Final Report

"Roma inclusion study"

For the Financial Mechanism Office

Ljubljana, October 2015

TABLE OF CONTENTS

LIST OF ABBREVIATIONS

Abbreviation	Description
APR	Annual Progress Report
CoE	Council of Europe
DEREX	Demand for right-wing extremism
Donors	Norway, Iceland and Liechtenstein
EEA	European Economic Area
EC	European Commission
ESF	European Social Fund
ESIF	European Structural and Investment Funds
EU	European Union
FMO	Financial Mechanism Office
FRA	European Union Agency for Fundamental Rights
GDD	Grant Decision Document
IR	Inception Report
LFS	Labour Force Survey
MoU	Memorandum of Understanding
M&E	Monitoring and evaluating
NFP	National Focal Point
NGO	Non-government organisation
NRIS	National Roma Integration Strategy
OECD	Organisation for Economic Co-operation and Development
PA	Programme Agreement
PDP	Pre-defined projects
PO	Programme Operator
PP	Project Promoter
REF	Roma Education Fund
QA	Quality Assurance
SILC	Statistics on Income and Living Conditions
S-P-O	Structure – Process – Outcomes
ToR	Terms of Reference
UNDP	United Nations Development Programme

EXECUTIVE SUMMARY

Introduction

This study covers 47 programmes relevant to Roma inclusion in 12 countries, with a focus on the countries with the largest share of Roma (Bulgaria, Czech Republic, Hungary, Romania and Slovakia). The study included a review of literature and programme documentation, interviews with stakeholders in the focus countries, and online questionnaires and telephone interviews with Donor Programme Partners and authorities in the other countries. The cut-off date for data collection was March 2015.

The issue of Roma inclusion and the response of EEA donors

The 10-12 million Roma are today Europe's largest minority, of which most are EU citizens. The migration of Roma EU citizens is an increasing source of tension and public debate. Despite efforts to improve integration, many Roma continue to face poverty, social exclusion and discrimination. The EU highlighted the need for better integration of Roma, with improved economic and social conditions. Under an EU framework, member states were invited to adopt National Roma Integration Strategies, focused on the areas of education, employment, housing and health. The implementation of the national strategies is reviewed annually by the EC. In 2015, member states revised their national strategies in alignment with the 2014-2020 European Structural and Investment Funds.

The issue of Roma inclusion is also a priority for EEA donors and the 2009-2014 EEA & Norway Grants. The grants provide significant funding for Roma inclusion, and are important in helping beneficiary states to address the issue. In countries with sizeable Roma minorities – Bulgaria, Czech Republic, Hungary, Romania and Slovakia – Roma were included as a target group in relevant programmes. For Bulgaria and Romania, targets were set for 10 % of respectively the total allocation or of 13 relevant programme areas supporting improvement of the Roma situation. Programme Operators had to develop 'Roma Inclusion Plans' that defined the way the numeric targets would be met, and the Financial Mechanism Office (FMO) pressed for high quality of the plans. In other beneficiary countries the Roma concern was highlighted in specific programmes.

Key findings from a review of current programmes

The current Roma-relevant programmes were assessed in the light of recommendations from an earlier '*Study on Roma Inclusion under EEA and Norway Grants*' prepared for the FMO in 2013. We found that the numbers of Roma NGOs applying and successful in receiving grants will be much higher than in the previous funding period. High-quality partnerships were formed in some of the larger projects between Project Promoters and local actors, such as local governments or NGOs. There were positive effects in some programmes of the emphasis of EEA & Norway Grants on mainstreaming the Roma inclusion concern where state institutions that did not have Roma inclusion as key part of their agenda increased their capacity in this area. EEA & Norway Grants are perceived by many stakeholders as a more flexible funding framework than the EU Structural Funds, with less onerous administrative requirements. They are used more extensively to fund innovative or pilot interventions with the potential for scale up or mainstreaming. There are no mechanisms in place to address scale up or mainstreaming (2.2.3).

Many of the programmes, including those relevant to Roma inclusion, are running behind schedule, and some may not be implemented with sufficient quality in the limited remaining time (2.2).

The available indicators for programmes are generally not defined with sufficient detail to ensure their uniform application and often do not address Roma inclusion outcomes or impact. Outcome indicators were usually indicators of output (immediate benefits directly delivered in a project) rather than outcome (measurable change in the target group). Programme-level output indicators were mostly

agreed before the focus on Roma inclusion was introduced. Many focus on vulnerable groups and do not directly measure effects on Roma. Others do focus on Roma directly, counting Roma beneficiaries or outputs specifically focused on Roma (e.g. numbers of projects, events or publications). However, Roma-specific indicators are often not specified sufficiently to provide consistency in reporting (2.7.2). In most focus countries national authorities were hesitant to use Roma-specific targets and indicators because of concerns about the legality of targeting a specific ethnic group and collecting data on beneficiaries disaggregated by ethnicity (2.7.3). However, some Roma-specific indicators were agreed, even where there were various degrees of reluctance (Bulgaria, Romania and Slovakia).

In Bulgaria and Romania, the key target and indicator – share of budget allocated to interventions focused on Roma – is effectively an input indicator, specifying the funding to a broadly defined area but without indicating what results to be delivered for Roma communities. The requirement to allocate a fixed share of funding to Roma inclusion was appropriate for the late introduction of the priority in EEA & Norway Grants, but some Romanian stakeholders felt that this has led to a focus on meeting the target at the expense of the quality of the programming. The Roma Inclusion Plans developed in these countries varied significantly in quality, though the Guidance Notes were well developed. The best plan described how programme activities would benefit Roma inclusion, specified reasonable indicators, and outlined meaningful steps in publicity and evaluation (2.7.1). In other countries there were no numeric targets, but the Roma concern was emphasised in specific programmes.

Key weaknesses in reporting are inadequate definitions and lack of processes for collecting the data. The source for data for indicators is often project reports but the quality of the data is not specified. There is no agreed definition of what a Roma NGO is, or who should be considered a Roma (2.7.2). There is limited comparability across countries and programmes in the same area due to the way in which the Roma-inclusion concern was added at a relatively late stage. It is therefore difficult to consolidate information on Roma inclusion in programme areas across countries.

The contribution of Roma-relevant programmes to increased capacity for Roma inclusion cannot be easily measured when programme implementation is only partly advanced. Although National Focal Points and most Programme Operators of Roma-relevant projects do not deal with Roma inclusion as a priority, interviews have indicated that Roma-relevant programmes have motivated some of them to give more consideration to Roma inclusion concerns. However, Programme Operators were reluctant to discuss changes to existing monitoring instruments in the present funding period because of the perceived complexity of existing instruments and limited experience with their use. Some national authorities voiced a need for assistance with implementing the Roma inclusion focus, in particular with regard to monitoring.

Conclusions from a review of current programmes

Conclusion 1 – There was early evidence that ***EEA & Norway Grants have achieved change in the area of Roma inclusion*** in the present funding period, notably the significant increase in the number of Roma NGOs that applied for and won grant funding mostly under NGO programmes, the formation of good-quality local project partnerships, and visible effects of the efforts at mainstreaming Roma inclusion on the capacity of some national institutions.

Conclusion 2 – For ***existing quantitative indicators,*** the ***scope for improvement is limited***, due to the advanced state of implementation of the programmes, and the limited capacity of stakeholders to make changes to the arrangements for collecting data. Where indicators cover several vulnerable groups jointly, it is difficult to extract information about Roma beneficiaries separately.

Conclusion 3 – ***Roma Inclusion Plans are useful instruments,*** offering benefits beyond their original purpose. The Guidance Notes have only minor shortcomings in terms of clarity and the greater

challenge is for POs to develop good-quality plans complying with the guidance. Countries without numeric targets lack such a programme-level instrument.

Conclusion 4 – In all the focus countries, existing mechanisms for national-level dialogue on Roma inclusion do not appear to be sufficient in terms of frequency and depth to meet the needs of national authorities for feedback and achieving a common understanding with other domestic actors, donor embassies, and the FMO (2.2.1).

Conclusion 5 – EEA & Norway Grants are *suitable for innovative interventions* in the area of Roma inclusion due to their flexibility and limited administrative requirements.

Key findings from the literature review - approaches to measuring progress

In terms of **practices of other institutions,** under the **European Social Fund** the focus of the Monitoring & Evaluation framework for 2014-2020 is on gathering data that can be aggregated, and there is a clear separation of monitoring and evaluation tasks. Monitoring is counting individual beneficiaries and measuring outputs of interventions on participating individuals and entities, while evaluation covers measurement of impact. Regarding sensitive individual data, such as ethnicity, the Managing Authority determines the eligibility to participate (4.1.1). The **EU Fundamental Rights Agency** has developed a useful framework focused on progress in achieving fundamental rights. The Agency leads a Working Group on Roma inclusion indicators and is working on introducing the framework to monitor Roma inclusion across EU member states. Most of the beneficiary states of EEA & Norway Grants are actively engaged in the working group and are committed to the framework (4.1.2). A potentially relevant method of collection of qualitative and quantitative data was noted in the EU-funded Roma pilot 'A Good Start', which used **household surveys of beneficiaries** to collect baseline and end-line information.

Other potentially useful approaches to collecting qualitative data include: **Community Based Monitoring** methods, which could be used both for larger individual community interventions and where similar interventions cover larger numbers of geographic units; **Network of Monitors to Collect Data**, which was developed under SocioRoMap, part of the EEA & Norway Grant-funded Romanian RO25 programme and can therefore help fill some gaps in information on Roma inclusion; **Distributed Online Surveys,** which can be used to gather data cheaply from project stakeholders, such as social workers, teachers, police and other professionals working with Roma communities; and **Quantitative impact assessment** (experimental and quasi-experimental evaluation methods) which is suitable for well-designed innovative approaches where a larger number of similar beneficiaries is targeted.

In terms of **qualitative data collection methods,** these allow the use of findings of earlier interventions as well as more effective targeting of grant support in future interventions but require significant human and financial resources, also in terms of processing the data gathered, which can pose a burden on reporting units. **Participative methods for monitoring & evaluation** must be built into project design, and are therefore only suitable for future programming.

In terms of **setting baselines**, no baseline values are necessary for output indicators, but outcomes require an *ex ante* indicator and a baseline measurement. In exceptional cases baselines can be set retroactively – these are the projects that intervene in geographic and programme areas where previous comparative data are available, or in Small Grant Schemes and NGO Funds, where a similar programme recurs in different funding periods, information on the proportion of Roma-relevant project applications and projects funded from previous period can be used as a baseline for the current period. The highest quality data on Roma comes from a 2011 survey carried out by the UNDP and the EU Fundamental Rights Agency. This survey is representative for Roma communities at country level but not at the level of lower territorial units.

Conclusions from literature review

Conclusion 6 – The Fundamental Rights Agency '***Structure – Process – Outcomes' framework*** for monitoring progress towards achieving fundamental rights is particularly relevant for the EEA & Norway Grants because it connects institutions gathering data and all key stakeholders in Roma inclusion across all beneficiary countries.

Conclusion 7 – ***Qualitative methods*** suitable at present include ***participative community-based monitoring and evaluation***. As participative methods have to be built directly into programme design, they are mainly suitable for future programming. They could be piloted in selected current projects to gather practical experience. Interim and final ***surveys of selected stakeholders other than beneficiaries using online tools*** are suitable even for current programmes, and can be implemented in several programmes where a similar intervention takes place in several localities.

Conclusion 8 – It was ***difficult to aggregate data*** across different stakeholders due to incomplete definition of Indicators. The system of project-level policy markers in use also uses definitions that are broad – a project where Roma inclusion is marked as a 'Significant Issue' or 'Fundamental Issue' can in reality correspond to a broad range of effects from insignificant to highly significant.

Conclusion 9 – ***Established national approaches to defining vulnerable population*** may be a suitable for targeting some programmes to marginalised Roma without explicit or exclusive targeting, which is seen as problematic by the national authorities in several of the countries with the highest proportion of Roma.

Conclusion 10 – Rigorous measurement of change requires ***baseline data*** – which usually need to be planned along with the intervention and collected at its start. Where baseline data are missing, these cannot be realistically collected *ex post*, not only because of the timing but also because of the limited capacity of Project Promoters and Programme Operators to change the monitoring framework in ongoing projects. For future setting of baselines, the sources available are quite limited. In Slovakia, the Atlas of Roma Communities may provide usable baseline data for some interventions. A similar effort is underway as part of RO25 '*Poverty alleviation*'. For small grant schemes the information on proportion of Roma-relevant project applications and approved projects in the previous period can be used as baseline for the current period and the current data as baseline for future programming.

Recommendations

These recommendations are in part applicable to present programming but also to Roma-relevant programming in the future.

Recommendation 1 – For existing programmes that use indicators where Roma are reported as part of vulnerable groups, ***Roma should be identified in a separate indicator*** where possible. In projects that only partially target Roma, a consistent methodology should be used to estimate the project contribution to Roma inclusion on the basis of an estimate of the proportion of Roma in the total number of beneficiaries. For policy markers at project level, for 'Significant Issue' there should be the expectation of a significant number of Roma beneficiaries and for 'Fundamental Issue', Roma inclusion or empowerment should be the explicit main focus of the project, and Roma beneficiaries should represent the majority of expected beneficiaries.

Recommendation 2 – Minor adjustments should be made to the guidance on Roma Inclusion Plans and the use of a ***programme-level instrument*** should be expanded, as this encourages POs to think through the specific mechanisms required, and to articulate them in an explicit way that allows discussion with other stakeholders. It may be feasible to extend this instrument to programmes where a concern is expressed in the MoU in the Czech Republic, Hungary and Slovakia – the PO could report explicitly on meeting the concern, which would provide an additional opportunity to discuss Roma inclusion and empowerment measures in these programmes.

Recommendation 3 – The mechanisms for ***national-level dialogue*** should be strengthened in order to speed up the iteration on Roma Inclusion Plans and exchange of other information that would help the implementation and monitoring of programmes. Further country-specific recommendations on national dialogue including specific actors to include are contained in the country reports for the five focus countries.

Recommendation 4 – A simple qualitative framework should be used to track ***innovative interventions*** financed by EEA & Norway Grants that are of particular importance in the area of Roma inclusion. It is important to ensure that the information that is best collected in the course of project implementation is available to support potential future scaling up or mainstreaming.

Recommendation 5 – Part of the ***evaluation*** effort should be focused on innovative interventions identified to gain understanding and facilitate learning for future programming. Where innovation or piloting serves as justification for a project, it is important to evaluate the success of the activities to provide the information needed for scale up. This requires an understanding of the potential channels for scaling up (e.g. which ministry is responsible for legislation and who are the key national stakeholders active in the area) and an outreach strategy. Evaluation in the present programming period can be used for promising interventions to plan more rigorous future evaluations using experimental and quasi-experimental methods that require a well-developed and documented intervention design.

Recommendation 6 – Use of the emerging ***S–P–O framework*** should be considered to identify what share of overall funding for Roma inclusion in a given country comes from EEA & Norway Grants and conversely, what share of EEA & Norway Grants focusing on Roma goes towards priorities identified in the frameworks.

Recommendation 7 – ***Participative monitoring instruments*** should be piloted to involve Roma communities in the monitoring of selected interventions,[1] and cost-effective online survey tools should be used to collect information from other participants. Participative monitoring can be piloted with a few suitable interventions delivering services to broader communities, mobilising Roma communities to become involved in selecting indicators of success and reviewing them regularly. Online surveys can be used to gather evaluation information from stakeholders such as teachers, police, and mediators.

Recommendation 8 – ***Learning across programmes and countries*** should be supported. Summative annotations of projects should be shared in a standardised format (on an existing website) to make sure lessons learned are available to others tackling related interventions. There are other relevant national audiences that could benefit from having access to information on activities related to Roma inclusion.

Recommendation 9 – For future programming in countries where exclusive targeting of Roma is seen as discriminatory, **existing domestic categories of vulnerable populations** should be used. These can be combined with geographic targeting. Such an approach should be considered for targeting in future programming, where they would target disadvantaged Roma together with a few people of other ethnicities living in the vicinity, thereby avoiding raising local tensions or legal questions.

Recommendation 10 – **Baselines** for outcome indicators should be set as early as possible in programme preparation.

---

[1] One such pilot started in late 2014 as part of an RO25-supported project, SocioRoMap.

ROMA INCLUSION STUDY

1.   INTRODUCTION

1.1.   Background

1.1.1. Issue of Roma inclusion

The Roma are today Europe's largest minority, totalling 10-12 million people, of which most are EU citizens. The migration of Roma EU citizens to other EEA countries is an increasing source of tension and public debate. Despite efforts to improve the integration of Roma, many are still facing rising levels of impoverishment, social exclusion and discrimination. The recent economic crisis has further aggravated their situation.

The EU has highlighted the need for a better integration of Roma. In order to improve the economic and social situation of the Roma, the 2011 EU Framework for National Roma Integration Strategies up to 2020 (NRIS) invited member states to adopt national strategies focused on the areas of education, employment, housing and health. The European Commission reviews the implementation of the NRIS annually, reporting to the European Parliament and the Council. In 2015, member states revised their National Roma Integration Strategies to align them with the European Structural and Investment Funds (ESIF) for the 2014-2020 programming period.

The issue of Roma inclusion remains high on the political agenda across Europe, and Roma inclusion has also become an increasingly important priority under EEA & Norway Grants.

1.1.2. EEA donor response to the Roma issue at national and programme levels

EEA donors,[2] through the Financial Mechanism Office (FMO), have made the social and economic inclusion of Roma one of the priorities of EEA & Norway Grants for the current funding period (2009-2014). EEA & Norway Grants represent the largest funding in the area of Roma inclusion after the EU, and can therefore play an important role in helping beneficiary states to advance with the complex challenge of reducing the exclusion of Roma.

In the countries where there are sizeable Roma minorities – Bulgaria, Czech Republic, Hungary, Romania and Slovakia – Roma were included as a target group in relevant programmes. The National Focal Points (NFP) in these countries were asked to submit concept papers on the methods they planned to use to achieve Roma inclusion targets or address the concern specified in the respective Memoranda of Understanding (MoU).

For Bulgaria, a target was set for 10 % of the total allocation to go towards improving the situation for the Roma population. In Romania the indicative target was set at least 10 % of

---

[2]   Norway, Iceland and Liechtenstein.

the total funding for 13 relevant programme areas. In the other beneficiary countries the Roma concern was highlighted in specific programmes.

In Bulgaria and Romania, Programme Operators (PO) of relevant programmes were asked to develop Roma Inclusion Plans defining how they planned to meet the numeric targets on the share of budget for their programmes. Where the plans did not provide sufficient detail or were not of sufficient quality, the FMO asked for improved plans to be submitted for approval.

1.2. Methodology and Implementation of the Study

The study was implemented between November 2014 and June 2015 by a team composed of a Team Leader, four country experts covering the five focus countries of the study, and support staff.[3]

The Study covered 47 programmes that were considered as relevant to or targeting Roma social inclusion in 12 beneficiary countries, and 27 programmes were selected for in-depth analysis. These are presented in Table 1.

Data collection

Data was collected in several different ways:
- Literature reviews;
- Personal interviews with representatives of National Focal Points in four focus countries, representatives of Norwegian Royal Embassies, and Programme Operators of in-depth programmes in the five focus countries;
- Online questionnaire, followed by telephone interviews, with Programme Operators of programmes that were not considered for in-depth review (eleven out of twelve POs provided their feedback);
- Online questionnaire for Donor Programme Partners (three responses received out of nine sent);
- Online questionnaire for representatives of Norwegian Royal Embassies in non-focus countries;
- Representatives of National Focal Points in non-focus countries were contacted by email with questions in May;
- Additional telephone interviews with Donor Programme Partner were carried out by the Team Leader with individuals recommended by the FMO as the most active and engaged in implementation of the relevant programmes.

---

[3] Team Leader of the study was Andrej Salner, who is the main author of this report. National analyses were carried out and reports prepared by Nikolay Bliznakov and Srebrina Cvetkova (Bulgaria), Marek Hojsík (Czech Republic and Slovakia), Adam Kullmann (Hungary, co-author of Chapter 3) and Ion Craciunel (Romania). Tanja Božinac contributed research on non-focus countries. Martin White edited the report.

Table 1   Roma-related programmes for in-depth study in five focus countries

Country	All Roma social inclusion related programmes		
		Programmes for in-depth study	
Bulgaria	NGO programme (BG 05)		✓
	Children and Youth at Risk (BG 06)		✓
	Public Health Initiatives (BG 07)		✓
	Schengen cooperation and combating cross-border crime, etc. (BG 13)		✓
	Judicial capacity building and co-operation (BG 14)		✓
	Correctional services(BG 15)		✓
	Domestic and gender-based violence (BG 12)		✓
	Cultural Heritage and Contemporary Arts (BG 08)		
	Scholarships (BG 09)		
The Czech Republic	NGO programme (CZ 03)		✓
	Natl, regional, local initiatives to reduce inter-group inequalities and to promote social inclusion (CZ 05)		✓
	Children and Youth at risk (CZ 04)		✓
	Cultural Heritage and Contemporary Arts (CZ 06)		
	Public Health Initiatives (CZ 11)		
	Mainstreaming Gender Equality and Promoting Work-Life Balance and Domestic and Gender-based violence (CZ 12)		
	Schengen cooperation and combating cross-border crime, etc. (CZ 14)		
	Judicial capacity building, co-operation and correctional services, incl. Non-custodial sanctions (CZ 15)		
Hungary	NGO programme (HU 05)		✓
Romania	NGO programme (RO 09)		✓
	Children and youth at risk and local and regional initiatives etc. (RO 10)		✓
	Mainstreaming Gender Equality and Promoting Work-Life Balance (RO 11)		✓
	Research within Priority Sectors (RO 14)		✓
	Promotion of Diversity in Culture and Arts within European Cultural Heritage (RO 13)		✓
	Schengen cooperation and combating cross-border and organised crime, etc. (RO 21)		✓
	Correctional services, including Non-custodial sanctions (RO 23)		✓
	Judicial capacity building and co-operation (RO 24)		✓
	Domestic and Gender-based Violence (RO 20)		✓
	Conservation and Revitalisation of Cultural and Natural Heritage (RO 12)		✓
	Scholarships (RO 15)		✓
	Public Health Initiatives (RO 19)		
	Poverty Alleviation (RO 25)[4]		✓
Slovakia	NGO programmes (2 Programmes SK 03 and SK 10)		✓
	Local and Regional Initiatives to Reduce National Inequalities and to promote Social inclusion (SK 04)		✓
	Domestic and Gender-based Violence (SK 09)		✓
Greece	NGO programmes (GR 04)		
Latvia	NGO programmes (LV 03)		
Lithuania	NGO programmes (LT 04)		
Poland	NGO programmes (PL 05)		
Portugal	NGO programmes (PT 05)		
Slovenia	NGO programmes (SI 03)		
	Norwegian Financial Mechanism Programme (SI 05)		
Spain	NGO programmes (ES 03)		
	Gender Equality and work-life balance (ES 04)		

---

[4]   As RO25 is only just up and running, there will be less to review than in the other programmes selected for in-depth review.

An e-mail requesting a telephone interviews with NFPs in the seven non-focus countries was sent out in May 2015. Three main questions were listed for a follow-up telephone discussion:

- The number of Roma inclusion and empowerment projects being implemented under EEA & Norway Grant Programmes in the country, and whether those projects included Roma as a target group;
- Identification of implementation of any project specifically or indirectly addressing the Roma population, and details of the subject of the project and how its achievements would be measured;
- Nature of monitoring tools used to assist in reporting to the FMO on issues related to Roma inclusion and empowerment.

Written answers from Greek, Latvian, Lithuanian and Spanish NFPs were received stating that Roma as target group was included only in projects financed from the NGO Fund, which was managed by the FMO and the Fund Operator. We were redirected to the relevant POs with whom we had already surveyed in January 2015. On 5 June, a telephone interview with Slovenian NFP was carried out.[5]

Analysis of Programmes

In-depth analysis involved:
a. Review of available programme documentation including text of the call for proposals, pre-defined projects (PDP), and Roma inclusion plans;
b. Identification and categorisation of listed indicators based on the position of the indicator in the results' framework (output, outcome), availability of baselines, suitability of targets, and other attributes (time-bound, availability);
c. Assessment of the indicators, i.e. are they set at the appropriate level or not – are the outputs really measuring outputs and the outcomes really measuring outcomes?
d. Identification of significant gaps in measurement across each of the relevant programme areas;
e. For indicators that were assessed as problematic, realistic improvements were proposed (including proposals from Programme Operators (PO), indicators used in NRIS and/or Structural Funds programming);
f. For significant gaps in understanding progress in Roma inclusion other methods were proposed for collecting the information;
g. Suggestions and recommendation from stakeholder interviews were collected and reviewed.

The analysis of programmes that were ***not studied in depth*** was limited in scope to:

h. Review of indicators used;

---

[5] According to Slovenian NFP, all three horizontal policies were considered with the same level of importance. Roma-related issues were not given specific attention. There are two Roma social inclusion related project being implemented, one under the NGO Fund and another under the Health Initiative Programme. Monitoring of projects is the responsibility of POs who report to the NFP on any issues at their request. Usually this is at the time of preparation of the annual report on implementation of EEA & Norway Grants, where the NFP needs to report also on horizontal concerns, in a more general way. More specifically, the impact on horizontal policies would be recorded at the end of project implementation.

i. Identification and categorisation of indicators based on the position of the indicator in the results framework (output, outcome), availability of baselines, suitability of targets, and other attributes (time-bound, availability).

1.2.1. Chronology and changes agreed during the study

Inception period

The study team attended the kick-off meeting for the study on 10 November 2014, compiled a list of programmes to be assessed, prepared a template of an indicator matrix and drafted an outline of an interview grid.

Interim period

The interim phase lasted from the end of December to 7 May 2015, when the Interim Report was accepted by the FMO. The main focus of the interim phase was data gathering, analysis and report drafting. In this period, several changes were agreed with the FMO:
- The foreseen workshop in Hungary was cancelled.
- Workshops in the other focus countries were postponed until the Country Reports, which were intended to contain the input material for the workshops, were approved by the FMO.

Final period

In the final stage, it was agreed that the country workshops and the roundtable in Brussels would be replaced by an extended analysis with the following deliverables:
- Concrete suggestions for how to ensure the follow-up of programme-level conditionality (e.g. analysis of the FMO's Guidance Note on the Roma plans, requirements on stakeholder consultations, and specific reporting – this information is provided as part of Section 2.1.
- Further refinement of the Checklist for Tracking Innovative Interventions, e.g. mainly for use with the NGO Fund – an updated checklist is provided as part of Recommendation 4 – Using a simple qualitative framework to track innovative interventions financed by EEA & Norway Grants.
- Expansion of the proposal to use an adjusted the ***Structure – Process – Outcomes*** (S-P-O) framework,[6] in particular showing a worked example for Romania or Bulgaria programmes. An updated proposal is provided in and worked example for all Roma-relevant Romania programmes is provided in Annex 6.
- Five Country Reports as Annexes to the Final Report, including:
  o An analysis of existing programme indicators, including comments on the use of possible qualitative indicators, e.g. surveys;
  o A suggested reporting template for each country;
  o Comments on how to conduct/organise a national level dialogue.

