

Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation

in the Netherlands







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LIST OF ABBREVIATIONS

CCV Centre for Crime Prevention
CSO Civil Acciety Organisation
EC European Commission

ECRI European Commission against Racism and Intolerance

EURSF EU Roma Strategic Framework for Eqlaity, Inclusion and Participation FCPNM Framework Convention for the Protection of National Minorities

JenV Ministry of Justice and Security

KIS Kennisplatform Inclusief Samenleven (Knowledge Platform Inclusive Living)
MOVISIE National Knowledge Institute for a Coherent Approach to Social Issues

NAP National Action Plan

NCDR National Coordinator against Discrimination and Racism

NEET Not in employment, education, or training NRSF National Roma Strategic Framework

OWRS National Education Support to Traveller, Roma, and Sinti Children (*Onderwijs aan*

Woonwagen-, Roma- en Sintikinderen)

RCM Roma Civil Monitor

SZW Ministry of Social Affairs and Employment

EXECUTIVE SUMMARY

The strength of the 'Policy Measures in the Netherlands for the Equality, Inclusion, and Participation of Roma and Sinti' (the National Roma Strategic Framework, NRSF)¹ lies in their foundation on well-established laws and rules. This applies to all Dutch citizens and ensures a consistent legal framework for addressing access to housing and employment issues. The measures also reflect a growing awareness of the specific challenges faced by Roma and Sinti communities, particularly concerning discrimination and access to education. Efforts are being made to tackle these issues, including some targeted initiatives to improve the social inclusion of these communities.

However, the main weakness of the NRSF is its generalised approach, which does not collecting disaggregated data to track progress and assess the specific needs of Roma and Sinti communities. There are also no clear targets related to Roma inclusion, and very few measures explicitly address their needs. Additionally, there is a significant gap in the provision of adequate measures specifically targeting Roma children, which limits the policy's overall effectiveness in addressing the challenges faced by the younger generation within these communities.

Implementation of the NRSF

The NRSF lacks new additions or updates since its initial version, and implementation largely follows the original plan. The absence of Roma-specific targets, disaggregated data collection, and clear action plans limits the effectiveness of the measures laid out. Additionally, decentralised governance, which is still relatively limited, yet growing, and Roma civil society involvement, further hinder meaningful progress. Recommendations include for more Roma-targeted initiatives, enhanced coordination, and more substantial support for Roma organisations to ensure the policy's success.

Review of country situation by area

Overall, progress in implementing the NRSF has been mixed across several key areas. Efforts to combat antigypsyism and discrimination have seen some advancements, such as the 'National Programme against Discrimination and Racism (2023)',² and the condemnation of discriminatory practices targeting Roma and Sinti. However, the persistent challenges highlight the continued stigmatisation of caravan dwellers and the lack of significant updates in legal frameworks supporting culturally adequate accommodation.

The decentralisation allowance initiative showed limited results in education due to poor monitoring and the lack of dedicated intermediaries. While there have been some efforts to support Roma and Sinti children's education through network events, there is insufficient data on the effectiveness of these initiatives.

Employment measures targeting Roma communities are sparse, and no new Roma-specific interventions have been implemented since the last RCM review.³

In child protection, although the government has increased funding to combat child poverty, Roma children still face inconsistent support, with decentralised implementation leading to regional disparities.

¹ European Commission. (n.d.). *Policy Measures in the Netherlands for the Equality, Inclusion, and Participation of Roma and Sinti*. Available at: https://commission.europa.eu/document/download/9660a253-3165-4ea2-ad5c-cobd4084e078 en?filename=policy measures in the netherlands for the equality inclusion and participation of roma and sinti.pdf

² National Coordinator against Discrimination and Racism, Ministry of the Interior and Kingdom Relations. (2023). *National Programme against Discrimination and Racism 2023*. Available at: https://www.bureauncdr.nl/binaries/bureauncdr/documenten/nationale-programmas/2023/12/12/national-program-2023-english/National+Programme+against+Discrimination+and+Racism+2023-+English.pdf

³ Roma Civil Monitor. (2022). *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation*. Available at: https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Netherlands-CATALOGUE.pdf

Finally, while there are efforts to promote Roma culture, such as exhibitions and cultural projects, there is a lack of systemic integration of Roma heritage into broader societal recognition.

In summary, some steps have been taken to address the challenges Roma communities face. However, the lack of targeted actions, consistent monitoring, and comprehensive policy measures limits the effectiveness of the NRSF's implementation, and more focused efforts are needed.

Focus on key issues affecting Roma

The lack of a national strategy on children's rights, combined with the decentralisation of youth services, has led to inefficiencies in the child protection system, including insufficient funding and long waiting lists. While the Dutch government has committed to addressing child poverty and improving youth care, Roma and Sinti children remain overlooked in national plans, especially regarding housing and early education.

The Netherlands is working on anti-discrimination initiatives, but there are gaps in addressing Roma and Sinti's concerns. Anti-discrimination laws do not specifically address ethnic-based⁴ discrimination, leaving Roma and Sinti without explicit protections. Efforts to combat discrimination are limited by a lack of Roma participation in the development of policies affecting their communities. A noteworthy development is efforts to address statelessness among Roma communities, which is reported to be a significant issue, through a new procedure for determining statelessness.⁵ This could enhance their ability to fully participate in society and benefit from the country's protections.

To address these issues, the Netherlands should develop a national strategy on children's rights, with specific measures to address the needs of Roma and Sinti children, including access to housing, education, and protection from exploitation. Legal protections should also be strengthened to include ethnicity as a protected category in anti-discrimination laws. Additionally, Roma and Sinti communities must be more actively involved in decision-making processes that impact their lives, ensuring their voices are heard in policy development.

⁴ The term 'ethnicity' does not appear explicitly in the Netherlands 'Equal Treatment Act' (Algemene Wet Gelijke Behandeling). However, the law prohibits discrimination on the grounds of 'race' and 'nationality', which are broadly interpreted to include discrimination based on ethnic background.

⁵ Determining statelessness. Available at: https://ind.nl/nl/vaststellen-staatloosheid

INTRODUCTION

The Roma⁶ and Sinti in the Netherlands are a diverse and historically marginalised population. The exact size is uncertain due to the absence of ethnic registration in Dutch population data. However, estimates suggest that their numbers range from a few thousand to 40,000, accounting for approximately 0.24% of the Dutch population. These communities are spread across the country, living in both permanent housing and mobile homes, with significant disparities in the regional distribution.

As the 'Policy Measures in the Netherlands for the Equality, Inclusion, and Participation of Roma and Sinti' (the National Roma Strategic Framework, NRSF)⁷ points out, the arrival of Roma and Sinti in the Netherlands occurred in multiple phases. Some Roma and Sinti population settled in the country as early as 1420,⁸ while others fled Communist regimes in Eastern Europe in the 1960s and 1970s. Those Roma and Sinti groups were granted residence permits under the General Pardon Scheme of 1978. The Balkan conflicts in the 1990s created another influx of Roma and Sinti refugees. After the enlargement of the EU in the early 2000s, further Roma groups came, enjoying the freedom of movement of EU citizens. These distinct migration waves have created a heterogeneous community with diverse cultural experiences and inclusion challenges into Dutch society.

Despite the cultural diversity, Roma and Sinti in the Netherlands face shared challenges, such as systemic discrimination, antigypsyism, and socioeconomic marginalisation. One of the main challenges remains housing, with 'Travellers' (*Woonwagenbewoners* – caravan dwellers) facing barriers to accessing mobile homes due to restrictive policies, while other groups struggle with inadequate living conditions. The limited access to education and training opportunities leads to high rates of unemployment among Roma and Sinti. The aforementioned migration experiences combined with underreported social stigmatisation create a complex overlap of challenges that require tailored and inclusive policies to address the structural inequalities faced by Roma and Sinti in the Netherlands.

National Roma strategic framework

The NRSF was introduced in September 2021 as a response to the 'EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030' (EURSF).⁹ The NRSF operates as an integrated set of mainstream and targeted measures aimed at addressing the challenges faced by Roma, Sinti, and Travellers. The Netherlands take a generalised approach to inclusion and anti-discrimination policies, which, while valuable, risks overlooking the unique challenges faced by Roma and Sinti communities. The lack of targeted measures suggests a perception that the existing frameworks sufficiently address their needs despite evidence of persistent structural discrimination and antigypsyism. This approach diminishes the urgency of addressing the specific barriers Roma and Sinti encounter, potentially perpetuating their exclusion and marginalisation.

The Ministry of Social Affairs and Employment (SZW), under an interim government, drafted and approved the NRSF. Additionally, the incumbent government committed to reporting on implementation, allowing subsequent

⁶ The word 'Roma' is used as an umbrella term for several different groups of Roma descent, including Roma, *Sinti, Kale, Gypsies, Romanichals*, and *Boyash/Rudari*. Groups like the *Ashkali*, '*Egyptians*', *Yenish*, eastern groups (including the *Dom, Lom, Rom*, and *Abdal*), and travelling groups, including ethnic *Travellers* or groups referred to under the administrative term '*Gens du voyage*' (travelling people), and people who identify as *Gypsies, Tsiganes*, or *Tziganes* too, are covered by this term, without such an approach constituting a disaffirmation of the specific characteristics of these groups.

