

Feedback on the implementation of the national Roma strategic frameworks

For the non-discrimination: Anti-racism and Roma coordination Unit of the Directorate-General for Justice and Consumers of the European Commission

*Input on behalf of the **European Public Health Alliance (EPHA)** and **Roma Health Network (RHN)***

Selected Guiding questions (2, 5, 7)

2. Did you observe that **NRSF implementation** has taken up speed or that findings from the EC Communication assessment report (Jan 2023) have been addressed? Please explain.

- The RHN is **cautiously optimistic** about the engagement in the EU Roma Framework in 2023; the **Roma Coordination Team is clearly committed** to staying engaged with Roma and pro-Roma civil society
 - The Network provided [extensive feedback on Roma health](#) to the Team, which was clearly **considered and partially included in the communication assessment report** in January 2023
 - The Team has been forthcoming with information, providing National Roma Contact Point information, as well as contacts in other Commission bodies, which has proven extremely valuable in providing input to the **National Roma Strategic Frameworks**
- The RHN is, however, **slightly concerned** with a **slight decrease in direct engagement** in the **civil society platforms** organised by the Roma Coordination Team
 - Though very useful, meetings are often very heavy on presentations from the Commission and the Presidencies of the Council; civil society often has limited room for input
 - In the lead-up to the **16th European Platform for Roma Inclusion** there was less involvement from civil society in comparison to the previous year; there was a lack of transparency on invitations, little input for the agenda and limited civil society engagement in the panels
 - It should be noted that the **12 December meeting** showed promise in providing Roma and pro-Roma civil society a central role for input, which can hopefully be maintained in future meetings

5. How do you assess the work and progress on **fighting and preventing antigypsyism and anti-Roma discrimination** since the adoption of the NRSF? Do you see any progress since the adoption of the EC Communication assessment report (Jan 2023)? What do you consider as the most urgent challenges and shortcomings that still need to be addressed in the area of fighting antigypsyism?

- The RHN welcomes the increasingly strong discussion on **structural racism** and **structural antigypsyism** and hopes this is a continuing trend which provides real momentum to make progress in Roma inclusion until 2030
- The RHN notes that there is **little to no progress** since 2020 when it comes to structural issues surrounding racism, discrimination and Roma health, [FRA reports](#):
 - The average **life expectancy** is still **10 years lower for Roma** compared to non-Roma, with some slight changes along gender lines since 2020
 - Average **medical insurance coverage** has stayed the same (from **73%** to **72%**)

- **Experiences of discrimination in healthcare** has increased from **8% to 14%** on average
- This causes concerns on reaching the sectoral goal for health to **cut the life expectancy gap in half by 2030** (between Roma and non-Roma)
- The RHN observes a very **sectored approach to antigypsyism** across the EU, while the only way to improve Roma health access and outcomes is through a comprehensive **cross-sectoral approach**
- In its [review of the National Roma Strategic Frameworks](#) – among other things – the RHN warns about **extremely fractured approaches** to Roma inclusion which should be addressed, particularly:
 - Lack of using clear progress indicators based on the [FRA portfolio of indicators](#) and equality data collection
 - Lack of a comprehensively addressing health and housing indicators based on the [2021 Council Recommendation on Roma equality, inclusion and participation](#)
 - Little progress has been made on the two points above, meaning the RHN repeats its call to the Member States to include these indicators in NRSF monitoring
- The RHN echoes messages shared at the 16th EPRI, saying it is clear that solutions to improve Roma inclusion, housing, and health are widely available among Roma and pro-Roma grassroots, and would call for member states to **more actively reach out to civil society** to put these in practice

7. In which of the **sectoral areas** of education, employment, health, and housing, you assess that the NRSF implementation has produced **meaningful, measurable progress**? Please give some **recent examples**, including since the adoption of the EC Communication assessment.

- The RHN welcomes the increased attention to **housing**, which is also a **crucial determinant of (Roma) health**, but this still needs to be translated to concrete action.
 - The RHN identifies this as progress as it has started **structural conversation** that goes **beyond the housing sector**
 - The RHN approaches segregated housing as a **structural issue which requires a structural solution**, for example through the very necessary approach through **environmental justice** which is [finally gaining ground](#)
- The RHN states that long-term solutions to reduce segregation and improve housing can only succeed if NRSF **structurally align their housing strategies** with their plans for **health**, and education, employment and combatting antigypsyism
- The RHN welcomes the fact that the structural discussion in 2023 has provided the foundations for meaningful and measurable progress in its activities on the following topics:
 - Addressing structural special segregation in the form of **environmental injustices**
 - Preventing structural injustice starts from an early age, ensuring that **Roma children** have the care and education they need from an early age
 - Combatting structural antigypsyism, for example through addressing **conscious or unconscious** bias in the healthcare system
- The RHN emphasises once more that much still remains to be done and that now is the time to act, and to ride the created momentum