---

[6] This is framework developed by the Fundamental Rights Agency (FRA) – see 4.1.2..

Main deliverables of Roma inclusion study

The chronology of main deliverables of Roma inclusion study is given in Table 2.

Table 2   Chronology of main deliverables of Roma inclusion study

Reports	Submission	Comments by FMO	Approval by FMO
Inception Report			
- First version	2 December 2014	15 December 2014	
- Final version	17 December 2014		18 December 2014
Interim Report			
- First version	20 February 2015	27 February 2015	
- Second version	1 April 2015	27 April 2015	7 May 2015
Final Report, including five country Reports			
- First version	8 June 2015	17 June 2015	
- Second version	8 July 2015		

1.2.2. Limitations to the Study

The early state of implementation of some of the programmes turned out to be one of the challenges in the gathering of data and preparation of this report. The study is neither prospective – looking at planned future programmes, nor retrospective, but rather tries to reflect on programmes and projects in various stages of implementation, with various levels of detailed data available. The intention was to analyse the current framework, propose realistic changes, but the scope for change was rather limited due to existing arrangements and agreements.

Although POs are bound by conditions set both at programme level and in national-level MoUs, many representatives of POs interviewed said they did not feel competent to respond to questions on Roma issues, and thus felt that they were inappropriate counterparts for discussions related to indicators and monitoring. In our view, this is because in the focus countries the responsibility for the Roma inclusion agenda usually lies with a specific office within the government (in some cases even with the NFP), but other officials, such as those in most POs, do not view Roma inclusion as part of their main agenda.

2.   KEY FINDINGS FROM A REVIEW OF CURRENT PROGRAMMES

The first task in the Terms of Reference (ToR) was to assess current programmes in the light of recommendation from the earlier Study on Roma Inclusion prepared under EEA and Norway Grants prepared for the FMO in 2013. This chapter follows the seven recommendations, and gives our assessment of the extent to which they have been taken on board in current Roma inclusion programmes, addressing the key questions outlined in the ToR.

> **Key questions outlined in the ToR**
> - To what extent have the Roma inclusion plans followed the recommendations in the previous study?
> - To what extent are the programmes expected to reach the planned results on Roma inclusion?
> - To what extent are the current indicators on Roma inclusion measuring what is being achieved?
> - What are the main weaknesses when it comes to reporting on results on Roma inclusion?
> - To what extent are programmes contributing to increased capacities for Roma inclusion of key stakeholders involved in projects at national, regional or local level in the beneficiary states?

2.1.   Donors' concern clearly defined as Roma inclusion concern

The 2013 Roma Inclusion Study recommended clearly **defining the donors' concern** regarding Roma inclusion. This recommendation has been effectively implemented through a framework of country-level and programme-level plans (although some of the MoUs and some programmes were agreed before the recommendations were issued).

2.1.1. Country Level Approaches

At country level, the NFPs in the five countries with high Roma populations had prepared special **concept papers on Improvement of the Situation of the Roma Population**. These papers were a means to specify clearly how Roma inclusion concerns would be addressed and, where applicable, how specific goals for Roma inclusion would be attained in the country's implementation of EEA & Norway Grants.

We can compare the different country-level approaches - budgetary share targets in the MoUs as used in Bulgaria and Romania, or specific concerns as expressed in the MoUs in the other three focus countries.

The approach where a share of budget is set at country level was a response by the donors to the need to provide an *ex post* focus on Roma inclusion and empowerment. The more flexible approach to MoU targets used in Bulgaria, where the target is set at national level and can be met by combining Roma inclusion support in various programmes, is likely to lead to greater allocative efficiency. Several representatives of Romania POs interviewed said that a lot of effort was focused on reaching this statistical target by programme without sufficient regard to the quality of the projects implemented.

In the other focus countries, specific MoU concerns combined with emphasis on Roma-relevant interventions by the FMO and donors can lead to implementation of successful projects contributing to Roma inclusion and empowerment.

2.1.2. Roma Inclusion Plans

In addition to country concept papers in Bulgaria and Romania, where numeric targets apply, **Roma Inclusion Plans** were used as a programme-level instrument to specify how the programme will go about achieving the target.[7] The FMO provided a Guidance Note to all POs concerned, the POs prepared Roma Inclusion Plans, and the FMO approved these after consultation with the Norwegian Ministry of Foreign Affairs.

The level of detail in the Guidance Note for standard Roma Inclusion Plans was effective in providing a structure for the POs to address explicitly all the key aspects of how the Roma inclusion concern would be implemented in projects within the programme. We have reviewed the Guidance Note in detail and recommend some minor changes to make the instrument easier to follow.

While from the donor perspective these plans were primarily focused on ensuring that the specified numeric targets in the two countries would be met, in our view, the plans represented an effective, realistic solution to a set of complex challenges:

- To draw the attention of institutions, many of which have a very different institutional focus, to the horizontal concern of Roma inclusion;
- To review existing planned activities and change their focus to Roma inclusion activities;
- To facilitate monitoring and evaluation of a Roma inclusion and empowerment focus at programme level by setting out or updating a results' framework.

The Roma Inclusion Plans are not uniform in their quality, as the FMO is well aware, and the FMO has pushed POs to provide better developed plans where required. The better developed plans offer clear logic on how Roma inclusion concerns will be addressed by their Measures. A few develop meaningful indicators, but even the better plans usually do not provide a specific definition and detailed information on measurement. Our follow-up interviews indicated that the data collection issue was generally not a major concern and POs planned to rely on project reporting without closely questioning the data.

We assessed all the Roma Inclusion Plans provided at the time of data collection for this study in the first quarter of 2015 on two issues: 1). how well developed is the logic of fitting the Roma inclusion concern into activities to be supported, 2). what is the quality of indicators proposed. A plan-by-plan review is provided in Annex 2.

A few Roma Inclusion Plans stood out as particularly well developed in some area, though no plan was uniformly strong:

---

[7] The Study Team was provided with Roma inclusion plans for those programmes where the plans were approved. We provide a list of Roma Inclusion Plans that we received and reviewed in Annex 2.

- The Roma Inclusion Plan for BG08 '*Cultural Heritage and Contemporary Arts*' showed the possibility of integrating a Roma inclusion and empowerment concern into a mainstream programme, though the quality of intervention logic presented was weak and the indicators were mixed in quality.
- The Plan for RO10 '*Children and Youth at Risk*' was very strong in developing a clear logic for implementing Roma inclusion in the relevant Measures, details of involvement of Roma representatives at various stages of programming and adjustments to the project selection criteria to accommodate the Roma inclusion concern. Despite having insufficiently-defined indicators, this was one of the best developed and thought out plans.
- The Plan for RO11 '*Mainstreaming Gender Equality and Promoting Work-Life Balance*' provides clear and good quality indicators, but does not provide any specific numeric targets for them.

2.2. Regular strategic review of implementation of the Roma inclusion focus within and across programmes

The 2013 Roma Inclusion Study stressed the importance of regular reviews in helping the beneficiary countries go beyond formal reporting in meeting their commitments. The Study specifically recommended reviewing three dimensions: (a) progress towards expected Roma inclusion outcomes and impact, (b) possible leverages of different Measures, especially at the local level, and (c) relevance and sustainability of actions by the potential mainstreaming of emerging good practice.

In view of **implementation delays** suffered by many of the programmes, it is not yet possible to review progress along two of these three dimensions. We can review progress towards expected outcomes and impact (a), but leveraging of measures at the local level (b) and mainstreaming of good practices (c) are topics that can be addressed only once programme and project implementation progresses to a stage where good practice can be identified.

2.2.1. *Reviewing progress towards expected outcomes and impact*

The FMO has devoted significant efforts to communication with NFPs and POs on the horizontal concerns including Roma inclusion since the recommendations were issued.

Formal strategic reviews, however, only take place annually or bi-annually, and given the complexity of implementing programmes with Roma inclusion concerns, this frequency seems insufficient. FMO staff said they felt they had less leverage between these meetings.

In some countries there were visible contributions to building Roma inclusion capacity through the involvement of Norwegian and international Donor Programme Partners, as well as Royal Norwegian Embassies. This was notably the case in Bulgaria, where the implementation of Programmes BG13 and BG14 was supported by a special Roma Inclusion Committee created by the Ministry of Justice, with participation of the representatives from the Norwegian partner – the Norwegian Correctional Service, the Council of Europe – also a partner, the

National Council for Ethnic Issue to the Council of Ministers, and representatives of active Roma NGOs, that meets regularly and is of great support to the implementation of both programmes.

As part of bilateral funding, a Roma Monitoring Committee was also established by the PO for programmes RO20, RO23 and RO24, and its first meeting took place in December 2014. Participants who were interviewed as part of research for this study said they expected this mechanism to improve coordination and also keep on achieving planned results within the programmes.

2.2.2. *Leveraging of measures at the local level*

The recommendation in the 2013 Roma Inclusion Study regarding leveraging of measures at local level is relatively specific. The appropriate ways of leveraging various interventions locally **depend on the specific project context**. This is therefore a relatively micro-level issue that is best addressed in the country context.

In Bulgaria we encountered an example of a project supported within the BG06 Programme of an Education Mediators Network, which at its launch partnered with an existing National Network of Health Mediators established with EU Structural Funds funding.

In Slovakia, the SK04 programme was prepared in cooperation with the Ministry of Education to ensure its complementarity with other activities in the sector, especially those funded from the European Social Fund (ESF), which are managed by the ministry itself. According to the PO representatives,[8] the Ministry provided the PO with a list of priorities based on a needs' assessment of schools with Romani pupils. Based on these inputs the PO decided to focus the programme on support in the area of education. The PDP and small grant scheme were designed to complement ESF national projects implemented by agencies managed by the Ministry in the area of training of teachers involved in education of Romani pupils.

Another good example of leveraging of measures is provided by the CZ04 programme. This programme was designed to assist the implementation of a planned Czech law on deinstitutionalisation of child care. The law envisaged an obligation for regional government to transform large child-care institutions into small community-based facilities or into professional families. The programme was designed to help provide regional governments with the necessary financial resources to implement this planned policy. However, after the change of government, the new policy was not adopted.

---

[8] In this case, the Programme Operator is the same institution as the National Focal Point – the Office of the Government of the Slovak Republic.

2.2.3. *Mainstreaming of good practice emerging from projects implemented*

This is a key concern. Several stakeholders interviewed[9] said that they or Project Promoters in their programmes saw EEA & Norway Grants as more flexible instruments in comparison with the largest instrument for Roma inclusion – EU funds. EEA & Norway Grants were in some cases more suitable for innovative or pilot efforts of any kind, due to greater flexibility, more direct contact with donors, and a lower administrative burden.

At the same time there are conditions for a pilot or experiment to make the desired impact on as many beneficiaries as possible and to be cost-effective. Specifically, **clear objectives must be set** (both in terms of actual outcomes and in terms of outputs of the pilot element).

A **pilot needs to be evaluated**.[10] In Chapter 6, we recommend a mechanism to help self-identify projects that claim to be innovative, experimental or pilot initiatives. Once identified, these can be a focus of proposed thematic evaluations (see Recommendation 5 – Focus evaluation on innovative and significant projects). Regardless of its success in achieving the objectives of the intervention, pilot efforts are likely to offer lessons that can be learned for future programming.

Also in planning and implementation of interventions, there should be explicit **focus on future dissemination of results**. This requires an understanding of the potential channels for scaling up or replication (e.g. which ministry is responsible for legislation in the area, who the key national stakeholders active in the area are) and an outreach strategy or direct communication with stakeholders who could play a role in later follow up efforts.

2.3. Comprehensive databases of planned and implemented activities in relation to Roma inclusion

According to FMO staff interviewed, the DORIS database used by FMO is a suitable vehicle for recording relevant data on Roma inclusion activities funded by EEA & Norway Grants. The key challenge is one in part addressed by the present study – to decide what data to collect. A second challenge then is what data to present to whom.

In the field of Roma inclusion, there are numerous parallel efforts by a number of stakeholders such as the EU, bilateral donors, the World Bank, Open Society Foundations and other institutions.

In this respect the existing ambition of the FMO to **connect with the work of the EU Fundamental Rights Agency** (FRA) on monitoring National Roma Strategies is a good step

---

[9]   This point was raised in interviews with representatives of the Open Society Foundations and the Ministry of Education in Bulgaria, two Romanian Programme Operators (BG09 and BG10), the Slovak NFP and one of the Czech Programme Operators.

[10]   The study did not review all interventions at project level, so we cannot identify comprehensively the pilot or innovative efforts. Some examples include one of the PDPs within the RO25 programme – SocioROmap – this is an innovative effort, which, if found successful, could be mainstreamed and continued, and might be worth replicating in other countries.

towards sharing information on EEA & Norway Grant-funded interventions with national and international stakeholders. Coordinating with the FRA work is logical since EEA & Norway Grants focus on overlapping issues in an overlapping set of countries.

Other relevant national audiences that would be interested and could benefit from having access to information on activities related to Roma inclusion exist at the national level in the context of specific projects. Some projects may also be inspirational in an international context. It is beyond the scope of this study to address arrangements for cross-country learning, but in the course of our data collection we did come across indications that the links between programme managers and the crosscutting issue of Roma inclusion were not clear.

2.4. Selection criteria and proactive communication to improve participation of Roma NGOs

This recommendation of the 2013 Study focused on the quality of selection criteria, as well as promotion of calls for proposals in such a way that the information reaches Roma NGOs.

2.4.1. Do selection criteria in Roma-relevant calls reflect the needs of Roma communities?

We have gathered information on applied selection criteria from reviews of available calls for proposals and from interviews with various national stakeholders in the five focus countries of this study. At this stage of implementation, only a portion of the expected calls for proposals had been launched.

There are two relevant aspects to evaluate with regard to calls for proposals:
- The first concern is whether there are **requirements or conditions that would prevent some Roma civil society organisations or institutions** in geographic units where Roma are over-represented **from applying**, and whether these organisations and/or localities systematically differ from others in the country.
- The second concern is the process of evaluation of proposals – whether there are any **evaluation criteria that would favour or hinder proposals promoting Roma inclusion**.

With respect to Roma-relevant mainstream calls, we were not able to identify systematic barriers that would preclude organisations, municipalities or other institutions in localities where Roma are overrepresented from applying or succeeding in calls. In particular in Bulgaria and Romania, where at programme level Roma Inclusion Plans were developed, there were significant efforts in many relevant programmes reviewed to **award extra points to Roma-focused projects** in order to meet the numerical targets.

This was also the case in a few other calls. In Czech programmes, the contribution to Roma inclusion was awarded a few extra points in line with extra awards for contribution to the other EEA & Norway Grants horizontal concerns. The Slovak Roma Inclusion programme SK04, which had a grant scheme focused on schools, awarded points for specific Roma-inclusion

attributes such as *"Proportion of pupils coming from marginalised Roma communities"* and *"Subject Romani language and literature as part of the school curriculum"*. In the case of SK09 *'Domestic and Gender-based Violence'*, for one of the Measures that focused on the specific needs of vulnerable groups including Roma extra points were awarded to *"provision of adequate services to each group of women with specific needs"*.

For Roma NGOs, the most relevant instrument is the respective **NGO Fund** in each country. These Funds need to take into account the capacity and state of development of Roma civil society. There is a lot of anecdotal evidence and also some more structured evidence on administrative capacity issues faced by Roma NGOs throughout the region.[11]

There is an obvious **trade-off between reaching grass-root NGOs** with limited capacity on one hand and **accountability concerns** on the other hand. If qualifications and requirements for reporting are reduced, the risks increase of poor management of results and funds. Global grants – the format used by EEA & Norway Grant NGO Funds, are seen as part of the answer, both in some of the stakeholder interviews in this study, and in the very recent evaluation of NGO funds.[12]

It is clear from the findings on Roma NGO involvement in the focus countries that the NGO sectors in the countries differ significantly. Specific issues encountered include problems with even small amounts of co-financing, and challenging administrative burdens for small NGOs in Romania and Slovakia.

In **Slovakia**, the introduction of SK03 was motivated by the desire to improve access to the EEA & Norway Grants for Roma NGOs, which generally have a weaker financial capacity. They cannot compete with larger NGOs for large projects, and in smaller projects, less co-financing is needed. From the PO's point of view, introduction of a scheme for such small projects is an affirmative action, because it substantially increases the PO's own administrative burden. The rules do not allow application of lighter administrative and reporting procedures for smaller projects, and thanks to the small projects the total number of administered projects increased.

With these measures, the PO expected a higher level of interest from Roma NGOs. Those interviewed suggested that the reasons for a relatively weak interest from Roma NGOs could have been the lack of funds for co-financing (even though they were as low as € 300-500 in the case of small grants), and the lack of administrative capacity to manage a project, which, even if small, has the same administrative requirements as a large project.

The methodology of this study did not provide for extensive access to unsuccessful Roma NGOs, which could have suffered from these issues to an even larger degree than those who

---

[11] The Working Paper by Kóczé (2012) presents results of an online survey of Roma civil society. There is extensive discussion of difficulties faced by Roma NGOs in accessing EU funds, with cited respondents pointing out the disadvantages of Roma NGOs in comparison with larger non-Roma organisations, and even cases where NGOs were forced to shut down due to not being able to meet the demanding administrative requirements.

[12] This is one of the recommendations of the very recent evaluation of NGO Funds (CREDA, 2015).

did apply and/or succeed. There may be additional barriers faced by grass-root Roma NGOs that POs and Fund Operators interviewed were not aware of.

A summary of selection criteria and scoring in each focus country is given in Table 3. We found that in two of the focus countries (Bulgaria and Czech Republic) there were eligibility criteria that could have prevented some NGOs with low institutional capacity from applying.

The review in Table 3 offers several lessons and suitable approaches:[13]
- To enable Roma civil society organisations with limited administrative capacity and project implementation experience to obtain support and build their capacity, it is important to offer grants of various sizes, including small grants;
- Global grants awarded to specialised intermediaries with a good understanding of the field of Roma inclusion may be a suitable modality for NGO grants schemes;
- It would be useful to assess as part of *ex post* evaluation the extent that the award of extra points in evaluating mainstream proposals for a Roma inclusion focus actually led to approval of good quality projects contributing to Roma inclusion.

2.4.2. Has communication in calls been targeted and proactive?

The issue of targeted and proactive communication of calls was addressed both at country and programme level. We divide our analysis into NGO Funds and communication in other programmes.

In **NGO Funds**, the Fund Operators are generally national NGOs with a **track record of working on Roma inclusion**. In addition to standard channels, such as press releases and the internet, local information days were held in various localities to provide potential applicants with information. Also, given the importance of EEA & Norway Grants as a funding source for NGOs in beneficiary countries, the interviews widely confirmed that NGOs were well aware of the calls for proposals.

Where issues may arise is with the smallest grass-root organisations, but these would also be generally the ones that would have problems clearing the administrative hurdles. In some types of programmes, especially where local service delivery is involved, the pool of applicants could be extended in some cases by simplifying implementation modalities.

---

[13] A conclusive assessment of these approaches can only be made once projects are completed – only then will it be clear whether the projects selected made a valuable contribution to Roma inclusion or empowerment. We therefore include this issue among our recommendations for topics on which to focus later evaluations.

Table 3   Overview of Qualifying and Selection Criteria for Roma NGOs and Projects in Focus Countries

Country	Qualification (eligibility) criteria	Selection (scoring)	Analysis and comments
Bulgaria	There are no specific conditions (exclusion criteria) that could in some way preclude NGOs with limited institutional capacity (like Roma NGOs) from applying. However, the common conditions for EEA & Norway Grants are difficult for all small (grass roots) organisations.	In BG05 Funds for NGOs the selection matrix favours Roma participation and activities – for instance, projects with 10 or more Roma participants receive higher scores than others. For the BG09 Scholarship Fund, extra points were awarded in the course of selection to those applications, which were in Roma priority fields or where the applicant had stated that he/she was of Roma origin.	In general, the conditions for application may be difficult to meet for grass roots NGOs. It is remarkable that under BG05, nearly 50 % of Roma proposals were funded - the condition was 10 % of allocation to be targeted at Roma – but In fact nearly 25-25 % of the allocation went to Roma projects.
Czech Republic	In the case of programmes CZ03 and CZ12, which could be the most attractive for Roma NGOs, there was an additional eligibility criterion – the applicant organisation had to have at least two years of institutional history. Additionally, the calls were launched in a period when the NGO law was modified and NGOs needed to change their status and comply with other new legal requirements to be eligible to apply to the calls.	In all calls for proposals where NGOs could apply, the applicant's experience with implementation of similar projects and its capacity were assessed, and assigned a relatively strong weight. In most of the launched calls for proposals, there were usually three selection criteria that assessed the Project Promoter´s capacity to implement the project by his technical capacity, administration capacity and previous experience in managing at least one project similar in activities and volume. Each of the criteria was awarded 4 points (together 12 points out of 100 points). This could exclude or at least put at a disadvantage many Roma NGOs. In most of the programmes there were no special criteria favouring Roma-oriented projects or Roma or pro-Roma applicants. In all programmes, contribution to Roma inclusion was assessed only as a contribution to one of several horizontal concerns and could be awarded by 3-5 points out of 100, regardless the actual given objectives.	The requirements for a two-year institutional history in programmes CZ03 and CZ12 precluded many small NGOs, especially Roma NGOs from applying. Roma NGOs could be disadvantaged in scoring also by points awarded for technical capacity, administration capacity and previous experience in managing a project with similar activities and volume of funding. This works to the disadvantage of organisations that are new to donor-funded projects and may reduce the possibilities for capacity building of new Roma NGOs.

Hungary	With regards to eligibility criteria, the NGO Fund Operator minimised administrative conditions that would exclude NGOs with limited institutional capacity, and designed a differentiated set of calls to offer opportunities for small, medium-sized and macro projects.	With regards to selection criteria, these included broad criteria such as relevance, methodology, coherence, results, sustainability, horizontal objectives (environmental sustainability, equal opportunities), communication and cost-effectiveness of the proposal, and experience and capacity of the applicant. Contribution to Roma inclusion was not assessed as a specific selection criterion but under relevance, methodology, coherence, results, horizontal objectives, etc.	The NGO Fund Operator's (only programme covered by this study) eligibility criteria were adjusted in order not to limit participation of Roma NGOs by offering schemes for projects of different size including small projects.
Romania	In general, there were no particular requirements for the applicants in terms of organisational capacity or specific Roma experience. In the NGO Fund, the applicants were asked in general terms "to have the capacity, in accordance to their Statute, to act in the domain of the project". For RO10 Coherent Calls, it has been indicated that the "partner NGO needs to be familiarised with the local context and that it has relevant experience within the sector for the last five years (meaning that the applicant has implemented in the last five years at least one project/action/initiative having a measurable impact and such supporting documentation on impact measurement need to be available)"	The selection criteria in the open calls favoured applications with Roma focus or pro-Roma organisations through a bonus score added to all applications clearly demonstrating their inclination towards Roma aspects.	Romanian programme operators were motivated by the numeric targets to provide extra points for Roma projects. No barriers preventing Roma organisations from applying were identified.
Slovakia	The Slovak NGO Funds and other relevant calls did not include any criteria that would preclude Roma NGOs (which have in general lower institutional capacity) – such as institutional history or minimum turnover. The applicants were expected to have *financial and personnel ability to implement the project*".	The institutional and managerial capacity of the applicant was awarded four points and previous experience five points out of 100. No special points were attributed for projects addressing Roma inclusion (or as contribution to horizontal concerns).	The Slovak NGO Funds and other relevant calls posed no barriers to Roma NGOs. There was no awarding of extra points for projects focused on Roma but certain calls had a specific Roma focus.

Operators of NGO Funds in Hungary demonstrated **specific approaches** that appeared beneficial in reaching out to Roma NGOs. The NGO Fund is the **second largest source of funding for NGOs**, so it is widely known among potential Project Promoters. Information was distributed by the Fund Operator not just through the internet but also through a large number of local information days, organised in each of the 20 counties.

An example of good practice is given in Box 1. We also collected evidence from the non-focus countries on this issue. They are the ones with small proportions of Roma and usually much less focus on Roma inclusion issues in the national discourse. Nonetheless, there was evidence that due to the FMO emphasis on Roma inclusion, attention was paid to this horizontal concern in NGO Funds across these countries (see Box 2).

Box 1. Good Practice in Pro-Active Communication

Additional evidence on pro-active communication came from a staff member at one of the Czech NGO Fund Programme Operators:

"*We do support and encourage Roma organisations (or organisation working with Roma) to apply for the grant from the programme CZ12 of Norway Grants, by means of:*

1. *Roma organisations were invited and participated at the opening conference of the programme which was held in Prague on September 9, 2013.*
2. *Small e-mail research aimed especially on Roma organisations was done by e-mail as a preparation for a special meeting. The aim was also to identify their recommendations for the programme and to think in common if there are any possibilities to target and to encourage Roma more actively in the field of our programme.*
3. *On October 1, 2013 we organised special meeting of Roma organisations at Open Society Fund Prague with following aims:*
   o *To find out what are their expectations regarding our programme and if they intend to apply or not (what they seem to be obstacles to apply);*
   o *To identify their current needs/ situation and possibilities;*
   o *To support their networking and cooperation within Norway Grants;*
4. *We prepared very concrete summary based on the research and meeting which includes also e-mail answers and reactions from those who were not able to participate at the above meeting. We also resumed our recommendations.*
5. *The summary was shared with all the participants involved in the process that they could have common knowledge of:*
   o *Who is doing what at this point;*
   o *Who is planning to submit a proposal to Programme CZ12 and with what aims;*
   o *How can they follow up further cooperation?*
6. *Based on the long-term experiences with implementation and support of Roma Programmes, Open Society Fund Prague has got the knowledge of difficulties with proposals preparation and projects planning within the Roma organisations. This was a reason to search for some kind of support for Roma organisations in the frame of Norway Grants. We finally agreed to cooperate on this activity with NGOs called Otevřená společnost o.p.s. that informed the Roma organisations about this possibility at our meeting on October 1, 2013. This will be financed by Otevřená společnost sources.*

All these activities were carefully planned as a complex strategy to support the engagement of *the Roma organisations in our programme and Norway Grants.*"

Source: Non-focus Programme Operators' online questionnaire.