⁷ European Commission. (n.d.). *Policy Measures in the Netherlands for the Equality, Inclusion, and Participation of Roma and Sinti.* Available at: https://commission.europa.eu/document/download/9660a253-3165-4ea2-ad5c-cobd4084e078 en?filename=policy measures in the netherlands for the equality inclusion and participation of roma and sinti.pdf

⁸ Roma history factsheets. Available at: https://www.coe.int/en/web/roma-and-travellers/roma-history-factsheets

⁹ European Commission. (2020). A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation—COM/2020/620 final. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0620

administrations to make additional amendments. As of the drafting of this document, there are no publicly available updates on whether the NRSF has been amended or further developed. Furthermore, the absence of a detailed action plan and specific funding allocations raises concerns about the framework's operational depth.

As outlined in the previous 2022 RCM report,¹⁰ the development of the NRSF reflects a certain extent of stakeholder participation. While Roma communities, civil society, and experts were reported to be consulted, the depth of their involvement or how their feedback was integrated into the policy changes remains unclear, raising questions on ownership and inclusivity. The consultation process risks becoming a procedural formality if it does not lead to tangible changes and effective monitoring and evaluation mechanisms. Moreover, while the National Roma Contact Point's (NRCP) role in policy coordination is emphasised, it remains unclear when the biennial reports on the efforts made by the Dutch government will become publicly available. However, the Roma and Sinti Knowledge Platform¹¹ is visible in its efforts, consistently updating its knowledge base, offering guidance on a wide range of topics, including barriers faced in the workplace and schools, as well as promoting awareness of Roma history.

Regarding housing, in May 2022, as part of the 'A Home for Everyone' Programme, the government pledged 50 million EUR¹² of the state budget to support efforts in housing priority groups, including Roma and Sinti. The introduction of mobile home pitches as culturally appropriate housing options reflects an attempt to safeguard the rights of these communities. While access to housing is provided and is theoretically non-discriminatory, the text of the NRSF does not address the challenges of maintaining adequate facilities, sanitation, and safety in mobile home pitches. Additionally, while the housing allocation system suppositionally gives equal access, there is limited mention of how discrimination, such as biases from landlords or local authorities, might be prevented in practice.

There has been demonstrated commitment to counter discrimination overall, particularly through establishing the 'National Coordinator against Discrimination and Racism' (NCDR). As a result of the effort led by the NCDR, the 'National Programme against Discrimination and Racism 2022' was developed and published in December 2023. This programme recognises the importance of incorporating more comprehensive historical education into Dutch society to create a deeper understanding of the past, thereby contributing to the promotion of equality among all citizens. Additionally, the 'National Knowledge Institute' (MOVISIE) has developed a report that defines antigypsyism and outlines effective strategies for its prevention and eradication.

The NRSF has made strides to promote cultural sensitivity. Introducing a framework on municipal mobile homes and pitch policy acknowledging culturally adequate housing for Roma and Sinti people is a positive step. Additionally, the involvement of Roma and Sinti representatives in discussions about their historical persecution, as seen with the 'International Holocaust Remembrance Alliance' (IHRA), highlights the government's commitment to raising awareness and improving cultural understanding.

As a general conclusion, the NRSF does identify relevant issues such as discrimination, lack of housing, and labour market exclusion. However, the absence of measurable objectives and specific timelines undermines its

¹⁰ Roma Civil Monitor. (2022). *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation*. Available at: https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Netherlands-CATALOGUE.pdf

¹¹ Knowledge Platform for Inclusive Living Together. Available at: https://www.kis.nl/het-kennisplatform

¹² 'A Home for Everyone' Programme. Available at: https://open.overheid.nl/repository/ronl-dfe59a4dce3367cfe84d95284838a8b69af70d4d/1/pdf/programma-een-thuis-voor-iedereen.pdf

¹⁴ A national database that advises and works together with civil society organisations, governments, socially involved companies and citizens' initiatives for a coherent approach to social issues

¹⁵ MOVISIE. (n.d.). *Hoe ga je antiziganisme tegen? (How do you combat antigypsyism?)* Available at: https://www.movisie.nl/sites/movisie.nl/files/2022-07/antiziqanisme-220727.pdf

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potential for accountability and meaningful impact. Additionally, the insufficient prioritisation of the topic in national and municipal planning hinders access to EU funding for initiatives on Roma-related challenges. Thus, the implementation of the NRSF could face challenges due to a lack of political prioritisation, fragmented approaches, and competing domestic agendas that overshadow Roma inclusion efforts. To build upon nominal compliance with EU guidelines, the Netherlands must secure dedicated resources and adopt a more rigorous approach to monitoring the implementation of its NRSF.

About this report

This report is part of a broader RCM exercise focused on the implementation of the NRSF in the Netherlands. Specifically, it analyses the implementation of the NRSF in the Netherlands, reviewing the current situation across key sectors such as education, housing, employment, and healthcare. It focuses on key issues affecting Roma communities, including discrimination and social exclusion, and evaluates the effectiveness of EU funding instruments in supporting Roma inclusion efforts. This report aims to provide perspective from civil society actors to both national authorities and the European Commission, offering valuable input and reflections on the design and content of the NRSF.

The data for this report was gathered from various sources, including Roma community members, representatives of Roma and non-Roma civil society organisations (CSOs), officials from ministries, and public institutions. The data collection process involved five in-depth interviews: four with representatives from three CSOs and one academic expert, and one with the NRCP. Additional data were sourced from national and international reports, publications, and media outlets. The interviews, combined with the review of the available reports and programmes, served as the basis for the analysis.

The data collection and analysis took place between August and November 2024. The report was drafted by Ms Reneta Krivonozova, an independent researcher.

The coordinator of the development of this report is the Phiren Amenca International Network, which is coordinating the RCM coalition in the Netherlands and consists of the following Dutch Roma organisations: *Zas Angle* (Go Forwards), Step Up 4 Youth, *REYN*, *Woonwagen Belangen Nederland* (Association of Sinti Roma Caravan Dwellers Netherlands), and Radio Patrin. The initial Roma Civil Monitor coalition meeting took place in Amsterdam on 26 March 2022 after receiving the applications of interest from the respective organisations. The meeting aimed to conduct an initial assessment of the needs of these Roma CSOs from all over the Netherlands and to meet them with the objective of the RCM 2021-2025 project.

1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

The Netherlands' highly decentralised governance model presents challenges for the uniform application of human rights for Roma, Sinti, and Travellers communities. According to the interviewees consulted for this report, the implementation of policies and specific measures concerning Roma, Sinti, and Travellers is primarily left to individual municipalities, which contributes to inconsistencies and unequal treatment across the country.

Interviewees have reported persistent challenges related to budgetary constraints and insufficient funding, which have delayed progress. Moreover, recent political developments, signalling a rightward shift in Dutch politics, are expected to further influence the allocation of resources for social programmes, potentially exacerbating funding shortages. The laborious 2024 formation of a right-wing government presented an agenda that included tax relief, stringent asylum and migration controls, significant investments in infrastructure, healthcare reforms, and support for agriculture and fisheries. The situation has been further complicated by gaps in institutional support, including a period when the NRCP was not yet appointed, thereby hindering coordinated efforts and the continuity of community-focused interventions.

The European Commission (EC) has outlined several recommendations to address gaps, emphasising the need for a structured approach to set specific, measurable targets for Roma and Sinti inclusion. The EC has also recommended establishing a 'National Roma Platform' (NRP) to facilitate engagement between Roma communities, local governments, and civil society organisations. Such a platform could strengthen the coordination of policy efforts, particularly in a country like the Netherlands, where Roma civil society lacks the resources to advocate consistently for their communities.

Organising a meeting with the NRCP proved challenging due to several cancellations, which were attributed to staffing shortages within the Ministry of Social Affairs and Employment (SZW). Despite these difficulties, the SZW claims to have made significant progress in supporting Roma and Sinti communities, notably through the fifth iteration of the 'Social Inclusion Monitor', ¹⁶ which provides valuable insights into inclusion efforts. SZW also reports on facilitating dialogue sessions with communities and developing a comprehensive overview of available subsidies for CSOs, with 'Knowledge Platform Inclusive Living' (*Kennisplatform Inclusief Samenleven*, KIS)¹⁷ assisting Roma individuals in navigating these resources. In collaboration with the Ministry of Interior and Kingdom Relations, SZW is working on recognising Roma and Sinti as a national minority, with a survey underway and further information expected before summer 2025. However, the final decision lies with the Parliament. Discussions are also underway to establish a Roma platform for youth, and there have been increased educational opportunities for young Roma parents since 2013. However, challenges remain at the local level, particularly in incentivising municipalities to prioritise action on Roma equity, participation, and inclusion. To address these, SZW is working towards establishing a more institutionalised contact point to enhance trust with the Roma community and improve outreach.

