization had more success in securing funding from the EU than from regional and local administrations.

Table 3. Thematic coverage of regional- and local-level implementing documents

	Unit of self-government					
	City of	City of	Međimurje	Osijek-	Sisak-	Varaždin
NRIS area	Crikvenica	Zagreb	County	Baranja	Moslavina	County
				County	County	
Education	X	X	X	x ²¹	X	X
Employment and economic inclusion	X	X	X	X	X	X
Health care		X	X	x ²²	x ²³	X
Social welfare		X	X	x ²⁴	x ²⁵	X
Physical planning, housing, and environmental	X	X	X	X	X	X
protection						
Inclusion in social and cultural life	X		X	x ²⁶	x ²⁷	X
Status resolution, combating discrimination and					x ²⁸	
assistance in exercising rights for the Roma						
minority						
Improvements in statistics gathering		X			X	

²¹ Covered as part of thematic area "Education and Culture".
²² Covered as part of thematic area "Health and Social Care".
²³ Covered as part of thematic area "Health and Social Care".
²⁴ Covered as part of thematic area "Health and Social Care".
²⁵ Covered as part of thematic area "Health and Social Care".
²⁶ Covered as part of thematic area "Education and Culture".
²⁷ Covered as part of thematic area "Education and Culture".

²⁷ Covered as part of thematic area "Status Issues, Social and Political Inclusion While Preserving Own Culture". ²⁸ Covered as part of thematic area "Status Issues, Social and Political Inclusion While Preserving Own Culture".

3.2. Communication and coordination

Given that the complex nature of Roma's poverty and exclusion requires a multidimensional approach, communication and coordination among relevant actors is crucial for bringing significant and lasting changes to the situation of Roma. The information gathered in the course of the evaluation suggests that communication has improved under the current strategic and implementing documents but that both horizontal and vertical coordination have generally been inadequate.

Communication

With few exceptions, interviewed stakeholders at central, regional, and local levels as well as representatives of international organizations assessed communication with GOHRRNM in positive terms. Members of the Working Group of the Monitoring Commission noted improvement over time in this regard, with some also crediting the establishment of the Working Group with improving communication among central-level institutions. Overall, however, most stakeholders at central, regional, and local levels noted that they had little contact in relation to Roma with central-level institutions other than GOHRRNM. For their part, representatives of GOHRRNM reported regular consultations with most central-level institutions represented in the Monitoring Commission while characterizing as less receptive institutions not directly involved in the Monitoring Commission or in NRIS design and implementation.

Information gathered during three of the five field visits undertaken in the framework of the evaluation suggests that communication between either local or regional authorities and central-level institutions is sometimes better than that between regional and local authorities. On the other hand, interviewed members of a regional Romani Minority Council reported less favorable relations with the current MP for national minorities than with the previous one. Also reporting poor communication with the MP were the inhabitants of the Romani settlement of Dumovec (Zagreb) with whom a member of the evaluation team spoke in the course of a field visit.

Another problem of communication different in kind from those discussed above relates to the distribution of funding by the Monitoring Commission. More specifically, some interviewed stakeholders expressed concerns about a lack of transparency in funding allocations. The paucity of public information on awards by the Monitoring Commission reinforces such concerns.

Coordination

The range of stakeholder assessments apparent in relation to communication is absent where coordination is concerned, as all expressed critical views. Whereas coordination between the central level on the one hand and regional and local levels on the other was usually presented as most problematic (and not only in relation to efforts to improve the situation of Roma), coordination among institutions at central level and coordination among institutions at local level were also subjects of criticism. In accounting for problems in coordination at central level, many interviewed stakeholders expressed views that the individual strategy areas are fragmented among institutions while some issues in different strategy areas are closely interrelated and demand an inter-sectorial approach. A specific example cited in the interviews conducted in the framework of the evaluation is the current absence of coordination among the Ministry of Health, the Ministry of Interior, and the Ministry of Social Policy and Youth despite the relevance of the planned health

mediators under the Ministry of Health and existing mobile teams under the Ministry of Interior for the strategy area of Social Care.

Problems in the fulfilment of GOHRRNM's coordinating role were often attributed to the Office's position in the institutional hierarchy, which is such that it lacks the formal political power needed to make demands on ministries, including but not limited to participation in the monthly interdepartmental operational meetings foreseen in the NRIS but not taking place since 2011. A factor receiving frequent mention in relation to central-level institutions in general was insufficient human resource allocations. In most central-level institutions, a single staff member is responsible for NRIS and AP in addition to other tasks unrelated to these documents. Thus, in the Ministry of Health, for example, one person is effectively responsible for overseeing implementation of, monitoring, and reporting on 25 measures of the AP.

With regard to coordination between central level and regional and local levels, the Croatian Employment Service was criticized both for the way in which it transmits information to its branch offices and for the way in which it processes information received from those offices. Finally, an interviewed representative of local administration observed that in the absence of coordination through at least quarterly meetings among local administration, county administration, CSOs, and the Romani National Minority Council, the implementation of activities to improve the situation of Roma is not systematic, depending primarily on enthusiastic individuals.

3.3. Monitoring and evaluation

Despite the considerable attention to issues of monitoring and evaluation in NRIS and AP, as noted in the report on AP implementation for 2013 (Vlada Republike Hrvatske 2014: 127), there is no overarching system in place for gathering data on the implementation of planned measures and the realization of strategic objectives. Thus, the report on AP implementation for 2013 generally contains data to fill output indicators, but data on the realization of strategic objectives are often lacking (Vlada Republike Hrvatske 2014). As a result, the report provides considerable information about implementation of the measures foreseen in the AP, but much less about how AP implementation is affecting the broader situation of Roma in Croatia. As will become apparent from the summaries of available data on implementation of measures by area in Section 3.4 (as well as from the more detailed information presented in Annex 5), the only areas in which data are available for all measures are "Education" and "Compliance of the Programs with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities", with data unavailable for a majority of measures in several other areas.²⁹ Additionally, as mentioned in Section 3.1, little attention has been paid to measuring implementation of implementing documents adopted at regional and local levels, with a representative of regional government attributing this to insufficient human resources.

One stakeholder from civil society characterized the absence of a centralized database as the most serious problem of AP implementation, explaining that it facilitates the continuation of activities from previous policies without regard for results. While other stakeholders provide less radical characterizations of the situation, the lack of an overview of implemented measures and their

²⁹ As of mid March 2015, the monitoring data provided to GOHRRNM by the institutions responsible for implementation of the measures of the AP had not yet been processed. As a result, improvements in the availability of data for some strategy areas are possible before the report on AP implementation for 2014 is finalized.

results and central, regional, and local levels was frequently identified as a problem. Additionally, the absence of a database creates additional work for GOHRRNM, which must process data separately as needed for specific reports.

In this context, concerns about the collection of ethnically disaggregated data received frequent mention at both central and local levels, with health singled out as the area in which reluctance to collect data on Roma as such is most evident. A concrete example of resistance from another institution relates to the second objective in the strategy sub-area of physical planning: "Number of applications for construction permits or legalisations of Roma buildings rejected due to the impossibility of incorporating them into the existing physical plans" (Government of the Republic of Croatia 2013: 76). As stated by a representative of a ministry with a key role in this sub-area, "Space does not recognize ethnicity". The Croatian Bureau of Statistics was also criticized for effectively acting as a spoiler by monopolizing data collection while hiding beyond data protection regulations in relation to ethnicity, in so doing also neglecting existing informal administrative data collection practices. On the other hand, as pointed out by a representative of GOHRRNM, the absence of a functional monitoring system in general and resistance to collection of ethnically disaggregated data in particular leave room for speculation that institutions are less active in AP implementation than they really are.

Interviews with members of the Working Group of the Monitoring Commission as well as with other stakeholders suggest that neither the Commission nor its Working Group is actively engaged in monitoring and evaluation, with the Commission's role to date limited to reviewing reports prepared by GOHRRNM. Whereas one member of the Monitoring Commission attributed the body's dysfunction to the absence of an agreement on procedures related to thematic meetings of the Working Group, an outside observer from civil society flagged the composition of the Commission as problematic and noted frequent misunderstandings among members of the Commission. Other interviewed stakeholders reported that the Monitoring Commission attends less to issues of monitoring and evaluation than to the direct distribution of funds to Roma to address urgent needs. Like the absence of a database, the dysfunction of the Monitoring Commission increases GOHRRNM's workload to a level which some stakeholders characterized as beyond the Office's capacity. Moreover, there has been no progress on the transfer to another institution of GOHRRNM's role in relation to monitoring and evaluation or the engagement of experts at local level, as foreseen in the NRIS (Government of the Republic of Croatia 2012: 140).

3.4. Implementation of measures foreseen in AP

3.4.1. Education

Reviewing available monitoring data for 2013 and 2014, it can be concluded that baseline data are available for only 2 out 7 objectives. With a single exception, data on these indicators for 2013 and 2014 are also not provided, meaning that for the majority of objectives it is not possible to measure progress. Realizing this, in their monitoring report for 2013, the Ministry of Science, Education, and Sports proposed a revision of these indicators. With regard to Objective 1, the Ministry has also pointed to a need for a change of the current indicator ("Acts adopted on the level of MoSES or ETTA laying down the monitoring and support programme, as well as the responsibilities of individual institutions for its implementation") insofar as the education of Roma

is a requirement of the broader legal framework for education in Croatia (see Government of the Republic of Croatia 2013: 7; Narodne novine 2008).

On the other hand, baseline values on the level of measures are available for all 14 measures of this strategy area, as are data on implementation for 2013 and 2014, which distinguishes education from all other areas of the AP. In 2013, progress is evident in 10 out of 14 measures. With regard to the four measures where progress has not been recorded, an increase in the number of Romaonly classes relative to the baseline means that Measure 1.4.1. ("Creation of the prerequisites for the reduction of the number of classes attended solely by Roma pupils") has not been implemented successfully (see Government of the Republic of Croatia 2013: 14). Deterioration from the baseline is also apparent in relation to Measures 1.6.1 and 1.6.2 (enrolment of and scholarships for Romani students in higher education, respectively), suggesting negative trends in university education for Roma (see Government of the Republic of Croatia 2013: 18-19). Finally, the same values as in the baseline have been recorded for Measure 1.5.4 "Accommodation in secondary school dormitories" (see Government of the Republic of Croatia 2013: 17).

In the year 2014, there is actually an increase of measures where no further progress can be recorded in relation to the previous year. These include the following four measures:

- 1.3.1 "Enrolment of Roma children of both genders in primary schools";
- 1.3.2 "Creation of the conditions for the inclusion of Roma pupils in after-school care";
- 1.3.3 "Training of associate assistants"; and
- 1.7.1 "Inclusion of adult Roma of both genders in literacy and training programme" (see Government of the Republic of Croatia 2013: 12-13, 20).

There are no measures in this strategy areas where progress was made in 2014 but not also in 2013.

There is broad (but not unanimous) agreement among interviewed stakeholders that education is the strategy area in which AP implementation has been most successful, with an increase in the number of Romani children enrolled in primary education frequently cited as the greatest example of progress in the situation of Roma in recent years. Evidence of progress in pre-school education under the AP includes an increase in the number of Roma enrolled in pre-school education from 769 children in the 2013-2014 school year to 873 children in the 2014-2015 school year,³⁰ as well as the measure adopted by the City of Rijeka to provide two years of free-of-charge pre-school education. At the level of secondary education, the number of Roma enrolled increased from 588 in the 2013-2014 school year to 682 in the 2014-2015 school year.³¹ The Ministry of Science, Education, and Sports reported spending 9 441 252 kn on NRIS implementation in 2014.

A representative of an international organization interviewed in the framework of the evaluation attributed the attention to education to the decision of the European Court of Human Rights in the case of *Oršuš and others v. Croatia*. At the same time, there is evidence that segregation in education is on the rise as the quality of education drops in schools attended largely by Roma. Other concerns regard pre-school and adult education programs. Finally, some Romani interlocutors noted the difficulty of promoting education when even educated Roma are often unemployed.

³⁰ Data provided by the Ministry of Science, Education, and Sports.

³¹ Data provided by the Ministry of Science, Education, and Sports.

Despite government efforts to address discrimination in education, the number of Roma-only classes appears to be increasing in the absence of clear modalities for desegregation, particularly in areas of *de facto* residential segregation (see Mikić and Babić 2014: 47-48, 50). At national level, the number of Roma-only classes has actually increased from 50 in 2012, to 56 in 2013, to 61 in 2014 (Vlada Republike Hrvatske 2014: 10).³² In Međimurje County, six out of a total of 39 pre-school groups formed in the 2013-2014 school year consisted exclusively of Roma (United Nations Development Programme 2014: 4). Moreover, two of these groups were housed in a primary school where Roma account for the majority of pupils (United Nations Development Programme 2014: 4-5). As noted by the Ministry of Science, Education, and Sports in a written response to questions submitted by the evaluation team, "In order to establish the optimal ratio of 30% Roma, 70% other students needed are space, transportation, and transfer of staff as well as students in other schools, which requires joint efforts in securing appropriate infrastructure."

Qualitative evidence from late 2013 points to poor and deteriorating quality of education in predominantly Romani classes in Međimurje County as educational standards are lowered to retain and advance Roma from one grade to the next, leading in turn to an increased rate of 'white flight' and thus deepening segregation as non-Romani parents make economic sacrifices to ensure that their children do not learn together with Roma in inferior schools (Mikić and Babić 2014: 48, 54-55). Consistent with these observations, a representative of Međimurje County administration interviewed for the current evaluation characterized education as the area in which the situation of the region's Romani population is worst despite "tremendous progress" over the past decade, particularly in the area of pre-school education.³³ The sharp drop in Roma's participation rates in the transition from primary to secondary education provides an illustration of one aspect of the remaining problem: Whereas Roma accounted for 16.56 percent of pupils enrolled in primary education in Međimurje County in the 2013-2014 school year, only 3.69 percent of students in secondary education in that region in the same year were Roma (United Nations Development Programme 2014: 10).

A Romani representative from Međimurje County assessed not only the current situation, but also recent developments in education negatively. In addition to claiming that attempts at educational integration have only increased antagonism between Roma and non-Roma, this stakeholder also criticized the introduction of Romani assistants as a "cover" (*paravan*) which prevents Romani children from learning Croatian. To the extent that Romani assistants negatively affect children's acquisition of fluency in Croatian, their deployment risks increasing the rate at which Romani children are streamed into special classes (see Brüggemann 2012: 60).

According to one representative of an international organization interviewed in the framework of the evaluation, despite the existence of an action plan for implementing the *Oršuš* decision, a situation similar to the one in Međimurje County which led to the case may be developing in parts of Sisak-Moslavina County. The focus group organized in the framework of the evaluation with inhabitants of the Romani settlement of Capraške Poljane in Sisak provided more information on developments in this direction, including separation of Romani from non-Romani children in pre-

³² Data for 2014 provided by the Ministry of Science, Education, and Sports.