Box 2.   Examples from non-focus countries

In **Lithuania**, a Fund Operator official reported: "*The information about the calls was widely disseminated among NGOs and communities – through media, newsletters, targeted mailing, social media, etc. Also through grass-roots human rights NGOs as well as communities working with vulnerable groups were specifically targeted and encouraged to participate in the calls. Despite the modest size of the NGO programme team, project supervisors have individually consulted every Roma issue related applicant, providing help in developing a project matrix or constructing the budget.*"

In **Greece**, the NGO Fund Operator reported: "*consultation meeting with NGOs that work on Roma issues before the submission of our application to become NGO Fund Operator:*

- *two consultation meetings with special session dedicated to the Roma in Athens and Thessaloniki before the open call on "Democratic values, including human rights, increased".*
- *representatives of Roma NGOs attended the launch event of our Programme in January 2014 and our Roadshow in selected cities throughout the country prior to the two last open calls. This was a result of a concerted effort to identify Roma NGOs (as well as any other NGO in the periphery) and inform them about our roadshow events.*
- *visit to the CoE and meetings with experts who work on the Roma*".

2.4.3. Has participation of Roma NGOs increased?

We have looked for structured evidence on the proportion of Roma NGOs applying in various calls for proposals. The number of Roma NGOs applying or successful in calls for proposals are summarised in Table 4.

Table 4   Number of Roma NGOs applying or successful in calls for proposals

Country	Applying or Successful Roma NGOs	Programmes
Bulgaria	271 applications	BG05, BG12
Czech Republic	7 successful	CZ03, CZ06
Hungary	22 successful	HU05
Romania	13 successful	RO09
Slovakia	9 successful	SK03, SK10

This information is from January 2015. Detailed tables are provided in the Country Reports in Annex 1. Each project is counted, so that an NGO successful in several calls for proposals will be counted several times.

Some comparative figures are provided in the 2013 Roma Inclusion Study (p. 31): "*Only a few of the project promoters had direct involvement of Roma in the project implementation not just as participants but as partners and managers. Only one project promoter of individual project in Slovakia was a Roma NGO, and one of the individual projects in Hungary had a contracted partnership with a Roma organisation. There were only few cases where Roma were on management or staff positions in the organisations managing the projects. Out of the 61 NGO sub-projects only 13 were implemented by Roma NGOs.*"

A thorough comparison, which will be possible once all funds in the present period are contracted, can provide more **detailed breakdowns by programme area**. The data for the current programme period can also serve as a baseline for further increasing Roma NGO participation in the upcoming programme period. Nevertheless, the figures already presented

indicate that the number of Roma NGOs successful in accessing EEA & Norway Grant funding has risen significantly in all five focus countries.

We have not located any specific objective in this area so it is not possible to assess whether this is in line with donor expectations.[14]

We were unable to locate a **clear definition of what is considered a Roma NGO for reporting purposes**. A working definition arrived at by a consensus of the country experts preparing this study was *"organisations with 50 % or more Roma in the membership and/or management"*. This is an area where it is feasible to improve reporting within the current programme period. Specific recommendations are provided in the Chapter 6.

2.4.4. *Have true local partnerships been developed?*

We have looked for evidence in the focus countries of development of high-quality local partnerships in approved projects.

There was evidence of partnerships in a number of early stage projects, especially larger ones in Bulgaria and Romania. Good examples came from Bulgaria:
- Under BG05 in Blagoevgrad, between NGOs and local authorities, which includes licensed training for experts at Local Action Groups under the EU LEADER programme and training on provision of social services in Bulgaria;
- Under BG06, the four Youth Centres in Stara Zagora, Plovdiv, Vratza and Dobrich will function with the support of networks of local NGOs - partners of the municipalities.

In contrast, in the Czech Republic, Hungary and Slovakia there was less evidence that projects aimed at Roma inclusion funded by EEA & Norway Grants have contributed to the formation or strengthening of local partnerships that could promote Roma inclusion. The NGO Funds support projects that are relatively small and short. Building partnerships between the Project Promoter NGOs and institutions (for example, a local school as an official body), was not seen as realistic for most of the projects due to their small scale and short duration. The calls for proposals were not designed in a way to promote such partnerships, as this desirability was neither communicated to potential applicants, nor awarded any extra points in the evaluation of project proposals. In the Hungarian case, cooperation of NGOs with municipalities was welcome but a formal partnership where the municipality would receive share of the budget was not eligible. As the EEA & Norway Grants are one of the few funding opportunities for many Project Promoters, sharing the grant with other partners would jeopardise their organisations and their activities.

---

[14] If there is follow up to Roma NGO surveys reported by the UNDP, these perception questions should be asked.

2.5. Capacity of Programme Operators and the National Focal Points for meaningful Roma inclusion

In addition to good will, effective intervention in Roma inclusion requires significant capacity on the part of national institutions.

While some POs are well placed as institutions to address Roma inclusion, in many cases the POs asked to support projects with Roma inclusion objectives are **state institutions with little experience, a limited formal mandate in the topic, and limited capacity**. This is also true for most National Focal Points, whose usual focus is on administration of foreign funds rather than implementation of domestic policies and programmes. In part due these capacity limitations, but probably also due to the domestic political sensitivities around Roma inclusion, public institutions in some beneficiary countries viewed the significant focus placed by EEA & Norway Grants on the Roma inclusion horizontal concern as a burden.

The Czech Finance Ministry, as NFP and PO for largest number of programmes, understands its role in the EEA & Norway Grant system as administrative, while the content of the programmes is to be proposed, defined, planned, and to a large extent also negotiated, by sectoral ministries. The Finance Ministry does not possess any capacity in Roma inclusion and the interviews indicated that it even does not see any need to have such specific capacity.

The Slovak Government Office, as NFP and PO for largest number of programmes in Slovakia, does not have in-house capacities for Roma inclusion, but for the Roma-targeted programme has used specific external capacities (Donor Programme Partner, Council of Europe, and hired experts). This was, however, not the case of other mainstream programmes managed by the Government Office.

The Bulgarian NFP, Monitoring of EU Funds Directorate, employs an expert on Roma inclusion issues who is consulted when the NFP is dealing with these questions.

As discussed in section 2.1, NGO Fund Operators in focus countries are an exception to this, and often have significant experience with grant-making and interventions in the area of Roma inclusion.

There is a flip side – we have seen some evidence that the focus on Roma inclusion "imposed" from outside has brought about **benefits in the form of mainstreaming** of Roma inclusion concerns. Examples include the Czech programme CZ14, where a PDP was included on police officers working with Roma, which is a topic of significant importance in accordance with the National Roma Integration Strategy.

The pressure to consult stakeholders, hold discussions or develop Roma Inclusion Plans has meant that officials had to think in a structured way about how Roma inclusion fits with their overall activities. This is evident from the better quality Bulgarian and Romanian Roma Inclusion Plans, where such analysis is presented, and was also confirmed in several PO

interviews in Romania, where officials claimed awareness of Roma inclusion in their institutions had increased.

2.6. Specific communication strategies to address the negative and discriminatory attitudes of the public

The 2013 Roma Inclusion Study recommended focusing on a specific area of programming – work focused on **influencing discriminatory attitudes of the public**. We reviewed to what extent this recommendation has been reflected in current programmes.

In Bulgaria this area is the focus of one of the calls for proposals under NGO Funds that has been reflected in the development of components in the focus countries of this study.

In the Czech Republic, public attitudes are specifically addressed in the CZ05 programme (Social Inclusion), which includes a PDP *"Campaign against Racism and Hate Violence"* implemented by the Agency for Social Inclusion. This PDP is wholly aimed at addressing public racist and discriminatory attitudes. It deals with hate speech on the Internet, specifically on social network sites, and promotes a hate-free culture (people can create their own profile picture with the slogan "Hate Free" and there are cartoon discussions dealing with the problem of the hate). The Czech project includes a specific noteworthy feature – in this case the donors agreed that the **campaign did not have to use identification of the Donor**, which is usually required (and the other rules relating to publicity) in order not to weaken the campaign's effects (as the campaign has the form of spontaneous comments appearing on social networks rather than coordinated activity of a public institution).

In Hungary, a total of 13 projects of various sizes and different approaches by ten NGOs are supported. These include projects focused on specific target groups such as the police, students or school teachers, innovative activities in areas such as gastronomy, art and fashion, and also projects monitoring discrimination. In Romania and Slovakia we were unable to identify specific projects focused in this area.

In some of the non-focus countries there were such projects supported by NGO Funds. These we identified in Lithuania, Poland and Portugal.

Influencing public attitudes towards the Roma is an important topic in the work of other actors – it is reflected in National Roma Integration Strategies with activities supported by the ESIF, Open Society Foundations, Council of Europe and others.

A separate part of the 2013 Roma Inclusion Study recommendation focuses on communicating other Roma inclusion interventions in a way that focuses on outputs and benefits of programmes. In discussions with POs of programmes outside those mentioned we did not see awareness of this issue. The communication strategies presented were standard strategies for programme publicity.

2.7. Explicit orientation of interventions at results

The study team invested significant effort into mapping the results framework in the area of Roma inclusion. The key finding is that the **results framework is hard to consolidate** both at country level and programme level.

As noted in FMO interviews, there is **limited comparability across countries** and **even across programmes in the same programme areas,** due to the specific way in which the Roma inclusion concern was added to programmes in separate negotiations at a relatively late stage.

While in the previous period, reporting was based on the project level, the system of implementation and reporting shifted to programme level for the 2009-2014 funding period. Given the structure of programmes, often including several dissimilar projects (in scale and even focus), reporting on a programme level is in some cases very complex.

To analyse the outcome indicators, we grouped all of the programmes into the 12 Programme Areas (see Annex 3). We then identified common types of indicators that would enable monitoring of the outcomes related to Roma inclusion. In all the Programme Areas we faced the same difficulties in identifying Roma-specific indicators. These were caused by the wide variety of components and activities within the programmes as well as the wide scope of the various target groups (including the Roma).

2.7.1. Country-level Roma inclusion results framework

Lack of well-defined country-level result frameworks poses a **serious limitation** and this determines the evaluability of the whole programme. Binding country-level frameworks are part of the MoU between the donor states and the respective beneficiary states. These are high-level documents without extensive detail, which then comes at programme level.

In two of the countries, **numeric targets are agreed in the MoU at country level**:
-   For Bulgaria, the target is 10 % of the allocation to go towards improving the situation of the Roma population.
-   For Romania, the indicative target is 10 % of the total funding in each of 13 relevant programmes should support improvement of the situation for the Roma population.[15]

This conditionality allows donors leverage in their dialogue with the recipient country. From the perspective of intervention logic, this is an **input target**,[16] and as it lacks a clear *ex-ante* formulated definition, it is problematic to monitor both for projects with specific Roma focus and those where Roma may be mainstreamed as target group through geographic targeting, or targeting of vulnerable sub-sections of population where Roma may be over-represented (children's homes, poor areas, social housing, prisons, and special schools).

---

[15] The National Focal Point indicated in an interview that the Romanian Government had originally understood that the percentage Roma allocation was valid for the total grant, not for each individual programme.

[16] Input target in the sense that it stipulated how much of an input (in this case money) goes into an intervention, rather than stipulating outputs or ideally outcomes to be reached, which would provide for greater accountability.

According to Romanian stakeholders, the 10 % allocation is more problematic for some programmes than for others. From an efficiency perspective, we would expect that the funding for different programmes would bring differing marginal benefits. Although the benefit would be difficult to measure directly, there are likely more efficient allocations.[17] An efficient allocation for most programmes would not be zero – i.e. in some programmes having a small financial allocation on Roma inclusion but nonetheless explicitly focusing some efforts on it may have a positive effect on mainstreaming of Roma inclusion issues.

In Slovakia and the Czech Republic, the country-level requirements are looser: the MoU mention certain programmes where specific needs of minority groups **including** the Roma should be addressed, earmarking a certain share of funds in these programmes to benefit **also** the Roma.

2.7.2. Programme-level results framework

At the Programme level, the indicators used were in many cases not sufficient to provide information on Roma inclusion or empowerment effects. We have applied the commonly used CREAM framework to review the indicators used,[18] drawing on a detailed mapping of indicators provided to us by the FMO. Many of the issues we discuss below have been identified in the 2013 Roma Inclusion Study and a note on indicators prepared by FMO staff in early 2014 accompanying the mapping mentioned.

Most of the indicators used are not defined in sufficient detail to allow a shared understanding of what information to collect, how and when. The standard definition of an indicator should contain a detailed description, clarifying each of its terms, as well as specifically data sources, collection methods and importantly a time frame defining when the target value is to be reached (for example end of project or several months after completion).

At programme level either a share of budget allocated to target Roma or figures on numbers of projects to support are used as indicators. Aside from the problems inherent in "management by inputs" – where the focus is on spending rather than the results that the spending brings, there is a problem with the definitions of the indicators. As pointed out in the 2013 Roma Inclusion Study, it is not clear who are Roma for the purposes of monitoring or evaluation. It is not feasible or even desirable for the FMO to impose a standard of who is a Roma, but if such a category is used to anchor indicators (e.g. number of Roma participants) it must be clear who is considered to be a Roma participant.

Project-level reporting is only in part within the scope of this study (inasmuch as we were not asked to review the reporting in approved projects in detail, and also some projects have not been contracted yet) but it appears less problematic. Indicators developed at project level that we have been able to review in particular in pre-defined projects seemed to capture

---

[17] This may be the case where some programmes have a higher share going to Roma inclusion e.g. in Romania.

[18] The CREAM framework provides five criteria that indicators should meet to be useful (Kusek and Rist, 2004): Clear -Precise and unambiguous, Relevant - Appropriate to the subject at hand, Economic - Available at a reasonable cost, Adequate - Provide a sufficient basis to assess performance, Monitorable - Amenable to independent validation.

outputs well. The issue then is whether and how they can be consolidated to programme level and then further to country level. This is only doable if the indicator framework is built top-down – i.e. for a limited set of *ex ante* determined indicators, which can be collected for all projects from the design phase (section 4.1.3 provides an example of such a framework for a large donor, but one with a narrower thematic focus).

The first problem common across the focus countries is the **almost exclusive use of output indicators rather than outcome indicators**. Indicators at programme level were in most cases agreed before the specific focus on Roma inclusion under EEA & Norway Grants. The available indicators for programmes often do not address Roma inclusion outcomes or impact.

Useful outcome indicators should reflect the most important outcomes, usually achieved by means of the most significant proportion of the allocated financial resources. In the cases where programmes only marginally contribute to social inclusion, and this contribution is spread over several vulnerable groups, it is practically impossible to measure/monitor any specific effect on Roma inclusion. The division of monitored indicators according to the individual target groups was complicated by the fact that in some of the recipient countries (in particular Romania, but also to some extent Bulgaria, the Czech Republic and Slovakia), there are legal complications related to collecting indicators disaggregated by ethnicity.

In most cases the indicators labelled as outcome indicators were what would usually be considered indicators of output (immediate benefits directly delivered in a project, such as number of children enrolled, number of new exhibitions of contemporary art, or number of information events carried out) rather than outcome (measurable change concerning the target group, such as change in behaviour or attitudes, usually visible only after project completion). The only exceptions we encountered were outcome indicators in SK04 and partly also CZ05 in PA12. Moreover, the CZ05 Programme was the only programme clearly targeted at social inclusion issues and addressing the groups vulnerable to social and economic exclusion, which is predominantly the Roma minority.

Standard Indicators are not used regularly, but provide the tools to monitor outputs and enable the consolidation of data. Where possible, they should be applied to demonstrate the scope of an intervention in simple figures (e.g. number of NGOs supported to promote democratic values).

Output target indicators set at programme level for Roma-relevant programmes fall into two groups:
1. Exclusive, explicit, specific - indicators exclusively targeting Roma
2. Explicit or non-explicit, non-exclusive, non-specific - indicators targeting Roma as part of more broadly defined vulnerable groups

The first group of indicators – those targeting Roma explicitly and specifically – consists of two types: indicators that count individual beneficiaries and indicators counting other outputs such as projects, research outputs, training, specialists trained, etc. see Table 5 and Table 6.

Table 5   Examples of output indicators exclusively, explicitly and specifically counting individual Roma beneficiaries

Programme/programme area	Type of indicator	Indicator description
CZ03 Funds for Non-governmental Organisations PA1010 - Empowerment of vulnerable groups	Output	Number of Roma children and youth included
RO23 Correctional Services, Including Non-Custodial Sanctions PA3202 - Increased application of alternatives to prison	Output	Number of Roma offenders mentored

Table 6   Examples of output indicators exclusively, explicitly and specifically counting Roma inclusion-related outputs other than individual beneficiaries

Programme/programme area	Type of indicator	Indicator description
BG08 Cultural heritage and Contemporary Arts PA1701 - Contemporary art and culture presented and reaching a broader audience	Output	Number of Roma oriented new exhibitions and/or events of contemporary art
CZ14 Schengen Cooperation and Combating Cross-border and Organised Crime, including Trafficking and Itinerant Criminal Groups PA3003 - Improved capacity to prevent and combat cross-border and organised crime, including trafficking in human beings and itinerant criminal groups	Output	Number of senior police management trained on how to improve the relationship between the police and the Roma communities.

The second group is more common – these are indicators mentioning vulnerable groups (sometimes explicitly listing Roma among them) but not containing a specific Roma target or exclusively targeting Roma - see Table 7.

Table 7   Examples of output indicators, which include Roma but not exclusively and specifically

Programme/programme area	Type of indicator	Indicator description
BG07 Public Health Initiatives PA2706 - Improved access to and quality of health services including reproductive and preventive child health care	Not specified	Number of children aged 0-3 years from vulnerable groups who are not fully vaccinated according to the national immunisation schedule
BG14 Judicial Capacity-building and Cooperation/Improvement of the efficiency of justice PA3101 - Improved access to justice, including for vulnerable persons (e.g. victims, minors, minorities)	Output	Number of individuals benefiting from free legal advice (including Roma)
RO24 Judicial Capacity-building and Cooperation PA3101 - Improved access to justice, including for vulnerable persons (e.g. victims, minors, minorities)	Output	Number of individuals benefitting from free legal advice (including Roma)
SK10 Funds for Non-governmental Organisations - Active citizenship and inclusion PA1001 - Active citizenship fostered	Outcome	Number of people from vulnerable groups (e.g. people in poverty, people from rural areas, socially excluded people, Roma, disadvantaged youth etc.) benefiting from improved access to work opportunities and from social inclusion
SK10 Funds for Non-governmental Organisations - Active citizenship and inclusion PA1001 - Active citizenship fostered	Output	Number of measures contributing to social inclusion of vulnerable groups

2.7.3. Ethnic targeting and data collection

While the explicit, exclusive and Roma-specific indicators are the most direct way to measure how programmes are reaching Roma beneficiaries, they are not suitable for many programmes due to national sensitivities regarding collecting ethnically identifiable data.

For some countries, notably Bulgaria, Romania and increasingly Slovakia, the explicit focus on Roma is viewed by national stakeholders as potentially discriminatory. A lot of Romanian POs have expressed misgivings about the legality of targeting only Roma without targeting other vulnerable populations in view of Romanian anti-discrimination legislation. The collection of ethnically disaggregated data by public institutions is also seen as illegal, in particular by Romanian officials interviewed. As noted in '*No Data, No Progress*', a 2010 Open Society Foundations publication, there are specific legal provisions in Romania prohibiting ethnic data collection with a few exceptions. Public institutions often interpret it as completely banning collection of ethnic data and completely avoid gathering any ethnic data.[19]

---

[19] McDonald and Negrin, 2010, p. 61.

The FMO maintains that in most countries this issue can be overcome within the existing legal frameworks if there is sufficient political will, and there are examples in practice (see below) where ethnically disaggregated data are collected.

Often, if indicators specify Roma, they do not specify how to determine unequivocally who to count as Roma, Roma NGO, etc. Current practices on identifying Roma in some projects is problematic – in one Romanian pre-school project, parents are asked to sign a declaration that they are Roma. In other contexts, particularly where inter-ethnic relations are tense, people would be likely to refuse such declarations (see REF 2013). In another Romanian programme, the plan is to assign expenditure to count towards the country target based on the proportion of Roma among beneficiaries. These types of indicators are very hard to verify to any reasonable standard – it is not within the normal terms of reference of a Monitoring Agent or Evaluator to follow up on who has declared themselves a Roma. We provide further discussion and recommendations on this issue in the Section 4.2.4.

In some projects this is addressed by territorial targeting – implementing projects in area with high proportions of Roma. For Measures in a few programmes such as BG06 and RO10, focusing on Children and Youth at Risk, this was used as an eligibility criterion. When such territorial targeting combines with targeting of vulnerable groups, there is high likelihood projects can be targeted at Roma without making the targeting exclusive.

2.7.4. Policy markers

One of the ambitions at the level of the Financial Mechanism is to consolidate information on Roma inclusion across the countries and programmes. The use of **policy markers** designed to identify programme outcomes and projects that contribute to politically important issues to the donors allows consolidation of allocation information. Data can be consolidated for projects, which contain the policy marker Roma as significant or fundamental issue (see Box 3). The FMO was at the time of this study working through the identified **policy markers** to audit and clarify them to allow consolidation and reporting for these country-level targets. Even when this is successfully carried out, information on financial allocations to projects or programmes marked with the Policy marker is only a crude indicator of contribution to Roma inclusion. Potential future impact may not be directly proportional to allocation for such broadly defined efforts, even when they have some degree of relevance to Roma inclusion.

Box 3.   Policy markers
Project level:
Code 1 - Significant Issue: when Roma inclusion is significant, but not among the principal justifications for the project.
Code 2 - Fundamental Issue: when Roma Inclusion is identified as being fundamental in the design and impact of the project, and is an explicit justification for the project."

Programme level:
Code 1 - Significant issue: Programme outcome documentation upholds that issues related to Roma will likely be improved as a result of the programme.
Code 2 - Fundamental issue: Programme documentation states explicitly that an unfavourable situation concerning Roma is a reason for proposing the programme outcome.

Our proposal to address this based on discussion with the FMO and developed in Chapter 6 relies on working with the emerging EU Fundamental Rights Agency **Structure – Process – Outcomes** (S-P-O) **framework** (see 4.1.2) to allow the identification of the portion of funding within the mechanism and within specific programme that goes towards processes identified in the National Roma Integration Strategies. When combined with tracking of funding of innovative or pilot interventions (which, by definition, may not yet be included in the NRIS and thus the country's S-P-O framework), this should allow input targeting as used now, while increasing the likelihood that the outputs provided are meaningful contributions to Roma inclusion, empowerment or other related objectives.

2.7.5. Review of indicators by Programme Area

PA10 - Funds for NGOs

This Programme Area is the most diverse in terms of activities and target groups. In most cases the proportion of projects devoted to Roma is negligible.

The most frequent indicator used is the Standard Indicator "*Number of NGOs promoting democratic values, including human rights*", which is essentially an input indicator (the number of NGOs receiving support does not say anything about the number of individual beneficiaries that might be affected by the activities or the effects on these beneficiaries).

Other similar indicators specify the number of projects focused on Roma communities (for example, "*Minimum number of projects targeting Roma communities*" in BG05, and "*Number of leisure and educational activities organised where Roma children and youth are included*" in CZ03).

A good example of an output indicator would be the one used in HU05: "*Number of people from vulnerable groups (e.g. Roma, people with disabilities; disadvantaged youth etc.) benefiting from improved access to social services, disaggregated by gender*" if the data for it could be collected at a disaggregated level, not only by gender but also by the groups listed. As it stands, the indicator aggregates all of the above groups in one figure. The same applies to other similar output indicators, where disaggregation should not be a problem in relation to ethnicity, since the unit is number of projects focusing on Roma (e.g. "*Numbers of NGOs*

whose work is focused on minority groups. e.g. minority ethnic groups including Roma people, refugees and asylum seekers; women and gay and lesbian groups" in RO09).

If the FMO requires special emphasis on a particular group, it could break these indicators down by group *ex ante*. Otherwise, there is the theoretical possibility that the number of projects required by the indicator would be met while none focussed on Roma.

PA11 - Children and youth at risk

The programmes implemented within this Programme Area are quite diverse. The outcome indicators also differ due to the various activities and target groups (e.g. vulnerable groups of children).

The HU06 Programme is the most focused on Roma inclusion. The outcome indicator however does not measure change. A very good and specific output indicator is used in BG06: "*Number of Roma and under-privileged children aged 5 enrolled each year in municipal kindergartens in the country*". If a similar activity (support to enrolment) is used in other countries, this would be a good indicator to use and aggregate (it would probably need to be made less specific in terms of age, due to differences in school systems).

PA12 - Local and regional initiatives to reduce national inequalities and to promote social inclusion

This area should cover the most relevant interventions. The Czech and Slovak Programmes deal with activities against racism and hate violence, which do not concern only Roma. The RO10 Programme has a clear focus on Roma inclusion, and addresses the most important aspects of inclusion, but the determined outcome indicator is not relevant and measures numerous diverse outputs in one figure.

Three relevant programmes contain a reference from the MoU addressing the needs of Roma. Roma-specific indicators are only used in RO10, where the output indicator "*Out of which, representatives of local or county authorities from areas/ localities with a high percentage of Roma*" is used. This is an indicator that side-steps the sensitivities around identifying ethnicity.

The outcome indicator "*Attitudes towards ethnic minorities, including Roma (survey)*" proposed in the SK05 Programme is the only relevant indicator measuring actual programme achievement. Provided that it can distinguish explicitly the attitude towards Roma in separate questions in the survey, it will be sufficiently specific. It lacks however a defined target level – under what conditions do we consider the outcome satisfactory? Also, it is to be collected by Project Promoters, and it is not clear whether they have the methodological capacity for such a task.

PA13, PA27 - Public health

The programmes address different issues, such as reproductive services, mental health or primary health care for children, youth or other vulnerable groups. The outcome indicators

are either missing or not adequate. Roma are often the target group or the Policy Marker for Significant or Fundamental issue is used.

PA16, PA17 - Cultural heritage and Cultural diversity

Several output indicators used in this Programme Area combine Roma with other minorities. Since they refer to numbers of exhibitions, etc., it would be easy to disaggregate these by ethnic group and again aggregate across programmes (e.g. total number of events/projects/exhibitions focusing on Roma supported activities).

The Roma Inclusion Plan for BG 08 develops a more detailed set of indicators, which are suitable to track specific activities. They include indicators of the number of Roma working in certain projects, the number of Roma cultural objects digitalised, and even the number of Roma attending certain exhibitions. These are suitable if there is capacity for detailed communication at programme level, but they would be too detailed to scale up across many programmes.

PA19 - Scholarships

The programmes in this area are struggling with the condition that 10 % of the total budget should be allocated to Roma interventions. The nature of the programmes is very specific and contains activities where the Roma may have an absorption problem.

While not listed among indicators, the number of Roma receiving scholarships in the BG09 and RO15 Scholarship programmes is actually measured by self-identified ethnicity in applications, and this is a good indicator.

PA28, PA29 - Mainstreaming Gender Equality and Promoting Work-Life Balance, and Domestic and gender-based violence

The focus of the interventions is narrower, but it involves very small proportion of Roma minority. The outcome indicators are not relevant and indicate outputs. One example is BG12 "*Number of information activities carried out in areas predominantly populated by Roma population*" – this is a suitable output indicator (with the possible caveat that holding an event in an area with a lot of Roma may not guarantee Roma will attend, so a good additional indicator might be the specific number of attendees).