1.1.1. Changes in the NRSF

Since the last RCM assessment was finalised in July 2022, and at the time of the drafting of the current report, the NRSF has seen limited updates. One of the main shortcomings in NRSF is the absence of a detailed action plan that clarifies how policies will be implemented, measured, and evaluated. The document remains largely unchanged, indicating limited responsiveness to evolving needs or stakeholder feedback. Current initiatives or activities tend to operate in isolation rather than as part of a cohesive national effort. Additionally, the ongoing

¹⁶ Risbo Contractresearch B.V./Erasmus University Rotterdam, Labyrinth Research & Advice, Utrecht. (March 2024). *Monitor Sociale Inclusie (meting 5): Vierde vervolgmeting naar de woon- en leefomstandigheden van Sinti en Roma in Nederland. (Social Inclusion Monitor (measurement 5): Fourth follow-up measurement of the living conditions of Sinti and Roma in the Netherlands)..* Available at: https://www.risbo.nl/media/120705

¹⁷ Knowledge Platform for Inclusive Living Together. Available at: https://www.kis.nl/het-kennisplatform

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initiatives have limited information on the number of representatives from the Roma and Sinti communities benefitting from measures and lack clear targets or monitoring mechanisms to evaluate impact.

For example, the NRSF provides a subsidy scheme that allocates approximately 1 million EUR annually to schools with Roma and Sinti students. This is an essential step toward addressing educational disparities. However, this subsidy scheme does not have the necessary baseline data to evaluate the effectiveness of removing educational equity barriers.

In addition, the 2022 subsidy scheme for the Sinti and Roma communities ¹⁸ aimed at addressing the legacy of post-war legal restoration of rights has concluded after exhausting its allocated budget of 4.1 million EUR. This programme provided annual funding of up to 500,000 EUR for initiatives promoting remembrance of the World War II, combating discrimination, strengthening advocacy, fostering education (including scholarships, vocational training, and language courses), enhancing employment opportunities, and preserving cultural identity. While the programme contributed to many of the areas outlined in the NRSF, the sustainability of long-term enforcement due to lack of future funding limits ongoing support for these critical areas. An overview of the programme's impact is forthcoming; however, at the time of drafting the current report, no further information is available.

1.1.2. Progress in implementation

As of 15 October 2021, the Netherlands established the position of 'National Coordinator against Discrimination and Racism' (NCDR) within the Ministry of Interior and Kingdom Relations. In December 2023, the NCDR presented a multi-year 'National Programme to Address Racism and Discrimination 2023', ¹⁹ ensuring input and collaboration from various stakeholders, including Roma representatives. The coordinator has already held initial meetings with minority groups, including members of the Roma community, to build rapport and gain a deeper understanding of their challenges and concerns.

In March 2022, the 'National Knowledge Institute for a Coherent Approach to Social Issues' (MOVISIE) published a guidance document titled 'No Room for Discrimination'²⁰ aimed at supporting municipalities in combating various forms of discrimination, including anti-Black racism, anti-Semitism, anti-Muslim racism, antigypsyism, and LGBTI+ discrimination. Two individuals of Roma and Sinti backgrounds were consulted alongside two academic experts for the section addressing antigypsyism. However, during interviews for the current report, Roma community members and other stakeholders raised concerns about the limited practical impact of this guideline. As it remains non-binding, there is no mechanism to ensure its enforcement.

In October 2023, a comprehensive 'Overview of International and National Policies Relevant to Roma and Sinti Communities' was published.

¹⁸ Verbetering participatie en emancipatie Sinti en Roma (Improving Participation and Emancipation of Sinti and Roma). Available at: https://www.dus-i.nl/subsidies/verbetering-participatie-en-emancipatie-sinti-en-roma

¹⁹ National Coordinator against Discrimination and Racism, Ministry of the Interior and Kingdom Relations. (2023). *National Programme to Address Racism and Discrimination 2023*. Available at: <a href="https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.bureauncdr.nl/binaries/bureauncdr/documenten/nationale-programmas/2023/12/12/national-program-2023--english/National%2BProgramme%2Bagainst%2BDiscrimination%2Band%2BRacism%2B2023-%2BEnglish.pdf&ved=2ahUKEwjt78mX7NKNAxVEiPOHHbNEBIYQFnoECBwQAQ&usq=AOvVaw2MMYDeERKDEZ2obePnqTLEE

²⁰ No Room for Discrimination. Available at: https://www.movisie.nl/sites/movisie.nl/files/2022-07/antiziganisme-220727.pdf

²¹ Knowledge Platform for Inclusive Living Together. (n.d.). Overzicht landelijk beleid Sinti en Roma (Overview of National Policy on Sinti and Roma). Available at: https://open.overheid.nl/documenten/0ca66851-a1d7-42b5-9652-ad6b9dcf70b7/file

Subsequently, in June 2024, Minister Van Gennip from the SZW presented the fifth edition of the 'Social Inclusion Monitor 2023' to the Dutch Parliament.²² The report, carried out by the Labyrinth research and consultancy firm, and published by Risbo Contractresearch B.V. at the Erasmus University Rotterdam, provides an in-depth assessment of the living conditions of Roma and Sinti populations in the Netherlands.

While the NRSF outlines broad goals for Roma and Sinti inclusion, its implementation within the Netherlands can improve alignment with relevant domestic and EU policies. Notably, recent legislative amendments in the Netherlands, such as the 2023 constitutional amendment²³ expanding protections against discrimination based on sexual orientation and disability, reflect the Dutch government's commitment to combating discrimination. However, specific protections and policies directly aimed at addressing discrimination against Roma and Sinti communities are still limited.

The Council of Europe's Fourth Opinion on the Netherlands²⁴ from April 2023 highlights several ongoing issues regarding the inclusion of Roma and Sinti communities under the 'Framework Convention for the Protection of National Minorities' (FCPNM). The Dutch Advisory Committee notes that these communities are still excluded from the FCPNM's scope despite their expressed interest in formal recognition as national minorities. While the FCPNM places significant emphasis on linguistic rights, it fails to address other fundamental rights enshrined in the FCPNM. According to the 'National Programme against Discrimination and Racism 2023', the relevant authorities took inventory of the consequences of extension of the 'Framework Convention for the Protection of National Minorities' to include Roma and Sinti. This inventory was to be completed after the summer of 2024.

Efforts to create intercultural understanding have relied on a more flexible dialogue approach. Although this represents some progress, representatives from Roma, Sinti, and Traveller groups have criticised this method, citing its top-down nature and lack of meaningful participation. These communities continue to advocate for the establishment of a formal, sustainable, and centralised consultation platform to enhance their engagement and ensure more effective policy development and implementation.

1.1.3. Effectiveness of monitoring

The only monitoring mechanism currently in place is the 'Social Inclusion Monitor', which has been carried out biennially by order of the SZW since 2013. This monitor looks at the degree of social inclusion of Sinti and Roma in the Netherlands and is based on seven themes chosen by the researchers carrying out the research: living according to culture, housing situation, educational position, making ends meet, health, discrimination, and institutional policy and trust. The EC's recommendations highlight the need for a monitoring framework that captures the impact of policies on Roma and Sinti individuals. Currently, monitoring mechanisms are sparse and do not systematically collect disaggregated data on Roma and Sinti inclusion. Such a framework could include annual progress reports, surveys on social inclusion, and target-specific indicators that measure the educational, economic, and health outcomes of Roma communities.

1.1.4. Data collection

The absence of data collection on Roma and Sinti populations in the Netherlands significantly hinders the ability to monitor, evaluate, and improve policy implementation. This issue persists due to the prohibition of ethnic data collection under Dutch law, which prevents the establishment of critical baselines or specific targets for these communities. Consequently, tracking progress, assessing the effectiveness of measures, and identifying gaps becomes nearly impossible, leaving efforts to address the needs of Roma and Sinti populations

²² Risbo Contractresearch B.V./Erasmus University Rotterdam, Labyrinth Research & Advice, Utrecht. (2024). *Monitor Sociale Inclusie (meting 5).* (*Social Inclusion Monitor (measurement 5).* Available at: https://open.overheid.nl/documenten/76d493ef-c824-4213-b99c-6bdf2b05d

²³ Government of the Netherlands. (n.d.). *Non-discrimination Grounds Constitution Extended to Include Disability and Sexual Orientation*. Available at: https://www.rijksoverheid.nl/actueel/nieuws/2023/01/17/non-discriminatiegronden-grondwet-uitgebreid-met-handicap-en-seksuele-gerichtheid/

²⁴ Council of Europe. (n.d.). *Vierde advies over Nederland, samenvatting (Fourth Advice on the Netherlands, Summary)*. Available at: https://rm.coe.int/4th-op-netherlands-summary-nl/1680ac50a1

fragmented and inadequately informed. This legal barrier underscores the challenges in creating evidence-based policies and ensuring accountability in addressing social inclusion and equity.

1.2. NRSF's synergy with domestic and EU actions

While the NRSF outlines broad goals for Roma and Sinti inclusion, its implementation within the Netherlands lacks a systematic alignment with relevant domestic and EU policies. Notably, recent legislative amendments in the Netherlands, such as the 2023 constitutional amendment²⁵ expanding protections against discrimination based on sexual orientation and disability, reflect the Dutch government's commitment to combating discrimination. However, specific protections and policies directly aimed at addressing discrimination against Roma and Sinti communities are still limited.