³³ As of 2011, however, "[t]he difference between group affiliation and average time spent in pre-school [was] the highest in Croatia: Roma with pre-school experience attended pre-school on average 1.7 years, in comparison to non-Roma with pre-school experience who attended on average 2.6 years" (Brüggemann 2012: 36).

school education and Romani pupils exiting primary school from a back door despite reportedly good relations with the school. Moreover, the absence at national and EU levels of a clear definition of segregation allows the problem to persist and grow largely unchecked. Even without such a definition, however, a representative of another international organization interviewed for the evaluation estimated that there will be approximately five all-Roma schools in Croatia by 2020. As of the 2013-2014 school year, there were four primary schools in Međimurje County in which Roma accounted for a majority of pupils (United Nations Development Programme 2014: 5). By way of contrast, participants in the focus groups organized in the framework of the evaluation with members of the Romani community of Beli Manastir reported that neighborhood schools take care to preserve ethnically mixed classes, cooperating with a CSO that serves as a liaison between school and Romani community.

Although Croatia differs from other countries in the region for its higher share of Roma attending ethnically segregated standard schools than attending ethnically segregated special schools for children with intellectual disabilities (Ivanov and Kagin 2014: 39), there is also evidence of overrepresentation of Roma in special education, as well as of segregation within classrooms (Mikić and Babić 2014: 10; Šikić-Mićanović et al. 2015: 46-47, 85). The share of Romani children enrolled in special schools for children with intellectual disabilities in Croatia more than tripled between 2004 and 2011, from two to seven percent (Brüggemann 2012: 67). In Međimurje County, where in the 2013-2014 school year Roma accounted for approximately 17 percent of all pupils enrolled in standard primary education, the proportion of Roma among pupils enrolled in the County's special school was over forty percent (United Nations Development Programme 2014: 5, 17). On the other hand, the interviewed representative of the City of Beli Manastir reported that special classes for Roma have been abolished there in recent years.

Beyond segregation, qualitative research conducted in late 2013 revealed concerns among Romani parents about pre-primary year programs, including needs for longer program duration and more emphasis on work than play (Šikić-Mićanović et al. 2015: 82, 83). Another issue, raised in particular in relation to Međimurje County, is physical access to schools. More specifically, the effects of a lack of public transport connecting Romani settlements to schools are sometimes exacerbated by the condition of social assistance that recipients not own a car. Finally, some interviewed stakeholders pointed to neglect of adult education.

Positive examples from outside Croatia

- **Pre-school education**. The project "Inclusion of Romani Children in Public Pre-Schools" creates ethnically mixed groups in public pre-schools in 18 municipalities located throughout Macedonia. In these groups, Romani and non-Romani children learn together in the presence of Romani as well as non-Romani staff. The project, which has been implemented since the 2007-2008 school year with financial support from the Roma Education Fund, is a cooperative effort of the Ministry of Labor and Social Policy, the Ministry of Education and Science, public pre-schools, and Romani CSOs.
- **Pre-school and primary education**. A project of Save the Children Albania in four preschools and four primary schools in the municipalities of Korça and Gjirokastra piloted a model of quality inclusive education. Implemented in partnership with Regional Education

Authorities, the project on the one hand provided training for teachers in child-centered, culturally sensitive methodologies while on the other hand actively involving Romani and Egyptian parents in their children's education. Intercultural understanding was fostered through instructional materials and extracurricular activities (including classes on Romani history and culture). Also offered were after-school classes in mathematics and Albanian language. Although the main target group of the project was Romani and Egyptian children, children in need from the ethnic majority were also included in project activities.

- **Primary education**. In Serbia, the position of teaching assistant has been salaried from the state budget since 2011, evolving from the position of Romani assistant in existence since 2007. The target group of the systematized teaching assistants includes all children with difficulties in following the school curriculum.³⁴
- Secondary education. A program for supporting Romani students in secondary education has been in place in Macedonia since the 2005-2006 school year with financial support from the Roma Education Fund. The program makes available to all Roma in secondary education school-based mentors who, in addition to providing extracurricular instruction, also offer general academic counseling and meet regularly with parents. Students who meet academic performance requirements also receive financial support through the program, which was implemented by the Foundation Open Society Institute Macedonia from 2005 to 2009, and has been administered by the Directorate for Promotion and Development of Education in the Languages of Minorities of the Ministry of Education and Science since the 2009-2010 school year.

Also in Macedonia, a conditional cash transfer program for secondary education provides a monthly benefit of approximately EUR 16 to households receiving social assistance for each child enrolled in secondary education who meets attendance requirements. Roma account for approximately seven percent of all program beneficiaries (Ministerstvo za trud i socijalna politika 2014b). The program's focus on secondary education avoids the risks of reinforcing segregation associated with conditional cash transfers at the level of primary education (see Friedman et al. 2009).

3.4.2. Employment and inclusion in economic life

A review of available monitoring data for 2013 and 2014 indicates that baseline data are available for all except one out of 7 objectives, although in three cases the data provided are incomplete. Based on the data from 2014, progress at the level of outcomes was reached in relation to only two objectives: Objective 5 ("To increase the rate of formal self-employment of members of the Roma national minority") and Objective 7 ("To strengthen the capacity of the Croatian Employment Service for working with members of the Roma national minority") (see Government of the Republic of Croatia 2013: 21). In their monitoring reports, the Croatian Employment Service and the Ministry of Labor and Pension System propose modification of outcome indicators and reported based on the proposed changes.

³⁴ Other countries in which Roma-focused teaching assistant positions have been institutionalized and financed from the budget of the central government include the Czech Republic, Hungary, and Slovakia.

Baseline data are available for 15 out 24 of measures in this strategy area. Implementation data for 2013 is available for all but three measures, where the provided data only vaguely relates to the outlined indicators.³⁵ In 2014, data are partially or fully unavailable for two measures: 2.2.2 ("To explore the professional plans of pupils in the final grade of primary school") and 2.2.4 ("To ensure additional professional counselling activities for Roma pupils (in addition to regular activities carried out by CES), such as visits to potential employers, job fairs etc. in order to acquaint Roma pupils with different professions") (see Government of the Republic of Croatia 2013: 27-28).

In 2014 progress is evident for a majority of measures -16 out of 24. Of the eight cases where evidence of progress is lacking, in two progress cannot be determined due to unavailability of data, in two the progress is only partial (based on the values of multiple indicators for a single measure) and in four cases the data show that progress has not been made. The measures in this last category are:

- 2.2.5 ("To encourage employers to be more open to employing members of the Roma national minority");
- 2.4.1 ("To identify and implement educational training programmes of long-term unemployed Roma persons");
- 2.5.1 ("To provide group informing on self-employment and counselling on starting a business"); and
- 2.7.1 ("To organise education sessions for the purpose of sensitising employment counsellors for the issues of the employment of Roma") (see Government of the Republic of Croatia 2013: 28, 34, 36, 39-40).

While poverty among Roma declined between 2004 and 2011 in all countries of the region except Bosnia and Herzegovina, Croatia was among the countries in which the situation of non-Roma did not see similar improvements (Ivanov and Kagin 2014: 23-24). This development makes measures targeting Roma's situation particularly delicate in order not to alienate the non-Romani population by neglecting non-Roma in need. At the same time, the findings of a 2014 survey conducted by UNICEF in Croatia indicate that Romani children in families receiving social assistance experience twice as much material deprivation as non-Romani children receiving social assistance (UNICEF 2014b).

Representatives of GOHRRNM presented employment and inclusion in economic life as one of the two most successful areas of AP implementation (together with education) and as continuing measures from previous policy. Broad support for this view comes from a focus group (not connected to this evaluation and) held in Slavonski Brod in 2013, which yielded favorable assessments of public works programs for providing practice in working and addressing problems in Romani settlements, as well as for their fairness due to the participation of local Romani councils in selecting program participants (Mikić and Babić 2014: 62). On the other hand, public works

³⁵ The measures for which data relating directly to AP implementation in 2013 are not available are the following: 2.1.2 ("To initiate and propose changes in legislation related to self-employment and entrepreneurship, and legalisation of work activities typically carried out by Roma"); 2.2.8 ("Informing possible candidates/members of the Roma national minority of the existence of the provision stipulating equality under equal conditions in employment by publishing and referring to the web pages of all state administration bodies in each job vacancy"); and 2.2.9 ("During the implementation of each job vacancy competition, education of the members of the Commission for the Implementation of the Job Competition or an internal call for the selection of candidates, on the implementation of Article 22 of the Constitutional Act on Minority Rights").

programs were also subject to criticism for their small scale and (decreasing) duration, such that they lack an element of sustainable employment. Also flagged as a problem was the Croatian Employment Service's low level of engagement with employers despite its high level of awareness about the employment situation of Roma. Overall, the effects of employment measures for Roma are limited by the specifics of the microregions where Roma are concentrated (Bagić et al. 2014: 104). In Međimurje County, where Roma account for approximately 4.5 percent of the total population, the share of Roma among the unemployed was estimated at 14 percent in 2014, with more than half of unemployed Roma without work for more than one year and fewer than ten percent of the unemployed having completed more than primary education (United Nations Development Programme 2014: 3, 18). In similar fashion, participants in the focus groups organized in the framework of the evaluation with members of the Romani community of Beli Manastir, Rijeka, Sisak, and Zagreb flagged high levels of unemployment as their most pressing problem and expressed pessimism about prospects for positive change in this area.

Data provided by the Ministry of Labor and Pension System provides insight into the scale of activities undertaken with the aim of improving the employment situation of Roma. In 2014, 914 Roma (of whom 355 women) participated in public works programs. Nineteen Roma (of whom seven women) received co-financing for employment and 16 (of whom five women) support for self-employment in the same year. The Ministry of Labor and Pension System also reported spending approximately 9 million kn in 2013 and 10 million kn in 2014 on AP implementation.

The interviews conducted in the framework of the evaluation revealed specific concerns about two measures of the AP in which the Croatian Employment Service is implicated, as well as three more general concerns. With regard to Measure 2.2.4 ("additional professional counselling activities for Roma pupils"), the indicator "Number of Roma pupils included in the measure" was criticized as unsuitable for the lack of possibility of counting Roma separately at relevant events, with the number of issued invitations proposed as an alternative (see Government of the Republic of Croatia 2013: 28). In relation to Measure 2.7.2 ("To implement research and analyses of the possibility of the employment of Roma persons"), interviewed stakeholders characterized the assignment of the measure to the Croatian Employment Service as inappropriate on the grounds that, besides regular statistics, the Croatian Employment Service produces neither research nor analyses (see Government of the Republic of Croatia 2013: 40). The more general concerns raised in this area were also closely related to monitoring and evaluation. On the one hand, because the Croatian Employment Service is not allowed to gather data on the ethnicity of the unemployed, the AP has resulted in a parallel monitoring system based on estimates by counselors on the basis of their direct contacts.³⁶ On the other hand, the interviewed representatives of an institution with a key role in implementing and monitoring measures in this strategy area stated that only the Croatian Bureau of Statistics could gather data on the selected outcome indicators, which were introduced separately and without sufficient discussion after a collaborative process of generating objectives and corresponding measures. Finally, the interviewed representatives of this institution pointed to the need for continued attention to education in order to ensure access not only to employment as such, but also to the range of programs offered by the Croatian Employment Service.

³⁶ Notwithstanding the widespread perception that gathering data on ethnicity is not allowed, the Ministry of Labor and Pension System estimated in its written response to questions submitted by the evaluation team that only six unemployed Roma have completed some form of post-secondary education. Additionally, the interviewed representatives of the Croatian Employment Service stated that it would be possible for them to gather data on ethnicity if clear legal authorization were given to do so.

Common among stakeholders participating in the evaluation is the view that affirmative action in the area of employment and inclusion in economic life has not been a success. In a written response to questions submitted by the evaluation team, the Ministry of Entrepreneurship and Crafts reported that no Roma had applied for its *Poduzetnički impuls* program despite the existence of affirmative action measures. This is in line with the view expressed by Roma during the focus groups that they lack capacities for more complex projects, whether acting through CSOs or individual entrepreneurs, as in the case of this particular program. The Ministry of Interior provided the more general observation that the effects of implementation of Measure 2.2.9 (education of members of commissions taking decisions on public employment competitions on affirmative action provisions of Article 22 of the *Constitutional Act on Minority Rights*) are limited by the failure of Romani applicants to declare their ethnicity and demand their legal right (see Government of the Republic of Croatia 2013: 30-31; Narodne novine 2010). The Council for National Minorities, on the other hand, reported that state and public institutions tend to ignore legal provisions for affirmative action for members of national minorities in the area of employment.

Positive examples from outside Croatia

- **Employment mediation**. Administered since 2000 by the Spanish Romani CSO *Fundación Secretariado Gitano* with financial support from the European Social Fund the Ministry of Health, Social Services, and Equality, regional and local authorities, and private enterprises, the *Acceder* program combines an explicit focus on Roma with advisory and counseling services, as well as training, job placement, and follow-up after placement. The program, which has established cooperation with more than 17 000 companies, has had over 70 000 beneficiaries and concluded nearly 48 000 employment contracts (Laparra et al. 2013: 73).
- **Employer branding**. In the Czech Republic, high rates of discrimination against as well as long-term employment among Roma prompted the Romani CSO *IQ Roma servis* in 2006 to establish a certification system to motivate employers to act on and publicize a commitment to equal treatment of non-Czech ethnics (IQ Roma servis 2011). Linking business, civic, and government sectors, the "Ethnic Friendly" program integrates into the certification process technical assistance to employers motivated to provide equal treatment in accordance with anti-discrimination legislation. Employers so certified earn the right to use the "Ethnic Friendly" brand for public relations and marketing purposes.

3.4.3. Health care

In the area of health care baseline values are available for only one out of seven objectives (Objective 2: "To increase the availability of health services to the Roma population") (see Government of the Republic of Croatia 2013: 41). Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in the area of health care cannot be determined. Furthermore, baseline values on the level of measures are not available for any of the 22 measures, making this strategy area unique in a negative sense. In anticipation of an EU-funded pilot with health mediators, progress is evidence in 2014 in relation to only two out of 22 measures: 3.3.1 ("To design and implement education programmes and campaign (media shows, leaflets, printed materials, public discussion forums, lectures, workshops, playrooms) aimed at

raising the Roma population's awareness of the responsibility of one's own health") and 3.7.3 ("To implement education sessions for children, youth and their parents on the harmful effects of narcotic drugs and harmful social and health effects of addiction") (see Government of the Republic of Croatia 2013: 46-47; 59).