A seemingly good outcome indicator is formulated for the programme RO20 – "*Number of vulnerable communities (including Roma) aware of dangers related to forced begging*", but there is very likely to be the issue of measurability. In order to measure whether a certain community is aware of something, a survey methodology is required with a definition of awareness. A more realistic indicator would be an output indicator based on the number of events held, and outcome could possibly be measured by the number of attendees, or their responses to a post-event survey.

PA30 - Schengen cooperation

The programmes implemented in this area concentrate on the training of police officers working in a multi-ethnic environment, which is mainly in Roma communities. The direct contribution of these activities to Roma inclusion is therefore not very significant. The outcome indicators are not relevant, but sensible output indicators are used, measuring the numbers of officers trained in specific areas. If a similar activity is carried out across programmes, it would be possible to formulate a more general indicator (that would include the different categories used here – police specialists, police minority liaison officers, senior police management, police officers), which could then be aggregated across programmes.

PA31 - Judicial capacity building

A partial aim of projects is to improve the access of Roma and other vulnerable groups to justice. The outcome indicator for BG14 "*Cases granted legal aid per 100 000 inhabitants*" is relevant but not Roma specific, unless it is clear that vulnerable groups are solely Roma citizens. Output indicators in BG14 and RO24 on numbers of individuals benefitting from free legal advice including Roma are meaningless, unless they are broken down by ethnicity. This is not likely to be feasible, so more appropriate indicators would be based on numbers of centres established or events held in predominantly Roma areas, etc.

PA32 - Correctional services

This area assumes that large proportion of ex-offenders and prisoners are Roma. The main activities are focused on solutions to prison overcrowding and training of staff in prisons or probation officers. The stated indicators are not relevant to Roma inclusion, and again reflect outputs not outcomes. However, in RO23 there are two output indicators specifically targeting Roma – "*Number of Roma offenders mentored*" and "*Number of young and adult offenders of Roma origin made subject of community based programmes as an alternative to prison during the funding period*".

The second part of this recommendation in the 2013 Roma Inclusion Study focuses on the **need to provide support to POs and NFPs in monitoring and evaluating** (M&E) their programmes. In this regard the feedback we received from interviews shows that these national actors feel they would benefit from additional support. Several cited the need for clear M&E manuals or other support for POs.[20]

There has been strong emphasis by EU institutions on inclusion of Roma within the Structural Funds, work of the EU Fundamental Rights Agency, activities within Decade of Roma Inclusion as well as involvement of UNDP, World Bank and other international actors. As a result, the framework on reporting on Roma inclusion has evolved rapidly over the past 10 or so years and there have been active discussions as recently as in the past few months in connection with programming EU funds addressing Roma inclusion in the 2014-2020 programming

---

[20] Specifically, requests for clear guidance or training were made in several interviews with Slovak and Czech POs, in Romania, in the case of new POs for RO12 and RO13, and also in the case of RO11, where the PO suggested as potentially useful the preparation of an "Implementation Manual" dedicated to those grants (similar to those available in ESF programmes), which could also include guidelines on dealing with Roma inclusion aspects in all projects.

period. Respondents said any additional requirements in terms of reporting would not be feasible from their perspective.

3.   CONCLUSIONS FROM REVIEW OF CURRENT PROGRAMMES

Conclusion 1 – There was limited early evidence that *EEA & Norway Grants have achieved change in the area of Roma inclusion* in the present funding period, notably the significant increase in the number of Roma NGOs that applied and were successful in winning grants, **mostly under NGO programmes,** in each of the five focus countries in comparison to the previous period, although the numbers for the present period are not yet complete (2.4.3). This increase was to be expected given the change in emphasis on Roma inclusion. There was no explicit donor target for the number of participating Roma NGOs, but the present period could serve as baseline if the donors wish to further increase this number in future programming. If guidance was provided on what is to be considered a Roma NGO, reporting on this indicator could be improved even in the present period.

Other evidence for the positive effect of the focus on Roma inclusion in EEA & Norway Grants was the formation of high quality local partnerships (2.4.4) in a number of larger projects in Bulgaria and Romania, and the mainstreaming of Roma inclusion concerns for example in the Czech Republic, where there was a project on police officers working with Roma, which a topic of significant importance in line with the National Roma Integration Strategy (2.5).

The pressure to consult stakeholders, hold discussions or develop Roma Inclusion Plans has meant that officials had to think in a structured way about how Roma inclusion fits with their overall activities. This has led for example to improved Bulgarian and Romanian Roma Inclusion Plans, where such analysis is presented, and increased awareness of Roma inclusion in several PO institutions in Romania. In some countries there were visible contributions to building Roma inclusion capacity through the involvement of the Royal Norwegian Embassies and Norwegian and international Donor Programme Partners.

Conclusion 2 – For *existing quantitative indicators*, the *scope for improvement is limited*. This is due to the advanced state of progress in the implementation of the EEA & Norway Grant programmes and the limited capacity of stakeholders to make changes to the arrangements to collect data.

In most cases, the quantitative indicators at programme level labelled as outcome indicators were actually indicators of output (immediate benefits directly delivered in a project, such as number of children enrolled, number of new exhibitions of contemporary art, or number of information events carried out) rather than outcome (measurable change concerning the target group, such as change in behaviour or attitudes, usually visible only after project completion). The only exceptions were outcome indicators in SK04 and CZ05 (2.7.2).

Where indicators cover several vulnerable groups jointly, it is difficult to extract information about Roma beneficiaries separately.

Conclusion 3 – Roma Inclusion Plans are well-developed and useful instruments, offering benefits beyond their original purpose. The Guidance Notes for these have only minor shortcomings, and the greater challenge is for POs to develop good-quality plans complying with the guidance. Programmes in countries without numeric targets lack such a programme-level instrument for programmes with a Roma inclusion concern.

Conclusion 4 – In all the focus countries, existing mechanisms for **national-level dialogue** on Roma inclusion do not appear to be sufficient in terms of frequency and depth to meet the needs of national authorities for feedback and achieving a common understanding. In addition to the annual meetings, the Roma inclusion focus would benefit from additional actions to support and coordinate Roma inclusion across programmes (2.2.1).

Conclusion 5 – EEA & Norway Grants are **suitable for innovative interventions** in the area of Roma inclusion and empowerment, due to their flexibility and limited administrative requirements (in contrast to national budgets or EU funds). Where innovation or piloting serves as justification for a programme or project, it is important to evaluate the success of the project and to provide richer information should the project be scaled up or some of its elements mainstreamed in the future. This requires an understanding of the potential channels for scaling up or replication (e.g. which ministry is responsible for legislation in the area, who are the key national stakeholders active in the area) and an outreach strategy or direct communication with stakeholders who could play a role in later follow up efforts.

4. LITERATURE REVIEW OF APPROACHES TO MEASURING PROGRESS

In this section we review existing qualitative and quantitative approaches to measuring change and setting baselines, and analyse below the pros and cons of these, addressing the key questions raised in the ToR.

> **Key questions from the ToR**
> * What are the possibilities for capturing progress in a more qualitative way?
> * What are the pros and cons with these?
> * Which ones would be more relevant for the EEA and Norway Grants?
> * How can we improve the existing quantitative indicators?

Monitoring of Roma inclusion is a rapidly evolving field. There is a complex matrix of approaches at national level, intense work at the EU level, and work at the UNDP and the World Bank. A host of other institutions have potentially relevant experience. At the request of the FMO we have looked at how methods and indicators used in other studies are equipped to provide Grant-level progress in specific programme areas. This chapter is divided into three areas: practices of other institutions (4.1), a qualitative approach to data collection (4.2), and available sources of information for setting baselines (4.3).

4.1. Practice of other institutions

4.1.1. European Structural and Investment Funds

We have reviewed both a number of past programmes specifically relevant to the area of Roma inclusion, and the monitoring and evaluation (M&E) arrangement for the European Social Fund in the current programming period. With regard to ESIF, the common elements of the M&E system are procedures and methods, rather than content (concrete indicators and targets in concrete fields such as Roma inclusion). This gives an example how another large donor, the EU, defines its role in relation to national authorities and is of particular interest with respect to the selection of indicators for monitoring. Unlike the present EEA & Norway Grants, the EU in the new ESIF period only monitors up to the level of outputs, leaving the measurement of outcomes entirely to the evaluation stage.

Past Experience

The EU, as the largest donor in the area of Roma inclusion, has supported measures in this area aimed at improving statistical data collection, research, and M&E. The European Parliament has initiated several Roma pilot projects, one of which – implemented between 2010 and 2012 under the name "Pan-European Coordination of Roma Integration Methods - Roma Inclusion" – had a large M&E component involving the EU Fundamental Rights Agency, the UNDP, and the World Bank.[21]

The EU pilot helped fund a UNDP/WB/EU household survey in 11 countries, which has served as a key input into policy making. Importantly, the survey's results are only representative at national level (as they cover usually a sample of 750 Roma households and 350 non-Roma living in their vicinity). The sample is representative of those communities where the proportion of Roma is higher than the average (national proportion of Roma), which will cover most of the Roma population.[22]

The survey is a good instrument for understanding the various issues facing Roma, but it cannot be used to set baselines at levels other than at the national level. Under 2014-2020 EU funds, there is an expectation of further household surveys to be carried out and other types of research. The surveys are expected to be mainly representative at national levels so their results will be of limited direct relevance to EEA & Norway Grants in terms of providing baseline data. Most grant-funded efforts target a specific geographic area.

M&E for the 2014-2020 Programming Period[23]

For the ESF, the M&E focus for the upcoming period is on gathering data that can be aggregated. This is of interest with respect to the needs of the FMO to report to Donors on results of Roma inclusion and empowerment across countries at an aggregated level.

---

[21] http://ec.europa.eu/regional_policy/archive/themes/roma/about_en.cfm?nmenu=2.

[22] For example in Romania this is representative of 89% of the population.

[23] Information in this section is based on European Commission (2014), Programming Period 2014-2020, Monitoring and Evaluation of European Cohesion Policy European Social Fund, Guidance document.

The EC intends with the ESF to move from the earlier predominant focus on the absorption of funding to more clearly articulated policy objectives. It also intends to separate out more clearly monitoring tasks from evaluation tasks. In evaluation the focus should be on more methodological rigour in demonstrating the effects of interventions. For EEA & Norway Grants, where the scale is smaller and more innovative interventions are supported, a focus of evaluation to demonstrate effects rigorously is not feasible – in most cases a meaningful focus will be on accountability and learning (see Recommendation 5 – Focus evaluation on innovative and significant projects).

Monitoring

Monitoring is defined as "*a continuous and systematic process of generating quantitative and - if relevant - qualitative information on implementation …* [and] *discussing these data sets in the monitoring committee*".[24]

The purpose of monitoring is to detect and quantify deviations from initial plans and targets, and as such it requires regular entry of data into a system (rather than just at the end of the year or end of an intervention).

Three types of **indicators** are used for monitoring:
- Financial;
- Output – what is directly produced or supplied by an intervention at the level of supported people, entities, goods or services delivered;
- Result – captures changes in the situation of supported entities or participants such as their employment situation.

The focus of result indicators is on results in entities directly benefitting from support. Result indicators are further subdivided into **immediate result indicators** – at the end of participation in the intervention – and **longer-term result indicators** – at a certain time after the end of intervention (usually several years). These are to be reported only on a representative sample of participants.

Importantly, the EU has **given up on requiring impact indicators in the monitoring process** in terms of effects on broader groups beyond direct participants, citing difficulties in collecting good quality and timely data. This data is more appropriately collected through evaluations.

For **output indicators**, some data are collected on all participants. This is noted as non-sensitive data (e.g. dimensions of gender, employment status, age). Some data on being disadvantaged – including the category "migrants, people with a foreign background, minorities (including marginalised communities such as the Roma) – is considered sensitive and its collection is not required. However, Managing Authorities are required to be able to demonstrate through evidence that a participant fulfils the criteria for the given intervention. This is possibly a model to be followed for EEA & Norway Grants where the problem of identifying participants as Roma has arisen due to concerns for individual privacy and legal concerns. The ESF model described leaves the method of determining eligibility at the

---

[24] EC, 2014, p. 6.

programme level, while requiring that it be verifiable – that the authorities be able to show evidence of eligibility for the individual, if asked.

The EC provides a set of common indicators in line with its objectives, which then allows aggregation at country and EU level. In addition, Operating Programmes may use programme-specific indicators to draw attention in monitoring to particular issues, but emphasis is placed on having **clear and easy to understand definitions**.

Targets, baselines and milestones are set cumulatively at programme level. Importantly, for indicators which represent the main outputs linked to a target, other specific indicators may be used to track progress on certain issues without a specific target.

Baselines for output indicators are by definition set to zero. For results, emphasis is on setting baselines according to available data from previous similar interventions. Only as an exception should zero be used as a results baseline.

In addition, **milestones** are set in the course of the programming period for result targets – these are intermediate targets to make sure implementation is on track towards the final targets. Milestones present intermediate values for indicators, for which target values have been set at the level of programme priorities. For the seven year programming period, milestones are set after the mid-point – for the end of 2018 (to be assessed in 2019). For most programmes, meeting of milestones is a conditionality for releasing a portion of further funding, the so-called **performance reserve** set at around 6% of total allocation.

Evaluation
Evaluations should focus on three standard criteria: effectiveness, efficiency and impact. Arrangements should be put in place to ensure access to data for these.
Evaluations are to take place *ex ante* (before approval), during the programming period (implementation evaluations, impact evaluations). *Ex post* evaluation is planned at the level of the whole fund.

Lessons for EEA & Norway Grants
We have reviewed the above framework in some detail here, not because it would be suitable as a direct model for EEA & Norway Grants for Roma inclusion issues, but we wanted to draw attention to the changes in the EU Funds compared to the M&E framework in place in the previous programming period – focus on counting individual beneficiaries and measuring outputs and results of interventions on participating individuals and entities, but relegating measurement of impact to evaluation, including the use of sampling of beneficiaries.

Of further interest is the treatment of sensitive individual data, including data on ethnicity, where determining eligibility to participate in an intervention is up to the Managing Authority (i.e. at programme level) but the Authority then has to be able to prove in each case the individual is eligible, if asked.

4.1.2. *Fundamental Rights Agency – Structure – Process – Outcomes Framework for the Monitoring of National Roma Integration Strategies*

The above described approach of the EU that focuses on procedures and methods creates the need for an additional element that deals with content: that is concrete indicators e.g. for Roma inclusion. This need has been addressed by the EU Fundamental Rights Agency (FRA).

The **Structure – Process – Outcomes** framework was developed by a working group led by FRA, and is based on an approach championed by the UN High Commissioner for Human Rights.[25] Rather than focus on progress in relation to specific goals (e.g. Europe 2020) the framework focuses on progress towards achieving what are referred to as fundamental rights. This framework is particularly relevant to the EEA & Norway Grants since it connects institutions across the EU working on Roma inclusion. It provides early information on planned interventions as well as data gathering activities, which can help in planning EEA & Norway Grant interventions, including in the area of measuring change.

The aim of the S-P-O framework goes beyond measuring progress towards a limited number of "official" EU targets, such as those defined for the EU2020 (of which those relevant to Roma inclusion would be the 75 % employment rate, the 10 % school drop-out rate, the 40 % tertiary school completion rate, and the 20 million people poverty reduction target)[26] - the goal is to measure progress in many dimensions where, at least in some of the member states, currently there is a gap between the Roma population and the general population.

For each of these dimensions, the framework defines right holders (people) and duty bearers (states). Duty bearers have to put in place specific **Structures** (legal tools and regulations) and **Processes** (e.g. measures to support school completion). This is the mechanism by which right holders should be able to achieve specific **Outcomes** (e.g. school completion rate). The three key elements explain why the framework is called Structure – Process – Outcome (S-P-O) framework. While Structure and Process indicators are typically "yes" or "no", Outcome indicators are typically numerical (e.g. percentage).

The framework defines indicators in five chapters: the four thematic fields defined for national Roma integration strategies, and a horizontal chapter. The horizontal chapter includes eight **Process** indicators, including M&E:

№ 1-2)   Is the NRIS monitored and evaluated?
№ 3-4)   Are baselines and targets set by the NRIS?
№ 5)   Are data regularly collected?
№ 6-7)   Are indicators and other methods of empirical social research regularly used for M&E?
№ 8)   Is FRA supporting M&E?

---

[25]   The FMO is part of the FRA Working Group and has specifically requested a focus on its work for this study due to the fact that most of the beneficiary states of the Grants are actively engaged in the FRA voluntary Working Group on Roma Inclusion Indicators and make commitments in this framework.

[26]   http://ec.europa.eu/europe2020/targets/eu-targets/index_en.htm.

One possible risk of reliance on this framework for the purposes of EEA & Norway Grants is that the Process elements listed are generally limited to specific measures outlined in the Council Recommendation on Effective Roma Integration Strategies from December 2013, or those additional measures identified by the respective national governments in their S-P-O frameworks.

In addition to the measures proposed by the Council Recommendation, each country can list its specific Process elements (activities, interventions, etc.) to report on. The FRA has compiled a template, which it is now be piloted in cooperation with two EU member states (Czech Republic and Slovakia).

It is possible that untested approaches will not be part of this template, composed of Processes in the Council Recommendation and in National Roma Integration Strategies, which has implications for connecting the reporting on EEA & Norway Grant funded interventions to the framework.

Lessons for EEA & Norway Grants

Once fully developed, each country's S-P-O framework will contain information on the financial resources devoted to the processes listed. The S-P-O monitoring framework could therefore provide a valuable indicator for the present programming period of EEA & Norway Grants by allowing it to identify what percentage of its funding contributes to the systematically identified national priorities on Roma inclusion, and perhaps even more tellingly, **what is the share of the EEA & Norway contribution on overall spending on Roma inclusion in the given beneficiary country**.

The indicators can be reported annually in collaboration by the NFPs with the NRIS contact points. This would require that each Roma-relevant project is identified as corresponding to one of the Processes listed in the country's framework. We provide a fully developed example of application of this framework to a list of EEA & Norway Grants-funded projects in Romania (as of September 2014) in Annex 6.

Because Romania has not yet developed an S-P-O framework, we were only able to identify (based on project descriptions) what portion of EEA & Norway Grants funding contributes to measures outlined in the Council Recommendation on Effective Roma Integration Strategies from December 2013.

Once the S-P-O frameworks are developed, the second proposed indicator can be measured – FMO can show the extent of EEA & Norway Grant-funded interventions' contribution to overall spending on Roma inclusion in the given beneficiary country.

For the purposes of monitoring EEA & Norway Grants, this framework could then be amended to allow the inclusion of measures that are proposed by Programme Operators and Project Promoters as promising innovations in addition to measures funded, which were already part of the S-P-O framework as set up by the beneficiary country's government.

Ideally, these could be included directly as additional Processes in the beneficiary country's S-P-O framework. This would require direct coordination with the respective NRIS contact points.

In order for this to be effective a process should be put in place to track pilot initiatives, evaluate their effectiveness, and design a follow-up/scale-up already in planning and during implementation.

For the future, the existence of relevant Structures and Processes could also be required as **ex ante** **conditionality** for the use of EEA & Norway Grants (especially in the fields of education, employment, health care or housing, but also horizontally), as these are needed for effective use of the grants.

Regarding programme areas, PA 11 '*Children and youth at risk*', PA 12 '*Local and regional initiatives to reduce national inequalities and to promote social inclusion*', and PA 13 / 27 '*Public health*' can be relevant, while e.g. PA 10 '*Funds for NGOs*', PA 16 '*Cultural heritage*', and PA 17 '*Cultural diversity*' are less likely to be well covered by Processes included in standard S-P-O frameworks..

4.1.3. Roma Education Fund

Two specific practices in monitoring and evaluating interventions implemented under the Roma Education Fund will be reviewed here as potentially useful models. The Roma Education Fund has an extensive field presence in Romania, where it implements programmes funded by a number of donors and cooperates directly with EEA & Norway Grants (in one of the projects within RO25)[27] so its expertise is accessible.

The Roma Education Fund (REF) both funds and implements interventions with the objective of reducing the gap between Roma and non-Roma in the area of education. These interventions take place on different scales – from national-level policy work to interventions focused on single communities or schools.

The Roma Education Fund collects information on the individual beneficiaries of its projects, sorted into categories reflecting its different areas of intervention.

Box 4.   Output indicators used to report on grants by the Roma Education Fund
• Participation in pre-school education (individual beneficiaries);
• Prevention of early school leaving (individual beneficiaries);
• Completion of upper secondary education (individual beneficiaries);
• Participation in tertiary education (individual beneficiaries);
• Parental participation in children's education (individual beneficiaries);
• Parents' participation in toy library (individual beneficiaries);
• Desegregation (individual beneficiaries);
• Prevention/reversal of enrolment in special education (individual beneficiaries);
• In-service teacher training (individual beneficiaries);

---

[27] This project is not analysed in detail here since country research for this study was carried out before it had been launched.

- Roma employed by REF-funded projects (individual beneficiaries).

Another potentially relevant experience comes from the EU Roma pilot 'A Good Start'. Within this pilot intervention carried out in 16 municipalities in four countries (Hungary, the former Yugoslav Republic of Macedonia, Romania and Slovakia) in 2010-2012, the Roma Education Fund implemented a household survey of some of its beneficiaries both to establish a baseline at the beginning of the project and again at the end of the project (Roma Education Fund, 2012).

The surveys collected both descriptive information on beneficiary household and information on parental attitudes. Parts of the survey designed with the assistance of the World Bank and the UNDP were identical to the UNDP/WB/EU Roma Survey from 2011, which allowed the comparison of beneficiaries with a representative sample of Roma in the four countries. This allowed analysis of possible scale-up of these activities by showing to what extent the beneficiaries are similar or dissimilar with other Roma.

A local survey can be very costly but in the case of 'A Good Start', the survey was implemented by trained local Roma NGO activists. This reduced the validity of the data but provided for capacity building of local NGOs and improved their knowledge of their beneficiaries.

Working with the World Bank and Jameel Poverty Action Lab, the Roma Education Fund is also implementing two experimental evaluations of Roma early childhood education interventions (one in Romania, which started in 2014, and one in Slovakia, finishing in 2015). The expectation is that the evidence coming from these evaluations could significantly improve the chances of financing interventions that prove effective from public budgets and EU funds.

Lessons for EEA & Norway Grants
In the present programme period of EEA & Norway Grants, the interventions in projects vary broadly. For some programme areas it would be possible to compile a list of types of beneficiaries – for the present application to Roma inclusion, however, the issue remains of providing guidance on what is a satisfactory method (country by country) of counting who is a Roma beneficiary.

The application of a beneficiary survey is another interesting idea applicable in situations where the donors wish to gather stronger evidence about the effectiveness of an intervention. This has several requirements:
- a well-designed intervention with clear objectives, which can be measured by means of a survey,
- a strong implementer capable of administering the survey or an outside partner, who can administer the survey,
- financial resources and expert capacity for survey design and analysis of results.

In a RO21 Pre-Defined Project focused specifically on victimisation in the Roma community a survey was planned at the beginning of the project. Depending on the exact methodology and quality of results, it may be possible to do a follow up survey on the same sample and measure change in beneficiary attitudes and outcomes.

Regarding Programme Areas, lessons may also be directly relevant for PA11 '*Children and youth at risk*' and possibly also PA12 '*Local and regional initiatives to reduce national inequalities and to promote social inclusion*'.

4.1.4. Summary of other potentially interesting approaches

Community Based Monitoring

Dimitrov and Milosheva-Krushe (2012) study on Monitoring of Roma Integration Policies reviews a number of monitoring practices and their advantages, challenges and success factors. The focus is on the emerging practice of community-based monitoring piloted by three NGOs, one in Bulgaria, one in the Former Yugoslav Republic of Macedonia and one in Romania.

The practice involves community members in overseeing the implementation of interventions to **increase accountability and quality of public services**.[28] The process starts with mobilising the community to share requests, proposals, criticisms and information on the intervention.

The pilot methodology was supported by the Open Society Foundation's Public Health Programme / Roma Health Project.

The study notes the importance of involvement of **experienced Roma NGOs** that can bridge local and national levels and mobilisation of broad local coalitions.

Lessons for EEA & Norway Grants
This approach would be potentially useful for EEA & Norway Grants both for larger individual community interventions, and where similar interventions cover larger numbers of geographic units. Community-based monitoring for individual interventions can benefit the quality of the intervention itself by allowing the target group to provide ongoing feedback to help steer the intervention.

Community based monitoring may be most relevant where activities are **soft** and therefore quality is key (e.g. training for employability rather than employment itself, or capacity building), or where the activities should **improve the quality of a public service for the community**.

Regarding programme areas, lessons may be directly relevant for some interventions in PA 11 '*Children and youth at risk*' and PA 13 / 27 '*Public health initiatives*'.

---

[28] This is not the same practice as "community-level monitoring" using community focal points discussed below in connection with the SocioRoMap project funded under the programme RO 25 – the difference is in whether the monitoring is done by a (local) monitoring agent such as an NGO/NGO staff member or the broad community is involved in monitoring. Of course, these approaches can be combined.

Most Significant Change Technique

A participative evaluation method designed to identify project impact in complex interventions is described by Davies and Dart (2005). The key to the technique is that researchers systematically seek out **stories from individuals** affected by a project on **changes that they attribute to the intervention**. The MSC method has been used in complex interventions around the world.

The technique is useful to identify unexpected changes, is participative, can help in building capacity and is good for monitoring and evaluating initiatives that do not have appropriate predefined outcome.

Lessons for EEA & Norway Grants
Where EEA & Norway Grants interventions are part of a larger set of overlapping interventions by public authorities and/or other donors, this technique may be suitable to understand complex effects and learn for the benefit of formulating future interventions.

It is also suitable for evaluating larger-scale innovative interventions, where there are effects beyond those planned.

Network of Monitors Used to Collect Data

This is an approach implemented in several interventions including the RO25-funded project SocioRoMap,[29] which intends to introduce **community-level monitoring of changes** with regard to Roma integration.

Similar activities were also tested in a UNDP project in Bosnia in the form of using local activists equipped with mobile internet connected tablet computers as monitoring agents to monitor changes in local sentiment over time.

Lessons for EEA & Norway Grants
This approach is suitable for interventions involving multiple municipalities. A network of local activists with knowledge of their communities and access to local stakeholders can be used as monitoring agents, reporting regularly on both quantitative and qualitative data.

Regarding programme areas, lessons may be directly relevant for PA 11 '*Children and youth at risk*', PA 12 '*Local and regional initiatives to reduce national inequalities and to promote social inclusion*', and PA 13 / 27 '*Public health initiatives*'.

Distributed online surveys

Online surveys of project beneficiaries are increasingly used due to their cost-effectiveness and ease of administration. Like any survey, an online survey must be well designed and may suffer from low response rates.

---

[29] Socio-graphic mapping of the Roma Communities in Romania for a community-level monitoring of changes with regard to Roma inclusion.

While **not suitable to survey disadvantaged populations** for obvious reasons of lower computer literacy and limited access to computers and the Internet, they may be used to survey other **project stakeholders**.