According to one of the interviewed stakeholders representing 'Vereniging Sinti Roma Woonwagenbewoners' (Sinti Roma Caravan Residents Association) Netherlands, welfare policies can address some of the challenges Roma and Sinti communities face; however, these communities are not very aware of this support and no particular outreach is being done to inform.

The NRSF should align with and complement policies within the 'EU Anti-Racism Action Plan' and the 'European Child Guarantee', emphasising equitable access to social services and education for all children, including those from marginalised communities. However, the lack of synergy between the NRSF and these frameworks has contributed to inconsistencies in the Netherlands' approach to Roma and Sinti inclusion. More importantly, the EC²⁶ and the Council of Europe²⁷ have called for policy adjustments to ensure the NRSF reflects the needs of Roma communities, especially in combating systemic discrimination and antigypsyism.

1.2.1. Complementary policies

The Netherlands has established a 'National Programme against Discrimination and Racism', ²⁸ which acknowledges the challenges faced by Roma and Sinti communities. While it includes the struggles of these communities within its broader anti-discrimination framework, its scope of action remains somewhat general. The programme has documented interactions, including meetings with representatives of Roma and Sinti groups, reflecting efforts to include their perspectives and discuss relevant issues. However, the extent of these discussions and their translation into concrete, actionable measures remains limited, and their needs have yet to be addressed comprehensively.

Since July 2022, the Dutch government has implemented several measures²⁹ to combat poverty. The objective is to reduce the number of people in poverty by half by 2030 compared to 2015 and halve the number of children living in poverty by 2025. Efforts include raising the minimum wage and benefits, increasing allowances for healthcare, housing, and childcare, and improving access to resources for children in low-income families. Municipalities complement these efforts through targeted initiatives. These measures, part of the broader national strategy addressing financial worries, poverty, and debt, aim to provide stable incomes, reduce inequality, and create better opportunities for impoverished individuals and families. In 2023, SZW conducted

²⁵ Government of the Netherlands. (n.d.). *Amendment to the First Article for Non-discrimination Grounds Constitution Extended to Include Disability and Sexual Orientation*. Available at: https://www.rijksoverheid.nl/actueel/nieuws/2023/01/17/non-discriminatiegronden-grondwet-uitgebreid-met-handicap-en-seksuele-gerichtheid

²⁶ European Commission. (January 2023). *Commission Staff Working Document: Assessment Report of the Member States' National Roma Strategic Frameworks.* Available at: https://commission.europa.eu/system/files/2023-01/1 3 50157 swd fiches roma strat ptl en.pdf?utm source=chatgpt.com

²⁷ Council of Europe, Advisory Committee on the Framework Convention for the Protection of National Minorities. (n.d.). Fourth Opinion on the Netherlands. Available at: https://rm.coe.int/4th-op-netherlands-en/1680ac509f

²⁸ National Coordinator against Discrimination and Racism, Ministry of the Interior and Kingdom Relations. (2023). *National Programme Against Discrimination and Racism 2023*. Available at: https://open.overheid.nl/documenten/b6a7ec23-71f8-4caf-a73d-a0ad7a020f0f/file

²⁹ Government of the Netherlands, Ministry of Social Affairs and Employment. (n.d.). *Tackling Poverty*. Available at: https://www.rijksoverheid.nl/onderwerpen/armoedebestrijding/armoede-verminderen

the fifth 'Social Inclusion Monitor' (SIM),³⁰ an initiative designed to assess and provide a comprehensive overview of the living conditions of Sinti and Roma communities in the Netherlands. This monitoring effort offers insights into these communities's social and economic circumstances, highlighting key trends, challenges, and areas for policy intervention. By systematically measuring these conditions, the SIM could inform government strategies to address disparities and foster a more inclusive society.

Aside from those mentioned above, specific new policies directly complementing the NRSF have not been reported. Efforts are primarily focused on overarching programmes like the EU's anti-racism action plan and climate-focused policies rather than Roma-specific initiatives.

1.2.2. Alignment with EU actions

There is no direct referral between the NRSF and broader EU policy documents. However, stronger synergies could be established with initiatives such as the 'European Child Guarantee', the 'European Youth Guarantee', and the forthcoming anti-poverty strategy set to be introduced in 2025. These alignments could enhance the NRSF's effectiveness by integrating its objectives with overarching EU social inclusion priorities.

The 'European Semester Country Report for the Netherlands',³¹ published in June 2024, highlights that there is significant potential for the country to enhance its social policy efforts in order to meet its national target of reducing the number of people at risk of poverty or social exclusion by 163,000 by 2030. The report stresses the importance of addressing persistent gaps between different groups in society, particularly focusing on the most vulnerable populations, such as individuals with migrant backgrounds, children, and persons with disabilities.

In the EC's January 2023 Assessment Report on the Member States' NRSFs,³² the Netherlands is highlighted as partially incorporating the standard features and minimum commitments outlined in the EURSF. However, the report notes that the Netherlands has not established specific targets for achieving the framework's objectives.

The EC has recommended more coordinated action to address Roma housing and access to services. In addition, it states that the decentralised policy landscape of the Netherlands often results in disparities, with some municipalities willing to support Roma communities in terms of housing policies, while others lack infrastructure or resources, leading to unequal treatment.

To address this, the EC has recommended a more centralised approach to housing and accommodation policies for Roma, calling on the Netherlands to develop guidelines that ensure consistent policy application across municipalities. Implementing these recommendations requires a more systematic alignment of the NRSF with both EU and national frameworks, enhancing the framework's potential to address the multifaceted challenges faced by Roma and Sinti communities in housing and social services.

1.2.3. Addressing concerns of previous assessments

The NRCP should include in the conditions for the tenders for the 'Social Inclusion Monitor' report that the Roma, Sinti, and Travellers are not just target groups and interviewees, but the research should be made participatory and involve the community members in the data collection and analysis process, either based on their capacity or by providing training to them.

³⁰ Risbo Contractresearch B.V./Erasmus University Rotterdam, Labyrinth Research & Advice, Utrecht. (2024). *Monitor Sociale Inclusie (meting 5). (Social Inclusion Monitor (measurement 5).* Available at: https://open.overheid.nl/documenten/76d493ef-c824-4213-b99c-6bdf2b05d

³¹ European Commission. (2024). *Netherlands 2024 Country Report*. Available at: https://economy-finance.ec.europa.eu/document/download/c3a6d1e0-8289-4fb9-91ab-3f3fb1ba6deeen?filename=SWD 2024 619 1 EN Netherlands.pdf

³² European Commission. (2023). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Assessment Report of the Member States' National Roma Strategic Frameworks. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52023DC0007

1.3. Roma participation in implementation and monitoring

The 'National Programme against Discrimination and Racism 2023' outlines key events and actions regarding Roma and Sinti discrimination. A working visit focused on Roma and Sinti discrimination took place in Amsterdam on 16 May 2023. Additionally, a town hall session addressing discrimination against Roma communities was held in Breda on 14 December 2023.

The annual conference 'Education for Traveller, Roma and Sinti Children' (*Onderwijs aan Woonwagen-, Romaen Sintikinderen*, OWRS) also serves as a platform for discussions on issues affecting Roma and Sinti, with the most recent meeting occurring on May 16, 2024, in Utrecht.³³ Due to budget cuts, new coalitions of Roma and pro-Roma civil society organisations have formed to discuss issues informally.

Furthermore, a high-level meeting with the European Commission against Racism and Intolerance (ECRI) was held between 4-8 November 2024 as part of the preparation for a monitoring report, following online meetings on 29 and 31 October 2024. During the visit, ECRI's delegation focused on issues such as equality, access to rights, hate speech, and integration. The Dutch government invited Roma CSOs to participate in these discussions, but many organisations expressed skepticism, believing these invitations were merely for 'boxticking' purposes. Furthermore, Roma CSOs highlighted the lack of financial support to attend these meetings.

1.3.1. Involvement of Roma CSOs in implementation

CSOs emphasise the need to take a proactive role in ensuring their participation in consultations and discussions. Roma organisations state that although authorities claim Roma CSOs are always welcome to engage, they rarerly rarely take the inititative initiative to proactively inform or involve them inavailable in available opportunities or initiatives.

There are several concerns regarding the accessibility of the NRCP, as they are perceived to be difficult to reach. Another interviewee underlines that:

"Institutional barriers exist, but the policy framework is efficient in its design. Despite this, there is significant mistrust among all stakeholders. The social monitoring process interviews up to 25 individuals, but due to the small sample size, there are no statistics published, and no large-scale surveys are conducted".

Representatives of CSOs express that they are aware EU funding is available and that it is not being fully utilised. Such funding could be used to establish an office that would better support the work of CSOs. Interviewees have shared sentiments like: "If we had an office, we could better serve both the community and the government".

1.3.2. Roma in public institutions implementing the NRSF

According to interviewees, no Roma or Sinti individuals are working in the NRCP office. Additionally, there is no evidence of Roma or Sinti individuals being in other related positions.