Of all strategy areas, health care has received the largest volume of criticism for the approach taken to implementation and data collection, with several interviewed stakeholders (mostly but not exclusively from civil society) accusing the Ministry of Health and institutions under it of inertia and ineffectiveness in relation to both. Inhabitants of the Romani settlement in Kuršanec (Čakovec) participating in the focus group organized in the framework of the evaluation complained of barriers in access to health care, including the refusal of the ambulance service to respond to calls from the settlement until the head of the local community center confirms the need for an ambulance. Inhabitants of the Romani settlement in Capraške Poljane (Sisak) also reported several instances in which ambulances refused to respond to calls from the settlement. Interviews conducted by civil society actors in Zagreb in early 2014 pointed to a need for more work on health education (particularly with parents and adolescents), as well as to the absence of ethnically disaggregated data on immunization (Mikić and Babić 2014: 67-68). Additionally, the 2015 report of the Roma Early Childhood Initiative+ project contains the following statement: "It should be noted that it was most difficult to obtain data from health professionals" (Šikić-Mićanović et al. 2015: 113). Finally, among the conclusions of the report on NRIS implementation produced in the framework of the EQUI-HEALTH program is that the situation of Roma seems to improve more slowly in the area of health than in other areas (Martinović Klarić et al. 2015: 56).

Although access to health insurance in Croatia does not depend on employment, data from the period prior to the NRIS and AP indicated that health insurance coverage among Roma is lower than the overall national rate by approximately 14 percentage points, with the gap in access to needed medicines approximately twice as large (Bagić et al. 2014: 70; see also Government of the Republic of Croatia 2007: 11). Insofar as these gaps are not related to employment, they can be presumed to result from unresolved status issues. On the positive side, participants in the focus group organized in the framework of the evaluation with members of the Romani community of Beli Manastir indicated the access to health insurance has improved in recent years despite a lack of improvement in Roma's employment situation. Still, the results of a survey conducted by UNICEF in 2014 indicate that Romani respondents were the only group in which a majority reported that their children's teeth had never been examined by a dentist (UNICEF 2014a).

Whereas the interviewed representative of one central-level institution with a key role in this strategy area identified immunization campaigns as an important success of AP implementation, an interview with representatives of another relevant central-level institution revealed a view that immunization takes place without regard to the AP and would continue even if there were no AP. The same interview revealed that the success of immunization campaigns and their monitoring varies by region. Consistent with these observations, the Ministry of Health reported on the occurrence of measles in Romani settlements in Zagreb, which rose from eight recorded cases in 2014 to more than 50 cases by February 2015. Monitoring visits in Zagreb by the Croatian Institute of Public Health identified a significant number of unimmunized children and youth, which led to the additional immunization of 200 individuals.

Also receiving favorable mention in interviews conducted in the framework of the evaluation was the EQUI-HEALTH program, implemented with support from the International Organization for Migration and including a component aimed at increasing Roma's access to health care (see also Martinović Klarić et al. 2015). On the other hand, representatives of two central-level institutions with a key role in this strategy area identified Measure 3.2.3 ("To implement programmes that enable marginalized Roma communities access to health care services (transportation, assistants to elderly persons ('gerontohosts'), mobile teams, availability of drugs etc.)") as a failure for being incorrectly assigned to the Ministry of Health despite relating most directly to social policy (see Government of the Republic of Croatia 2013: 45). Also noted in an interview with a representative of a relevant central-level institution were problems of information and/or motivation among Roma, with the interviewed representative pointing to a campaign for free gynecological exams in the framework of the *Program for Roma* which resulted in only five Romani women making use of the service provided.

With regard to data collection, the interviewed representative of a competent institution explained the lack of data on health indicators contained in the AP in terms of the absence of a legal obligation to keep ethnically disaggregated records (cf. Martinović Klarić et al. 2015: 35). At the same time, this stakeholder noted that adding a question to the developing online health dossiers to be maintained by doctors would require only around 10 minutes work if a clear decision were to be taken to do so.

The same stakeholder also expressed the view that the fulfilment by 2015 of the objectives of the NRIS and AP in this strategy area is unrealistic. Moreover, this stakeholder noted that the fulfillment of objectives by 2020 depends in large part on the introduction of health mediators, programmed to begin (with funding from the EU) no sooner than 2016. Given this state of affairs, it is simply too early to speak about sustainability (cf. Martinović Klarić et al. 2015: 49-50).

Positive example from outside Croatia: Health mediators

Health mediation programs – often implemented primarily by Romani women – in local Romani communities enjoy a reputation as an effective way to improve Roma's access to health services by facilitating communication between Roma and (non-Romani) healthcare workers, providing health education, and undertaking social work in the community.

A model of health mediation has been growing in Bulgaria since 2001. Beginning as a CSO pilot project with five health mediators in the city of Kyustendil, as of mid-2013 there were over 100 mediators active in 19 districts and paid from budgets delegated to municipalities (Council of Europe 2013; Zdravenmediator.net 2008). The profession "health mediator" was incorporated in the National Classification of Occupations in 2007. A National Network of Health Mediators was established the same year.

Bulgaria's experience with health mediators has already served as a source of inspiration for other countries with considerable Romani populations, including Macedonia (in 2012) and Serbia (in 2008).³⁷

³⁷ Among countries participating in the Decade of Roma Inclusion, health mediation programs have also been implemented in the Czech Republic, Hungary, Romania, Serbia, Slovakia, and Spain.

3.4.4. Social care

Baseline data are not available for any of three objectives in the area of social care. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in the area of social care cannot be determined. At the level of measures, baseline data are available for only three out of the total of 11. However, data for 2013 and 2014 are available for all measures, thus providing new baselines. In 2014, some progress can be tracked in relation to six out of 11 measures. On the other hand, a lack of progress is evident in relation to the following measures: 4.1.2 ("To sensitise and educate social workers so that they can provide better services and social mentorship");

- 4.1.3 ("To educate Roma mediators as a support to the availability of social care in the Roma population and other activities which will serve to ensure a better coordination between social care centres and the Roma population"); and
- 4.3.1 ("The implementation of the survey in Roma communities to be used as a source of data") (see Government of the Republic of Croatia 2013: 64-66, 71-72).

For two other measures, progress cannot be determined for lack of data on implementation in 2014 from GOHRRNM.

According to the interviewed representatives of a central-level institution with a key role in relation to this strategy area, the institutions most important for the implementation of the measures assigned in the AP to the Ministry of Social Policy and Youth are the 80 Centers for Social Welfare and 39 branch offices located throughout the country. Barriers to the implementation of the relevant measures of the AP include the hiring freeze in public administration (exerting a direct negative effect on implementation of Measure 4.1.1, which calls for "increase[ing] the number of employees in social care centres and/or family centres in areas with a large Roma population") as well as the absence of clear guidance on the obligation to collect data disaggregated by ethnicity insofar as the *Law on Social Welfare* does not recognize national minorities as a separate category (see Government of the Republic of Croatia 2013: 62; Narodne novine 2013b). In addition to meaning that reported data on AP implementation amount to estimates from the field based on name, address, and direct contacts, the absence of an official category for Roma exerts an indirect negative effect on implementation of Measure 4.2.1 ("aid and support to Romani families") (see Government of the Republic of Croatia 2013: 67).

The interviews conducted in the framework of the evaluation also transmitted information apparently received from the Centers for Social Welfare that the priority placed on training mediators to improve the availability of social care in Measure 4.1.3 of the AP is problematic because Roma do not view mediators as authoritative (see Government of the Republic of Croatia 2013: 65). Specifically, social workers' experiences to date suggest that Roma are well aware of their rights in the social welfare system. Moreover, previous experiences in introducing Romani mediators for implementation of measures in the area of family law demonstrated that the mediators were not treated with respect by other Roma. Taking this into account, there is a lack of clarity – apparently stemming from the provisions for mediators in two thematic areas of NRIS and AP – about the number of categories of mediators and the institutions responsible for them. On a broader level, the interviewed representatives of a central-level institution with a key role in

relation to this strategy area observed a lack of ownership due to understaffing in some Centers for Social Welfare and reported threats to social workers by Romani clients.

3.4.5. Physical planning, housing, and environmental protection

In this strategy area, baseline values are not available for any of the seven objectives. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in this area cannot be determined. Additionally, baseline data are available for only three out of the 15 measures in this priority area. While some progress is apparent on all measures in 2013 despite incomplete data in some instances, the data available on implementation in 2014 allow progress to be assessed in relation to only five measures, with progress evident for four.

Views on AP implementation in relation to physical planning, housing, and environmental protection vary widely, even at regional and local levels. In Čakovec, for example, inhabitants of the Romani settlement of Kuršanec participating in the focus group organized there in the framework of the evaluation characterized infrastructure as the most pressing problem. In similar fashion, participants in the focus group organized in the framework of the evaluation with inhabitants of the Romani settlement of Capraške Poljane in Sisak pointed to a need for more and better infrastructure, with participants in both focus groups describing a situation in which the distance to public transport makes it impractical to use but owning a car would make them ineligible for the social assistance which is their main source of income. A representative of a county-level Romani National Minority Council commented sardonically that the most significant change for Roma as a result of AP implementation is "asphalt", while the interviewed representative of regional administration in the same county pointed to infrastructure as the area in which the greatest progress had been made.

As discussed in Section 2.1, "by planning and conducting most housing interventions in segregated environments, the Strategy goes against the principles of de-segregation and de-ghettoization that it generally promotes" (Mikić and Babić 2014: 69). One representative of an international organization interviewed for the evaluation cited the tendency to "cement[] existing segregated locations" in explaining the characterization of housing as the greatest failure of the AP, attributing this failure in turn to a lack of understanding of area-based development. While further mentioning the absence of a strategy on social housing as a problem, this interlocutor also made note of infrastructural improvements as a positive change resulting from AP implementation. A representative of another international organization interviewed for the current evaluation cited Belišće as an example of using funding to support segregation by paving the road to a Romani settlement with deplorable living conditions without addressing those conditions.

Concerns about segregation were apparent also in the interviews with representatives of regional and local administrations conducted in the framework of the evaluation. Whereas the interviewed representative of one regional administration pointed to increased segregation as a result of improvements to existing Romani settlements, representatives of another regional administration referred to two projects undertaken at local level which were ultimately rejected by the targeted Romani populations, in part out of concerns about ghettoization. A representative of city administration interviewed in the framework of evaluation made note of positive experience with integration through removal of Roma from Romani settlements, while the interviewed representative of another city administration observed that Roma living outside settlements are

more integrated but noted that the city's social housing program – like other local-level social housing programs implemented in Croatia – leaves no room for affirmative measures for Roma as such insofar as it is based on exclusively social criteria. Whereas the interviewed representatives of a third regional administration noted that Roma want to live in integrated neighborhoods, representatives of a fourth such administration mentioned cases in which Roma had refused to move into apartments provided by authorities because moving would deprive the targeted Roma of the space needed for storing the bulk waste from which they earn a living.

Whereas the interviewed representative of one central-level institution with a key role in relation to this strategy area explained the focus on improving living conditions in Romani settlements in terms of a finding of a 2005 study that Roma prefer to stay in their settlements,³⁸ the interviewed representative of another competent institution provided information on problems with the two measures in the sub-area of housing in which the Ministry of Regional Development and EU Funds is identified as an implementing partner. With regard to Measure 5.2.2.3 ("Renovation and construction of houses for Roma families in areas of special state concern"), this interlocutor noted a lack of clarity resulting from the separation of the State Office for Reconstruction and Housing Care from the Ministry of Regional Development and EU Funds (see Government of the Republic of Croatia 2013: 81). The same interlocutor also noted a lack of demand for implementation of Measure 5.2.2.4 ("Co-financing of infrastructure projects for Roma settlements in accordance with an upon request of L(R)SGU") in both 2013 and 2014 (see Government of the Republic of Croatia 2013: 82).

Several interviewed stakeholders presented legalization as the most pressing problem faced by Roma in relation to housing, while the MP for national minorities was broadly recognized for his efforts to mobilize inhabitants of Romani settlements to apply for legalization. Although units of local self-government may in certain cases adopt decisions to waive utilities fees in part or in their entirety, one stakeholder from civil society warned that arrears on utilities mean that an unknown but presumably considerable proportion of the dwellings inhabited by Romani households are not eligible for legalization and lack prospects for becoming eligible in the foreseeable future due to high levels of unemployment and poverty which make payment of arrears unlikely. Information on the practices of individual units of local self-government in this regard are not available at central level.

As one of the highlights in 2014, the interviewed representative of the Ministry of Construction and Spatial Planning reported the co-financing of documentation needed for legalization in two localities: the Romani settlement MO Josip Rimac in Slavonski Brod (funded at a level of 386 625 km) and the Donja Gračenica in Popovača (100 000 km). The same ministry also provided co-financing of 100 000 in for construction of a Romani cultural center in the Municipality of Darda.

Positive examples from outside Croatia: Ethnically integrated social housing

Since 2008, the "Project for Housing of Socially Vulnerable Groups F/P 1674" of Macedonia's Ministry of Transport and Communications has made use of explicit but not exclusive targeting of Roma in allocating government-subsidized social housing in ethnically mixed apartment

³⁸ In fact, however, the study in question found that a majority (55 percent) of respondents from Romani settlements expressed a preference for living in a modern, urban, non-Romani settlement (Štambuk 2005: 173).

buildings. In addition to being an explicit target group of the project, Roma are also eligible to benefit from the housing scheme to the extent that they meet other (i.e., non-ethnic) criteria. As of end 2012, allocations to Roma accounted for 17.4 percent of all apartments distributed through the project (Friedman et al. 2013: 54).

3.4.6. Inclusion of the Roma national minority in the cultural and social life

Baseline data are not available for any of the three objectives in this strategy area. Values on these indicators are also not available for 2013 and 2014, such that progress toward objectives in this area cannot be determined. The situation at the level of measures is somewhat better, with baseline values available for six out of 14 measures. In the absence of data for 2014 from GOHRRNM as of March 2015, it is possible only to observe progress in 2013 in relation to seven of the 14 measures in this area.

Several interviewed stakeholders credited AP implementation with increasing societal interest in the situation of Roma through increases in the quantity and quality of media coverage about Roma. One stakeholder characterized this development as the greatest success of AP implementation to date. By way of contrast, another warned that the predominant emphasis placed in the media on Romani cultural identity does little to reduce social distance between Roma and non-Roma. Further, participants in the focus group organized in the framework of the evaluation in Capraške Poljane (Sisak) reported that Roma are increasingly hesitant to identify themselves as such to non-Roma out of a perception that doing so makes it more likely that they will be subject to discrimination.

Also receiving mixed reviews from interviewed stakeholders were developments in the political representation of Roma. In a written response to questions sent by the evaluation team, the Ministry of Administration noted on the one hand increased participation of Roma in regional and local politics while on the other hand pointing to insufficient interest on the part of Roma in active inclusion in political life. While the role of the MP for national minorities was generally presented in a positive light, interviews with stakeholders in Međimurje County provided indications that the sub-ethnic (and to some extent geographic) division between Boyash Romanian- and Romanispeaking Roma is sometimes politicized in ways which have potential to affect negatively relations between Roma in Međimurje County and Romani-speaking political representatives in Zagreb.