Barnes (2010) discussed coding of feedback responses to identify positive and negative sentiment. He distinguishes between using predetermined codes (when we know in advance what words we are identifying as positive or negative) and the so-called emergent coding where written text such as survey responses or interview transcripts are turned into a word cloud. He argues such a methodology can provide deep insight in hard to measure areas such as influencing value systems.

An example of use of an online survey (using the free Google Forms platform) comes from the evaluation of A Good Start II, a follow up to the EU Roma Pilot 'A Good Start', funded by private donors and implemented by Roma Education Fund in partnership with local Roma NGOs in four countries.

A Hungarian Home-School-Community Liaison intervention, where Roma mothers developed pre-school activities working together with preschool teachers, was evaluated with an **online survey of preschool professionals**. In addition to summarising categorical answers (e.g. share of teachers who saw improvements in certain variables) the implementers used simple Wordle, a tool to visualise keyword frequencies to analyse longer write-in answers (see for example Box 5). This provided valuable insight on the views of the teachers involved in the project.

Box 5.   Example of Wordle Analysis of Survey Responses

Figure 1: When <u>your daughter</u> is about 25 years old, what job would you like her to be doing?

Figure 2: When <u>your son</u> is about 25 years old, what job would you like him to be doing?

Source: Salner, Kubánová (2014)

Lessons for EEA & Norway Grants

An online survey may be suitable as a tool to gather stakeholder feedback both within projects and across projects – e.g. surveying a sample of all teachers involved in Roma inclusion interventions across a country, all police or prison officials undergoing training.

Regarding programme areas, lessons may be directly relevant for PA 11 '*Children and youth at risk*' and PA 13 / 27 '*Public health initiatives*' but also PA 30, PA 31 and PA 32 in the areas of Schengen cooperation, justice and correctional services.

Quantitative impact assessment

In the area of **innovation, where large numbers of beneficiaries are similarly involved**, e.g. receive a standardised service – this is the case typically in education – classical quantitative impact assessment remains the most appropriate method to generate evidence.

One example for such an innovation is the 2008 launch of standardised Sure Start early childhood development projects for marginalised communities in Hungary. Around 30 projects were launched in the first round, and around 15-20 children and mothers were expected to be involved in each project, so altogether 450-600 children and mothers. This provided a good opportunity to measure the impact of the service on the development of the children, provided that:

- data (e.g. on skills of the children) were collected both when children joined a project and when they left;
- comparable data were collected on children with similar background who did not join a project.

The input data were collected as planned, but due to many reorganisations of the coordinating organisation over the years, the exit data were not, and the evaluation plan failed.

Another example with a more positive outcome, at least regarding the implementation of the evaluation plan, is the support to integrated education, also in Hungary (Kézdi, Surányi (2009)). Here input and output data as well as comparable data of a focus group were collected and analysed. In this case, the shortcoming is that although the impact assessment found strong evidence that integrated education can be mutually beneficial for both Roma/disadvantaged and non-Roma/non-disadvantaged children (especially where the proportion of Roma/disadvantaged children is below 20-30%), there is a lack of political will to challenge contradictory popular thinking.

Lessons for EEA & Norway Grants
Although the EEA & Norway Grant is not typically used for innovations where hundreds or thousands of beneficiaries receive a standardised service, wherever this is the case, quantitative impact assessment should be part of the activity from the beginning (starting with designing the assessment and collecting input data).

Regarding programme areas, lessons are most relevant for PA 11 '*Children and youth at risk*', and are not likely to be relevant for most of the other areas.

4.2. Data Collection Issues

4.2.1. Background on good quality monitoring and evaluation systems

There is a lot of theoretical background on what constitutes good quality monitoring and evaluation systems. Among other attributes, a good quality system should provide relevant and timely input into decision making, be efficient in terms of workload and financial cost and flexible to recognise that in socio-economic interventions many details cannot be planned in advance.

Sridharan (2009) warns that "*If rigidly adopted, performance monitoring can overemphasize indicators of progress that are easily measured rather than those that are more significant, if more difficult to measure*".

4.2.2. Providing well defined indicators

In order for an indicator to be usable across the different participants in the M&E system, it needs to be defined in sufficient detail. If there are terms, which could be interpreted in different ways (such as who is a Roma, when is a child considered enrolled – only if they sign up or do they need to attend regularly, what is a participant – how much participation is required) it is important to provide a clear *ex ante* definition and description.

A fully defined indicator would normally contain most of the following attributes: name, definition, measurement methods, data collection methods, frequency, and disaggregation.

As discussed in an Aid Leap post on indicators, a focus on indicators is not sufficient and has to be combined with the use of qualitative data. An open framework is needed to collect good qualitative information to understand the "*progress, sustainability and success of a project.*".[30]

Okagaki (2010) identifies a key tension between accountability and learning – he argues that measurement for accountability purposes makes the Project Promoters defensive and motivates them to "cook" numbers to achieve objectives and obtain funding.

A good quality monitoring system must then balance these considerations, making grant recipients accountable, but nurturing the possibility of learning. In socio-economic interventions, the latter may be a more realistic but also a more useful objective.

4.2.3. Collecting qualitative data and using it for learning

Usable qualitative data is costly to collect in terms of human resources and time required but qualitative data collection is required to allow learning within and across programmes, countries and institutions.

Qualitative data on **lessons learned** should be collected from as many interventions as possible. For certain types of projects – those that intend to introduce innovative or pilot approaches – it is sensible to collect qualitative data even more extensively. This data can be used both to evaluate the success of the project and to provide richer information should the project be scaled up or some of its elements mainstreamed in the future.

Participative methods in M&E

Another aim for M&E systems is communicating information on implementation progress broadly to participants. This is accomplished by participative evaluation methods and use of dashboards or other reporting tools simplifying monitoring data for broader use.

Since the use of such methods has to be built in to the project design, it is not possible or would be very costly to introduce them into projects already planned or under implementation.

---

[30] Aid Leap, 2015.

It would be possible at reasonable cost to carry out interim or final surveys of selected groups of stakeholders in projects (as discussed above, this is problematic for marginalised Roma communities due to limited computer literacy and access to computers). These surveys could cover professionals in programmes that take place in more than one geographic locality (e.g. Youth Centre or kindergarten staff in BG06 or police officials trained in CZ14 and BG13).

The surveys could collect qualitative data through open questions and could serve both the PO in informing future programming, thinking about mainstreaming and FMO as reflection on the quality of the interventions.

4.2.4. Clarifying how to collect data for indicators, which specifically mention number of Roma individuals or organisations

Where EEA & Norway Grants are asking for information on number of Roma participants (either individuals or organisations), the NFP should clarify how that data is to be provided.

If the determination of how the number for a certain reporting category is to be actually collected is left to the National Focal Point and Programme Operator, they should provide an exact definition.[31]

The question of who is Roma for the purposes of programme monitoring, or what is a Roma NGO, comes up repeatedly in the currently used indicators as their available definitions do not specify this. Since EEA & Norway Grants work with governments as counterparts, they are not in a position to develop and impose these definitions, and their framework has to respect the national frameworks for defining Roma.

There are several methods: from participants' (anonymous) self-identification, through identification via participants' residence in socially excluded Roma communities/localities – which are defined through external identification of persons that can be subjectively identified as Roma by their social environment and therefore face a higher risk of discrimination). In one Romania project, the procedure used actually requires a signed statement from the beneficiary confirming he or she is a Roma.

In interview, authorities in the five focus countries have often stated that there were problems with the legality of collecting ethnically disaggregated data. This frequently used argument has been addressed in 'No Data, No Progress' (McDonald and Negrin, 2010). This book shows that it is common practice in EU countries with strong privacy protection and human rights record to collect ethnically disaggregated data and also that collecting such data is a prerequisite to effective programmes.

Of the five focus countries, the only country where 'No Data, No Progress' notes that there is a legal problem with ethnic data collection is Romania. However, they find that while public institutions avoid recording any ethnic data, some local authorities collect ethnic data,

---

[31] The Guidance note for programme-level Plans on Roma inclusion asks for specification of Information and Data Collections Methods, Monitoring and Evaluation methods. Most of the plans submitted do not cover this in much detail.

"*usually to support project grants that target Roma*" (p. 61). Regardless of any legal restrictions, there is in some cases a high degree of resistance to even targeting Roma explicitly in programmes.

Where there are established definitions of disadvantaged status such as the multiple-disadvantaged in Hungary or children from socially disadvantaged environments in Slovakia, these categories overlap significantly with Roma ethnicity in regions with high proportions of Roma. These legally accepted categories can be used as alternatives for targeting without raising any legal concerns with the national authorities, while targeting Roma along with a few other disadvantaged individuals living in their vicinity. Such a recommendation is made by the Hungarian NFP in its Concept paper: "*It is suggested that the most disadvantaged or vulnerable groups should be targeted since they can be better reached and measured (as is the practice in numerous projects financed through the Structural Funds*)."

A possible advantage of this approach is also that it reduces negative responses by non-Roma to explicitly and exclusively targeted projects helping the Roma.

This question must be addressed separately for each country in cooperation with national authorities – their approach used to determine eligibility for interventions focused on Roma or count Roma beneficiaries should be specified to provide context to the data reported.

4.2.5. Defining a Roma-relevant Programme or Project

The recent evaluation of EEA & Norway Grant NGO Funds stated that the self-marking were of "*only general informative value*".[32] They note three reasons:
* For projects marked with several areas, it is not clear what share of budget should be assigned to which area;
* Duplication between horizontal concerns and areas of support;
* Unclear terminology for self-marking of horizontal areas.

FMO staff indicated that this problem was being addressed.

At the project level, the Statistical Manual provides the following specification of a Roma inclusion policy marker:

"*Use Code 1 Significant Issue when Roma inclusion is significant, but not among the principal justifications for the project.*
Use Code 2 Fundamental Issue when Roma Inclusion is identified as being fundamental in the design and impact of the project, and is an explicit justification for the project."

If we look at actual impact on Roma inclusion or empowerment, each marker can represent a continuum of effects from insignificant to major. A good way to clarify the Significant versus Fundamental Issue would be to specify that for Significant Issue there must be expectation of a significant number of Roma beneficiaries (e.g. projects in geographic or thematic areas where Roma are over-represented and addressing socio-economic problems more prevalent

---

[32] Milosheva-Krushe *et al.*, 2014.

among Roma) and for Fundamental Issue Roma inclusion or empowerment must be the explicit main focus of the project and Roma beneficiaries must represent the majority of expected beneficiaries.

4.2.6. Pragmatic approach to budget allocation conditionalities and alternative outcome targeting

The conditionality of a fixed percentage of country spending or programme spending on Roma inclusion projects has been used to refocus portion of assistance under EEA & Norway Grants to address Roma inclusion concerns.

This has led to a strong focus by the FMO, NFPs and POs on formally meeting this target. The target is a good way to stress a donor concern but otherwise says little about the quality or quantity of contribution to desired Roma inclusion outcomes. The FMO has managed this on a case-by-case basis in communication with national stakeholders to ensure that activities not only contribute to the budget allocation target but are also meaningful. At the present time, this seems the only feasible approach, but for future programming we would recommend qualifying the targets in the MoU with an agreement to strive for meaningful projects, and make a reference to the later documents that would connect input targets with output and outcome targets, to lend them credence.

For EEA & Norway Grant programme areas, where some or all of the outcomes focus on individual beneficiaries,[33] it is feasible to target a specific number of Roma beneficiaries or a share of total number of beneficiaries. Examples include specifying the numbers of Roma children to be enrolled in kindergarten, number of Roma youth involved in a certain training, etc.

Meeting such an output target would force the PO to adjust publicity in calls for proposals and selection criteria for projects to ensure that the target is met. The best way to set an ambitious yet realistic target here would be to base it on research carried out in advance in the given programme area. The *ex ante* assessment of targets must involve the PO directly.

4.2.7. Capacity of National Stakeholders to Collect Data

In our interviews with National Focal Points and Programme Operators in focus countries they usually indicated they had at least some monitoring and evaluation staff with experience. Given the timing of this study – at a time when some calls for proposals were being evaluated and in many projects implementation was just starting, interviewees shared concerns about the monitoring requirements.

In some cases they felt they had insufficient guidance on data collection from the NFP (or the FMO in the case of some NFP responses) and were very concerned about any possible changes to the monitoring framework at this stage of programme implementation.

---

[33] Such as PA11 'Children and youth at risk', PA19 'Scholarships', and some outcomes in PA29 'Domestic and Gender-based violence'.

As a result, in our proposals of additions or changes to the indicator framework we try to be conservative and pragmatic, and not propose any new instruments for the current programme period that would create new tasks.

4.3.   Principles of setting baselines and available sources of baseline data

Rigorous measurement of change requires clearly defined target outcomes and baseline data – these usually need to be planned along with the intervention and collected at its start. We do not have this option here, not only because of the timing but also because a change in the monitoring framework for projects that are already designed and being implemented would create an unrealistic burden for Project Promoters and Programme Operators.

Setting baselines retroactively is an option only where a data source is available that would fit with the targeted outcome, target beneficiaries, geographic area and time. In most cases, due to the limited availability of data, this is not a realistic option.

For future setting of baselines the resources available are quite limited. In Slovakia, the Atlas of Roma Communities provides a lot of information at the level of each Roma settlement and may provide usable baseline data for some interventions. A similar (but even more ambitious) effort is underway now in its early phases as part of RO25 and is likely to provide useful baseline data for future programming.

For NGO projects, information on the participation of Roma NGOs can be used as a baseline. This information is available for the previous funding period from the 2013 Roma Inclusion Study and again, the same type of information can be collected for the present period.

4.3.1. Focus-Country Approaches to Data Collection

The aim of this Section is to present a comprehensive although not exhaustive overview of the most important data sources on Roma inclusion.

The common data and reports that have been most used in all the five focus countries derive from the **UNDP** and **FRA,** based on their regional survey of marginalised Roma carried out in 2011. As mentioned in 4.1.1, the survey results are representative at national level but not for smaller units, and cannot be used to determine baselines for indicators at levels other than at the national level.

According to its 2015 Annual Work Programme[34], the **FRA** will carry out the second wave of the European Union Minorities and Discrimination Survey (EU-MIDIS II) in 2015 to collect data on Roma in EU countries covered by the 2011 survey. First results of this survey are to be published in the second half of 2016.

---

[34] http://fra.europa.eu/sites/default/files/annual_work_programme_2015_-_dec2014.pdf.

A recent EC Roma Health Report on the **health status of the Roma population** across the member states (EC 2014) attempted to map information on seven key Roma health indicators[35] in 32 EU member states with a special focus on 11 with significant proportions of Roma. The survey, however, found that there were few reliable regularly updated data sources on Roma health status and there is no comprehensive data collection at national levels.

National sources in countries of interest failed to collect ethnically disaggregated data and international sources suffered from two key problems:

- *Representativeness only at country level* – available representative surveys were carried out at country level, so do not provide geographically disaggregated data that would be relevant to any other interventions other than those at national level, which limits their usefulness for the purposes of monitoring and evaluating EEA & Norway Grants
- *Irregular* – for a tool to be useful for tracking progress, it needs to be administered regularly. This was not the case for the existing surveys – they were one off efforts and mostly no follow-up was scheduled.

For EEA & Norway Grants, the EC 2014 study is useful as a country-level reference in health-related programmes, as it may help locate useful baselines for some future interventions.

There are significant differences between the five focus countries with regard to the extent to which they have used the data collected and analysed by the UNDP and other, mainly country-specific data. The presence of **international organisations** in this field seems to be the strongest in Slovakia (UNDP, until the regional office was moved from Bratislava to Istanbul) and Romania (World Bank, UNICEF). The **National Statistical Office** is the most pro-active probably in Hungary; other **national authorities** – ranging from the government and ministries to equality bodies and the ombudsman – are active in most countries. **Non-governmental organisations** – including spin-off national foundations from the Open Society Foundations – have a pro-active role in piloting surveys in new, sensitive areas such as migration, drug use, etc.

We describe in Annex 4 data sources in the five focus countries that have been identified as important, either in the NRIS (some of which devote a separate section to data sources, others do not mention them) and/or civil society monitoring reports prepared for each focus country by national NGOs with coordination by the Decade of Roma Inclusion Secretariat.[36]
Of particular interest is an updated **Atlas of (Marginalised) Roma Communities** (2013)[37]. this identified 804 settlements in Slovakia with 402,840 people in 584 municipalities (of the total 2,890 municipalities), including 246 settlements with 52,000 people inside villages or towns, 327 settlements with 96,000 people on the edge of the village or town, and 231 settlements with 69,000 people segregated from the village or town. The Atlas maps in detail a variety of

---

[35] 1. Mortality and life expectancy, 2. Prevalence of major infectious diseases, 3. Healthy life styles and related behaviours, 4. Access and use of health services and prevention programmes, 5. Prevalence of major chronic diseases, 6. Health factors related to the role of women in the Roma community, 7. Environmental and other socio-economic factors.

[36] http://www.romadecade.org/civilsocietymonitoring.

[37] http://www.minv.sk/?atlas_2013.

indicators for every Roma settlement and is potentially useful in setting baselines for municipality-based interventions in Slovak programmes (see Box 6). The Atlas was used extensively in programming for European Structural and Investment Funds in the 2014-2020 programming period. Some examples of its use include the identification of municipalities to target with certain infrastructure interventions.

Box 6.   Information collected in questionnaire for 2013 Atlas of Marginalised Roma Communities in Slovakia

• Total population of settlement
• Number of houses and apartments, type of dwellings (bricked, wooden, shacks, etc.)
• Basic demographic information on population (e.g. age distribution)
• Educational profile of settlement's residents (estimates)
• Infrastructure (water pipelines, sewage, electricity, gas, waste disposal, etc.)
• Schools (types of schools in the settlement/village/town, number of Roma students)
• Access to services (doctors, shops, pharmacy, bus stops, ATMs, cultural house, church…)
• Political participation (ethnic composition of the council, political parties)
• NGOs, community centres, field social work
• Rates of unemployment, Employment opportunities (main employers, Roma employers)

http://www.romadecade.org/cms/upload/file/9653_file2_atlas-romadecade.pdf.

EEA & Norway Grants support for the strengthening of data collection

In Romania, some of the expected results of projects under the programme RO25 will represent a significant contribution to the availability of data on Roma inclusion.

The gaps in this area are significant in all of the focus countries (though to varying degrees). Repeated surveys that allow comparison across countries and over time are therefore of particular value.

In certain fields, such as poverty, employment, health or education, the extension of the mainstream EU surveys (Statistics on Income and Living Conditions (SILC), Labour Force Survey (LFS), European Health Interview Survey[38] and tests with an ethnicity dimension seems to be the most promising approach, as piloted in Hungary (for the SILC and the LFS), which could be disseminated and adapted to the national context in other countries.

In other fields, such as attitude surveys, there are several approaches piloted in various countries, and collective thinking could result in better understanding of the challenges as well as comparable data. There is increasing recognition of the need to address anti-Gypsyism as a root of discrimination and social exclusion, and attitude surveys may have growing importance and added value.

Some areas are more country-specific – such as the problematic use of 'special schools' in the Czech Republic and Slovakia, and the spatially most segregated marginalised Roma communities in Slovakia – with a consequent limited need for comparable data.

---

[38] http://ec.europa.eu/eurostat/web/microdata.

4.3.2. *Additional Data Sources by Programme Area*

In addition to the sources of information in the five focus countries of this study identified in Section 4.3.1, we searched for additional sources of information relevant to specific programme areas with Roma-relevant projects in the present EEA & Norway Grants programme period. In Box 7, we list sources published from 2010 onwards only, as older sources are unlikely to be current enough to be used in practice.

Box 7.   Additional Data Sources by Programme Area

PA11 'Children and youth at risk' (BG06, CZ04, HU06, RO10)
UNICEF Roma Early Childhood Inclusion, 2012
UNDP Roma Education in Comparative Perspective 2012

PA19 'Scholarships' (BG09, RO15)
Lanert, J. and Garaz, S. (2014). The Academic and Professional Trajectory of REF's Law and Humanities Scholarship Program Student-Beneficiaries. A Tracer Study. Roma Education Fund.

PA29 'Domestic and gender-based violence' (BG12, RO20, SK09)
Yildiz, et al. 2010. Empowering Women or Perpetuating Victimhood: Minority Ethnic and Roma Women's Experiences of Domestic Violence Policy and Service Provision

Poverty alleviation (RO25)
UNDP/WB/EC Survey 2011
World Bank Diagnostic Studies Bulgaria, Romania, Slovakia

---

5.   CONCLUSIONS FROM LITERATURE REVIEW

Practices of other institutions

Conclusion 6 – *The* Fundamental Rights Agency '**Structure – Process – Outcomes'** *framework for monitoring* progress towards achieving fundamental rights is particularly relevant for the EEA & Norway Grants because it connects institutions gathering data and all key stakeholders in Roma inclusion across all beneficiary countries*.* The Programme Areas of EEA & Norway Grants that are likely to fit well in the S–P–O frameworks are PA 11 '*Children and youth at risk*', PA 12 '*Local and regional initiatives to reduce national inequalities and to promote social inclusion*', and PA 13/27 '*Public health initiatives*'). Areas that may not be covered extensively are PA 10 '*Funds for NGOs*', PA 16 '*Cultural heritage*', and PA 17 '*Cultural diversity*'.

Conclusion 7 – *Qualitative methods* suitable at present include participative community-based monitoring and evaluation. These could be piloted in interventions delivering services to broader communities such as large projects in PA 11 '*Children and youth at risk*' and PA 13/27 '*Public health initiatives*'.

Interim and final surveys of selected stakeholders using online tools are suitable even for current programmes and can be implemented in several programmes where a similar intervention takes place in several localities (e.g. Youth Centre or kindergarten staff in the programme BG06 '*Children and Youth at Risk*' or police officials trained under the Czech – CZ14 and Bulgarian BG13 programmes on Schengen Cooperation and Combating Cross-border and Organised Crime).

Household surveys of beneficiaries to collect baseline and end-line information as used by the Roma Education Fund in 'A Good Start' and 'A Good Start II' may be suited for use in programme areas PA11 '*Children and youth at risk*' and possibly also PA12 '*Local and regional initiatives to reduce national inequalities and to promote social inclusion*'. The surveys could be used to collect qualitative data and reflect the quality of the supported interventions for POs and the FMO, helping them to think about mainstreaming, and provide the basis for future programming.

Data Collection Issues

Conclusion 8 – It was *difficult to aggregate data* across different stakeholders due to incomplete definition of Indicators. **Indicators need to be defined in full** including the name, definition, measurement methods, data collection methods, frequency, and disaggregation. A top-down indicator system, which starts with a limited set of indicators at the highest level and trickles down to programme or project level allows the consolidation of data across interventions.

At the level of individual programmes or even projects, additional indicators may be added to draw attention to specific issues in the monitoring process but without the intent to consolidate these across several programmes or projects.

The system of project-level **policy markers** in use also uses definitions that are broad – a project where Roma inclusion is marked as a 'Significant Issue' or 'Fundamental Issue' can in reality correspond to a broad range of effects from insignificant to highly significant.

Conclusion 9 – Established national approaches to defining vulnerable population may be suitable for targeting some programmes to marginalised Roma without explicit or exclusive targeting, which is seen as problematic by the national authorities in several of the countries with the highest proportion of Roma.

Setting of baselines

Conclusion 10 – Rigorous measurement of change requires clearly defined target outcomes and baseline data – these usually need to be planned along with the intervention and collected at its start. We do not have this option here, not only because of the timing but also because a change in the monitoring framework for projects that are already designed and being implemented would create an unrealistic burden for Project Promoters and POs.

Setting baselines retroactively is an option only where a data source is available that would fit with the targeted outcome, target beneficiaries, geographic area and time. In most cases, due to the limited availability of data, this is not a realistic option. Surveys by UNDP and the EU Fundamental Rights Agency are representative of marginalised Roma communities at national levels but not representative for regions, municipalities or smaller geographic areas.

For future setting of baselines the resources available are quite limited. National sources do not offer comprehensive data disaggregated by ethnicity that would be usable for the setting of baselines. In Slovakia, the Atlas of Roma Communities provides a lot of information at the level of each Roma settlement and may provide usable baseline data for some interventions. A similar (but even more ambitious) effort is underway now in its early phases as part of RO25 and is likely to provide useful baseline data for future programming.

The overall picture is that outside data sources on Roma do not provide sufficient information to be useful in monitoring in the present programme period.

For NGO projects, information on the participation of Roma NGOs can be used as a baseline. This information is available for the previous funding period from the 2013 Roma Inclusion Study and again, the same type of information can be collected for the present period.

6.   RECOMMENDATIONS

It is difficult to propose any mechanism for improving the use of indicators in the current programmes, as the findings in the field were that the POs were extremely resistant to accepting any change to the tasks for which they had signed up. However, based on the findings and conclusions from both the assessment of existing programmes and the review of literature, we have synthesised a set of recommendations that are in part applicable to present programming but also to Roma-relevant programming in the future.

Recommendation 1 – Changes to current indicators
(Conclusions 2 and 8)

Where existing indicators cover several vulnerable groups jointly, Roma should be identified in a separate indicator where possible.[39] While some national authorities, particularly in Bulgaria, Romania and Slovakia, said in interviews there were legal issues, each of these countries has agreed to the use of ethnically specific indicators in at least one of its programmes, showing that the legal issues can be addressed.

In projects that only partially target Roma, a consistent methodology should be used to estimate the project contribution to Roma inclusion on the basis of estimating the proportion of Roma of the total number of beneficiaries. Guidance for this calculation is proposed at part of Annex 5:
- where a project targets a geographic unit, the proportion of Roma on population in the unit according to available estimates should be used (e.g. proportion of Roma in the population as measured by the Census, where possible also with a local government or local NGO estimate, if the Census figure underestimates proportion of Roma);
- where individuals are targeted by a project such as members of vulnerable groups, they can be asked to self-identify as part of application process (especially where preference is given to Roma participants);
- where institutions such as NGOs are targeted by a project, they can be asked to self-identify as Roma NGOs – POs should provide guidance on what it considers a Roma NGO such as on the basis of membership, leadership or mission relevant to Roma.

With respect to **defining Roma-relevant projects**, we propose a clarification to the definitions of the Policy Marker used: for *Significant Issue* there must be expectation of a significant number of Roma beneficiaries (e.g. projects in geographic or thematic areas where Roma are over-represented and addressing socio-economic problems more prevalent among Roma) and for *Fundamental Issue* Roma inclusion or empowerment must be the explicit main focus of the project and Roma beneficiaries must represent the majority of expected beneficiaries.

For **policy markers** at project level, for 'Significant Issue' there should be the expectation of a significant number of Roma beneficiaries and for 'Fundamental Issue', Roma inclusion or

---

[39] In a spreadsheet external to the report, we have provided a detailed review of existing quantitative indicators by programme and where possible specific recommendations for improvement, and suggestions for the development of more suitable indicators for these programme areas in the future.

empowerment should be the explicit main focus of the project, and Roma beneficiaries should represent the majority of expected beneficiaries.