1.3.3. Roma participation in monitoring and evaluation

Interviewees have also expressed that the outreach to Roma organisations primarily focuses on providing information rather than engaging in consultation. Many expressed concerns that, due to the lack of availability of the NRCP, meaningful actions have been limited until recently.

There is no formal feedback mechanism to gather insights from these organisations or individuals, and they feel that the challenges Roma communities face are not a priority on the political agenda. Broader discussions on migration and refugees often overshadow these issues. Additionally, interviewees noted that even well-established CSOs are now facing a 20% budget cut, and the Ministry of Foreign Affairs has been helping them maintain their available funding. Many Roma organisations are grassroots and lack the resources or capacity to manage EU funding effectively, resulting in sporadic, local, and unevenly distributed initiatives.

³³ Network Meeting 16 May 2024. Available at: https://www.owrs.nl/nieuws/netwerkbijeenkomst-2024

2. REVIEW BY THEMATIC AREA

2.1. Fighting antigypsyism and discrimination

Despite efforts to combat discrimination in the Netherlands, antigypsyism persists, particularly against Travellers. In June 2022, it was revealed³⁴ that many municipalities blacklisted this group as a 'risk' for committing crimes based on a national checklist used to assess suspicious situations. This has led to their further stigmatisation. The National Coordinator against Discrimination and Racism (NCDR) and government officials have condemned the practice, noting the need for further investigation and adjustment of the checklist.

In addition, one of the individuals from the University of Leiden interviewed for this report criticised the approach of the Center for Criminality Prevention – CCP (a centre of expertise working with ministries, law enforcement, municipalities, companies, and knowledge institutions), noting that it is the only government institution with a Roma-specific framework. Established in 2020, the CCP raises concerns with its ongoing focus on identifying early signs of Roma youth joining criminal organisations. This can only reinforce stereotypes and increase discriminatory practices.

The Dutch government launched the 'National Program against Discrimination and Racism 2023' (NPDR 2023), which mainstreams Roma and Sinti but outlines the current state of play and some recommendations to improve overall well-being. This programme aims to strengthen efforts to combat racism and promote equality by implementing targeted measures to protect the rights of marginalised groups such as Roma and Sinti, enhance awareness of antigypsyism, and ensure more effective responses to discriminatory practices. By incorporating Roma and Sinti issues into its broader anti-discrimination framework, the programme seeks to foster greater inclusivity and social integration while actively addressing the unique challenges these communities continue to face in the Netherlands.

2.1.1. Effectiveness of the NRSF in addressing the problems

The study 'From Extinction to Postponement Policy'³⁵ by the NCDR, published in March 2024, contributes to understanding where antigypsyism is most prominent, shedding light on the systemic discrimination faced by Roma and Sinti, particularly in accessing adequate housing and accommodation. It identifies the shortcomings in current policies and municipalities' lack of proactive action, and underscores the urgent need for inclusive reforms. The research also offers key recommendations that align with the goals set out in the national policy measures on Roma, specifically promoting participation through empowerment, cooperation, and trust.

The Dutch government supports the EC's proposal³⁶ to classify hate speech and hate crime as criminal offences under Article 83(1) TFEU, recognising the need for a stronger, unified approach. However, it stresses that any new EU obligations must align with Dutch criminal law and not infringe on fundamental rights, particularly freedom of expression.

³⁴ De Stentor, June 2022. Available at: https://www.destentor.nl/zwolle/ophef-over-zwarte-lijst-woonwagenbewoners-bij-qemeenten-stigmatiserend-en-zelfs-discriminerend~a5c9a7f3/

³⁵ From Extinction to Postponement Policy. Available at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjQnsqjl4SMAxXMhv0HHdlPCBgQFnoECBEQAQ&url=https%3A%2F%2Fwww.bureauncdr.nl%2Fbinaries%2Fbureauncdr%2Fdocumenten%2Fkamerstukken%2F2024%2F04%2F08%2Fverkennend-onderzoek-woonwagenstandplaatsen-roma-ensinti%2FVerkennend%2Bonderzoek%2Bwoonwagenstandplaatsen%2BRoma%2Ben%2BSinti%2BDEF.pdf&usq=A0vVaw1P2yijFHM3u_oVy8ozRUzH&opi=89978449

³⁶ European Commission. (n.d.). Communication from the Commission to the European Parliament and the Council: A More Inclusive and Protective Europe - Extending the List of EU Crimes to Hate Speech and Hate Crime. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0777

In 2022, a letter, along with a fact sheet³⁷ from the Working Group on the Assessment of New Commission Proposals (BNC) on hate speech and hate crime, was sent to the Dutch House of Representatives. No further updates are available at the time of the report draft. The delay in responding to such crucial proposals highlights the slow progress in addressing these issues at the national level.

2.1.2. Addressing the problems beyond the NRSF

The Dutch government's NPDR 2023 focuses on addressing the challenges faced by Roma and Sinti communities, aiming to combat discrimination and promote equality. As part of its broader commitment, the cabinet evaluated the potential impact of extending the 'Framework Convention for the Protection of National Minorities' to include Roma and Sinti, with the findings expected to have been finalised by the end of the summer of 2024. Additionally, following a Letter to Parliament's 'Social Inclusion Monitor 2023' (Measurement 5), ³⁸ in June 2024, the Minister of Social Affairs and Employment, Van Gennip, presented a report³⁹ with insights into the living conditions of Sinti and Roma in the Netherlands.

A significant development also occurred in May 2022, with the adoption of a new bill⁴⁰ allowing stateless individuals to seek a court ruling on their status, granting them increased rights, such as the ability to register their statelessness in the Municipal Personal Records Database (BRP), apply for travel documents, and pursue Dutch nationality after three years of legal residence under more favourable terms.

2.2. Education

In July 2023, SZW commissioned an evaluation⁴¹ of the decentralisation allowance (DU) provided to municipalities to enhance labour and education participation among Roma and Sinti. This evaluation aimed to assess the experiences with and outcomes of this initiative. However, a critical review of the initiative reveals significant shortcomings in its implementation and effectiveness.

According to the evaluation, from 2019 to 2022, seven municipalities were allowed to use intermediaries to help improve the participation of Roma and Sinti in education and the labour market, supported by the decentralisation allowance. The goal was to foster inclusion by creating specific roles for intermediaries to work directly with these communities. However, the pilots largely deviated from their original plans, and in many municipalities, the use of intermediaries was not fully realised. The pilots were not adequately monitored, which means there is no concrete data on the outcomes or impact of the intermediaries in promoting the education or labour participation of Roma and Sinti.

In practice, the use of dedicated intermediaries often failed to materialise. Instead, existing municipal professionals were given additional time and resources to work with Roma and Sinti without formally establishing intermediary roles. While this adaptation allows for more individualised attention, it raises questions about the necessity and effectiveness of the intermediary role in the first place. The temporary increase in resources did not translate into a systematic or sustainable change, and the lack of monitoring

³⁷ Fiche 5: Mededeling en Raadsbesluit haatzaaiende uitlatingen en haatmisdrijven (File 5: Communication and Council Decision on Hate Speech and Hate Crimes). Available at: https://open.overheid.nl/documenten/ronl-cb4d8d1fd9fa9c19449b81fe9efa0ec75db3a30b/pdf

³⁸ Risbo Contractresearch B.V./Erasmus University Rotterdam, Labyrinth Research & Advice, Utrecht. (2023). *Monitor Sociale Inclusie 2023 (meting 5): Naar de woon- en leefomstandigheden van Sinti en Roma in Nederland (Social Inclusion Monitor 2023 (measurement 5): On theLiving Conditions of Sinti and Roma in the Netherlands)*. Available at: https://open.overheid.nl/documenten/5657e2df-e334-4ce6-a81c-cd02f0644d66/file

³⁹ Tweede Kamer der Staten-Generaal. (2022). *Bijzonder ingewikkeld om aan papieren te komen (Extremely Complicated to Get Papers)*. Available at: https://www.tweedekamer.nl/downloads/document?id=2022D45406

⁴⁰ Statelessness. Available at: https://www.rijksoverheid.nl/onderwerpen/nederlandse-nationaliteit/staatloosheid

⁴¹ Intermediaire inzet voor arbeidsparticipatie en onderwijsdeelname van Roma en Sinti (Intermediary Commitment for Labour Participation and Educational Participation of Roma and Sinti). Available at: https://open.overheid.nl/documenten/bd4839d3-a71c-4bcf-b5f1-f6d7aa2d5688/file

means there is no way to determine whether these efforts led to tangible improvements in the communities' educational and employment outcomes.

A key conclusion from the programme implementation is that intermediaries should supplement, not replace, existing municipal services. Embedding intermediaries within municipal teams proved less effective or was not implemented. Instead, existing staff were given temporary capacity, offering some customisation but not the same impact.

However, effective mechanisms were identified: trust at the micro level, good collaboration at the meso level, and the need for structural funding at the macro level. Positive results, especially in the city of Enschede, show the value of community-based intermediaries. For long-term impact, the programme must be extended with stable funding and include Roma voices in shaping institutional approaches. A broader roll-out and sustained, inclusive strategy are essential to tackling systemic challenges.