While the Council for National Minorities took the position (in its written response to questions submitted by the evaluation team) that elections for Romani National Minority Councils and for Romani representatives have considerably improved the overall situation of the Romani population in Croatia, several other stakeholders asserted that the minority council model has not functioned adequately at regional and local levels. Among the reasons given for this state of affairs were a lack of clarity about councils' roles and poor relations between the councils and local Romani communities. Zagreb provides an example of the latter phenomenon, where the good relations reported between the Romani National Minority Council and city administration stand in apparent contrast to relations between the Council and the Romani inhabitants of Dumovec. Dissatisfaction with regional Romani National Minority Councils was voiced also by interviewed representatives of some regional and local administrations, with some stakeholders presenting a community center as an alternative to a dysfunctional Romani National Minority Council.

While some stakeholders observed progress in the quantity and quality of dialogue between government and Romani CSOs, others claimed that Roma are more often ignored or instrumentalized. Additionally, organizational capacity in general and financial management capacity in particular received frequent mention as a factor limiting not only CSOs' ability to benefit from the increased availability of funding (especially from the EU, but also from state sources as application processes become more complex in an attempt to increase the transparency of funding to CSOs), but also their role in coordination among actors at local level as well as between local and regional levels on the one hand and between local and central levels on the other. An indication of this state of affairs is the fact that of the 13 projects directly targeting Roma and two projects in which Roma were among target groups under IPA Component IV in 2013, only six involved Romani CSOs (seven organizations in total), and always as partners rather than leading organizations (Mikić 2013: 5). Further, the representative of a competent central-level institution interviewed in the framework of the evaluation commented that implementation of Measure 6.3.3 ("Education of representatives of Roma associations on the possibilities of financing their projects and activities through EU funds, and on the possibilities of creating partnerships and networking with other similar organisations in the Republic of Croatia and abroad through international projects" (Government of the Republic of Croatia 2013: 94-95) was compromised by the low level of participation of Romani NGOs with the Info Days organized on a regular basis by the Government Office for Cooperation with NGOs, stating that only one such organization took part in an Info Day in 2014 but also that no events specifically targeted Roma were organized. Finally, participants in the focus group organized in the framework of the evaluation in Capraške Poljane (Sisak) expressed distrust for Romani CSOs which they reported had received local funding for but not implemented project activities.

With regard to culture, the Council for National Minorities reported providing 1 345 000 kn in 2013 and 1 146 000 kn in 2014 for activities and equipment for the cultural autonomy of the Romani population. At the same time, the Council characterized access to broadcast time in minority languages as insufficient. The Ministry of Culture reported funding 10 of the 12 projects proposed by Roma in 2014 at a total of 100 000 kn in implementing the measure of the AP on funding of programs for Romani culture (Government of the Republic of Croatia 2013: 88).

Positive example from outside Croatia: Treating Romani culture as changing and varied

Spain's Action Plan for the Development of the Roma Population 2010-2012 advises that policies in the area of culture "should be built on the acceptance of diversity as part of development and should consider cultural identity to be broad and dynamic" (Ministry of Health, Social Policy and Equality 2010: 36). Consistent with this conception of culture, objectives of the Action Plan in this area include on the one hand the dissemination of information about Romani cultural values and their contribution to the country's common cultural heritage and, on the other hand, increasing the participation of Romani youth and women in society with an eye to promoting discussion on issues of Romani culture. This combination of conception and objectives creates a framework not only for the integration of Roma in the wider society, but also for developing Romani culture in a direction not dominated by men.

Among Croatia's neighbors, Serbia's action plan for Roma and the Slovenian *National Programme of Measures for Roma* also take explicitly into account that Romani culture does not consist only of traditional practices, but is also in a process of constant development (Government of the Republic of Slovenia 2010: Section 4.5.2.2; Ministry of Human and Minority Rights 2010: 55, 118).

3.4.7. Status solutions, combating discrimination, and help in realizing rights

The only one of the 10 objectives in this strategy area for which baseline data are available is Objective 2 of the sub-area "Status Solutions" ("To inform and encourage members of the Roma community on the full cooperation in procedures for the resolution of their status") (see Government of the Republic of Croatia 2013: 96). Data from 2013 and 2014 further point to progress toward this objective. No baselines are available for the rest of the objectives in this strategy area, but data for 2013 and 2014 are available also for Objective 1 of the sub-area "Status Solutions" ("To identify, by detection by mobile teams, the number of persons with significant difficulties in regulating their status in the Republic of Croatia"), indicating progress as well (see Government of the Republic of Croatia 2013: 96).

Baseline data are available for eight out of 20 measures in this strategy area. Based on data from 2014, some progress can be tracked on six out of the 15 measures for which data are available. Data for 2014 on implementation of five measures in the sub-area "Combating Discrimination" were not available as of mid-March 2015.

In a written response to questions submitted by the evaluation team, the Ministry of Interior, which has a role in implementing nine measures of the AP in this strategy area, characterized the implementation of relevant measures as successful while pointing to a persistent lack of interest in status solutions on the part of some Roma despite the legal aid offered through the mobile legal teams established in the City of Zagreb and nine counties. With regard to budgetary expenditures, the Ministry of Interior indicated only that the measures were funded from the state budget. The Ministry of Justice, which is implicated in relation to four measures of the AP in this strategy area, indicated in its written response to questions submitted by the evaluation team that ethnically disaggregated data on implementation of relevant activities are not available, such that it is also not possible to estimate budgetary expenditures for the corresponding measures of the AP. The Ministry of Justice further noted that fulfilment of the objectives of the AP depends on available funding.

Estimates of the number of Roma in Croatia with status problems vary from 1 500 to 3 000. The finding of qualitative research conducted in 2013 that Roma in Croatia with unresolved legal status face "complete economic and social marginalization and societal exclusion" suggest in turn a need for an intensification of efforts in this strategy area (Bagić et al. 2014: 88).

Information provided by a representative of a CSO involved in implementation of the UNHCR-funded project "Legal Aid for Stateless Persons" in five counties suggests that the deployment of mobile teams has brought progress in the identification of persons with problems in regulating

³⁹ The measures of the AP which foresee a role for the Ministry of Justice are 7.2.3.2, 7.3.1.1, 7.3.2.1, and 7.3.3.1 (Government of the Republic of Croatia 2013: 108, 112-114).

their status (Objective 7.1.1) as well as in increasing the visibility and availability of free legal aid to Roma (Objectives 7.3.1-7.3.3) despite regional variations in the level of engagement of the mobile teams (see Government of the Republic of Croatia 2013: 96-98; 111-114). This same stakeholder as well as a representative of UNHCR expressed the view that CSOs often undertake the activities formally assigned to the mobile teams. At the same time, the CSO representative also reported excellent cooperation with local police stations for this purpose, as did members of one county-level Romani National Minority Council. On the negative side, the representative of the CSO mentioned above in relation to implementation of the UNHCR-funded legal aid project observed that Roma who attempt to regulate their status without expert support are often subject to discrimination.

Both the CSO representative and the written response of the Ministry of Interior to questions submitted by the evaluation team pointed to the administrative difficulties encountered by non-citizens living in Croatia who lack a passport from any country. One the one hand, a passport is required for regulation of status. On the other hand, the embassies of relevant countries in Croatia are not generally equipped to issue passports (the major exception in this regard being Bosnia and Herzegovina).

Positive examples from outside Croatia

- Settlement visits by ombudsperson institution. Local-level outreach by central-level human rights institutions is particularly important for Roma who live outside the capital. The costs of travel may limit physical access, while communication with official institutions may be intimidating and/or difficult due to low levels of education, language barriers, or both. Local-level outreach by central-level human rights institutions has become more common in recent years in several Decade countries, yet Serbia's ombudsperson institution stands out for the weekly visits to Romani settlements organized by the Deputy Protector of Citizens for the Rights of National Minorities (Friedman 2013).
- Health mediators (bis). Given the close links between civil registration and access to healthcare, health mediators' role of better connecting local Romani communities with official institutions has often left them particularly well positioned to provide support not only in accessing services directly related to health, but also in securing the various kinds of documentation enabling access to services in the areas of education, employment, and housing.

More detailed information on selected health mediation programs implemented in countries participating in the Decade of Roma Inclusion is given in Section 3.4.3.

3.4.8. Improvement of statistical data collection

No baseline data for the four objectives and accompanying measures in this area are available, mostly because the planned activities are new for the period covered by the AP. Progress through 2014 is evident in relation to only two measures in this strategy area: 8.2.4 ("To continuously monitor the provision of social care by local self-government units") and 8.2.5 ("Monitoring of the status regarding social care by means of a cooperation with the competent social work centre,

councils or representatives of the Roma national minority, and the competent local administration body") (see Government of the Republic of Croatia 2013: 119-120).

Available information suggests that there has been only modest progress toward realization of the four objectives in the strategy area "Improvement of Statistical Data Collection":

- (5) Age- and gender-disaggregated statistics on Roma remain rare;
- (6) There is some evidence of improvements in the methodology for collecting data on education, employment, material and social deprivation, poverty rates, and quality of life among Roma;
- (7) There is evidence of resistance to collecting ethnically disaggregated data on health indicators for the Romani population; and
- (8) There is some evidence of improvements in the methods for monitoring the inclusion, participation, and representation of Roma in cultural, political, and social life.

However, the design of the new forms distributed in early 2015 by GOHRRNM and tailored for each responsible institution for reporting on AP implementation in 2014 appears to provide a basis for improvement in this strategy area, particularly given that representatives of central-level institutions interviewed did not voice objections to the new design.

3.4.9. Compliance of the programs with international standards and accepted treaties in the area of human rights and rights of minorities

Baselines are available for all four measures in this area. Additionally, the data provided for 2013 and 2014 allow progress to be tracked, with the measures planned in this area generally corresponding to regular activities of the Ministry of Foreign and European Affairs.

The design of the NRIS and the AP conform to the *EU Framework for National Roma Integration Strategies up to 2020* (see European Commission 2011). On the other hand, the exclusion of Boyash Romanian and Romani from the list of languages covered by the *European Charter for Regional or Minority Languages* poses a barrier to the exercise of the right to mother tongue education for Roma in Croatia (Šikić-Mićanović et al. 2015: 59; see also Council of Europe 1992).

4. CONCLUSIONS, LESSONS LEARNED, AND RECOMMENDATIONS

4.1. Conclusions and lessons learned

While stakeholder views on the NRIS vary, the document distinguishes itself from other documents produced in response to the *EU Framework for National Roma Integration Strategies up to 2020* in its attention to issues of gender and to monitoring and evaluation. The thematic coverage of the NRIS and AP is also broader than that of the respective documents adopted in most countries participating in the Decade of Roma Inclusion, with the sections of Croatia's AP entitled "Improvement of Statistical Data Collection" and "Compliance of the Programmes with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities" unique among countries participating in the Decade. More important, the AP's compression of the eight-year NRIS into a three-year period raises immediate questions about prospects for the fulfillment of its objectives by 2015.

At regional and local levels, only five of the 33 units required by the NRIS to develop, adopt, and implement action plans for Roma had done so by March 2015. Notwithstanding similarities in thematic coverage relative to the NRIS, the implementation documents adopted at regional and local levels vary considerably in overall volume and in number of planned measures. The dominant view among interviewed stakeholders is that the adoption of implementing documents at regional and local levels has not thus far had a significant effects on the situation of Roma in the self-government units covered by the documents. At the same time, representatives of regional administration in Osijek-Baranja County and local administration in Sisak pointed to exceptions to this generalization.

Communication has improved under the NRIS and AP, but horizontal and vertical coordination are generally inadequate. The findings of the field research conducted in the framework of the evaluation suggest that communication between either local or regional authorities on the one hand and central-level institutions on the other is sometimes better than that between local and regional authorities. On the other hand, the transmission of information from the Croatian Employment Service to its branch offices and processing of information received from the branch offices was identified as problematic. Concerns were also raised about the transparency of funding allocations by the NRIS Monitoring Commission.

GOHRRNM's ability to perform its coordinating role in relation to NRIS and AP implementation is negatively affected by its position in the institutional hierarchy, with insufficient human resource allocations affecting the ability of central-level institutions to fulfill their roles in relation to NRIS and AP implementation. Additionally, participants representing institutions at central, regional, and local levels in the interviews conducted in the framework of the evaluation often stated that the activities implemented to improve the situation of Roma are not directly related to NRIS or its implementing documents and would be implemented even without those documents, or that the measures included in the AP fall within the already-ongoing work of the respective institutions. Closely related to these tendencies, the introduction of new approaches is often slow, with the planned health mediation program central to realization of objectives in the strategy area of health care a case in point.

Despite the considerable attention to issues of monitoring and evaluation in NRIS and AP, there is no overarching system in place for gathering data on the implementation of planned measures and the realization of strategic objectives, with neither the Monitoring Commission nor its Working Group actively engaged in monitoring and evaluation. Additionally, no overview of implemented measures and their results at central, regional, and local levels is available. Some hesitation in relation to the collection of ethnically disaggregated data is also apparent. Taken together, the absence of a functional monitoring system in general and resistance to collection of ethnically disaggregated data in particular leave room for speculation that institutions are less active in AP implementation than they really are.

As of mid-March 2015, the only areas of the AP in which data are available for all measures are "Education" and "Compliance of the Programs with International Standards and Accepted Treaties in the Area of Human Rights and Rights of Minorities". In several other areas, data are unavailable for a majority of measures. Notwithstanding the incompleteness of data on AP implementation in the evaluation period, the design of the AP and information gathered in the course of the evaluation together suggest that the objectives of the AP cannot be fulfilled by 2015.

While it is already too late to revise the current AP according to the procedures elaborated in the NRIS, a partial revision of the NRIS should be considered. Additionally, the design of the AP for the period 2016-2018 should differ considerably from that of the current AP, taking into account not only the revised NRIS, but also the lessons learned from implementation to date and the findings of this evaluation. Detailed guidelines for approaching both documents and the arrangements for their implementation and monitoring are given in the next and final section of this report.

4.2. Recommendations

Strategic and implementation documents

1. Revise selected areas of the NRIS. The strategy areas "Physical Planning, Housing, and Environmental Protection" and "Inclusion of the Romani National Minority in the Cultural and Social Life" should be reworked in order to bring strategic objectives in these areas into line with the overall orientation of the NRIS toward integration. Revisions to the strategy area "Physical Planning, Housing, and Environmental Protection" should take into account good practice from Macedonia in relation to ethnically mixed social housing, as well as (future) experiences from the announced pilot of "intervention plans" in selected war-affected small cities in Croatia (including Beli Manastir and Darda, both with considerable Romani populations),), as well as from the implementation of plans for the rehabilitation of areas damaged by illegal construction. And Revision of the strategy area "Inclusion of the Romani National Minority in the Cultural and Social Life" should draw on positive examples from Serbia, Slovenia, and Spain, which treat Romani culture as dynamic and varied in their strategic documents for Roma. The occasion of revision should also be used in the other priority areas, in accordance with proposals from the Working Group.