Recommendation 2 – Programme-level qualitative instrument
(Conclusion 3)

Minor adjustments should be made to the guidance on Roma Inclusion Plans and the use of a **programme-level instrument** should be expanded where possible, because of its added value in making the POs think through the specific mechanisms required, and articulate them in an explicit way that also allows discussion with other stakeholders. It may be feasible to expand this instrument to programmes where there is a concern stated in the MoU in the Czech Republic, Hungary and Slovakia – the PO could report explicitly on meeting the concern, which would provide an additional opportunity to discuss Roma inclusion and empowerment measures in these programmes.

Recommendation 3 – Strengthening the mechanisms for national-level dialogue
(Conclusion 4)

The mechanisms for national-level dialogue should be strengthened in order to speed up the iteration on Roma Inclusion Plans and exchange of other information that would help the implementation and monitoring of programmes.

Recommendation 4 – Using a simple qualitative framework to track innovative interventions financed by EEA & Norway Grants
(Conclusion 5)

A simple qualitative framework should be used to track innovative interventions financed by EEA & Norway Grants that are of particular importance in the area of Roma inclusion. It is important to ensure that the information that is best collected in the course of project implementation is available to support their potential future scaling up or mainstreaming. Grants that are intended to fund innovative activities with the potential of scaling up should be systematically tracked to help in the evaluation of the results and if successful, to help mainstream the innovation.

We propose developing a simple qualitative instrument at project level to:

1. **Identify activities proposed as promising innovations by Project Promoters.**
   A simple checklist with questions regarding innovative nature of the activity should be developed. It can ask directly whether the PP considers the project as innovative, and can also ask about specific attributes of innovation (i.e. what exactly is innovative about the intervention). A preliminary proposal for a checklist is given in Annex 7.

2. **Identify the information needs for scaling up or mainstreaming**

A common feature of pilots and innovations in the area of Roma inclusion is the lack of relevant data that would serve as basis for planning scaling up or mainstreaming of the activity or transfer the know how acquired to other localities, countries or actors. Efforts to identify best practices often come at a late stage of programme implementation and lead to the need for retrospective data collection, which can be costly and in many cases impractical. If an activity is identified as innovative by its Promoters, it would be useful to support the Promoters methodologically in gathering information as they go along on actual implementation details, structured stakeholder feedback, unit costs and other information that will facilitate learning.

3. **Identify outside stakeholders who could facilitate follow up**
   Although the responsibility for scaling up cannot be taken on the shoulders of the FMO, a simple identification effort can help communicate early on with public authorities, experts, potential partners and other outsiders who will be instrumental in case the innovation shows potential. For new innovative projects information for the Innovation Assessment could be provided as part of the application. For projects under implementation, the information for the Innovation Assessment could be gathered by Monitoring Agents at project level. Once the information is entered, it could be followed up either in reporting by Project Promoters, if such a change to reporting format is feasible, or again through monitoring. The monitoring information could be used to mobilise additional resources including outside expertise.

Additionally, projects identified as innovative can be aggregated at programme level and country level and systematically followed up in final reporting and evaluation. In many cases, single projects (especially small NGO Fund projects, even if they are often the most innovative), lack the critical amount of experience for scaling up and mainstreaming, but a group of similar projects in one or more countries can accumulate a critical mass, and the FMO has access to all these.

The potential of scaling up innovative interventions may be especially relevant in certain fields where new consensus is emerging, such as
- Children, especially early childhood development. There is growing recognition that decreasing disadvantages can be most effective at early ages. For example, the EP Roma pilot "A Good Start" identified a wealth of innovative practices such as in the field of parenting. Still, few of these practices have been continued with other funding so far.
- Youth, judicial capacity building, and other fields especially to address anti-Gypsyism. There is growing recognition that a root cause of the exclusion of Roma is anti-Gypsyism in the majority population, the media, and especially people and institutions representing the state, including the judicial system, police, etc. There is increasing consensus that for example equality training could address this problem. However, there is little analytical evidence about what types of equality training can indeed change attitudes.

Methodological challenges

The proposed checklist adds to the workload of Programme or Fund Operators and requires of them detailed knowledge of the projects supported. In some programmes this will be made easier where innovative projects are explicitly requested in the calls for proposals.[40]
The information collected will need to be processed by the FMO and innovative interventions will need to be identified (as opposed to interventions claiming innovativeness). The truly innovative interventions may benefit from additional support or resources, which needs to be organised.

Recommendation 5 – Focus evaluation on innovative and significant projects
(Conclusion 5)

Part of the **evaluation** effort should be focused on the innovative interventions identified to gain understanding of the promising interventions and facilitate learning from them for future programming. For promising interventions, evaluation in the present programming period can be used to plan more rigorous future evaluations using experimental and quasi-experimental methods. These methods require a well-developed and documented intervention design, which the evaluation can provide. More information on these methods is given in Annex 8.

Outputs from the proposed checklist in Annex 7 (from Recommendation 4) can help identify projects for later planned or *ad hoc* qualitative evaluations, which would focus on learning from the innovative efforts supported by EEA & Norway Grants. Implementation of Recommendation 4 will increase the quality of monitoring information available for the evaluation of these projects and programmes.

Evaluations could be structured not only by country but thematically across countries (e.g. the themes mentioned above, such as children and early childhood development; youth, judicial capacity building and addressing anti-Gypsyism) to promote learning from promising interventions. Also, once innovative projects are identified across the EEA & Norway Grants, other themes may emerge where there is innovation in several countries.

In terms of Programme Areas, good candidates for evaluation are NGO Funds, including projects in non-focus countries,[41] are PA11 '*Children and Youth at Risk*' and possibly PA30 Schengen Cooperation, with comparable activities on training the police in three countries,

The FMO could consider employing some of the methods outlined for gathering feedback from participants using online surveys to increase the amount of information available for evaluations.

---

[40] For example, in HU05 NGO Funds one scheme looked for "*new methods and models to tackle prejudices and to bring Roma and non-Roma people closer together*" or RO10 '*Children and Youth at Risk*' and '*Local and Regional Initiatives to Reduce National Inequalities and to Promote Social Inclusion*', where one of the calls (Coherent Call) awarded extra points for piloting and innovation: "*the project is initiating and piloting specific measures for Roma population in areas with high percentage of Roma (more than 5 % of the total population of the targeted administrative-territorial units, according with the last census, are Roma)*".

[41] As a first step, this would require a complete list of Roma relevant NGO projects to be reviewed for recurring themes.

Recommendation 6 - Use an adjusted FRA S-P-O framework to monitor contribution of EEA & Norway Grants to national Roma inclusion priorities
(Conclusion 6)

Use of the emerging '*Structure – Process – Outcomes'* framework should be considered to identify what share of overall funding for Roma inclusion in a given country comes from EEA & Norway Grant funding and conversely, what share of EEA & Norway Grant funding focusing on Roma goes towards priorities identified in the frameworks.

We propose adding an indicator to every Roma-relevant grant that will show whether it supports one of the **Processes** contained in the S-P-O framework. In addition to the identification of corresponding Process, we propose requiring a brief textual justification that can be used by evaluators.

Two sub-indicators can be calculated:
- Share of EEA & Norway Grants Roma inclusion funds funding Processes contained in the national S-P-O Framework;
- Share of budget reported by beneficiary country through FRA S-P-O framework provided by EEA & Norway Grants.

1. Share of EEA & Norway Grants Roma inclusion funds funding Processes contained in the national S-P-O Framework

The rationale behind this proposed indicator is that when we lack realistic means to quantify Roma inclusion impact of programmes in the current programme period, we can use an externally developed framework based on extensive analytical work and consultation (i.e. the National Roma Integration Strategy) to see if the spending is relevant to the national priorities as best known at present. For projects, which do not correspond to any of the processes in the framework, we propose using the framework for tracking innovative interventions suggested in Recommendation 4.

Timing can be harmonised with S-P-O reporting by member states, which is to be piloted in 2015 and required in 2016. The NFP could connect with the national body responsible for reporting on Roma inclusion to the EU to make the relevant EEA & Norway Grants awarded part of the standard reporting.

Annex 6 provides the background information and analysis to support this recommendation.
- Table 8 is an example of application of this framework to a list of EEA & Norway Grants-funded projects in Romania (as of September 2014). From this information, we have calculate that over 73 % of funding allocated to projects identified as Roma-relevant in Romania as of September 2014 clearly corresponded to at least one Measure for Roma inclusion outlined in the Council Recommendation.
- Table 9 is a review of the list of Measures in the Council Recommendation on Effective Roma Integration Strategies from December 2013, which provides for coding of interventions according to which measure they correspond.

- Table 10 derives from an assessment at the level of individual projects for PDPs, projects supported in open calls and projects supported in Small Grant Schemes.[42] The table illustrates the logic applied – the column 'Justification' shows how the analysis is applied to the given intervention. POs (with possible input from Project Promoters) are best suited to provide this type justification of how the project corresponds to a measure outlined in the Council Recommendation (or the country S-P-O strategy, once that document is available).
- Table 11 summarises the number of projects corresponding to Measures, the funds allocated and the proportion of funds allocated to Roma-relevant projects. This shows that 34 projects were not attributable to any specific measure in Council Recommendation based on available description of activities. This does not imply that the projects are not beneficial to Roma inclusion or empowerment but means they use other approaches than those in this recommendation. Once countries develop their own S-P-O frameworks, the governments may add additional national measures beyond those outlined in the Council Recommendation.
- Table 14 shows that some programme areas of EEA & Norway Grants do not have obviously matching recommendations in the Council Recommendation. In these cases, unless they are included among Processes derived for the country S-P-O frameworks from the respective NRIS or are innovative in nature (and thus addressed by Recommendation 4), it may not be possible to include them in reporting under this proposal.

2. Share of budget reported by beneficiary country through FRA S-P-O framework provided by EEA & Norway Grants

The S-P-O framework will contain information on inputs (i.e. budget allocation) for each of the measures listed by the reporting state. This indicator will provide information of the relative importance of EEA & Norway Grants in Roma inclusion activities carried out in the beneficiary country and reported by its government to the EC. Coordination with the state body reporting within the S-P-O framework will be needed to avoid double counting – identify activities funded by EEA & Norway Grants that are reported directly by the beneficiary country as part of government activities. Reported on an annual basis, this indicator will give an idea of the importance of EEA & Norway Grants funding in meeting the beneficiary country's Roma inclusion obligations.

Methodological challenges

As discussed in 4.1.2, the S-P-O framework is limited by the list of Measures provided by the EU Council and the quality of National Roma Integration Strategy In each country.

Another challenge encountered in all efforts to aggregate projects or programmes made up of various components is the attribution of funding in interventions where only a portion of activities and funding contribute to Roma inclusion or empowerment.

---

[42] For each project we reviewed the available annotation and determined whether it corresponded clearly to one of the Measures. Where the project corresponded to more than one Measure and we were unable to determine which was more relevant to describe the project, we noted both codes.

The final challenge relates to the timing of when S-P-O frameworks for recipient countries will be developed. Depending on exact timing, this may come at a late stage of the EEA & Norway Grants programme period.

Recommendation 7 – Pilot participative monitoring and evaluation instruments to involve civil society and beneficiaries
(Conclusion 7)

Participative monitoring instruments should be piloted to involve beneficiaries in monitoring interventions.[43] We propose piloting participative monitoring instruments involving Roma communities in reflecting on the ongoing interventions. This would involve selecting a few suitable interventions delivering services to broader communities and mobilising Roma communities to become involved in selecting indicators of success and reviewing them regularly.

Going beyond organisations and individuals with various mandates to broader communities could build on the FMO's strong track record in involving Roma NGOs and experts in consultation and monitoring of programmes and the piloting of participative methods. However, there is not much available good practice in this area and limited experiences with applying these instruments to Roma communities. Participative monitoring involving civil society and local communities is more common in some donor-funded interventions in less developed countries, or at policy level.[44]

In the present programme period, the FMO could select some projects that deliver services to broader communities (e.g. Romanian interventions in the area of pre-school education) and that include soft activities (such as training, capacity building, etc.), and develop and pilot ways of mobilising Roma communities, selecting indicators, and reporting them in a transparent and broadly understandable format.

A typical problem with monitoring of Roma inclusion interventions is that the POs or PPs tend to report on selected positive cases of individuals or localities, even if the programme or project covers thousands of individuals or dozens of localities, and picking positive cases does not say anything about the programme or project as a whole. Independent monitoring should avoid this problem. Therefore, it should seek a balanced involvement of experts and activists or beneficiaries.

Importantly, mobilising civil society and communities is not only a Roma inclusion concern – it could be of benefit to other beneficiary communities.

---

[43] One such pilot started in late 2014 as part of an RO25-supported project, SocioRoMap.

[44] see civil society monitoring of the implementation of national Roma integration strategies - http://www.romadecade.org/civilsocietymonitoring.

Beneficiary surveys are costly and need to be planned long in advance. ***Online surveys*** are a more realistic alternative, which can be employed without high costs and in a shorter time frame. Given the limitations of access of marginalised communities to online tools, these types of surveys can be used to collect monitoring and evaluation data from other project participants.

In existing projects, online surveys could be employed to evaluate interventions such as those under BG06 '*Children and Youth at Risk*', where Youth Centre or kindergarten staff could be surveyed, or the CZ14 and Bulgarian BG13 programmes on Schengen Cooperation and Combating Cross-border and Organised Crime, where participating police officers can be surveyed.

The surveys can gather their views on effectiveness of the projects, as well as feedback on lessons learned.

Recommendation 8 – Facilitating learning
(Conclusion 8)

Learning across programmes and countries should be supported. **Summative annotations of projects** should be shared in a standardised format (on an existing website) to make sure lessons learned are available to others tackling related interventions. Other relevant national audiences that would be interested and could benefit from having access to information on activities related to Roma inclusion exist at the national level in the context of specific projects.

In addition, NFPs could coordinate exchange of information with actors outside the grants. Further country-specific recommendations on national dialogue including specific actors to include are contained in the country reports for the five focus countries.

Recommendation 9 – Non-ethnic definitions for exclusion
(Conclusion 9)

For future programming in countries where exclusive targeting of Roma is seen as discriminatory, **existing domestic categories of vulnerable populations** should be used. These can be combined with geographic targeting. Such an approach should be considered for targeting in future programming, where they would target disadvantaged Roma together with a few people of other ethnicities living in the vicinity, thereby avoiding raising local tensions or legal questions.

This does not replace explicit and even exclusive targeting of Roma in some areas of intervention, such as civil society support for human rights, anti-discrimination, or multicultural dialogue and identity or culture, which are emphasised less by many other donors.

Recommendation 10 – Set baselines for outcome indicators
Conclusion 10

Baselines for programmes should be set of the level of programme outcomes – these are what the programmes aim to change and where change can be captured. At output level, baselines are usually zero by definition. They should be set as early as possible in programme preparation.

Measures to fill in the data gaps may also be considered in future EEA & Norway Grants programming.

Annex 1. List of detailed country Annexes

Country reports for the five focus countries of this study are enclosed as separate documents under the following titles:

- Bulgaria - Roma inclusion - Annex 1a - Country Report BG.docx
- Czech Republic - Roma inclusion - Annex 1b - Country Report CZ.docx
- Hungary - Roma inclusion - Annex 1c - Country Report HU.docx
- Romania - Roma inclusion - Annex 1d - Country Report RO.docx
- Slovakia - Roma inclusion - Annex 1e - Country Report SK.docx

Annex 2. Assessment of Programme-level Roma Inclusion Plans

Programme	Plan available	Quality of programming	Quality of proposed indicators	Other comments
BG07 – Public Health Initiatives	Yes (undated), FMO states (January 2015) it is expecting a revised plan when programme implementation progresses	Very limited detail, says it will allocate certain percentage of some measures to Roma projects through "quotas" without further detail	There is a specific indicator related to the Scholarship programme for medical and other healthcare professions for Roma students (75 students trained)	
BG08 – Cultural Heritage and Contemporary Arts	Yes, draft dated 13 December 2013, FMO reviewed a revised plan stating it did not show significant improvement. A revised plan was submitted to the FMO in October 2014	Very limited detail, says it will give extra points for projects focused on Roma and carry out unspecified publicity to Roma	Proposes specific indicators for all measures, some are meaningful, some not clearly defined (e.g. 20 Roma population representatives attended new exhibitions and/or events of contemporary art) – not clear by when and how these will be measured	Shows the possibility of integrating a Roma inclusion and empowerment concern into a mainstream programme
BG09 – Scholarships	Yes, a revised plan was sent by the PO on 16.01.2014	Gives some ideas on how to increase proportion of Roma scholarship beneficiaries and vaguely hints on counting also mobility of academics studying topics related to Roma	No specific targets for numbers of Roma beneficiaries proposed in the plan	The PO says that the Programme will contribute to reaching the target of 10 % at the national level, although there is no specific Roma target.
RO10 - Children and Youth at Risk and Local and Regional Initiatives to Reduce National Inequalities and to Promote Social Inclusion	Yes, dated November 2013, FMO lists as approved by Donors in April 2014, stating the updates reflected reallocation of additional funding to the programme	The plan develops clear logic for implementing Roma inclusion in the relevant measures, details involvement of Roma representatives at various stages of programming,	Clear indicators are identified and numeric targets have been provided by the PO	This is one of the best developed and thought out Roma Inclusions Plans available

		adjustments to the selection criteria		
RO11 – Mainstreaming Gender Equality and Promoting Work-Life Balance	Yes, undated draft version and updated version received by study team in March 2015	The plan describes a little vaguely the inclusion of Roma in the programme's measures	Clear indicators are identified but no numeric targets are listed	It is not clear from the plan to what extent the numeric 10% target is realistic, proposed indicators would be usable but need detail on how they will be collected and specific numeric targets
RO12 - Conservation and Revitalisation of Cultural and Natural Heritage	Yes, undated draft version and updated version received by study team in March 2015	The plan describes clearly the inclusion of Roma in the programme's measures	No indicators specific to Roma are developed	
RO13 - Promotion of Diversity in Culture and Arts within European Cultural Heritage	Yes, marked as revised in December 2013, 2015 revision was in process at time of preparation of this study	Programme aims at selecting Roma projects for all measures by awarding extra points	Indicators cover expected number of Roma project applications selected but no Roma-specific outcome indicators	The plan will be likely revised in near future (2015)
RO15 – Scholarships	Yes, undated plan received in April 2015	The inclusion of Roma in academic mobility measures is described vaguely	Output indicators included are 2 preparatory visits, 30 students 12 teachers for mobility, 2-3 cooperation projects aimed at improving condition of Roma population	
RO20 – Domestic and Gender Based Violence	Yes, undated plan received in April 2015	The plan describes the inclusion of Roma in various measures, in some the logic is clearer (campaign on trafficking, allocated share of budget in one of the open calls), while in others Roma are only targeted as part of mainstream targeting	Campaign in PDP to target 1,000 members of Roma community or other vulnerable communities	Roma in most measures not counted separately from other vulnerable groups

RO21 – Schengen Cooperation	Yes, undated plan received in April 2015	One pre-defined project aimed specifically at a Roma community, other pre-defined project also includes focus on Roma-related issue	Only output indicators defined	Survey implemented as part of victimisation PDP may allow assessment of results if it is repeated after project completion
RO23 – Correctional Services, Including Non-Custodial Sanctions	Yes, approved version of plan received	The plan describes the inclusion of Roma in various measures, in some the logic is clearer (teaching prison staff Romanes), while in others it is less clear (preference given to self-identified Roma in vocational training)	Plan received does not contain Roma-specific indicators	
RO24 - Judicial Capacity-building and Cooperation	Yes, approved version of plan received	The plan outlines clearly the inclusion of Roma-relevant activities in its measures	Plan contains some Roma-specific indicators, but without sufficiently specific definition and information on how they will be measured	One of the better developed plans with respect to programme logic

Annex 3. Programme and Indicator Assessment

In this annex we present an assessment of outcome indicators analysed by Programme Areas. In addition a detailed assessment of programmes and their outcome and output indicators across all programmes reviewed is attached in a separate spreadsheet file named Roma inclusion - Annex 2 - Programme and Indicators Assessments.xlsx.[45]

Indicators not explicitly mentioning Roma are marked in red, good practices are marked in grey.

Prog. Area	Prog.	Outcome Indicator	Standard Indicator	Comments
PA10: Funds for NGOs	CZ03	Number of NGOs informed and involved in combating racism and xenophobia (including hate speech and hate crimes)	No. of NGOs promoting democratic values, including human rights	The programme should address the specific needs of minority groups including Roma (at least 5 % of the total allocation), environmental protection and climate change. The current indicator is an output indicator.
			No. of NGOs using participatory approaches to engage vulnerable groups	
	BG05	n.a.	No. of NGOs using participatory approaches to engage vulnerable groups	All the standard indicators are output indicators and can be aggregated. However, none of them can be considered Roma specific, and it is unlikely that any of them could measure Roma inclusion as the target group is much wider.
	GR04	Awareness levels on human rights strengthened	No. of basic and welfare services that meet needs of defined target groups	None of the published public calls so far are explicitly aimed at enhancing Roma inclusion.
	HU05	No. of people from vulnerable groups (e.g. Roma, people with disabilities; disadvantaged youth etc.) benefiting from improved access to social services, disaggregated by gender	No. of NGOs promoting democratic values, including human rights	The 1st call for proposals contained Roma integration micro projects. The programme has already achieved the target for the allocation of funds for Roma inclusion projects. The outcome indicators could measure attitude change, but currently they are set out as output indicators.
		No. of NGOs whose work is focused on minority groups e.g. minority ethnic groups including Roma	No. of NGOs using participatory approaches to engage vulnerable groups	

---

[45] Assessment is contained in columns N-X of the Excel document.

		people, refugees and asylum seekers; women and gay and lesbian groups		
	HU12	n.a.	No. of strategies, standards, norms and guidelines developed to ensure equal access and quality of health services at national or regional/local level	Output indicator
	LV03	Increased number of innovative social services and social measures for children and youth at risk, and families with children that potentially more often experience crisis situation	No. of NGOs promoting democratic values, including human rights	The programme should support multicultural dialogue and the integration of national minorities, incl. awareness raising information, education activities on citizenship, language training activities, and support of NGO capacity building. There are 13 projects under implementation that tackle Roma issues of which 5 are Roma specific. The wide scope of the programme and target groups hinders the establishment of specific and relevant outcome indicators.
			No. of basic and welfare services that meet needs of defined target groups	
	LT04	No. of new basic and welfare services created to meet needs of defined target groups	No. of NGOs promoting democratic values, including human rights	The programme includes democracy and good governance; human rights; vulnerable groups; protection of environment and climate change. There are two intercultural projects where Roma and other minorities are included. The wide scope and numerous target groups hinder the focus on Roma inclusion indicators.
	PL05	No. of NGOs protecting victims of discrimination and intolerance	No. of NGOs promoting democratic values, including human rights	Roma inclusion is not considered among the priorities of the programme, but it is considered as a horizontal concern. There are no special calls foreseen, no specific objectives or indicators given. Over 500 projects were granted under the programme, but only 7 of them concern Roma. They relate to combating discrimination and exclusion.
			No. of NGOs using participatory approaches to engage vulnerable groups	
	PT05	No. of NGOs promoting better understanding and attitudes towards minorities and at risk groups	No. of NGOs promoting democratic values, including human rights	Covering wide scope of thematic areas: democracy; human rights including minority rights; good governance and transparency; social inequalities; gender equality; gender-

				based violence; capacity building; etc. but not Roma specific. The indicators measure outputs.
	RO09	No. of NGOs whose work is focused on minority groups. E.g. minority ethnic groups including Roma people, refugees and asylum seekers; women and gay and lesbian groups	n.a.	At least 10 % of the total programme allocation should be allocated to activities targeting Roma. So far 224 projects were supported, 42 explicitly mentioned Roma in the summary and 12 others are dedicated to Roma communities.
		No. of NGO initiatives that involve in planning and implementation vulnerable groups	n.a.	
	SK03	n.a.	No. of NGOs promoting democratic values, including human rights	Similar scope of topics as above. So far of 63 projects granted, 9 are Roma focused. One of possible indicators (output level) could also monitor the number of Roma-oriented projects and their overall allocation. Clear criteria are needed to specify what is a Roma project.
			No. of NGOs using participatory approaches to engage vulnerable groups	
	SK10	No. of people from vulnerable groups (e.g. people in poverty, people from rural areas, socially excluded people, Roma, disadvantaged youth etc.) benefiting from improved access to work opportunities and from social inclusion	No. of basic and welfare services that meet needs of defined target groups	The programme is focused on active citizenship; empowerment of vulnerable group; increased contribution to sustainable development; provision of welfare and basic services. No specific Roma inclusion interventions are included. Of 69 approved projects, 38 are Roma oriented.
			No. of NGOs using participatory approaches to engage vulnerable groups	
PA11: Children and youth at risk	BG06	No. of regions with established and operational community based programmes addressing specific needs of vulnerable groups of children and youth	No. of measures addressing the needs of vulnerable groups of children and youth facing particular risks	The programme is focused on school attendance, including specific needs of Roma children. Therefore at the outcome level it would be more appropriate to measure percentage of Roma children regularly attending youth clubs or kindergarten.