Lastly, intermediaries work best when independent, trusted, and equipped to navigate both the community and institutions. Without structural support and proper monitoring, even promising initiatives risk being short-lived. Sustainable progress requires treating Roma inclusion as a continuous process, not a temporary project. This highlights a broader issue of insufficient accountability and follow-through in programmes targeting Roma and Sinti, undermining their potential to bring about lasting and meaningful change.

2.2.1. Effectiveness of the NRSF in addressing the problems

The 'National Education Support to Traveller, Roma, and Sinti Children' (OWRS) project⁴² organises regular network meetings and events to foster collaboration and address the educational support needs of Roma and Sinti children. The meetings feature presentations on various topics, including the Sinti Helpdesk and the research on the educational support needs of Roma, Sinti, and Traveller children. These events encourage discussions on critical issues like tackling stigmatisation, discrimination, and the liaison of key figures in national developments.

However, while these network meetings are part of the core activities of the OWRS initiative, there is no available data on the number of participants, the main outcomes, or the effectiveness of these events in increasing school attendance among Roma pupils. The lack of concrete data makes it difficult to assess whether these efforts significantly impact Roma education.

2.2.2. Addressing the problems beyond the NRSF

The 'State of Education 2025' conference, ⁴³ scheduled for April 2025, where the eponymous report ⁴⁴ will be presented, discusses broader educational issues, such as the performance of pupils, absenteeism, and shortage of professional staff. The report, however, does not explicitly address Roma and Sinti children.

By addressing education in a generalised manner, these efforts overlook the critical need for targeted measures that directly support Roma and Sinti children, particularly in tackling early school dropout rates and ensuring their sustained engagement in the education system. Without a clear focus on these issues, the initiatives risk undermining the NRSF's commitment to improving educational outcomes for Roma communities.

2.3. Employment

The most pressing issues identified in the previous monitoring cycle include the high rates of Roma youth not in employment, education, or training (NEET), as well as discrimination against Roma and Traveller communities

⁴² Onderwijs aan Woonwagen-, Roma- en Sintikinderen (Education for Caravan, Roma and Sinti Children). Available at: https://www.stichtingpas.nl/owrs/

⁴³ Inspectie van het Onderwijs (Education Inspectorate). (n.d.). *Staat van het Onderwijs (State of Education)*. Available at: https://www.onderwijsinspectie.nl/onderwerpen/staat-van-het-onderwijs

⁴⁴ Inspectie van het Onderwijs (Education Inspectorate). (2024). *De Staat van het Onderwijs 2024 (The State of Education 2024*). Available at:

 $[\]frac{https://www.onderwijsinspectie.nl/binaries/onderwijsinspectie/documenten/rapporten/2024/04/17/rapport-de-staat-van-het-onderwijs-2024/De+Staat+van+het+Onderwijs+2024+inclusief+sectorbeelden.pdf}{}$

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in the labour market. These challenges became even more pronounced in the aftermath of the COVID-19 pandemic, which had a disproportionate impact on Roma people across Europe, including in the Netherlands.

The restrictions on free movement imposed during the pandemic also disproportionately affected Roma and Traveller communities in several European countries, including Ireland, France, Belgium, and the Netherlands. These communities, often caravan dwellers, were subject to the same restrictions as the general population. However, their living conditions made compliance with such restrictions particularly difficult. Caravans provide limited space for families, and the authorised sites they occupy are often overcrowded, further exacerbating the challenges they faced during the pandemic.

The 'Guidelines on Anti-Discrimination Policy for Municipalities' highlight that Sinti and Roma frequently face discrimination but seldom report these incidents to either the Anti-Discrimination Agencies (ADV) or the police.

Short-term interventions have consistently proven less effective when achieving meaningful and lasting improvements in employment outcomes for Roma and Sinti communities. While pilot projects or temporary initiatives may raise initial awareness or provide brief support, they often lack the consistency and relationship-building needed to address the structural barriers these communities face. Sustainable, long-term engagement allows for trust to develop, tailored support to evolve, and systemic issues, such as discrimination, educational gaps, and intergenerational poverty, to be tackled more holistically. This lesson is echoed not only in the Dutch context but across numerous European efforts: quick fixes rarely lead to real change, whereas ongoing commitment and embedded strategies are essential for genuine social and economic inclusion.

2.3.1. Effectiveness of the NRSF in addressing the problems

No recent updates are available regarding the implementation of the NRSF in relation to employment. The prepared document indicates that studies have been conducted to explore methods of addressing discrimination in the labour market. Still, it does not specifically highlight the discrimination faced by Roma and Sinti communities, nor does it propose any measures to tackle this challenge.

2.3.2. Addressing the problems beyond the NRSF

According to recent statistics on labour participation and unemployment,⁴⁶ youth unemployment saw a slight increase, with the rate for individuals aged 15-25 rising by 0.2%. The government has made efforts to combat youth unemployment⁴⁷, including funding for municipalities and schools to support young people entering the labour market, especially for secondary vocational education school-leavers. This includes a significant budget to help guide them toward work or further education.

The government has also implemented measures⁴⁸ to support the broader unemployed population, such as providing a supplement to meet the social minimum for unemployed individuals with low total household incomes. While there is detailed data on unemployment among various ethnic groups, including the Caribbean, the figures do not specifically mention Roma and Sinti.

https://www.rijksoverheid.nl/binaries/rijksoverheid/documenten/rapporten/2022/06/30/handreiking-antidiscriminatiebeleid-voor-gemeenten/Handreiking+Antidiscriminatiebeleid+voor+gemeenten.pdf

⁴⁵ Handreiking - Antidiscriminatiebeleid voor gemeenten (Guidelines - Anti-discrimination Policy for Municipalities). Available at:

⁴⁶ Werkloosheid in januari toegenomen (Unemployment Increased in January). Available at: https://www.cbs.nl/nl-nl/nieuws/2025/08/werkloosheid-in-januari-toegenomen

⁴⁷ Verlenging aanpak jeugdwerkloosheid t/m 2022 (Extension of Youth Unemployment Approach until 2022). Available at: https://www.nponderwijs.nl/gemeenten/aanpak-jeugdwerkloosheid

⁴⁸ 3.5 Artikel 5 Werkloosheid (3.5 Article 5 Unemployment). Available at: https://www.rijksfinancien.nl/memorie-van-toelichting/2024/OWB/XV/onderdeel/2123904

2.4. Child protection

On the child protection front, the Centre for Crime Prevention (CCV), which is funded by the Ministry of Justice and Security (JenV), has developed a 'barrier model'⁴⁹ and an integrated approach to address exploitation within Roma family networks. The barrier model helps map out the steps of a criminal or rule-breaking process, identifying key conditions (occasions), warning signs (signals), and supporting individuals or groups (facilitators). By recognising these elements, targeted actions (barriers) can be taken to disrupt or prevent crime. The model also highlights the role of various partners, such as authorities, businesses, or citizens, who can intervene effectively. Its main goal is to reduce opportunities for crime, making it harder to commit and easier to prevent through situational crime prevention. The programme had two phases. From 2011 to 2013, it focused on understanding the problem and testing innovative approaches in four living labs, supported by the JenV and SZW. In the second phase (2013–2016), the goal was to develop practical tools and methods for professionals working with complex multi-problem Roma families, expanding to a total of eleven living labs.⁵⁰ In the Netherlands, there has been a greater focus on addressing child poverty, with the government prioritising efforts to ensure that children from low-income families have equal opportunities and can fully participate in activities with their peers. Efforts include increasing rent allowances and child-related budgets in 2025 to boost disposable income, addressing debt issues, and supporting families transitioning from welfare to work. The government is also working on a better disconnection scheme to ensure children have access to drinking water. Additionally, there are initiatives aimed at promoting equal opportunities, such as providing lessons on financial literacy, offering free school meals in vulnerable neighbourhoods, and increasing funding for supplies and activities through municipalities and foundations. Municipalities also play a key role by providing targeted support for children whose families struggle financially, with varying eligibility criteria and application processes depending on the local area.

The national anti-poverty policy of the Netherlands encourages collaboration between the National Government, municipal authorities, and social organisations. It is worth noting that the decentralised nature of this approach can lead to inconsistent implementation and outcomes. Municipal authorities have discretion in determining policy and allocating resources, which may result in varying levels of support across different regions, potentially leaving some communities, including Roma and Sinti children, without adequate assistance.

The 'Child Poverty Ambitions' initiative, a joint effort between the National Government and the Association of Netherlands Municipalities, aims to address child poverty more comprehensively. However, while this is a positive step, there is limited information on how effectively this initiative is being implemented or monitored, especially regarding its impact on marginalised groups like Roma and Sinti.

The Dutch government has committed to providing an additional 2 billion EUR annually to support vulnerable households, aiming to prevent a rise in poverty levels and reduce child poverty. While the Dutch government's decision to allocate an additional 2 billion EUR annually to combat poverty is a significant step toward addressing the needs of vulnerable households, the effectiveness of these measures is still open to question. Although the measures, such as increased child benefits, housing allowances, and free school breakfasts, are intended to provide immediate relief, they do not fundamentally address the structural causes of poverty or inequality. The continuation of poverty rates at 4.8% and a reduction in child poverty suggest that the measures, while helpful, may not be enough to drive significant change. While the government's commitment to supporting vulnerable populations is clear, the reliance on temporary measures and the lack of structural reform means that the root causes of poverty may remain unaddressed.