⁴⁰ The intervention plans are foreseen under the European Fund for Regional Development, National Operative Programme "Competitiveness and Cohesion 2014-2020", Priority 9.2. "Physical, economic and social regeneration of deprived communities in urban and rural areas". Rehabilitation plans are foreseen on the basis of the new Law on Spatial Planning.

- 2. Make clear and realistic commitments in the next action plan. Taking into account that it is already too late to revise the current AP, efforts should be directed toward applying lessons learned from implementation of the AP to the action plan for 2016-2018. To this end, prioritization among strategy areas should be introduced, with not all strategy areas necessarily included in the action plan. Additionally, there is a need to prioritize *within* strategy areas by assigning concrete timeframes to planned measures which reflect the relative urgency with which the measures should be implemented. Further, conceptual clarity in the statement of objectives should be ensured rather than relying on elaborate and separate definitions. Finally, the next action plan should include clear links between planned measures and the availability of EU funding as specified in the recently approved Operational Programme "Effective Human Resources 2014-2020" and Operational Programme "Competitiveness and Cohesion 2014-2020".
- 3. Reconsider the development of implementing documents at regional and local levels. Given that few units of regional and local self-government have adopted implementing documents to date and that there is little evidence that the measures foreseen in these document have been implemented, a more effective approach might be for the central-level institutions responsible for AP implementation to disaggregate by the measures foreseen in the AP for further disaggregation to local level by regional authorities.

Communication and coordination

- 4. <u>Increase human resource allocations at central level</u>. The practice common in central-level institutions of making a single staff member responsible overseeing implementation of, monitoring, and reporting on NRIS and AP implementation should be replaced with the establishment of a working group among current staff within each relevant institution with an eye to more even distribution of tasks. Each intra-institutional working group should meet on at least a monthly basis to discuss developments in NRIS and AP implementation.
- 5. <u>Routinize contacts among central-level institutions</u>. Thematic meetings of the Working Group of the Monitoring Commission should be held on a monthly basis, with priority given to issues for the resolution of which inter-sectorial cooperation is necessary.
- 6. Extend the reach of GOHRRNM. The engagement of experts at local level as foreseen in the NRIS has potential to improve communication and coordination between central, regional, and local levels. Partnership with the regional offices of the Ombudsperson institution should also be considered for this purpose.
- 7. Attend to sub-ethnic divisions within the Romani population. While complaints about lack of unity among Roma are sometimes rooted in the inconsistency of valuing pluralism in society at large while expecting minorities to speak with a single voice, politicization of the division between Romani- and Boyash Romanian-speaking Roma has potential to compromise realization of the broader objectives of the NRIS. For this reason, outreach to Boyash Romanian-speaking Romani communities should be increased with an eye to co-opting less constructive attention from (sub-) ethnic entrepreneurs with an agenda not clearly focused on integration.

- 8. <u>Improve Roma's access to EU funding</u>. The increased availability of EU funding resulting from completion of the accession process provides an opportunity both to improve intersectorial cooperation and to build the capacity of Romani CSOs with enduring ties to local communities. Particularly under the European Social Fund, activities to build the institutional capacities and project management competences of Romani CSOs project management should be encouraged for non-Romani organizations implementing project activities targeting Roma, as well as for the information units of ministries part of the operational structure for implementing EU funds. Additional targeted support outside EU-funded projects could be provided by experienced CSOs and by the Government Office for Cooperation with NGOs.
- 9. <u>Harmonize mediation concepts</u>. References to health mediators as best practice are frequent and such mediators accordingly figure as crucial actors in the implementation of specific measures of the AP. Reports from Centers for Social Welfare, on the other hand, indicate that Roma tend to see mediators as lacking the necessary level of authority. This conceptual tension should be resolved through discussion involving at minimum health and social care sectors.

Monitoring and evaluation

- 10. Ensure collection of ethnically disaggregated data. The reluctance of some institutions to collect data on ethnicity should be overcome by addressing legal concerns directly. To this end, a working group of the Monitoring Commission should be established for this purpose, with the working group including a representative of the Croatian Personal Data Protection Agency. Additionally, a thematic session of the Monitoring Commission should be prepared with appropriate expert support to demonstrate the feasibility of ethnic data collection in line with EU standards on data protection. An official statement reflecting common agreement within the working group could provide a basis for institutions to use existing technical capacities by expanding their existing internal data systems, thus facilitating systematic data collection and avoiding the parallel monitoring processes currently associated with NRIS and AP.
- 11. Establish baselines. While a revision of the current AP is no longer feasible, measuring progress against the objectives of the current AP (and thus the NRIS) is a precondition for grounding the next action plan. Among possible sources of baseline data for the current AP are the 2011 census and the UNDP/WB/EC Regional Roma Survey 2011. Data from the forthcoming annual report on AP implementation in 2014 could serve as baselines in the next action plan.
- 12. <u>Build capacity for monitoring and evaluation</u>. On the one hand, the capacity of GOHRRNM to engage in monitoring and evaluation in general and to maintain a database on the situation of Roma in particular should be increased by hiring a staff member focused primarily on this area. On the other hand, the capacity of the Monitoring Commission to engage actively in monitoring implementation of the NRIS and the AP should be increased by expanding the membership of the Commission's Working Group to include external experts, at least during the time of preparation of the annual monitoring report. Finally, the members of Romani National Minority Councils should be introduced to the fundamentals of monitoring and evaluation as a basis for soliciting their input on annual reports on action plan implementation.

- 13. Standardize reporting on problems of data collection. Beyond requiring the reporting of data to fill indicators in the AP, reporting forms on AP implementation in 2015 and beyond should require responsible institutions to provide a specific explanation for not providing requested data, choosing among the following pre-developed options: (a) data not available in time for reporting deadline but will become available on a date to be indicated; (b) data has not been collected as planned due to errors in carrying out data collection; (c) the required data cannot be collected by law. On the basis of this information, the Monitoring Committee should take a decision on whether to exclude the indicators in question from further monitoring and/or to propose alternative solutions for the collection of relevant data.
- 14. <u>Improve indicator selection</u>. The indicators incorporated in the next action plan should attend to outcomes as well as to outputs in order to allow assessment of how the implementation of measures affects Roma (rather than only assessment of the degree to which measures were implemented). The selection of indicators should draw on the pilot coordinated by the European Union Agency for Fundamental Rights of the "Structure-Process-Outcome" rights-based indicator model. Only indicators for which baseline values are available at the time of drafting the action plan should be included in the document, with targeted studies to be carried out as necessary in advance of drafting in order to ensure the availability of relevant data. Wherever possible, indicators should include target values in order to make clear the degree of change which can be considered adequate progress.
- 15. <u>Contextualize monitoring and evaluation</u>. Beyond the quantitative research needed to generate baseline data on the basis of which progress can be measured, qualitative research has an important role to play not only for helping to make sense of quantitative data, but also for orienting future efforts. Particularly relevant for promoting the inclusion of Roma in Croatia are qualitative studies in local Romani communities to assess the broader impact of measures implemented to date and outstanding needs in the substantive areas of the NRIS.

ANNEX 1: TERMS OF REFERENCE

Terms of Reference

for the project "Evaluation of Croatian National Roma Inclusion Strategy"

1. Background

The Government of the Republic of Croatia, at its session held on 29 November 2012, has adopted *The National Roma Inclusion Strategy for the period from 2013 to 2020* (hereinafter "the Strategy"). The Strategy is the result of the Republic of Croatia's decision to align its fundamental policy paper on the integration Roma with the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on *EU Framework for National Roma Integration Strategies* up to 2020. The Strategy also relies on the provisions of international instruments on human and national minority rights, to which the Republic of Croatia is a party. The Strategy has been aligned with the identified needs and challenges related to Roma inclusion at all levels: local, regional, national and EU levels. It contains goals and targets set as guidelines for making public policies aimed at the socio-economic inclusion of Roma communities up to 2020. In order to define the means of implementation of the Strategy, the *Action Plan for the Implementation of the National Roma Inclusion Strategy* was created for the period 2013-2015 (hereinafter referred to as "the Action Plan" or "implementing document").

Report on the Implementation of the Action Plan for the Implementation of the National Roma Inclusion Strategy for 2013 was submitted for approval to the Croatian Government. Preparation of this report involved competent authorities - ones responsible for the measures as well as local and territorial (regional) self-governments - and its preparation process was coordinated by Government Office for Human Rights and Rights of National Minorities of the Republic of Croatia (hereinafter referred to as "GOHRRNM").

Several important documents discussing issues of strategic and accompanying implementation process of different strategic documents were also published in 2014: European Commission published comments on the Strategy (COM (2014.) 209 final), Report of Civil Society Monitoring on the Implementation of the National Roma Integration Strategy and Decade Action Plan in Croatia in 2012 and 2013 was published as well as publication Everyday life of Roma in Croatia, supported by the UN organisations, was realised.

During the preparation of Report on the implementation of the Action Plan for the Implementation of the National Strategy for Roma Inclusion for 2013, it was observed that the results were not completely in line with expectations expressed initially. On the fifth session of the Committee for Monitoring the National Strategy for Roma Inclusion 2013-2020, held on the 7th October 2014, after taking note of the Report on the Implementation of the Action Plan for Implementation of the National Strategy for Roma Inclusion in 2013, Roma members of the Committee requested the revision of the strategic document.

Pursuant to the Evaluation Strategy for European Structural Instruments (2012) document, if the competent national authority determines that the data received through monitoring are not in line with expectations included in strategic documents, it may decide the conduction of an evaluation

of progresses (periodic and/or mid-term evaluation) justified by the need to conduct a more detailed research of the

Accordingly, the document (The Strategy) provides the possibility to review The Strategy and The Action Plan in case it is established that the intended targets or measures do not yield results, or in case that they are unenforceable. According to The Strategy, the revision considers "the deletion of certain objectives of the Strategy or action plan measures, and/or the introduction of new targets in the strategy or new measures in the Action Plan, changes of deadlines, financial ratios, key duty bearers and indicators of implementation". For the purpose of assessment of results and effects of the measures defined in the context of the Strategy objectives and accompanying Action Plan, the mid-term evaluation of the Action plan is anticipated in order to identify trends and possible difficulties in achieving the goals set out in the documents.

In this context, evaluation of the implementation of the Croatian National Roma Inclusion Strategy for the period from 2013 to 2020 and Action plan for the Implementation of National Roma Inclusion Strategy for the period from 2013 to 2015 has been decided and support of evaluation process will be provided by UNDP Croatia between January and March 2015.

Purpose of the evaluation is:

- to determine the impact both positive and negative regarding level of achievement of the different Strategy's outcomes within the period from April 2013 to October 2014;
- to determine the extent to which budgetary allocations on national and local levels corresponded to objectives defined in the NSRI;
- to assess the effectiveness of institutional arrangements and partnership strategies;
- to analyze factors which have positively and negatively influenced achievement of strategic outputs and outcome;
- to document lessons learnt during the course of implementation to inform future decisions in strategy design, implementation and management of similar interventions.

The overall goal of this evaluation is to examine the extent to which National Strategy for Roma Inclusion 2013-2020 and Action Plan for the National Strategy for Roma Inclusion 2013-2015 contributed to inclusion of Roma in Croatia, and to provide recommendations for more effective future implementation of these documents.

Specific goals of the evaluation are:

- to examine the scope of discrepancy between strategic and implementing document on national level as well as implementing document on regional and local levels (where applicable);
- to examine key achievements of the documents and plausibility to achieve goals of the implementing document by the end of 2015;
- to determine the obstacles in implementing and propose ways of overcoming them;
- to review monitoring and evaluation procedures and management structure (roles and responsibilities) of the National Strategy for Roma Inclusion 2013-2015 and Action plan;
- to propose improvements of reporting format to Government Office for Human Rights and Rights of National Minorities that is in charge of writing annual national report on the implementation of the National Strategy for Roma Inclusion 2013-2015;
- to examine the role, scope and effectiveness of key stakeholders in implementation process (ministries, representative bodies, regional and/or local (self)-governments, civil society organizations, international organizations) and propose measures for improvement;
- to examine the efficiency of the Government Office for Human Rights and Rights of Minorities regarding its coordinative role (financial and human resources, partnership arrangements, communication strategies) and propose for improvement;
- to examine the need for revision of strategic and accompanying implementation document.

ANNEX 2: FIELD VISITS

Locality	Date
Beli Manastir	3 March 2015
Čakovec	6 February 2015
Rijeka	6 March 2015
Sisak	2 March 2015
Zagreb	14 March 2015

ANNEX 3: STAKEHOLDERS INTERVIEWED

Central-level government institutions

Organization/Institution	Date of interview	Location of interview
Council for National Minorities	5 February 2015	Zagreb
Croatian Employment Service	4 March 2015	Zagreb
Croatian Institute of Public Health	3 March 2015	Zagreb
GOHRRNM	4 February and 3 March 2015	Zagreb
Government Office for Cooperation with NGOs	2 March 2015	Zagreb
Ministry of Construction and Spatial Planning	24 February 2015	Zagreb
Ministry of Health	24 February 2015	Zagreb
Ministry of Regional Development and EU Funds	25 February 2015	Zagreb
Ministry of Social Policy and Youth	4 March 2015	Zagreb
NRIS Monitoring Commission ⁴¹	5 February 2015	Zagreb

⁴¹ Members of the Monitoring Commission participating in the interview were a Member of Parliament; a representative of the CSO "Bolja budućnost"; representatives of the Ministry of Interior, Ministry of Labor and Pension System, and Ministry of Science, Education, and Sports; and a representative of the Roma Education Fund.

Regional- and local-level government institutions

Organization/Institution	Date of interview	Location of interview
City of Beli Manastir	3 March 2015	Beli Manastir
City of Čakovec	6 February 2015	Čakovec
City of Rijeka	6 March 2015	Rijeka
City of Sisak	2 March 2015	Sisak
City of Zagreb	11 March 2015	Zagreb
Međimurje County	6 February 2015	Čakovec
Međimurje County Romani Minority Council/ National Coordinating Body of Romani Minority Councils	6 February 2015	Čakovec
Transport Councils	0140164119 2010	C WILL V CC
Osijek-Baranja County	3 March 2015	Osijek
Primorje-Gorski Kotar County	6 March 2015	Rijeka
Sisak-Moslavina County	2 March 2015	Sisak

Civil society organizations

Organization/Institution	Date of interview	Location of interview
ACT Čakovec	5 February 2015	Zagreb
Center for Peace, Legal Advice and Psychosocial Assistance	23 February 2015	Skype
Informativno-pravni centar Slavonski Brod	10 March 2015	Skype
POU Korak po korak	3 March 2015	Zagreb
Romani National Council	5 February 2015	Zagreb

International organizations

Organization/Institution	Date of interview	Location of interview
IOM	4 February 2015	Zagreb
UNDP	4 February 2015	Zagreb
UNHCR	4 February 2015	Zagreb
UNICEF	26 February 2015	Zagreb

ANNEX 4: RESEARCH INSTRUMENTS

Core interview guide

The interview guide below contains the main questions for the planned semi-structured interviews with representatives of government institutions and international organizations. This core interview guide was adapted in preparation for each interview targeting these stakeholder categories. ⁴² Interview guides for the planned interviews with representatives of civil society organizations were generated on the basis of consultation with GOHRRNM and UNDP about the targeted organizations.