	CZ04	Measures addressing the needs of vulnerable groups of children, youth and families facing particular risks created	n.a.	The programme deals with the deinstitutionalisation of care. A more specific outcome level indicator would measure the proportion of Romani children in institutional child care (although the numbers are not officially collected, in fact they must exist, as information on a child's ethnicity is used in adoption).
	HU06	No. of children and young people directly benefiting from the programme - disadvantaged, multiple disadvantaged children, mostly Roma girls who took part in the projects successfully, received services and stayed in the school system	n.a.	The programme supports several areas (social integration, child protection, and early school leaving) and should set a reasonable outcome indicator for each of them. If dealing with various groups, the indicators should distinguish between them. The current indicator is an output indicator.
	RO10	No. of appropriate social facilities (educational centres, day care centres, offices etc.) established under the Programme, for the delivery of services for vulnerable groups of children and young people facing particular risks	n.a.	The programme should address the specific needs of Roma and social inequalities, social inclusion, employment, children and youth at risk, pre-school day care and education. In this case, the outcome indicator can be sufficiently specific as the target group is largely Roma minority. It should be set based on the most substantial activities and in line with the programme objectives. Currently, both of the determined indicators are output indicators.
		No. of methodologies, tools, projects, action plans or local development plans etc. aiming to ensure the internalisation of anti-discriminatory, inclusive culture and practices, based on the principle of equal opportunities etc. in working with / addressing disadvantaged groups developed under the Programme		
PA12: Local and regional initiatives to reduce national inequalities	CZ05	Capacity building and transfer of good practice in local and regional schools and authorities in regions facing and dangers of racism and hate crimes	n.a.	The programme activities comprise campaigns against racism and hate violence. The interventions should be implemented by local and regional authorities, private and civil society actors, and should strengthen anti-discriminatory measures for groups vulnerable to social and economic exclusion. The capacity building indicator is not measurable and public awareness needs to be measured through the survey.
		Increased public awareness of issues of hate violence through campaign against racism and hate crimes	n.a.	

and to promote social inclusion	RO10	No. of methodologies, tools, projects, action plans or local development plans etc. aiming to ensure the internalisation of anti-discriminatory, inclusive culture and practices, based on the principle of equal opportunities etc. in working with / addressing disadvantaged groups developed under the Programme	n.a.	The programme should address the specific needs of Roma through innovative initiatives strengthening cooperation between and within local governments, NGOs and the target population. It should address social inclusion, social inequalities, employment, children and youth at risk, pre-school day care and education including multicultural perspectives and history teaching. Municipalities in disadvantaged areas with a high percentage of Roma population should be given priority. This is the only Roma inclusion specific programme with a wide scope of activities. The outcome indicator is not relevant (measuring numerous outputs).
	SK04	Attitudes towards ethnic minorities, including Roma (survey)	n.a.	This could serve as a good example of a sufficiently specific Roma inclusion outcome indicator. To ensure provision of reasonable information, the survey should be conducted under identical conditions, a minimum of two occasions, before the start of the intervention and after its completion.
PA13, PA27: Public health	BG07	Establishments of RH services for adolescent and other vulnerable groups	n.a.	The programme consists of 7 measures, of which 2 are relevant for Roma inclusion: sexual and reproductive health services for adolescents and health services through a homecare approach to pregnant women and children up to 3 years old. Part of the budget is set aside for a small grant scheme to fund a Roma scholarship programme for health-care professions. The determined indicator is not specific to Roma inclusion and is more suitable for output level.
	CZ11	n.a.	n.a.	The programme deals with mental health and prevention of child injuries, not related to Roma inclusion.
	HU12	n.a.	n.a.	The programme focused on mental health with a component "*Improvement of the working conditions of health visitors active in Roma communities*". No direct relation to the Roma inclusion.

	RO19	No. of vulnerable people served by the health mediators and community nurses	n.a.	The programme is focused on primary healthcare and should address the specific needs of Roma. One of 4 projects should deal with the National Network of Roma Health Mediators to Improve the Health Status of Roma population. The outcome indicator measures outputs and is not Roma specific.
PA16, PA17: Cultural heritage and Cultural diversity	BG08	The number of new exhibitions of contemporary art (including art and culture of cultural minorities)	n.a.	The main topic of the programme is cultural heritage. There is no relation to Roma inclusion, though the MoU condition applies (target of 10 % of the allocation to go towards improvement of the situation for the Roma population).
	CZ06	n.a.	n.a.	The programme should support the cultural diversity and cultural expression of minority groups. The PO is obliged to report on funding towards Roma, Jewish and multicultural heritage. However, the relevant outcome indicators are missing.
	HU07	No. of capacity building activities focusing on promotion of cultural diversity	n.a.	The PO has to report on funding towards Roma, Jewish and multicultural heritage. One of the 8 calls should address promotion of intercultural Roma/non-Roma dialogue. The outputs indicators do not cover Roma inclusion and are set out at the output level.
		No. of projects stimulating intercultural dialogue (including Roma, Jewish and other ethnic and cultural minorities)	n.a.	
	RO12	n.a.	n.a.	The programme should support projects related to the documentation of the cultural history of social, ethnic and cultural minorities and groups. A small grant scheme should be devoted to cultural projects related to the Roma population. No outcome indicator is determined.
	RO13	n.a.	n.a.	The cultural diversity programme has so far contracted 40 grant projects, of which 27 are Roma projects. No outcome indicators are determined.
PA18: Research within priority sectors	RO14	n.a.	n.a.	The PO declares that the area has no relevance to Roma inclusion. It is unlikely to fulfil the condition to allocate at least 10 % of the total eligible costs of the programme to improve the situation of the Roma population.

PA19: Scholar-ships	BG09	n.a.	n.a.	Focused on higher education mobility projects. Therefore unlikely to influence Roma inclusion. The risk of not reaching the Roma target (10 % of the total allocation (national level) for the Roma population) is high.
	RO15	n.a.	n.a.	Focused on higher education mobility projects. Therefore unlikely to influence Roma inclusion. Nevertheless, still with the condition to allocate at least 10 % of the total eligible costs of the programme to improve the situation of the Roma population. In this particular case it looks unrealistic unless the aim is changed.
PA28, PA29: Main-streaming Gender Equality and Promoting Work-Life Balance, and Domestic and gender-based violence	BG12	No. of information activities carried out in areas predominantly populated by Roma population	n.a.	The Roma aspect should be incorporated in both the general training and in training for trainers within the programme. There are awareness raising activities planned with a special focus on Roma and other vulnerable communities. No specific outcome indicator is set.
	CZ12	No. of publications, reports, scientific papers originating from projects financed by the Programme made available to public	n.a.	The focus of the programme is gender equality, promotion of the work-life balance and domestic and gender-based violence. The Roma focus is mentioned in the selection criteria. Currently there are 29 projects recommended for funding, of which 3 were classified as Roma projects. The outcome measuring attitude is relevant but not Roma specific.
		Attitudes towards gender roles (survey)	n.a.	
	RO11	n.a.	n.a.	The programme should address the specific needs of minority groups, with a special focus on Roma. Although the outcome indicator is not determined, the proportion of Roma children attending pre-school education could be used.
	RO20	No. of shelters for victims of trafficking established	n.a.	One part of the programme, a pre-defined project, is devoted to the Joint Action against Domestic violence including Roma, and is being implemented. The outcome indicators are not related to this part of the Programme.
		No. of vulnerable communities (including Roma) aware of dangers related to forced begging	n.a.	
	SK09	n.a.	n.a.	No Roma specific issues.

	ES04	Employment rate of women in vulnerable groups (specially Roma)	n.a.	The programme should address violence against women, and a small grants scheme should target vulnerable groups such as Roma. So far 38 projects were selected, of which one directly targeted Roma. Based on the focus, there is no visible direct relation to the outcome indicator.
PA30: Schengen co-operation	BG13	n.a.	n.a.	One of 6 pre-defined projects is related to the development of skills and knowledge of police officers, especially those working in multi-ethnic environment, including Roma communities. There are thus some activities related to Roma-population, but the Roma focus is not strong. The financial condition required that the project should be completely Roma relevant. No outcome indicators are listed.
	CZ14	An analysis of the effectiveness, the appropriateness and the impact of existing laws, strategies and action plans etc. relevant to policing minorities carried out	n.a.	One of 6 projects aims at improving the relationship between the police and the Roma community. It should train police specialists for work in socially segregated Roma locations. The implementation has not started yet. The outcome indicator is not Roma specific and not measurable.
	RO21	No. of police units with increased knowledge of how to improve the relationship with Roma communities	n.a.	One of pre-defined projects deals with the integrated approach to the prevention of victimisation in Roma communities. The outcome indicator was set out to reflect the Roma focus of the intervention but again it measures the output.
PA31: Judicial capacity building	BG14	Cases granted legal aid per 100 000 inhabitants	n.a.	One of 5 pre-defined projects aims to ensure better access to justice for vulnerable groups, particularly Roma, through the implementation of a pilot scheme for primary legal aid, a national telephone hotline, and legal aid centres in two municipalities. The outcome indicator is not Roma specific but is properly set out.
	CZ15	n.a.	n.a.	See comments under PA32. Training of the staff and preparation of the prisoners are the main activities. No Roma specific measures are mentioned. The outcome indicators in fact measures outputs.

	RO24	No. of feasibility studies conducted on access to justice for the Roma population	n.a.	One of 3 pre-defined projects aims to improve access to justice for Roma and other vulnerable groups. The outcome indicator measures the output and is not Roma specific.
PA32: Correct-ional services	BG15	n.a.	No. of persons (prison staff only or experts outside specialised institutions, NGOs, Charities etc.) participating in programmes aimed at assisting vulnerable groups in prisons	The programme should reduce the overcrowding in Bulgarian prisons, which will lead to better protection of human rights of the inmates and decrease in the tension among the prison population. The grant schemes target reintegration and after-care services and programmes for ex-offenders. A substantial part of the target group are Roma. The outcome indicators were not determined.
			No. of prison staff trained to deliver specialised rehabilitation programmes and to work with vulnerable groups	
			Specialised rehabilitation programmes for vulnerable groups of prisoners developed	
	RO23	No. of prison staff trained in new curricula	n.a.	The main components of the programme include development of prison staff, reintegration for inmates, a therapeutic community centre for women and probation tools. The Roma offenders are not specifically mentioned and no outcome indicators are determined.
		No. of specialised programmes for vulnerable groups	n.a.	
	CZ15	No. of persons participating in programme aimed at assisting vulnerable groups in prisons	n.a.	Training of the staff and preparation of the prisoners are the main activities of the Programme. No Roma specific measures are mentioned. The outcome indicators in fact measure outputs.

Annex 4. Data sources in the five focus countries

This Annex reviews sources listed in the NRIS of the five focus countries of the study, which should present the most comprehensive overviews of official sources of data on Roma inclusion at the time of their approval. We complement this with the so-called shadow national reports prepared as part of Decade of Roma Inclusion by civil society organisation in the respective countries.

Bulgaria

The availability of data seems to be most limited in Bulgaria. This is also the only country where the National Roma Integration Strategy acknowledges only census data. In the census 325,000 people identified themselves as Roma, although the EU Framework for National Roma Integration Strategies also quotes estimates of 700-800,000 Roma in Bulgaria (as in all countries, the higher figures are not by self-identification).

The Bulgarian NRIS – which is much shorter than strategies of any other focus countries in this study – describes the situation in each field with census data, and no other data source is mentioned.

In order to ease this general shortage of data, according to the Civil Society Monitoring Report, the Open Society Institute Sofia has conducted several relevant surveys, including older surveys on specific topics such as health care and employment[46] and relatively recent (2013-2014) surveys on hate speech (Ivanova, 2013, based on a public opinion poll, funded by EEA Grants[47]) and Roma women in Bulgaria (based on a special survey in 100 Roma neighbourhoods and FRA survey).

Czech Republic

In the Czech Republic, public authorities were active in data collection in the area of disproportionate representation of Roma children in a segregated education stream for children diagnosed with mental disabilities. This was motivated by a key decision by European Court of Human Rights on discrimination of Roma children in the Czech education system.[48]

- The Ombudsman as well as the School Inspectorate had conducted surveys to identify the **proportion of Roma children in 'practical schools' – former 'special schools'**. The two institutions established somewhat different figures. The survey from the Ombudsman[49] had the advantage of a more sophisticated methodology, while the strength the School Inspectorate's survey[50] was that its figures were comparable with its previous survey.
- The STEM Agency (centre for empirical surveys) had measured **attitudes** of the Czech population towards Roma.

---

[46] http://osi.bg/cyeds/downloads/Report_good_practices_eng_Final_ISBN.pdf.

[47] http://eeagrants.org/content/download/10152/140125/version/1/file/Hate_speech_Bulgaria_EN_2014_interact.pdf.

[48] D.H and others vs the Czech Republic, 57325/00.

[49] http://www.ochrance.cz/fileadmin/user_upload/DISKRIMINACE/Vyzkum/Vyzkum_skoly-zprava.pdf.

[50] http://www.csicr.cz/getattachment/9140af7c-eae6-425c-b097-c43938d885c4.

Hungary

In Hungary, the National Roma Integration Strategy, which covers not only Roma inclusion but broader social inclusion, mentions evidence-based policy development as a priority, and includes a comprehensive list of mainstream data sources.

The following items from that list are the most relevant to Roma inclusion:

- In the area of poverty, inclusion and employment, the most important mainstream European surveys that allow comparison across countries and over time are the **Statistics on Income and Living Conditions (SILC)** and the **Labour Force Survey (LFS)**. Since the drafting of the National Roma Integration Strategies, the Hungarian Central Statistical Office is piloting the extension of **SILC** and **LFS** with an **ethnicity dimension**, including Roma. The first results are promising, and the sample seems to be representative from an ethnicity perspective. This will provide nationally representative data.
- In the area of education, the Education International Fair collects data on **secondary school careers** of disadvantaged children (of parents without school qualification) and Roma children.
- The National Institute of Family and Social Policy[51] implements an EU-funded project that includes research and surveys on disadvantaged groups including Roma, with the explicit objective to provide **social policy development** with data.
- A recent mapping focused on housing identified 1,663 **segregated localities**, most of them on the edge of the village or town.

Further relevant information

- According to the Civil Society Monitoring Report[52], in the area of education, the above collection of data on secondary school careers was **not continued**. As this database was built over more than six years, included data of 10,000 children, and included an ethnicity dimension, this is a significant loss.
- Based on data from the European Social Survey, the Political Capital Institute[53] has calculated an index quantifying the **demand for right-wing extremism** (DEREX), with several components including **prejudices and welfare chauvinism**. The index shows that prejudices and welfare chauvinism is extremely high in Hungary, and demand for right-wing extremism is high in Bulgaria and Hungary. This data may have relevance to some projects in PA 10 – NGO funds, where anti-Gypsyism is addressed.

Romania

In Romania**,** the focus of surveys has ranged from basic data such as the estimated number of Roma to specific data such as migration and attitudes. We identified the following sources of data as interesting in the Romanian National Roma Integration Strategy and the shadow report – the Civil Society Monitoring Report:

---

[51] http://ncsszi.hu/national-institute-for-family-and-social-policy

[52] http://www.romadecade.org/cms/upload/file/9270_file30_hu_updated-civil-society-monitoring-report.pdf

[53] http://www.riskandforecast.com/

- The government and the World Bank conducted a survey called The Roma Communities Social Map[54], which provided basic data such as the **estimated number** of those who declare themselves Roma (the estimate is around 850,000, which is well below the estimated number of Roma identified by sociologists quoted in the EU Framework for National Roma Integration Strategies that are around 1,850,000).
- The Ministry of Labour, Family and Social Protection conducted a survey on family budgets that included an ethnicity dimension and identified the **proportion of Roma within the poor population**, according to various definitions.
- A representative survey of the Soros Foundation Romania (now the Foundation for an Open Society) called '*The Roma situation in Romania, 2011. Between social inclusion and migration*'[55] quantified a number of problems, e.g. **lack of identity and property documents**, **lack of stable, formal employment**, **lack of housing**, etc.
- UNICEF conducted a survey on **education**, covering school participation as well as discrimination.
- A survey by the Roma NGO Romani Criss[56] provided information on **health care**.
- The National Council for Combating Discrimination, Romania's National Equality Body, conducts an annual survey on **perceptions and attitudes** towards discrimination, with a section on Roma.

Slovakia

Slovakia is the country that has used the **UNDP** Regional Survey data the most extensively, probably influenced by the presence of a regional UNDP office based in Slovakia, which had Slovak staff members, and had more intensive cooperation with national institutions and NGOs there than in other countries.

Besides these data, according to the NRIS and the Civil Society Monitoring Report, the following specific sources of data are most relevant or interesting:
- There is an officially recognised, updated **Atlas of (Marginalised) Roma Communities** (2013)[57]. It identified 804 settlements in Slovakia with 402,840 people in 584 municipalities (out of the 2,890 municipalities altogether), including 246 settlements with 52,000 people inside villages or towns, 327 settlements with 96,000 people on the edge of the village or town, and 231 settlements with 69,000 people segregated from the village or town.
- The Atlas maps in detail a variety of indicators for every Roma settlement and is potentially useful in setting baselines for municipality-based interventions in Slovak programmes.
- The Atlas was used extensively in programming for European Structural and Investment Funds in the 2014-2020 programming period. Some examples of its use include the identification of municipalities to target with certain infrastructure interventions.
- A survey of the Open Society Foundation identified the **use of drugs** among Roma youth in settlements, including young children, as a key problem that has not been addressed.

---

[54] http://www.anr.gov.ro/docs/statistici/Roma_Social_Mapping_187.pdf.

[55] http://www.fundatia.ro/sites/default/files/en_122_Roma%20situation%20in%20Romania.pdf.

[56] http://www.euro.who.int/__data/assets/pdf_file/0016/235141/e96931.pdf.

[57] http://www.minv.sk/?atlas_2013.

- A survey of human rights by the NGO CCHR confirmed concerns about the **implementation and enforcement of anti-discrimination legislation**: a very high proportion of members of marginalised Roma communities experienced discrimination, but a very low proportion of them sought a legal remedy.

This is not a comprehensive mapping of sources, as some national sector-specific sources may be available but their analysis was beyond the sectoral expertise of the country consultants on the team of this study.

Annex 5. Proposals for improving the Guidance on Roma Inclusion Plans

The Guidance Note containing FMO proposal of elements to be included in the Roma Inclusion Plan and in its consultation is developed in great detail. In spite of this, the quality of Roma Inclusion Plans as presented by Programme Operators varies widely.

In many cases the information provided does not follow the detailed guidance in the note. In particular many responses are **superficial** showing likely lack of understanding of the objectives of the various components of the Guidance Note or lack of capacity to provide sufficiently specific responses.

We propose the following modifications to the Guidance Note:

1. **Require a clearer formal structure for the document containing the Roma Inclusion Plan (identification of version and date, numbering of sections and subsections to simplify cross-referencing and increase clarity):**
   A. Programme Outcomes
   B. Measures Supported
   C. Measures Directly Relevant to Roma Inclusion
      C.1 Roma inclusion in Measure X
         C.1.1 Rationale
         C.1.2 How will this be achieved
         C.1.3 Expected budgetary contribution
         C.1.4 Information/Data Collection
         C.1.5 Monitoring
         C.1.6 Evaluation
      C.2 Roma inclusion in Measure XX
         C.2.1 Rationale
         C.2.2 How will this be achieved
         C.2.3 Expected budgetary contribution
         C.2.4 Information/Data Collection
         C.2.5 Monitoring
         C.2.6 Evaluation
         …C.X for each additional measure…
   D. Other measures in the Programme
      D.1 Communication Strategy
      D.2 Synergies with other programmes/initiatives
      D.3 Sustainability
   E. Stakeholder consultation

2. **For section A. on Programme Outcomes, if any outcome indicators explicitly mentioning Roma are proposed, require a specification who will the Programme Operator consider a Roma participant/beneficiary/ NGO for reporting purposes.**

3. **Provide more detailed methodological guidance for sections C.X.3 on Expected budgetary contribution**
   - the example provided in the Guidance Note focuses on Scholarship programmes but may be difficult for some Programme Operators to apply to other programmes.

- guidance should be added to identify share of project contribution to Roma inclusion in projects, that only partially target Roma – this could be addressed by multiplying the project allocation by an estimate of the proportion of Roma on total number of beneficiaries:
  o where a project targets a geographic unit, the proportion of Roma on population in the unit according to available estimates should be used (e.g. proportion of Roma on population as measured by the Census, where possible also with a local government or local NGO estimate, if the Census figure underestimates proportion of Roma);
  o where individuals are targeted by a project such as members of vulnerable groups, they can be asked to self-identify as part of application process (especially where preference is given to Roma participants);
  o where institutions such as NGOs are targeted by a project, they can be asked to self-identify as Roma NGOs – Programme Operator should provide guidance on what it considers a Roma NGO such as on the basis of membership, leadership or mission relevant to Roma.

4. **For sections C.X.4, C.X.5 and C.X.6, provide a more extensive list of examples of what is expected**
   - content of most Roma Inclusion Plans in this section is particularly weak, with Programme Operators mainly relying on programme reports and standard monitoring and evaluation arrangements.

5. **For section D.1 clarify what kind of Communication strategy should be considered**
   - a list of examples of specific communication strategies appropriate to increase outreach to Roma such as approaching Roma NGOs, communicating with the national Roma integration focal point, holding information events in regions with high proportion of Roma population.

6. **Section D.3 Sustainability could be connected explicitly to the Checklist for Tracking Innovative Interventions proposed in Proposal 2 in Chapter IV.1 of this study, if adopted**
   - the guidance could take up the question 5. from the checklist on potential scale up or mainstreaming.

Annex 6. Application of modified S – P – O framework to EEA & Norway Grants

Table 8   Example of the application of a modified S – P – O framework to a list of EEA & Norway Grant-funded projects in Romania

Prog.	Project Identifier	Project Title	Project Grant Award	Correspondence to S-P-O measure	Sub-measure, if appropriate
RO09	RO09-0007	Multicultural dialogue centre for children	58 629	2.5	
RO09	RO09-0008	Keep Up with Social Justice	67 538	2.10	
RO09	RO09-0011	Investing in Children. Developing Parents	67 500	2.5	
RO09	RO09-0012	Strategic Development for the Protection of Child Rights	135 150	2.5	
RO09	RO09-0013	NGO Voice for the community!	130 180	2.8	
RO09	RO09-0017	Helping Roma Survivors of Deportations to Transnistria	31 480	██	
RO09	RO09-0020	Inclusive education - a right of the disabled child	67 455	1.3	1.3 (b)
RO09	RO09-0022	Alternative Education in Penitentiaries	74 315	2.10	
RO09	RO09-0025	Interculturality – one step towards equality	69 931	1.3	
RO09	RO09-0026	We all have a story - Pro-diversity and pro-inclusion kindergarten programme	200 862	1.3	1.3 (d)
RO09	RO09-0027	Non-formal Education is Education	74 992	2.8	
RO09	RO09-0034	Local Group of Initiative for the development of Giulesti Sarbi community	70 021	3.3	
RO09	RO09-0036	Recovery network mobile complex for children and youth with disabilities in rural areas	181 744	██	
RO09	RO09-0038	I want to go to school too!	74 722	3.3	
RO09	RO09-0040	Innovative social services for isolated communities	234 819	1.3	1.3 (d)
RO09	RO09-0041	ACCESS	249 721	1.5	
RO09	RO09-0042	SOCIAL INCLUSION GARDENING	62 088	1.4	1.4 (a)
RO09	RO09-0043	Racos – responsibility and participation for community development	54 650	3.1	
RO09	RO09-0045	School more closer to the community	74 702	1.3	1.3 (e), 2.9
RO09	RO09-0047	Volunteer Programme in Palliative Care	74 627	██	
RO09	RO09-0048	The Prince and the Pauper	69 988	██	
RO09	RO09-0049	Look beyond appearances	70 785	2.4	

RO09	RO09-0050	Access to basic social services for vulnerable people in Brasov County	25 826	2.1	
RO09	RO09-0051	Together for Equality of Opportunities	24 142	███	
RO09	RO09-0053	Media Literacy for High School Students against Discrimination	141 358	2.4	2.4 (b)
RO09	RO09-0054	Romanian Coalition for Gender Equality	74 252	2.5	
RO09	RO09-0055	Active citizens for Bacau	63 729	███	
RO09	RO09-0060	Volunteer Center for community	31 456	███	
RO09	RO09-0061	Start the engine of change in your community	63 557	███	
RO09	RO09-0068	Specialised methods for people with intellectual and multiple disabilities	72 551	███	
RO09	RO09-0071	My Body My Own	67 581	2.5	
RO09	RO09-0072	"I, an Oltenia-Based Peasant, Need an Education"	215 015	1.3	1.3 (c)
RO09	RO09-0075	Local Development Centre - Ciumârna	20 218	███	
RO09	RO09-0076	Prevalcool	70 184	███	
RO09	RO09-0081	Pro Bono Network against Discrimination	53 484	2.1	
RO09	RO09-0083	Activating Citizens in 4 Communities	71 544	2.8	
RO09	RO09-0087	Inter-sector partnership – the base for quality social services	186 157	███	
RO09	RO09-0088	Come Together - For Responsible Consume	14 999	███	
RO09	RO09-0090	Arguments against discrimination	34 974	2.2	
RO09	RO09-0091	Breaking the Silence on Sexual Violence	34 709	2.5	
RO09	RO09-0092	Young people from Romania and Norway - Promoters of Civic Community Volunteering	74 970	2.8	
RO09	RO09-0093	Revival of Roma cultural traditions, a path to a harmonious development	65 199	███	
RO09	RO09-0094	School-a chance for all children	67 177	1.3	
RO09	RO09-0096	Rural youth participation	26 610	2.8	
RO09	RO09-0099	PANDORA	61 733	2.4	
RO09	RO09-0100	Big Brother: Mentoring program for Roma youth	31 369	███	
RO09	RO09-0102	Together for health	72 000	1.5	1.5 (b)
RO09	RO09-0104	Women's participation is EQUAL	30 240	2.8	
RO09	RO09-0105	The Anti-discrimination Coalition	130 369	2.4	
RO09	RO09-0107	Full and Active Participation for Quality Education in Interethnic Rural Area	74 970	1.3	

RO09	RO09-0108	Establishing the Time Bank - a network of mutual voluntary help	72 391	2.8	
RO09	RO09-0109	Combating social exclusion and ethnic disparities in the South of Harghita County	62 544	2.8	
RO09	RO09-0110	Active for Our Community!	73 263	2.8	
RO09	RO09-0116	YouthBank Academy	75 000	2.8	
RO09	RO09-0117	„Hand in Hand" in Sângeorgiu de Mures	74 999	3.1	
RO09	RO09-0118	We are the community	17 731	1.4	
RO09	RO09-0119	DELICOM – Integrated Local Development under Community Responsibility	67 828	2.8	
RO09	RO09-0120	Interethnic community facilitators – Solution for Roma social inclusion	31 500	2.9	
RO09	RO09-0121	Participatory Democracy. Piloting a citizen's initiative for interethnic communities in Romania	74 331	2.8	
RO09	RO09-0122	Remedial education - School after school Programme	27 090	2.8	
RO09	RO09-0123	A Good Start – Encouraging the early childhood education in the community of Glina	74 999	1.3	
RO09	RO09-0126	Youth Voice	51 262	2.4	
RO09	RO09-0129	Active participation of the NGOs in European Funds management	89 376	🟥	
RO09	RO09-0130	Creative education for a harmonious community	34 848	🟥	
RO09	RO09-0131	Every Child in Preschool - Reduction of poverty and social exclusion through early education	244 005	1.3	1.3 (d)
RO09	RO09-0133	Youth Involvement Academy	74 240	2.8	
RO09	RO09-0136	Connect to your Community	74 034	2.8	
RO09	RO09-0138	Mobilizing universities to combat discrimination	73 045	2.4	
RO09	RO09-0139	Counselling and support services for ASD	187 485	🟥	
RO09	RO09-0140	Community and Support Centre Prejmer	34 997	2.6	
RO09	RO09-0141	Good start - early intervention for children with disabilities or at risk of developmental delay or disability, and their families	223 380	1.3	1.3 (d)
RO09	RO09-0144	Community - Children - Family	67 500	2.5	
RO09	RO09-0149	Short term professional care for children with handicap providing thus short breaks for their families.	124 057	2.6	
RO09	RO09-0150	Bucsani between Bucharest and Europe - Social services for children and youngsters from Giurgiu County rural areas	241 097	2.6	
RO09	RO09-0151	IMPACT for community	74 630	2.8	
RO09	RO09-0152	Human Rights for Roma	191 803	2.4	
RO09	RO09-0153	Combating Inequality and Social Exclusion of Roma, by Promoting a Correct and Multi-ethnic Dialog	70 870	2.4	