2.4.1. Effectiveness of the NRSF in addressing the problems

The NRSF strongly emphasises combating child poverty, improving access to education, and ensuring the availability of essential services. Central to this approach is the belief that all children, including Roma children,

⁴⁹ Living Labs Tackling the Exploitation of Roma Children. Available at: https://hetcv.nl/themas/georganiseerde-criminaliteit-binnen-familienetwerken/voorbeeldprojecten-aanpak-criminaliteit-binnen-familienetwerken/proeftuinen-aanpak-uitbuiting-roma-kinderen/

⁵⁰ Letter from the Government; Completion of the Programme Tackling the Exploitation of Roma Children - Integration Policy. Available at: https://www.parlementairemonitor.nl/9353000/1/j9vvij5epmj1ey0/vkdahwpkggv0

are entitled to education and a safe upbringing, rights enshrined in the International Convention on the Rights of the Child. JenV contributes to this effort by developing and disseminating knowledge and practical tools while also reinforcing the existing national strategy to prevent the exploitation of Roma children. This enables municipalities to maintain and strengthen their local approaches, ensuring that protective and supportive measures for Roma youth are sustained and adapted to local needs.

In summary, while the Netherlands has made strides in addressing child poverty, there are concerns about the consistency and impact of these measures. The lack of detailed data and monitoring, especially regarding marginalised groups like Roma and Sinti, makes it difficult to assess whether these efforts are truly reaching those most in need and effectively tackling the challenges they face.

2.4.2. Addressing the problems beyond the NRSF

The Child Protection Board (RvdK) in the Netherlands operates under JenV and plays a vital role in safeguarding children's well-being. Its core responsibility is to ensure that every child has the opportunity to grow up in a safe and healthy environment. When concerns arise that a child's development may be at serious risk and voluntary support has failed or is refused, RvdK can step in to assess whether mandatory interventions are needed. This intervention is usually triggered by reports from social workers, youth protection organisations, or Safe Home services.

The RvdK typically gets involved in cases involving serious family issues such as neglect, domestic or sexual abuse, parental substance abuse, mental health problems, or behavioural and criminal issues involving the child. If such risks are identified, and informal or voluntary assistance has proven insufficient, the RvdK initiates a formal investigation into the parenting situation. Its goal is to determine whether compulsory support or protective measures are necessary to secure the child's safety and development.

The Netherlands' National Action Plan (NAP)⁵¹ for the European Child Guarantee Initiative outlines key initiatives in early childhood development, education, healthcare, nutrition, and housing. It also identifies target groups of children in need; however, it lacks specific provisions for Roma and Sinti children. Although there are efforts to expand access to early childcare, improve school quality, and enhance healthcare services, these measures do not address the unique barriers Roma and Sinti children face, such as discrimination, limited access to services, and lower educational attainment.

Additionally, while the NAP's focus on housing and homelessness may benefit vulnerable groups, it does not specifically target the housing challenges faced by Roma communities, including discrimination and the lack of culturally appropriate options. Although civil society engagement is mentioned, it is unclear if Roma-specific organisations were consulted, and no dedicated funding is outlined for Roma and Sinti children. As a result, the NAP risks overlooking the distinct needs of Roma children, hindering its potential to address inequality effectively and ensure their inclusion in the country's social and welfare improvements.

While the National Child Aid Fund could serve as a valuable resource for supporting Roma children and their families, there is no clear indication of how aware Roma communities are of this tool nor how accessible it is to them. Without greater outreach, awareness-raising efforts, and accessibility improvements, the effectiveness of this fund in reaching those who need it most remains uncertain.

2.5. Promoting (awareness of) Roma arts, culture, and history

The lack of transparency and accountability in the allocation of special grant funds remains a significant concern, as the Roma community has expressed dissatisfaction with the absence of public information about the funded projects and their outcomes.

When drafting this report, no evidence suggests that Roma history or culture is being systematically integrated into school curricula. However, interviewees have acknowledged that there has been a gradual increase in the Dutch government's efforts to address and speak more about Roma history, signalling a potential shift toward greater recognition of Roma heritage in the future.

⁵¹ National Action Plan (NAP). Available at: https://ec.europa.eu/social/BlobServlet?docid=25518&langId=en

2.5.1. Effectiveness of the NRSF in addressing the problems

As currently outlined, the Dutch government's policy measures do not specifically address the promotion of Roma culture or history, nor do they acknowledge the distinct needs of the Roma community in this regard. The diversity of Roma culture and identity in the Netherlands, ranging from native Dutch caravan dwellers to various migrant Roma communities, is not reflected in current policy measures. However, a subsidy scheme⁵² exists to support Roma in preserving their culture and identity. Interviewees expressed a strong desire for Roma culture and history to be included in school curricula. This omission is surprising given the ongoing efforts and initiatives that have been carried out in this area, such as exhibitions and cultural projects.⁵³ While these activities are valuable, they remain isolated and lack systemic support within national policy. There is a clear need for more deliberate recognition of the Roma as a distinct minority in the Netherlands, alongside targeted actions to ensure their cultural heritage is actively promoted, preserved, and integrated into the fabric of Dutch society.

2.5.2. Addressing the problems beyond the NRSF

Up to 2024, the Netherlands has made several efforts to promote Roma history and culture. One notable initiative is the video portrait series 'Cultural Bridge Builders', created by the Knowledge Institute Sinti (KIS) in collaboration with documentary filmmaker Will Falize. This series focuses on young people with Sinti or Roma backgrounds, highlighting their contributions to society and their struggles balancing their cultural heritage with modern life. The project provides a platform for Roma youth and aims to challenge stereotypes and deepen understanding of the Roma community's lived experiences. Furthermore, an annual Roma history exhibition at Utrecht University of Applied Sciences, led by Roma advocate Mila van Burik, offers a detailed exploration of Roma culture and the persecution of the Romani people during the Holocaust. The exhibition serves an educational purpose, raising awareness among students and the public about the atrocities faced by Roma during World War II, ensuring that these painful histories are not forgotten.

Despite these commendable efforts, gaps remain in the broader promotion of Roma culture and history in the Netherlands. While financial support is provided for events such as the National Programme commemorating the 80 years of persecution of the Sinti and Roma, there is limited information on broader, sustained funding for Roma cultural initiatives outside of the Holocaust context. To truly foster inclusion, more consistent and wide-reaching efforts are needed to integrate Roma culture into mainstream Dutch society through historical remembrance and active celebration and promotion of Roma traditions, languages, and contemporary cultural contributions.

⁵² Grant for the National Programme for 80 Years of Persecution of Sinti and Roma. Available at: https://open.overheid.nl/documenten/b26ca5f3-1a8e-4726-ad82-6be2b7a50828/file

⁵³ Eens waren we vogels (Once We Were Birds) Podcast. Available at: https://www.oncewewerebirds.nl/podcast/

3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

3.1. Child protection

In May 2023, the Dutch government agreed to ratify the Third Optional Protocol to the UN Convention on the Rights of the Child (UNCRC),⁵⁴ but the process is still ongoing, subject to the completion of ratification procedures of the protocol to the UN Convention on Disability.

Currently, there is no national strategy on children's rights, which poses a significant challenge. Regarding child protection, the 2015 Child Protection Act and Youth Act⁵⁵ marked a significant shift in the Dutch system, decentralising youth services from national and provincial to local municipal levels. However, the transition has faced several challenges, including insufficient funding, long waiting lists, high staff turnover, and a complex system involving multiple organisations.

'Eurochild's Children's Realities in Europe: Progress & Gaps' report⁵⁶ highlights that the child protection system is under immense pressure, particularly in handling out-of-home placements for children. As a result, there are growing concerns about whether national authorities meet their international obligations concerning family reunification and the legal protection of children and parents.

The same report by Eurochild noted that the government's new programme, under a far-right leadership, includes measures to strengthen youth care and tackle child poverty but lacks a comprehensive long-term vision for children's rights. The government's focus is on stabilising poverty figures rather than reducing them, raising concerns about the sustainability and effectiveness of these measures.

A major concern regarding the Netherlands' National Action Plan⁵⁷ of the EU Child Guarantee is that it fails to specifically address the needs of Roma and Sinti children in terms of access to housing and early education and care. This oversight leaves children from these communities at risk of further exclusion and deprivation.

3.1.1. Effectiveness of the NRSF in addressing the problem

Child protection for Roma and Sinti communities in the Netherlands is mainly addressed through measures aimed at preventing exploitation. The lack of a more targeted, cohesive national strategy risks leaving the most vulnerable children without adequate protection.