- 1. How familiar are you with the *National Roma Inclusion Strategy for the Period from 2013 to 2020* (NRIS) and the *Action Plan for the Implementation of the National Roma Inclusion Strategy* (AP) for the period 2013-2015?
- 2. To what extent have you been involved in the implementation of measures foreseen in the AP^{243}
- 3. What have been the greatest successes of AP implementation? To what do you attribute these successes? How sustainable are they?
- 4. What have been the greatest failures of AP implementation? What kinds of obstacles account for these failures?
- 5. What are the prospects for realizing the objectives of the AP by 2015? What, if anything, can be done to improve those prospects?
- 6. How is AP implementation measured? (How are data on implementation collected? How frequently? By whom? To whom are they sent?)
- 7. What have been your experiences in cooperation with the Government Office for Human Rights and Rights of National Minorities (GOHRRNM)? How effective has GOHRRNM been in its coordinating role in relation to AP implementation? Has GOHRRNM provided support as needed?
- 8. How much direct communication is there among institutions other than GOHRRNM in relation to AP implementation?
- 9. What has changed for Roma as a result of AP implementation?

⁴² Whereas question 2 was not asked of interlocutors from international organizations, for the interview(s) with GOHRRNM additional questions were included to gather more detailed information on this institution's role, capacity, and outstanding needs in relation to NRIS and AP.

⁴³ Lists of relevant measures were prepared for interviews with representatives of responsible institutions.

Questions by e-mail

1.

- a. Koja je Vaša <u>procjena razine uspješnosti</u> provedbe mjera predviđenih *Akcijskim* planom za provedbu nacionalne strategije za uključivanje Roma za razdoblje 2013.-2015. godine koje su u Vašoj nadležnosti (prema listi dostupnoj u Prilogu)?
- b. Koje su <u>prepreke</u> u provedbi koje susrećete?
- c. Koja je <u>razina financijskih sredstva utrošenih</u> na provedbu predviđenih mjera iz Vaše nadležnosti?
- d. Koji je <u>rezultat provedbe</u> mjera predviđenih Akcijskim planom iz Vaše nadležnosti?

2.

- a. Kakva su Vaša <u>iskustva u suradnji s Vladinim Uredom za ljudska prava i prava nacionalnih manjina</u>? Koliko ste zadovoljni međusobnom suradnjom?
- b. Koliko je, po Vašem mišljenju, Vladin Ured <u>djelotvoran u koordinacijskoj ulozi</u> u provedbi Akcijskog plana?
- c. Jeste li dobili <u>potrebnu podršku</u> od strane Vladinog Ureda za provedbu mjera Akcijskog plana? Koja vrsta moguće dodatne podrške Vam je potrebna?
- 3. <u>Što se promijenilo u životu Roma kao rezultat provedbe Akcijskog plana?</u>
- 4. Koja je <u>perspektiva ostvarenja ciljeva Akcijskog plana do kraja 2015. godine</u>? Što se eventualno može unaprijediti da se ta perspektiva poboljša?

Questions for focus groups in Romani communities

- 1. What has changed in your neighborhood in the last couple of years? (How did the changes come about? How much do the changes affect you?)
- 2. What has gotten better in your neighborhood in the last couple of years? (How/why did this happen? What is the best thing about this neighborhood now?)
- 3. What has gotten worse in your neighborhood in the last couple of years? (How/why did this happen? What is the worst thing about this neighborhood now?)
- 4. Where do children from your neighborhood go to school? (How are the schools? How do teachers treat children? How do teachers communicate with parents?)
- 5. How is the employment situation in your neighborhood? (How much does the employment office help? How do the workers in the employment office treat you?)
- 6. Where do people from your neighborhood go when they need a doctor? (How far do you have to travel? How do you get there? How do healthcare workers treat you?)
- 7. To whom do people in your neighborhood turn when they have a problem which they and their family can't solve themselves? (Why?)

Observation grid for Romani settlements

	DIMENSION	OBSERVATIONS
1	Settlement, municipality, and date	
	of visit	
2	Approximate distance to center of	
	municipality and available	
	transportation	
3	Approximate distance to nearest	
	non-Romani settlement	
4	Roads leading into and out of	
	settlement (type and condition)	
5	Streets within settlement (type and	
	condition)	
6	Dwellings (construction materials,	
	number of stories, size, overall	
	external appearance)	
7	Public utilities (electricity, gas,	
	sewage, water)	
8	Location of nearest educational	
	institutions:	
	- Preschool	
	- Elementary	
	- Secondary	
9	Other facilities (banks, city hall,	
	cinemas, churches,	
	community/cultural centers, health	
	clinics, post office, shops, etc.)	

10	Recent infrastructural	
	improvements and when	
	completed	

ANNEX 5: MONITORING DATA ON AP IMPLEMENTATION IN 2013 AND 2014

Table A5.1. Education

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1- To increase the quality and efficiency of education of Roma children, and to ensure the acquisition of the necessary skills and competences that will enable a personal development of pupils, as well as the completion of primary education with the aim of continuing education, and to reduce the differences between the educational achievements of Roma children compared to the average level of educational achievements of all pupils in the primary school system in RH	Not available	Available	Progress not made	Available	Progress not made (but indicator apparently inappropriate)
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.1.1 Training of teachers and expert associates in primary schools with the aim of increasing the quality and efficiency of the education of Roma children	Available	Available	Progress made	Available	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 – To increase the inclusion of Roma children of both genders in preschool education, and to increase the quality of preschool education of Roma children as a part of early childhood education, which helps reduce the differences in social classes and learning capacities, and strives to meet the educational needs of children as much as possible, and introduce them into the world of conscious learning	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress

1.2.1 Co-financing of a part of the parents' share for the members of the Roma national minority in the integrated preschool education programmes.	Available	Available	Progress made	Available	Progress made (but indicator apparently inappropriate)
1.2.2 Preschool co-financing programme for members of the Roma national minority	Available	Available	Progress made	Available	Progress made (but indicator apparently inappropriate)
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 – To equalise the inclusion of members of the Roma national minority in primary education compared to the enrolment average of the primary education on the national level (to reach the inclusion level of 98 %) and to equalise the completion rate of Roma children with the national completion rate in the primary education system (to reach the completion rate of 95 %)	Not available	Not available	Not possible to determine	Partially available	Partial progress
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.3.1 Enrolment of Roma children of both genders in primary schools	Available	Available	Progress made	Available	Progress not made – fewer children involved in primary schools than in previous reporting period
1.3.2 Creation of the conditions for the inclusion of Roma pupils in after-school care	Available	Available	Progress made	Available	Progress not made – fewer children involved in after- school care than in previous reporting period
1.3.3 Training of associate assistants	Available	Available	Progress made	Available	Progress not made – fewer assistants financed and fewer trainings offered to them than in previous reporting period
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress

Objective 4 – To abolish all classes attended exclusively by Roma children by 2020	Available	Available	Progress not made – increase in classes attended exclusively by Roma	Available	Progress not made – increase in classes attended exclusively by Roma
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.4.1 Creation of the prerequisites for the reduction of the number of classes attended solely by Roma pupils	Available	Available	Progress not made – increase in classes attended exclusively by Roma	Available	Progress not made – increase in classes attended exclusively by Roma
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 5 – To reduce the gap between the average inclusion and completion rate of Roma children in secondary education compared to the national average inclusion and completion rate in the secondary education system in order to equalize opportunities for acquiring the skills and competences necessary for the continuation of schooling – to increase the number of members of the Roma national minority enrolling in secondary education until 2020. To increase the number of members of the Roma national minority completing secondary education until 2020	Not available	Not available	Not possible to determine	Partially available	Progress made (based on incomplete data)
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.5.1 Enrolment of Roma pupils of both genders in secondary schools	Available	Available	Progress made	Available	Progress made
1.5.2 Ensuring scholarships for regular secondary school Roma pupils	Available	Available	Progress made	Available	Progress made

1.5.3 Creating the prerequisites for increasing the number of Roma pupils of both genders who successfully complete their secondary education, by grades	Available	Available	Progress made	Available	Progress made
1.5.4 Accommodation in secondary school dormitories	Available	Available	Same values as baseline	Available	Same values as baseline
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 6 – To reduce the gap between the average inclusion and completion rates of higher education of members of the Roma national minority compared to the national average inclusion and completion rates in the higher education system in order to equalise opportunities for acquiring the skills and competences necessary for the continuation of schooling – to increase the number of members of the Roma national minority completing higher education and those who enrol in a postgraduate study programme by 2020.	Not available	Not available	Not possible to determine	Partially available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.6.1 Enrolment of Roma students of both genders in universities	Available	Available	Progress not made – decrease in relation to baseline	Available	Progress not made – same values as in previous reporting period
1.6.2 Providing scholarships for Roma students (college/university degree)	Available	Available	Progress not made – decrease in relation to baseline	Available	Progress not made – same values as in previous reporting period
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 7 – To increase the inclusion of adult members of the Roma national minority in literacy, education and training programmes through their entire general and vocational education in order to develop their individual potential and strengthen their capacities and competences for achieving a greater competitive strength on the labour market and permanent employability, as well	Partially available	Not available	Progress made	Partially available	Progress made (based on incomplete data)

as to increase their social inclusion and active participation in all spheres of contemporary life.					
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
1.7.1 Inclusion of adult Roma of both genders in literacy and training programme	Available	Available	Progress made	Available	Progress not made – decrease in relation to previous reporting period

Table A5.2. Employment and inclusion in economic life

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1- To increase the level of social inclusion of the Roma population through strengthening for the inclusion in the labour market	1/2 available	Not available	Not possible to determine	Available	Progress not made (but indicator apparently inappropriate)
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
2.1.1 To empower and motivate Roma capable of work for inclusion in the labour market and continuously point to the need to acquire and maintain working habits	Available	Available	Partial progress	Available	Progress made
2.1.2 To initiate and propose changes in legislation related to self- employment and entrepreneurship, and legalisation of work activities typically carried out by Roma	Available	Not available (presented data only vaguely relevant to the indicators)	Not possible to determine	Not available (presented data only vaguely relevant to the indicators)	Not possible to determine
2.1.3 Mutual cooperation of competent authorities, the civil sector and local community with the aim of encouraging social inclusion and employability of members of the Roma community	Not available	Available	Progress made (although no baseline to measure against)	Available	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To increase the competitive strength and employment rate of younger members of the Roma national minority	Available (but providing data for 2011, instead of 2012)	Not available	Progress made (but suggesting change of indicator)	Not available	Progress not made (decrease of employment rate of youth in relation to 2013)
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress

2.2.1 To include Roma pupils in professional informing and counselling for the choice of profession and secondary school programme for pupils of the final grade of primary schools, and to counsel them on the labour market needs.	Not available	Available	Progress made (although no baseline to measure against)	Available	Progress made
2.2.2 To explore the professional plans of pupils in the final grade of primary school	Not available	Available	Progress made (although no baseline to measure against)	Partially available	Progress made (although data on one indicator not available for 2014)
2.2.3 To provide professional counselling to young persons choosing not to continue education, and to define an activity plan with the aim of continuing their education	Not available	Available	Progress made (although no baseline to measure against)	Available	Progress made
2.2.4 To ensure additional professional counselling activities for Roma pupils (in addition to regular activities carried out by CES), such as visits to potential employers, job fairs etc. in order to acquaint Roma pupils with different professions	Not available	Available	Progress made (although no baseline to measure against)	Not available	Not possible to determine
2.2.5 To encourage employers to be more open to employing members of the Roma national minority	Available	Available	Progress not made - decrease in relation to baseline	Available	Progress not made - decrease in relation to baseline
2.2.6 To provide professional training programmes without employment	Available	Available	Progress made (although only one person involved)	Available	Progress made (although only one person involved)
2.2.7 Co-financing of the first employment of unemployed young Roma persons without working experience	Available	Available	Progress not made - decrease in relation to baseline	Available	Progress made
2.2.8 Informing possible candidates/members of the Roma national minority of the existence of the provision stipulating equality under equal conditions in employment by publishing and referring to the web pages of all state administration bodies in each job vacancy	Available	Not available (presented data only partially relevant to the indicators)	Not possible to determine	Available	Progress made
2.2.9 During the implementation of each job vacancy competition, education of the members of the Commission for the Implementation of the Job Competition or an internal call for the selection of candidates, on the implementation of Article 22 of the Constitutional Act on Minority Rights	Available	Not available (presented data only partially relevant to the indicators)	Not possible to determine	Not available	Not possible to determine
2.2.10 Monitoring and analysis of the representation and employment of members of the Roma national minority in state	Available	Available	Progress made	Incomplete data	Progress made

administration bodies and administration bodies of $L(R)SGU$ in accordance with the Constitutional Act on Minority Rights	(but providing data for 2011, instead of 2012)				
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To increase the competitive strength and employment rate of Roma women;	Available	Available	Progress made (but suggesting change of indicator)	Available	Progress not made – decrease in number of newly employed Roma women
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
2.3.1 To create and implement workshops on active job seeking, intended for Roma women	1/3 available	Available	Progress made	Available	Progress made
2.3.2 To encourage and educate Roma women for the inclusion in women's entrepreneurship programmes and other programmes for women created by competent authorities	Not available	Available	Progress not made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 4 - To increase the competitive strength and employment rate of long-term unemployed members of the Roma national minority	Available	Available	Same values as baseline	Available	Progress not made – decrease of number of newly employed
					long-term unemployed
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	long-term
2.4.1 To identify and implement educational training programmes of long-term unemployed Roma persons		implementation of measure in	Progress Partial progress	implementation of	long-term unemployed
2.4.1 To identify and implement educational training programmes	value	implementation of measure in 2013	Ü	implementation of measure in 2014	long-term unemployed Progress Progress not made – decrease in involved Roma in educational

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 5 To increase the rate of formal self-employment of members of the Roma national minority	Available	Not available	Progress made (but suggesting change of indicator)	Available	Progress made (but suggesting change of indicator)
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
2.5.1 To provide group informing on self-employment and counselling on starting a business	2/4 available	Available	Progress made	Available	Progress not made – decrease of values in relation to 2013
2.5.2 To co-finance the gross minimum wage to self-employed persons in the first two years of business	Available	Available	Progress made	Available	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 6 - To increase the motivation level of members of the Roma national minority for the inclusion in the labour market	1/3 available	Not available	Progress made	Partially available	Progress not made – decrease in values in relation to 2013
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
2.6.1 To implement workshops for the acquisition of active job seeking skills of members of the Roma national minority	2/3 available	Available	Progress made	Available	Progress made
2.6.2 To organise promotional activities for the existing employment and self-employment measures for Roma persons (inclusion of Roma associations in job fairs, visits to employers, promotion of employment measures etc.)	Not available	Available	Progress made (although no baseline value to measure against)	Available	Partial progress
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 7 - To strengthen the capacity of the Croatian Employment Service for working with members of the Roma national minority	Not available	Available	Progress made (although no baseline value	Available	Progress made