RO09	RO09-0154	Together for community change	72 221	2.4	
RO09	RO09-0155	Second chance for Roma	67 500	1.3	
RO09	RO09-0156	Her Story – Women in rural inter-ethnic communities	70 020	2.5	
RO09	RO09-0157	Interethnic Cooperation for Brăhășești village	74 700	2.8	
RO09	RO09-0158	Community Development Through Education and Culture	7 417	1.3	
RO09	RO09-0159	Interethnic Mobile School	73 350	1.3	
RO09	RO09-0160	Directing the Future: Integration Through Cinematographic and Non-formal Education	72 000	🟥	
RO09	RO09-0167	Third place of active citizenship	220 877	2.8	
RO09	RO09-0169	Informed and Influential in the EU Negotiations - Expertise and Debates	49 350	🟥	
RO09	RO09-0173	Ethnic and social development	44 950	1.8	
RO09	RO09-0174	Multiculturalism - engine for sustainable development	69 351	2.8	
RO09	RO09-0175	Together for a better life	34 999	1.3	
RO09	RO09-0176	A gift from a Gift for Băgaciu	61 047	2.8	
RO09	RO09-0178	Quality Education Is For All!	249 975	1.3	
RO09	RO09-0180	Network for the Social Inclusion of the Roma – Capacity Building and Advocacy	148 121	2.8	
RO09	RO09-0185	YOUTH WITHOUT LABELS	130 769	2.5	
RO09	RO09-0189	I am a role model for my community	29 498	1.3	1.3 (h)
RO09	RO09-0190	Children of Dumbravita for the future	62 997	🟥	
RO09	RO09-0191	The Cojocna Civic Brigade	72 363	2.8	
RO09	RO09-0192	Woman Entrepreneur	9 000	🟥	
RO09	RO09-0193	Children of Dumbravita for the future	56 504	🟥	
RO09	RO09-0203	Initiation of community facilitator services for the development of interethnic communities	49 057	2.9	
RO09	RO09-0205	Net-rangers against Intolerance	116 523	2.4	
RO09	RO09-0207	Children's right to participate	220 886	2.8	
RO09	RO09-0208	Socio-educational services for Roma inclusion - ROMEDIN	224 952	1.3	
RO09	RO09-0209	Monitoring human rights through international mechanisms	56 940	2.10	
RO09	RO09-0211	Together for the future- innovative social services network to support disadvantaged children and young people	209 988	🟥	
RO09	RO09-0212	Day 15	34 002	2.8	

RO09	RO09-0213	Creating an NGO Coalition interested in opening up the political market	45 992	🟥	
RO09	RO09-0214	I Care Map	74 617	2.8	
RO10	RO10-0001	Strengthening anti-discriminatory measures at national level through large participation of professionals and civil society	339 991	2.4	
RO17	RO17-0016	Comana Crafts Village	197 991	🟥	
RO17	RO17-0017	Sustainable green waste management	199 999	🟥	
RO17	RO17-0024	Environment services from High Nature Value farmland	190 000	🟥	
RO19	RO19-0001	Improving the health status of the Romanian population in Romania by increasing Tuberculosis control	3 900 510	1.5	
RO19	RO19-0002	Strengthening the prevention and control of HIV/AIDS, HVB, HVC in Romania	992 332	1.5	
RO19	RO19-0003	Strengthening the National Network of Roma Health Mediators to Improve the Health Status of Roma Population	760 727	1.5	1.5 (b)
RO20	RO20-0001	Best practice model on assistance for victims of trafficking in human beings - Pilot project	1 224 999	2.5	
RO20	RO20-0007	JAD - Joint action against domestic violence	414 641	2.5	
RO21	RO21-0006	PDP 1 "Strengthening the police cooperation between Romania and Norway, to fight criminal itinerant groups and human trafficking"	2 439 641	3.10	
RO23	RO23-0001	Strengthening the capacity of the penitentiary system in the area of human capital development at the level of prison staff	548 308	🟥	
RO23	RO23-0002	Establishing a therapeutic community centre for women in Gherla Prison	1 047 571	🟥	
RO23	RO23-0003	Strengthening the capacity of the Bacau prison for minors and youngsters to comply with the relevant international human rights instruments	2 658 251	🟥	
RO23	RO23-0004	Strengthening the capacity of the pre-trial detention system to comply with the relevant international human rights instruments	1 093 608	🟥	
RO23	RO23-0005	Strengthening the capacity of the Romanian probation system for delivering effective alternative to prison interventions	1 643 122	🟥	
RO23	RO23-0006	Setting up an eco–reintegration mechanism for inmates	493 272	🟥	
RO24	RO24-0005	Improving access to justice. An integrated approach with a focus on Roma and other vulnerable groups	800 000	2.2	
RO25	RO25-0001	Social interventions for de-segregation and social inclusion of vulnerable groups in Cluj Metropolitan Area, including the disadvantaged Roma	2 079 500	3.3	
RO25	RO25-0002	Social inclusion through the provision of integrated social services at community level	3 258 706	3.3	
RO25	RO25-0003	Community Centres Armata Salvarii Iasi and Ploiesti	3 205 751	3.3	
RO25	RO25-0003	Community Centres Armata Salvarii Iasi and Ploiesti	3 205 751	3.3	

Table 9   Measures in Council Recommendation on Effective Roma Integration Strategies

Grouping of measures
Access to education
1.3 Effective measures to ensure equal treatment and full access for Roma boys and girls to quality and mainstream education and to ensure that all Roma pupils complete at least compulsory education
Measure   (a) eliminating any school segregation;   (b) putting an end to any inappropriate placement of Roma pupils in special needs schools;   (c) reducing early school leaving (7) throughout all levels of education, including at secondary level and vocational training;   (d) increasing the access to, and quality of, early childhood education and care, including targeted support, as necessary;   (e) considering the needs of individual pupils and addressing those accordingly, in close cooperation with their families;   (f) using inclusive and tailor-made teaching and learning methods, including learning support for struggling learners and measures to fight illiteracy, and promoting the availability and use of extracurricular activities;   (g) encouraging greater parental involvement and improving teacher training, where relevant;   (h) encouraging Roma participation in and completion of secondary and tertiary education;   (i) widening access to second-chance education and adult learning, and providing support for the transition between educational levels and support for the acquisition of skills that are adapted to the needs of the labour market.
Access to employment
1.4 Effective measures to ensure equal treatment of Roma in access to the labour market and to employment opportunities
Measure   (a) supporting first work experience, vocational training, on-the-job training, lifelong learning and skills development;   (b) supporting self-employment and entrepreneurship;   (c) providing equal access to mainstream public employment services, alongside services to support individual job-seekers, focusing on personalised guidance and individual action planning and, where appropriate, promoting employment opportunities within the civil service;   (d) eliminating barriers, including discrimination, to (re)entering the labour market
Access to healthcare
1.5 Effective measures to ensure equal treatment of Roma in access to universally available healthcare services (8) on the basis of general eligibility criteria
Measure   (a) removing any barriers to access to the healthcare system accessible for the general population;   (b) improving access to medical check-ups, prenatal and postnatal care and family planning, as well as sexual and reproductive healthcare, generally provided by national healthcare services;   (c) improving access to free vaccination programmes targeting children and vaccination programmes targeting, in particular, groups most at risk and/or those living in marginalised and/or remote areas;   (d) promoting awareness of health and healthcare issues

Access to housing
1.6 Effective measures to ensure equal treatment of Roma in access to housing
Measure (a) eliminating any spatial segregation and promoting desegregation; (b) promoting non-discriminatory access to social housing; (c) providing halting sites for non-sedentary Roma, in proportion to local needs; (d) ensuring access to public utilities (such as water, electricity and gas) and infrastructure for housing in compliance with national legal requirements
1.7 Whenever relevant, ensure that applications from local authorities for urban regeneration projects include integrated housing interventions in favour of marginalised communities
1.8 Promote community-led local development and/or integrated territorial investments supported by the ESIF
Funding
1.9 Funding for the implementation and monitoring of national and local strategies and action plans
Anti-discrimination
2.1 Ensure the effective practical enforcement of Directive 2000/43/EC
2.2 Desegregation measures concerning Roma both regionally and locally, accompanied by appropriate training and information programmes, including training and information on human rights protection, addressed to local civil servants and representatives of civil society and Roma themselves
2.3 Ensure that forced evictions are in full compliance with international human rights obligations
2.4 Measures to combat discrimination and prejudice against Roma, sometimes referred to as anti-Gypsyism, in all areas of society
Measure (a) raising awareness about the benefits of Roma integration both in Roma communities and among the general public; (b) raising the general public's awareness of the diverse nature of societies, and sensitising public opinion to the inclusion problems Roma face, including, where relevant, by addressing those aspects in public education curricula and teaching materials; (c) taking effective measures to combat anti-Roma rhetoric and hate speech, and addressing racist, stereotyping or otherwise stigmatising language or other behaviours that could constitute incitement to discrimination against Roma
Protection of Roma children and women
2.5 Combat all forms of discrimination, including multiple discrimination, faced by Roma children and women, and fight violence, including domestic violence, against women and girls, trafficking in human beings, underage and forced marriages, and begging involving children, in particular through the enforcement of legislation…ensure the involvement in this exercise of all relevant actors including public authorities, civil society and Roma communities, cooperation between Member States in situations with a cross-border dimension
Poverty reduction through social investment
2.6 Combat poverty and social exclusion affecting the disadvantaged, including Roma, through investment in human capital and social cohesion policies
Measure (a) supporting Roma at all stages of their lives, starting as early as possible and systematically dealing with the risks they face, including by investing in good-quality inclusive early childhood education and care, targeted youth guarantee schemes, life-long learning and active ageing measures; (b) pursuing policies of activation and enablement by supporting (re)entry to the labour market through targeted or mainstream employment support schemes, and promoting inclusive labour market by addressing discrimination in the workplace;

(c) making social benefits and social services granted to the disadvantaged, including Roma, in accordance with national legislation, more adequate and sustainable through more joined-up social policies, through the simplification of procedures, and by combating fraud and errors; ensuring the take-up of social assistance schemes; and providing adequate income support to those eligible

Empowerment

2.8 Support the active citizenship of Roma by promoting their social, economic, political and cultural participation in society, including at the local level, including through representatives and organisations

2.9 Promote the training and employment of qualified mediators dedicated to Roma and use mediation as one of the measures to tackle the inequalities Roma face in terms of access to quality education, employment, healthcare and housing

2.10 Information activities to further raise awareness among Roma of their rights in relation to discrimination and the possibilities of seeking redress and of their civic duties

Local action

3.1 Local action plans or strategies, or sets of local policy measures within wider social inclusion policies, which could include baselines, benchmarks and measurable objectives for Roma integration as well as appropriate funding

3.2 Involve regional and local authorities and local civil society in developing, implementing and monitoring their national strategies or integrated sets of policy measures within broader social inclusion policies, support local public authorities so as to facilitate the implementation of sets of policy measures at local level

3.3 Integrated approach concerning families with a Roma background facing multiple problems such as non-completion of school, debt, poverty and poor health - capacity of local authorities strengthened, work in co-operation with the families concerned and, for example, schools, youth care organisations, police, public health organisations, welfare organisations and housing corporations

Monitoring and evaluating policies

3.4 Monitor and evaluate the effectiveness of national strategies or integrated sets of policy measures within broader social inclusion policies by setting baselines or measurable targets or by collecting relevant qualitative or quantitative data on the social and economic effects of such strategies or measures

3.5 Use core indicators or methods of empirical social research or data collection for monitoring and evaluating progress on a regular basis, particularly at the local level

Bodies for the promotion of equal treatment

3.6 Support the work and institutional capacity of bodies for the promotion of equal treatment by granting them adequate resources so that the legal and judicial assistance they provide can effectively benefit Roma victims of discrimination.

3.7 Promote regular dialogue between their National Contact Points for Roma integration and national bodies for the promotion of equal treatment.

National Contact Points for Roma integration

3.8 Provide National Contact Points for Roma integration with resources

Transnational cooperation

3.10 Encourage the development of, and active participation in, transnational forms of cooperation at national, regional or local level, through policy initiatives, in particular projects and bilateral or multilateral agreements.

Measure (a) coordinate on issues related to the cross-border mobility of Roma within the Union; and (b) support mutual learning and the multiplication of good practices

Table 10   Example of assessment of projects for correspondence to Measures in S-P-O framework

Programme/Project	Grant Awarded (€)	Correspondence to Measure in S-P-O framework	Justification
SK04 – PDP "*Creating an accredited study programme for innovative education for teaching staff in primary schools to increase their intercultural competence in education of Roma pupils*"	258,000	Grouping of measures: 1.3 e)-h) Systems of targeted support for [early childhood education and care] [primary] [secondary] [tertiary] education provided/in place (measures taken to provide inclusive and tailor-made teaching and learning methods) Measure: Are specific actions implemented for the specific needs of Roma children, e.g. language, culture, etc. in regard to pre-primary /primary /secondary/ post-secondary education?	Lacking intercultural and inclusive teaching competences of teaching staff have been identified as one of the key deficits reducing the quality of education of Roma children from marginalised communities. This PDP aims to develop an accredited programme for teachers addressing this deficiency.
RO24 – project Improving access to justice. An integrated approach with a focus on Roma and other vulnerable groups	800,000	Grouping of measures: Anti-discrimination Measure: 2.4 Are measures to combat discrimination and anti-Gypsyism in place - other?	There is evidence of problems in access to the justice system for marginalised Roma. The project will set up legal assistance offices in give communities with high proportions of Roma population.

Table 11   Correspondence of Romania EEA & Norway Grants projects to Council Recommendation

Measure	No. of projects corresponding to Measure	Funds allocated (€)	Proportion of funds to all Roma-relevant projects (%)
1.3 Access to Education	18	2,235,006	6.03%
1.4 Access to Employment	2	79,819	0.22%
1.5 Access to Healthcare	6	6,207,048	16.76%
1.8 Promotion of community-led local development and/or integrated territorial investment	1	44,950	0.12%
2.1 Anti-discrimination - efforts to ensure the effective practical enforcement of Directive 2000/43/EC	2	79,310	0.21%
2.2 Implement desegregation measures regionally and locally	2	834,974	2.25%
2.4 Combat discrimination and prejudice against Roma in all areas of society	11	1,319,960	3.56%
2.5 Protection of Roma Children and Women	11	2,345,750	6.33%
2.6 Poverty reduction through social investment	3	400,151	1.08%
2.8 Empowerment - Support the active citizenship of Roma by promoting their social, economic, political and cultural participation in society, including at the local level	25	2,059,851	5.56%
2.9 Empowerment - Promote the training and employment of qualified mediators dedicated to Roma and use mediation	2	80,557	0.22%
2.10 Empowerment - Information activities to further raise awareness among Roma of their rights	3	198,793	0.54%
3.1 Local Action - Encourage those authorities to develop local action plans or strategies, or sets of local policy measures within wider social inclusion policies	2	129,649	0.35%
3.3 Local Action - Integrated approach concerning families with a Roma background facing multiple problems such as non-completion of school, debt, poverty and poor health	5	8,688,700	23.46%
3.10 Transnational Cooperation	1	2,439,641	6.59%
Projects not attributable to any specific measure in Council Recommendation based on available description of activities	34	9,891,062	26.71%

Table 12   Overlap between Roma-relevant EEA & Norway Grant programme areas and Council Recommendation

Programme areas	Council Recommendation Measures
PA10 - Funds for non-governmental organisations	Most areas
PA11 - Children and youth at risk	Access to education (1.3), Protection of Roma children and women (2.5)
PA12 - Local and regional initiatives to reduce national inequalities and to promote social inclusion	Access to employment (1.4), Poverty reduction through social investment (2.6), Local action (3.1)
PA14 - Mainstreaming gender equality and promoting work-life balance (EEA grants), PA28 - Mainstreaming gender equality and promoting work-life balance (Norway grant)	Protection of Roma children and women (2.5)
PA16 - Conservation and revitalisation of cultural and natural heritage, PA17 - Promotion of diversity in culture and arts within European cultural heritage	
PA19 – Scholarships	Access to education (1.3)
PA27 - Public health initiatives (Norway grant), PA13 - Public health initiatives (EEA grants)	Access to healthcare (1.5)
PA29 - Domestic and Gender-based violence	Protection of Roma children and women (2.5)
PA30 - Schengen cooperation and combating cross-border and organised crime, including trafficking and itinerant criminal groups	Transnational cooperation (3.10)
PA31 - Judicial capacity-building and cooperation	
PA32 - Correctional services, including non-custodial sanctions	

Annex 7. Proposed Checklist for Tracking Innovative Interventions

1. Project Identification				
	Programme	Project	Project Promoter	Allocation

2. Summarise:

a.	what change in Roma inclusion or empowerment is targeted in the project,
b.	how it is measured,
c.	what result must be achieved for the project to be considered successful.

(Please be specific in terms of number of beneficiaries, measurement instruments and indicators of success. Specify, if these correspond to the official indicators used).

3.   Do you believe this project constitutes an innovative intervention? Yes/No

If the answer is yes, please answer part 3b. Otherwise, please answer part 3a.

a.   If the project is not innovative, please identify where the approach used had been piloted or verified

(Please state specifically where the approach has been used, what indicators of success were available and whether and how this approach has been modified for the present intervention.)

b.   Please identify the type of innovation (check all that apply):

- a completely new approach first applied in this project;

- an existing domestic approach applied to a new geographic or socio-economic target group;

- an existing approach used in other countries applied in project country.

4.   Please describe the innovative aspects in accordance with the types of innovation identified in 3b in detail.

5.   What are your expectations of the potential of the project approach for scaling up (i.e. application of the same approach to a larger target group) or mainstreaming (making the approach part of national or local government policies)?
a.   Specify how you expect the approach to be suitable for scaling up at regional, national or international level. Have any funding possibilities for the scaling up been identified (state budget, EU SIF, other funding)?
b.   Specify if you expect the approach to be mainstreamed into national legislation, public budgets, activity of public institutions, etc. What policy changes will be required for mainstreaming of the approach?
c.   Do the partnerships required for mainstreaming or scaling up already exist? Please specify key partners involved.
6.   What are the main risks to the success of the project?
7.   What lessons have been learned in the implementation of this project so far that should be shared with others implementing similar approaches?

Annex 8. Evaluation for Scale Up

A possible consideration is to prepare in the present programming for the future use of experimental and quasi-experimental methods to evaluate especially promising interventions that seem suitable for scale up. Such rigorous evaluation is costly and needs to be built into project design in advance. Having a well-developed and described "treatment" design is one of the pre-requisites and outputs of evaluations of innovative interventions in the present programme period would make it feasible to use counterfactual impact evaluations for selected interventions in the subsequent programme period. There is a network supporting such experimentation with particular interest in finding interventions effective in addressing Roma inclusion including the Jameel Poverty Action Lab Europe and the World Bank.

This would require a project-level evaluation focused on understanding the intervention and should involve an expert on counterfactual impact evaluation who understands the needs of designing such evaluations.

Table 13   Selection of proposed evaluation questions

Learning
- Are there any successful innovative or pilot activities with potential for scale up or mainstreaming?
- What programmes have contributed to the sustainable mainstreaming of innovative activities?
- What were the costs and benefits of addressing Roma inclusion concerns in mainstream programmes?
- What approaches by Programme Operators resulted in the highest number and best quality of Roma inclusion and empowerment projects?

Accountability
- Compare cost effectiveness across programmes with a focus on countries and programmes with numeric targets
- It would be useful to seek a comparison of what has been achieved with grant funding across very different programmes, especially where the numeric targets were applied
- Comparison across programme areas will allow better targeting of funds towards Roma inclusion

Note that this is not an exhaustive evaluation plan but rather a suggested list of some evaluation questions based on the findings of this study.

Annex 9. List of Documents Consulted

The Aspen Institute: Voices from the field III: Lessons and Challenges from Two Decades of Community Change Efforts, Washington (2006).

Barnes, J. (2010), Learning to make space for qualitative indicators, IOD PARC.

Beall, J. and Piron, L.-H. (2005), DFID Social Exclusion Review.

Bennet, J. (2012), Roma Early Childhood Inclusion, The RECI Overview Report, UNICEF.

Coffman, Julia, 2007, "*A Framework for Evaluating Systems Initiatives*", Paper based on the Build Initiative's Evaluation Symposium.

Council of the European Union (2013), Council recommendation on effective Roma integration measures in the member states, Brussels, 9 and 10 December 2013.

Davies, R. and Dart, J. (2005), The 'Most Significant Change' (MSC) Technique, A Guide to Its Use. http://www.mande.co.uk/docs/MSCGuide.pdf

Decade of Roma Inclusion Secretariat Foundation (2013), Civil Society Monitoring Reports on the implementation of the national Roma integration strategy; Bulgaria, Czech Republic, Hungary, Romania and Slovakia. http://www.romadecade.org/civilsocietymonitoring

Deepa Narayan and Michael F. Cassidy, A Dimensional Approach to Measuring Social Capital: Development and Validation of a Social Capital Inventory, Current Sociology, Vol. 49 No. 2, Sage Publications, March 2001.

DFID (2009), Guidance Note on Gender Mainstreaming and Social Exclusion in Research.

Dimitrov, D. and Milosheva-Krushe, M. (2012), Towards mainstreaming of good practices for monitoring of Roma integration policies, CREDA Consulting.

ESD Inds: Value-based Indicators for Sustainable Development: DRAFT Handbook for Civil Society Organisations On Indicators.

EuropeAid: Results-Oriented Monitoring Handbook, European Commission , 2012. http://capacity4dev.ec.europa.eu/system/files/file/28/10/2013_-_1159/ec_rom_handbook2012_en.pdf

European Commission (2014), Programming Period 2014-2020, Monitoring and Evaluation of European Cohesion Policy European Social Fund, Guidance document.

Evaluation Guidelines EEA and Norwegian Financial Mechanisms 2009-2014

FRA (2013), Roma Pilot Survey, Technical report: methodology, sampling and fieldwork, EU Agency for Fundamental Rights. http://fra.europa.eu/sites/default/files/fra-2014-roma-pilot-survey-technical-report_en.pdf.

Garbarino, S. and Holland, J. (2009), Quantitative and Qualitative Methods in Impact Evaluation and Measuring Results, GSDRC.

Gawlik, R. and Golebiowski, K. (2013), Incorporating Qualitative Indicators of Well-Being into Quantitative Economic Research, Cracow University of Economics.

Guthrie, K., et al. (2005), The Challenge of Assessing Policy and Advocacy Activities: Strategies for a Prospective Evaluation Approach, San Francisco: Blueprint Research and Design.

Kabeer, N. (2005), *'Social exclusion: concepts, findings and implications for the MDGs'*, Paper commissioned by DFID.

Ivanova, I. (2013), Public Attitudes towards Hate Speech in Bulgaria, Open Society Institute – Sofia.

Kézdi, G., and Surányi, É. (2009), A Successful School Integration Program: An Evaluation of the Hungarian National Government's School Integration Program, 2005-2007, Roma Education Fund.

Kóczé, A. (2012), Civil society, civil involvement and social inclusion of the Roma, Roma Inclusion Working Papers, Bratislava: United Nations Development Programme. http://www.eurasia.undp.org/content/dam/rbec/docs/Civil-society-civil-involvement-and-social-inclusion-of-the-Roma.pdf

Kusek, J. Z. and Rist R. (2004), Ten Steps to a Result-Based Monitoring and Evaluation System, The World Bank, Washington.

Lazarov, L., Dimitrov, D., Tahir, O., Zahariev, B., Yordanov, I., Mihaylov, T., and Grigorova, V. (2012), Stocktaking of Good Practices with Roma Inclusion Interventions Report, Open Society Institute Sofia.

Mid-term evaluation of NGO Programmes under EEA Grants 2009-2014 Evaluation report 1/2015.

Milosheva-Krushe, M. et al. (2014), Out of the Box: Providing Oxygen to Civil Society, Mid Term Evaluation of the NGO Programmes under the EEA and Norway Grants (2009-2014), Part One: Main Evaluation Report, Sofia.

McDonald, C. and Negrin, K. (2010|, No Data – No Progress, Open Society Foundations, New York.

Ministry of Public Administration and Justice, State Secretariat for Social Inclusion (2011), National Social Inclusion Strategy – Extreme Poverty, Child Poverty, the Roma – (2011–2020), Budapest.

Morra, L. and Rist R. (2009), The Road to Results. Designing and Conducting Effective Development Evaluations, The World Bank.

National Roma Integration Strategies; Bulgaria, Czech Republic, Hungary, Romania and Slovakia. http://ec.europa.eu/justice/discrimination/roma-integration/index_en.htm

Okagaki, A. (2010). Response Essay in Kubisch, A. et al. Voices from the Field III: Lessons and Challenges from Two Decades of Community Change Efforts, The Aspen Institute, http://www.aspeninstitute.org/sites/default/files/content/docs/pubs/VoicesIII_FINAL_0.pdf

Piron, L.-H. (2003), Learning from the UK Department of International Development's Rights-Based Approach to Development Assistance

Political Capital Policy Research & Consulting Institute (Political Capital) (2010). Back by popular demand; Demand for right-wing extremism (DEREX) index. http://www.riskandforecast.com/post/in-depth-analysis/back-by-popular-demand_411.html

Salner, A. and Kubánová, M. (2014). Final Evaluation of a Good Start, Phase II, Roma Education Fund, Budapest.

Salner, A. (2013), Good Practice Guide on Data Collection, Roma Education Fund.

Smits and Hoekstra (2011), Measuring sustainable development and societal progress: Overview and conceptual approach, Statistics Netherlands, (The Hague).

Soros Foundation Romania (2012), "*Roma Inclusion in Romania: Policies, Institutions and Examples*".
http://www.romadecade.org/cms/upload/file/9668_file1_soros_romania_foundation_report--roma-inclusion-in-romania--policies-institutions-and-examples.pdf.

Stroschein, S. (2002), NGO Strategies for Hungarian and Roma Minorities in Central Europe, Voluntas: International Journal of Voluntary and Non-profit Organisations

UNAIDS: An Introduction to Indicators (2010).

UNDP, RBM [Results-Based Management] in UNDP: Selecting Indicators, Signposts of Development, (UNDP, 2002).

UNDP Roma data http://www.undp.org/content/rbec/en/home/ourwork/povertyreduction/roma-in-central-and-southeast-europe/roma-data.html.

Weaver, L., Born, P. and Whaley, D. (2010), Approaches to Measuring: Community Change Indicators.

World Bank (2014), Diagnostics and Policy Advice for Supporting Roma Inclusion in Romania. http://www.worldbank.org/content/dam/Worldbank/document/eca/romania/OutputEN.pdf.

Additional Websites:

http://eeagrants.org/
http://fra.europa.eu/
http://romed.coe-romact.org/

Additional documents consulted are listed in the respective country reports.