Measure	Baseline value	Data on implementation	to measure against) Progress	Data on implementation of	Progress
		of measure in 2013		measure in 2014	
2.7.1 To organise education sessions for the purpose of sensitising employment counsellors for the issues of the employment of Roma	Not available	Available	Progress made (although no baseline value to measure against)	Available	Progress not made – decrease in relation to previous reporting period
2.7.2 To implement research and analyses of the possibility of the employment of Roma persons	Not available	Available	Progress made (although not baseline value to measure against)	Available	Progress made

Table A5.3. Health care

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1 - To increase the number of Roma covered by health insurance	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
3.1.1 To implement routine informing of Roma within the existing public administration bodies on exercising their rights to health care and the related status issues	Not available	Not available (data not desegregated by ethnicity)	Not possible to determine	Not available (data not desegregated by ethnicity)	Not possible to determine
3.2.1 To create an education programme for Roma mediators for the issue of health in Roma communities and for providing support in exercising the right to health care	Not available	Available	No progress made	Available	Partial progress (preliminary activities to finance this measure though EU funds)
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To increase the availability of health services to the Roma population, with special emphasis to elderly persons, disabled persons, persons with impairments, persons with special needs and mobile Roma groups;	Available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of	Progress	Data on implementation of	Progress
3.2.1 To continuously implement visits of attending services in Roma settlements, and to increase the standard of the attending service	Not available	Available (although data not desegregated by ethnicity)	Not possible to determine	Measure in 2014 Available (although data not desegregated by ethnicity)	Not possible to determine
3.2.2 To increase the availability of health services to the Roma population, and to encourage a greater inclusion of Roma persons in prevention programmes of the health care through the actions of Roma mediators in Roma communities	Not available	Not available (as mediators are still not established)	Progress not made	Not available (as mediators are still not established)	Progress not made
3.2.3 To implement programmes that enable marginalised Roma communities access to health care services (transportation, assistants to elderly persons ("gerontohosts"), mobile teams, availability of drugs etc.)	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To raise the Roma population's awareness of the responsibility for their own health	Not available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
3.3.1 To design and implement education programmes and campaign (media shows, leaflets, printed materials, public discussion forums, lectures, workshops, playrooms) aimed at raising the Roma population's awareness of the responsibility of one's own health	Not available	Available	Progress made	Available	Progress made
3.3.2 To implement the activities of educating the population in Roma settlements on the prevention of diseases, and healthy lifestyles	Not available	Not available (as mediators are still not established)	Progress not made	Not available (as mediators are still not established)	Progress not made
3.3.3 To support projects of the associations, aimed at raising awareness of disease prevention, healthy lifestyles and mental health protection	Not available	Available (although no activities with regard to this measure)	Progress not made	Not available	Progress not made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 4 - To improve the protection of women's reproductive health, health of pregnant women and children, and to reduce the number of teenage pregnancies	Not available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of	Progress	Data on implementation of	Progress
		measure in 2013		measure in 2014	
3.4.1 To organise programmes involving education and campaigns, educational and preventive programmes in Roma settlements, aimed at protecting the reproductive health of women, pregnant	Not available	Not available	Not possible to determine	Not available (as mediators are still not established)	Progress not made
women and children					
3.4.2 To implement education sessions on family planning, venereal diseases and risks of teenage pregnancies	Not available	Not available	Not possible to determine	Not available	Progress not made
3.4.3 To implement	Not available	Available	Not possible to	Available	Not possible to
programmes and projects aimed at organising specialist medical examinations for Roma women, including transportation for such purposes		(although no details on the conducted activities)	determine	(although data cannot be desegregated by ethnicity)	determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 5 - To sensitise employees in the health care system for working with the Roma population, and to improve the communication between the Roma population and general practitioners	Not available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
3.5.1 To implement specific education sessions for health workers, especially in areas with a large number of Roma, and to encourage health workers to cooperate more intensively with the social service, especially in cases where there is possible abuse and neglect of children's health	Not available	Partially available (values on 2/3 indicators missing)	Not possible to determine	Available (although not responding to the indicators)	Not possible to determine
3.5.2 To implement analyses of the status of persons who have chosen their general practitioner in the Roma community	Not available	Not available (as mediators are still not established)	Progress not made	Not available	Progress not made
3.5.3 To encourage Roma to choose their general practitioner and exercise their right to primary health care through the mediators and attendant service	Not available	Partially available (as mediators are still not established)	Progress not made	Not available (as mediators still not established)	Progress not made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 6 - To decrease the morbidity from disease resulting from a low hygienic standard and vaccine- preventable diseases	Not available	Not available	Not possible to determine	Available	Progress not made

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
3.6.1 To control the safety of drinking water in Roma settlements	Not available	Partially available (without quantified data)	Partial progress	Not available	Not possible to determine
3.6.2 To implement and increase the scope of vaccination according to the mandatory vaccination programme, including mobile Roma groups	Not available	Partially available (only data on Primorje- Gorski kotar and Međimurje)	Partial progress	Partially available (although placed under different measure)	Partial progress
3.6.3 To implement the DDD preventive measures (disinfection, disinsection, deratization)	Not available	Available	Progress made	Not available	Not possible to determine
3.6.4 To implement education and informing sessions on hygiene habits	Not available	Partially available only (only data on Primorje- Gorski kotar)	Partial progress	Not available	Progress not made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 7 - To reduce the spread of narcotic drugs abuse within the Roma population, with special emphasis on children and youth, and to raise awareness of the harmful effects of narcotic drugs	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress

3.7.1 To carry out research on the spread of narcotic drugs abuse in the Roma population, with special emphasis on children and youth	Not available	Available	Progress not made	Not available	Progress not made
3.7.2 To include members of the Roma national minority in national campaigns aimed at raising awareness of the harmful effects of narcotic drugs abuse	Not available	Available	Progress not made	Not available	Progress not made
3.7.3 To implement education sessions for children, youth and their parents on the harmful effects of narcotic drugs and harmful social and health effects of addiction	Not available	Available	Progress made	Available	Progress made
3.7.4 To encourage and support projects by NGOs dealing with the prevention of addiction	Not available	Available	Progress not made	Available (although not responding to indicators)	Not possible to determine

Table A5.4. Social care

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1- To increase the quality, availability and timeliness of social services and services in the community, with special emphasis on women, children, youth, elderly persons and disabled persons;	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
4.1.1 To increase the number of employees in social care centres and/or family centres in areas with a large Roma population	Available	Available	Progress made	Available	Progress made
4.1.2 To sensitise and educate social workers so that they can provide better services and social mentorship	Available	Available	Progress not made	Available	Progress not made
4.1.3 To educate Roma mediators as a support to the availability of social care in the Roma population and other activities which will serve to ensure a better coordination between social care centres and the Roma population	Not available	Available	Progress not made	Available	Progress not made (indicating inappropriate measure)
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To increase the quality of life within Roma families, with special emphasis on the rights and welfare of children and youth	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
4.2.1 To provide aid and support to Roma families regarding issues in their family relations and/or marriage, and the resolution of crisis situations in the family with special emphasis on combating and the prevention of violence in the family	Not available	Available	Progress made	Available	Progress made
4.2.2 Empowering Roma family for good and responsible parenthood, including raising awareness of the Roma	Not available	Available	Progress made	Available	Partial progress

population regarding teenage marriages and money management					
4.2.3 Empowerment and support to biological families with the aim of preventing the separation of children from those families	Not available	Available	Progress made	Available	Progress made (although lacking indicator of satisfaction with social workers)
4.2.4 To encourage the development of foster care and adoption of Roma children lacking the appropriate parental care, especially in Roma families	Not available	Available	Progress made	Available	Progress made
4.2.5 To implement programmes and activities for the improvement of social skills of children and youth with the aim of preventing behavioural problems	Not available	Available	Progress made	Available	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To empower the local Roma community for recognising the risk of exposure to human trafficking, sexual abuse and other types of violence, with special emphasis on women and children	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
		2013			
4.3.1 The implementation of the survey in Roma communities to be used as a source of data	Available	Available	Progress not made (planned for 2014)	Available	Progress not made
	Available Not available Not available		made (planned	Available Not available	Progress not made Not possible to determine

Table A5.5. Physical planning, housing, and environmental protection

Physical planning

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1 - To ensure the physical planning documentation for Roma settlements in order to create the conditions for the improvement of the Roma housing	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.1.1.1. Creation, updating and implementation of county programmes consisting of activities and measures for the improvement of the space and environment on locations inhabited by Roma people. The aims set out will be achieved by using the existing documentation, which needs to be updated/adapted where appropriate	Available	Available (although only for the City of Zagreb and Gospić)	Progress made	Partially available (missing for City of Zagreb)	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To furnish housing and improve the quality of living in legalised Roma settlements	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.1.2.1 Creation and, where necessary, amendments of the existing physical plans of LSGUs for locations inhabited by Roma people, as the physical planning prerequisite for the incorporation of their buildings into spatial and functional systems of the existing settlements	Available	Available	Progress made	Due to the change of legislation, MCPP did not receive request for co-financing physical plans, but was co-financing documentation needed for legalization	Not relevant in 2014

5.1.2.2 To provide connections to the main water supply in Roma settlements where there is none	Not available	Available	Progress made	Available	Partial progress
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To resolve property disputes in Roma settlements	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.1.3.1 To encourage the resolution of property relations in Roma settlements by means of a cooperation between the competent authorities	Not available	Available	Progress made	Not available	Not possible to determine
5.1.3.2 To design and carry out a campaign on the Act on Dealing with Illegally Constructed Buildings (Official Gazette No. 86/12) and legalisation procedures in Roma settlements	Not available	Available	Progress made	Available	Not relevant in 2014

Housing

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1 - To improve the housing integration of Roma people in the community	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.2.1.1 To design and implement education sessions on the manner of using houses and the environment	Not available	Available (although only data from the City of Zagreb)	Partial progress	Not available	Not possible to determine
5.2.1.2 To promote anti-discrimination measures during lease and/or allocation of apartments	Not available	Available	Progress made	Not available	Not possible to determine

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To ensure housing in the appropriate conditions	Not available	Not available	Progress not made	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.2.2.1 Application of social housing care programme to Roma families and individuals	Not available	Partially available (selective data)	Partial progress	Not available	Not possible to determine
5.2.2.2 To provide alternative accommodation for members of the Roma national minority who live in housing units for which a decision on demolitions has been issued, or which cannot be legalised due to physical planning reasons.	Not available	Available	Not relevant for 2013	Not available	Not possible to determine
5.2.2.3 Renovation and construction of houses for Roma families in areas of special state concern pursuant to the Act on the Areas of Special State Concern (Official Gazette No. 86/08 and 57/11) according to the plan of L(R)SGU.	Not available	Available	Partial progress (indicating change of jurisdiction)	Available (although suggesting lack of ethnically desegregated data and a need for change of indicator). Data available only from municipality Darda	Partial progress
5.2.2.4 Co-financing of infrastructure projects for Roma settlements in accordance with and upon request of L(R)SGU	Available	Available	Partial progress made	Data available only from municipalities of Darda, Hlebine, and Peteranec	Partial progress

Environmental protection

Number of objective	Baseline value	Data on outcome indicators in	Progress	Data on outcome indicators in 2014	Progress
		2013			
Objective 1 - To improve the environment of Roma settlements	Not available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.3.1.1 Removal of the existing illegal waste disposal sites in all Roma settlements	Not available	Available	Progress made	Available	Progress made
5.3.1.2 Strengthening of the cooperation between the local and regional self-government and the Roma national minority in order to coordinate and improve environmental protection activities	Not available	Available	Progress made	Still not assembled from individual monitoring reports for 2014 delivered by L(R)SGU	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To inform the Roma national minority of environmental protection and means of its implementation	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
5.3.2.1 To implement education of members of the Roma national minority on the system of communal waste disposal	Not available	Available	Progress made (although data available only for the City of Zagreb)	Not available	Not possible to determine
5.3.2.2 Involvement of councils and members of the Roma national minority, as well as the legal entity with the concession for communal waste disposal on the territory of the LSGU, in actions and targeted environmental protection programmes of the L(R)SGU	Not available	Available	Progress made	Not available	Progress not made

 $\label{thm:continuous} \textbf{Table A5.6. Inclusion of the Roma national minority in the cultural and social life} \\$

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1- To achieve a positive perception of the Roma culture and identity within the Roma national minority within the majority population and the society as a whole;	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
6.1.1 Creating the conditions for active participation of Roma cultural and social activities in all areas with a significant proportion of the Roma national minority	Not available	Available (although limited to Zagreb)	Progress made	Available	Progress made
6.1.2 Establishment of multi-purpose centres in areas with a significant proportion of the Roma national minority	Not available	Available	Progress not made	Not available	Not possible to determine
6.1.3 Funding of programmes dedicated to the original Roma culture, language, traditions and artistic expressions, as well as the collection and publishing of the Roma historical, literary and cultural materials (in Croatian and Roma languages)	Available	Available	Progress made	Available	Progress not made (decrease in funded programs)
6.1.4 Publishing of a tender for the funding of programmes for the preservation of Roma traditional culture	Available	Available	Progress made	Not available	Not possible to determine
6.1.5 Intensifying of informing on the Roma national minority, as well as of the affirmation of the Roma culture in all public media (the Croatian Radiotelevision, especially local radio stations in areas with a significant proportion of the Roma national minority), and research by independent experts thereon	Not available	Available (although missing data on fulfillment of indicator)	Partial progress	Available	Partial progress (indicating unrealistic indicator)
6.1.6 Organising seminars with media representatives and members of the Roma national minority on the affirmation of Roma people through media, and on the means of promotion of the positive aspect and equal reporting on Roma people, as well as of the rights and obligations in the field of combating discrimination, with special emphasis on the position or Roma women	Not available	Available (indicating preparatory measures)	Partial progress	Available	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress

Objective 2 - To increase the level of inclusion of the Roma national minority, with special emphasis on women, in the public and political life of the local community	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
6.2.1 Organisation of seminars for newly elected members of councils, representatives of the Roma national minority and L(R)SGU on their functions, rights and obligations	Available	Available (moved for implementation in 2014)	Progress not made	Not available	Not possible to determine
6.2.2 Organising consultations representatives of L(R)SGU with members of councils and representatives of the Roma national minority	Available	Available (moved for implementation in 2014)	Progress not made	Not available	Not possible to determine
6.2.3 Education of members of the Roma national minority on activities related to the adoption, implementation and/or monitoring of policies on the national and EU level, with special emphasis on the Decade of Roma Inclusion 2005-2015, with the aim of empowering their participation in conferences and seminars essential for the issues of the Roma national minority, both on the national and international level	Available	Available	Progress made	Not available	Not possible to determine
6.2.4 Inclusion of members of the Roma national minority in participation in national and international seminars and other conferences dedicated to issues essential for the Roma population, and for a cooperation with Roma representatives from other counties, and with international institutions and associations	Partially available	Available	Progress made	Not available	Not possible to determine
6.2.5 Education of the Roma national minority, especially women and youth, for participation in the decision-making process, exercising their rights, and a greater inclusion in the social life, including youth councils	Available	Available	Progress made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To strengthen the capacities of associations and other forms of Roma organisations, with special emphasis on strengthening associations and other forms of organisations led by Roma women, for advocacy and problem solving in the Roma and wider community	Not available	Not available	Not possible to determine	Not available	Not possible to determine

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
6.3.1 Implementation of the research "Roma People in Croatia -	Not applicable	Available	Progress not	Not available	Not possible to
Assimilation or Integration" (data collection study)			made		determine
6.3.2 Inclusion of Roma associations in the Regional Development Programme and strengthening of the capacities of the civil society on the local and regional level in the area of education and consultations on better association management, inter-sector cooperation, and preparation of project proposals	Not available	Available	Progress made	Not available	Not possible to determine
6.3.3 Education of representatives of Roma associations on the possibilities of financing their projects and activities through EU funds, and on the possibilities of creating partnerships and networking with other similar organisations in the Republic of Croatia and abroad through international projects	Not available	Available	Progress made (although only one person has participated)	Available	Progress not made

$Table \ A5.7. \ Status \ solutions, combating \ discrimination, and \ help \ in \ realising \ rights$

Status solutions

Number of objective	Baseline value	Data on outcome indicators in	Progress	Data on outcome indicators in 2014	Progress
		2013			
Objective 1 - To identify, by detection by mobile teams, the number of persons with significant difficulties in regulating their status in the Republic of Croatia	Not available	Partially available	Progress made	Available	Progress made
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress

7.1.1.1 To strengthen and expand the work of mobile teams in the resolution of status issues, i.e. to form mobile teams for the resolution of the status of Roma persons in all areas where there are indications of Roma persons with an unresolved status. The mobile teams consist of representatives of police precincts, police stations, state administration offices, representatives of coordination actions, councils and representatives of the Roma national minority/Roma associations, and social care centres in order to resolve status issues	Not available	Available	Progress made	Available	Progress made (although reported activities often initiated and performed by NGOs)
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To inform and encourage members of the Roma community on the full cooperation in procedures for the resolution of their status	Partially available	Available	Progress made	Available	Progress made
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.1.2.1 Forming of multidisciplinary info counters in all areas inhabited by Roma people in order to provide support and the relevant information on the resolution of their status issues, combating discrimination and crime, health care, rights to health protection, education, social care, responsibility in familial relationships, and the mechanisms for the protection of rights in the area of familial relationships	Not available	Available	Progress not made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To establish mechanisms for a faster and more efficient resolution of Roma people's status issues in the Republic of Croatia	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.1.3.1 Establishment of mechanisms for a better coordination of actions between the competent authorities for the purposes of the resolution of status issues of persons (especially as regards proceedings initiated at the issuing of certificated of nationality	Not available	Available	Progress made (although no requests for administrative	Available	Progress made

based on an invalid legal basis) and aid to persons initiating a new			acts adopted		
proceedings for the acceptance into Croatian citizenship after the			related to		
proceedings correcting incorrectly entered information on			certificates of		
citizenship in state registries, as well as the immunity from			nationality		
administrative fees in such proceedings and the proceedings for			issued on illegal		
obtaining new Croatian documents			grounds)		
7.1.3.2 To develop a cooperation with the competent institutions in	Available	Available	Progress made	Available	Progress made
the region for overcoming problems related to establishing	(although not				
identities	fully in line				
	with indicator)				

Combating discrimination

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1 - To raise the public awareness of the need for combating discrimination against the Roma national minority	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.2.1.1 Research on the perception of the discrimination against the Roma national minority	Not available	Available	Progress not made	Not available	Not possible to determine
7.2.1.2 Continuous education of civil servants on the anti- discrimination legislation and its application in practice	Not available	Available	Progress made	Not available	Not possible to determine
7.2.1.3 Raising awareness of the wider public in the Republic of Croatia on the anti-discrimination legislation in the Republic of Croatia and activities undertaken for combating discrimination against the Roma national minority systematically by organising public discussions and seminars and implementing further activities within the "Dosta!" campaign of the Council of Europe	Available	Available	Progress made (although not indicating the number of attendees)	Not available	Not possible to determine
7.2.1.4 To encourage and provide support to programmes and projects of NGOs dealing with the protection of the human rights of the Roma national minority in the Republic of Croatia, with special emphasis on programmes and projects aimed at affirmation and raising awareness of Roma women on human rights and gender equality	Available	Available	Progress not made (decrease in funded Roam NGOs)	Not available	Not possible to determine

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To improve cooperation between the competent authorities and the representatives (e.g. members of the Council of Roma National Minority and its representatives) of the Roma national minority in combating discrimination against Roma people	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.2.2.1 To establish and ensure systematic communication and transmission of data on the state of human rights of the Roma population in the Republic of Croatia between the competent authorities on the national, regional and local level and representatives of the Roma national minority	Not available	Available	Progress made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To ensure and improve the implementation of anti-discrimination legislation by the competent authorities on all levels (national/regional/local), and to implement all other regulations and laws with the application of anti-discrimination principles (education, housing, health, employment)	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.2.3.1 Improvement of the efficiency of work of the competent bodies in identifying, preventing and combating incidences of discrimination against the Roma national minority by strengthening the administrative capacities of the competent services through an education of the relevant employees on all forms of discriminations and mechanisms of combating discrimination, as well as improving the surveillance over the implementation of the legislation related to the Roma national minority	Not available	Available	Progress made (although not indicating the number of attendees)	Not available	Not possible to determine
7.2.3.2 Keeping a database on court proceedings based on the Anti-Discrimination Act	Available	Available	Progress made (although Roma	Available	Partial progress

7.2.3.3 Monitoring of hate crime statistics	Available	Available	not separated from other ethnic minorities)	Available	Partial progress
			(although Roma not separated from other ethnic minorities)	(but missing data)	
Objective 4 - To reduce the number of violent incidents against Roma people through police action	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.2.4.1 Achieving a greater efficiency of the police in detecting and preventing crimes against Roma people and violence in Roma communities will be implemented by implementing the Action Strategy "Police in the Community", or creating a system of crime prevention	Available	Available	Partial progress	Not available	Not possible to determine
7.2.4.2 Encouraging Roma people to report ethnic and other forms of crime against Roma people, and recording and statistical monitoring of the number of such incidents in order to prevent and reduce the number of crimes and ethnically motivated violence - hate crimes	Partly available (not indicating resolved, only reported crimes)	Available	Not possible to determine	Not available	Not possible to determine
7.2.4.3 Professional training of police officers of the Ministry of the Interior in the implementation of the measures from the "Protocol on the Proceedings in Cases of Hate Crimes", their sensitisation as regards working with minority groups, especially members of the Roma community, for a better mutual understanding and respect, and prevention of all forms of discrimination.6	Available	Available	Not possible to determine (data not comparable)	Not available	Not possible to determine
7.2.4.4 Strengthening of the proactive work of police officers in the detection of child trafficking cases in the Roma population	Available	Available	Progress made	Not available	Not possible to determine
7.2.4.5 Strengthening of community programmes in order to raise awareness regarding the issues and incidences of child trafficking	Not available	Available	Progress made	Not available	Not possible to determine

Help in realising rights

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1 - To increase the availability of free legal aid to Roma persons pursuant to the Free Legal Aid Act	Not available	Not available	Not possible to determine	Not available (data not collected based on ethnicity)	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.3.1.1 Training of legal aid providers, competent authorities and members of the Roma national minorities in topical round tables and public discussions on the Free Legal Aid Act	Not available	Available	Partial progress	Available (although no details on implementing activities)	Progress made
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To increase the visibility of free legal aid instruments	Not available	Not available	Not possible to determine	Not available (data not collected based on ethnicity)	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.3.2.1 Increasing the visibility of free legal aid by informing the public by means of brochures, flyers and posters to be distributed to social care centres, CPII, CES and by means of mobile teams directly in the field.	Not available	Available	Progress not made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To increase the level of the availability of free legal aid to Roma people, especially in cases in which they are suspected victims of discrimination, by increasing the availability of aid in realising rights, and by increasing the visibility of free legal aid	Not available	Not available	Not possible to determine	Partly available (suggesting ½ inappropriate indicator)	Progress not made

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
7.3.3.1 Implementation of activities aimed at informing the Roma population of the possibilities provided in the Free Legal Aid Act by organising topical round tables, which would acquaint citizens, including members of the Roma national minority, with the free legal aid system.		Available	Progress not made	Available	Progress made

Table A5.8. Improvement of statistical data collection

Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 1- To ensure statistical gathering of data on the Roma national minority in the Republic of Croatia (while protecting personal data), broken down by gender and age	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
8.1.1 To create, in cooperation with the Croatian Bureau of Statistics, in each national administrative authority and within their competence, forms for the monitoring of statistical data broken down by gender and age of members of the Roma national minority, with comparative data in relation to the total population	Not available	Available	Partial progress	Not available	Not possible to determine
8.1.2 To create at GOHRRNM and update at least annually a unique database on the position of Roma men and women, including an atlas of micro regions	Not available	Available	Progress not made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 2 - To improve the methodology of data collection on the rates of poverty, material and social deprivation, education, employment, and quality of living of the Roma population	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
8.2.1 To analyse reports of social care centres and other bodies (family centres, health institutions, educational institutions, NGOs)	Not available	Available	No progress made	Not available	Not possible to determine
8.2.2. To collect data and carry out targeted research on the effects of social care measures, availability and effects of social services	Not available	Available	No progress made	Not available	Not possible to determine
8.2.3 To carry out longitudinal research with the aim of monitoring the indicators related to the social status of Roma men and women	Not available	Available	No progress made	Not available	Not possible to determine
8.2.4 To continuously monitor the provision of social care by local self-government units	Not available	Partially available	Partial progress	Partially available	Partial progress

8.2.5 Monitoring of the status regarding social care by means of a cooperation with the competent social work centre, councils or representatives of the Roma national minority, and the competent local administration body	Not available	Available	Progress made	Available	Progress made
8.2.6 To record the issues faced by the Roma population on the territory of the local self-government (atlas of micro regions)	Not available	Available	Partial progress	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 3 - To improve the methodology of data collection on health, health habits and other health indicators of the Roma population	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
8.3.1 To implement analyses of the reports of attendant services, general practitioners, specialists and other professional services	Not available	Available	Progress not made	Not available	Not possible to determine
8.3.2 To collect data and carry out targeted research on the health habits, health, use of health protection, and number of uninsured persons	Not available	Available	Progress not made	Not available	Not possible to determine
8.3.3 To carry out longitudinal research in order to monitor the indicators related to the changes in health habits and health status	Not available	Available	Progress not made	Not available	Not possible to determine
Number of objective	Baseline value	Data on outcome indicators in 2013	Progress	Data on outcome indicators in 2014	Progress
Objective 4 - To improve the method of monitoring the inclusion, representation and participation of the Roma national minority in the social, political and cultural life of the community	Not available	Not available	Not possible to determine	Not available	Not possible to determine
Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
8.4.1 Analyses of the proportion of the Roma national minority in the population, broken down by gender, on the local and regional level, compared to the representation in the representative bodies of L(R)SGU for the purposes of realising the right to representation in the executive and representative bodies of L(R)SGU stipulated by the Constitutional Act on the Rights of National Minorities	Not available	Available	Progress made	Not available	Not possible to determine

Table A5.9. Compliance of the programmes with international standards and accepted treaties in the area of human rights and rights of minorities

Measure	Baseline value	Data on implementation of measure in 2013	Progress	Data on implementation of measure in 2014	Progress
9.1.1 Continuous monitoring of the realisation of human rights and minority rights of Roma people in accordance with international standards and accepted treaties in the area of human rights and rights of minorities, and active participation in international organisations (UN, CE, OSCE), as well as the EU and its bodies and agencies	Available	Available	Progress made	Available	Progress made
9.1.2 Monitoring of policies towards Roma people in other countries, especially in the region, and strengthening of bilateral relations in the context of the resolution of their common issues	Available	Available	Progress made	Available	Progress made
9.1.3 Coordination of the preparation of national reports according to international treaties in the area of human rights, including reporting according to the Universal Periodic Review of the Human Rights Council, in the part relating to reporting on human rights and minority rights of Roma people	Available	Available	Progress made	Available	Progress made
9.1.4 Monitoring of the process of the harmonisation of the legislation with international standards, with special emphasis on the acquis communautaire of the European Union	Available	Available	Progress made	Available	Progress made

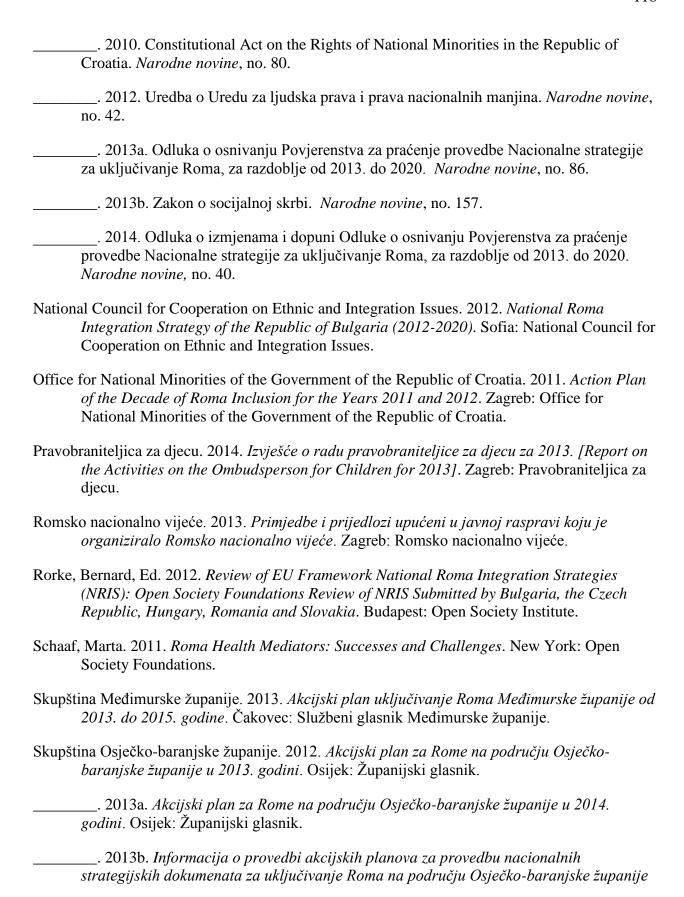
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