3.1.2. Synergy with other actions

The European Child Guarantee initiative outlines specific guidelines for targeting children who face significant barriers to accessing essential services, early education, and care. The NAP of the European Child Guarantee from the Netherlands, published on 27 April 2022, serves as the primary framework for implementing these measures. In its progress report, the Netherlands has highlighted a significant achievement that may indirectly benefit Roma and Sinti children, notably the National Housing and Homebuilding Agenda. This ambitious agenda aims to provide affordable housing and eliminate homelessness by 2030, focusing on offering youth care services for young people with special needs. Programmes such as 'A Home for Everyone' and 'Housing First' are designed to remove obstacles to housing access and support families facing challenging circumstances. However, despite these positive initiatives, Roma and Sinti children are notably absent from both the NAP and

⁵⁴ Child Rights Connect. (n.d.). An International Human Rights Treaty that Allows the United Nations Committee on the Rights of the Child (the Committee) to Hear Complaints Alleging that a Child's Rights Have Been Violated. Children Will Only Be Able to Approach the United Nations if the National Legal System Has Not Been Able to Provide a Remedy for the Violation. Available at: https://opic.childrightsconnect.org/what-is-opic/

⁵⁵ Youth Act. Available at: https://wetten.overheid.nl/BWBR0034925/2025-01-01

⁵⁶ Eurochild. (2024). *Children's Realities in Europe: Progress and Gaps*. Available at: https://eurochild.org/uploads/2024/11/Eurochild-Flagship-Report-Childrens-Realities-in-Europe.pdf

⁵⁷ National Action Plan, Netherlands. Available at: https://ec.europa.eu/social/BlobServlet?docId=27661&langId=en

the progress report. While the European Child Guarantee framework recognises Roma children as a vulnerable group requiring targeted action, the Dutch approach fails to specify Roma children in any meaningful way.

Though there are measures addressing early school leaving and combating poverty, these are implemented using a generic approach that does not acknowledge the unique challenges faced by Roma children. There is no evidence that these policies are tailored to address specific barriers such as discrimination, social exclusion, or limited access to services that disproportionately affect Roma communities. This lack of targeted measures is concerning, as it highlights the risk of Roma children being overlooked in broader national strategies.

To effectively support Roma and Sinti children, a more integrated and culturally sensitive approach is needed, ensuring that their specific needs are met and that existing gaps in policy and practice are addressed.

3.1.3. Roma participation

At the time of drafting this report, there is no evidence to suggest that Roma communities were actively involved in developing the National Action Plan of the EU Child Guarantee or in any child-related initiatives.

3.2. Antigypsyism, hate-motivated violence

In the Netherlands, everyone is entitled to equal treatment, a right enshrined in the Constitution - Article 1 of the Constitution and provisions in the Dutch Criminal Code (Articles 137c–137g), which criminalise group defamation and incitement to hatred or violence. This principle is reinforced by several legal provisions, including the Equal Treatment Act, the Equal Treatment of Disabled and Chronically Ill People Act, the Equal Treatment in Employment (Age Discrimination) Act, and the Equal Treatment (Men and Women) Act. Although these laws protect individuals from discrimination based on various grounds, such as race, sex, sexual orientation, political opinion, religion, belief, disability or chronic illness, civil status, age, nationality, working hours, and type of contract, they do not specifically mention ethnicity, which leaves Roma and Sinti without a clear option to report hate speech or crimes against them based on this category. In addition, there is no formal recognition of Roma, Sinti, or Travellers as national minorities and ethnic data collection is limited. This lack of recognition hinders the development of targeted policies and makes antigypsyism less visible in official discourse. Though mechanisms like anti-discrimination bureaus (ADVs), and the Netherlands Institute for Human Rights are in place, many Roma individuals remain unaware of or reluctant to use these avenues due to historical mistrust.

Many cases of antigypsyism, ranging from online hate speech to ethnic profiling, are not identified and cannot be prosecuted as such. As a result, while the legal tools exist on paper, their effectiveness in combating anti-Roma hate crime and hate speech is significantly limited without structural changes and explicit recognition of the Roma community within national anti-discrimination policies.

It is important to note that in line with these legal frameworks, the Netherlands has made significant developments in combating discrimination. In 2023, a revised draft bill on aggravating circumstances was introduced in Parliament, allowing for increased prison sentences when discriminatory elements are proven in a crime.

Concerning Roma migration, the ECRI 2022 report⁶⁰ recommended that the Netherlands adopt an integration strategy focusing on a two-way process, with free, tailored language courses and clear targets. The new Civic Integration Act⁶¹ (effective since 2022) includes positive changes like municipal responsibility for integration

⁵⁸ Discriminatie.nl (Discrimination.nl). Available at: https://discriminatie.nl/over-ons/

⁵⁹ As an independent supervisor, the Board highlights, protects and promotes human rights in the European and Caribbean Netherlands. In addition, it rules on discrimination complaints. Available at: https://www.mensenrechten.nl/

⁶⁰ European Commission against Racism and Intolerance (ECRI). (n.d.). *ECRI Conclusions on the Implementation of the Recommendations in Respect of the Netherlands Subject to Interim Follow-Up*. Available at: https://rm.coe.int/ecriconclusions-on-the-implementation-of-the-recommendations-in-respe/1680a59aee

⁶¹ Civic Integration Act. Available at: https://www.rijksoverheid.nl/onderwerpen/inburgeren-in-nederland/nieuwe-wet-inburgering

CIVIL SOCIETY MONITORING REPORT ON THE IMPLEMENTATION OF THE NATIONAL ROMA STRATEGIC FRAMEWORK in the Netherlands

plans and free integration. The fines for failing to pass exams within three years are, however, seen as counterproductive. As a result, ECRI considers the recommendation unimplemented.

Regarding labour market discrimination, ECRI recommended that the Netherlands include measurable targets in its action plan. Although efforts like awareness campaigns have been monitored, the plan lacked clear indicators and evaluation methods.

On 27 February 2024, the Senate discussed the long-awaited 'Equal Opportunities in Recruitment and Selection Bill'. It represents a significant milestone for the Dutch labour market that would endorse the standard that no discrimination may occur in recruitment and selection, particularly against people with a migration background and others who experience discrimination in the labour market. On 26 March 2024 the amended motion was rejected, which means that ECRI's recommendation remains unimplemented.

The Safety Monitor 2023 Report, ⁶² published on 1 March 2024, is a comprehensive survey on the perception of safety and livability score of neighbourhoods, carried out by Statistics Netherlands (CBS) in collaboration with JenV. The report provides valuable insights into public perceptions of safety and offers citizens' views on the performance of the police. While it contains figures on perceived discrimination in the Netherlands, ⁶³ this data is mainly disaggregated by age, gender, religion, and some countries of origin. However, it does not include Roma or Sinti, nor does it capture discrimination toward Eastern European populations. As such, the report holds limited relevance for the Roma and Sinti communities, as it lacks specific data reflecting their experiences. This absence means that issues of safety, discrimination, or trust in law enforcement specific to these communities remain invisible in national statistics. As a result, their unique concerns and challenges may not be adequately addressed in policy responses based on this data.

3.2.1. Effectiveness of the NRSF in addressing the problem

As laid out in the NRSF, in October 2020, the International Holocaust Remembrance Alliance (IHRA) adopted a 'Working Definition of Antigypsyism and the Discrimination of Roma'. This definition was an important step in acknowledging the ongoing prejudice and discrimination that Roma and Sinti communities face today. By recognising this, the IHRA has underscored the need to address and counter antigypsyism in modern society.

Moreover, the NRSF emphasises cooperation with equal treatment organisations as a key strategy to combat antigypsyism. These organisations, such as the Netherlands Institute for Human Rights, are vital in investigating discrimination cases, issuing reports, and providing policy recommendations to lawmakers.

In addition, municipal anti-discrimination services across the country offer legal support and advice to Roma in need, including assistance during proceedings against municipal authorities.

However, the NRSF remains broad in its approach, relying on existing equality laws to address discrimination. While these laws, including the Equal Treatment Act and others, provide important protections, they fail to specifically address issues of discrimination based on ethnic background. This approach, although well-intentioned, may not fully meet the unique needs of Roma and Sinti individuals in the Netherlands.

3.2.2. Synergy with other actions

The 'National Programme Against Discrimination and Racism 2023'⁶⁴ has highlighted several critical issues faced by the Roma and Sinti communities in the Netherlands. From conversations with Roma and Sinti communities and reports from the Advisory Committee of the Council of Europe, the National Co-ordinator against Discrimination and Racism (NCDR) highlights that these communities continue to experience significant social disadvantages, facing discrimination and prejudice in many aspects of daily life. Despite efforts to

⁶² Akkermans, M., Derksen, E., Kennis, M., Kloosterman, R., & Moons, E. (2024). *Safety Monitor 2023 Report*. Available at: https://open.overheid.nl/documenten/dpc-9a9f6b051ff743f1b469040b00d8946351c6f009/pdf

⁶³ Perceived Discrimination in the Netherlands, December 2024. Available at: https://www.cbs.nl/nl-nl/longread/rapportages/2024/ervaren-discriminatie-in-nederland/3-1-ervaren-discriminatie

⁶⁴ National Coordinator against Discrimination and Racism, Ministry of the Interior and Kingdom Relations. (2023). *National Programme against Discrimination and Racism 2023*. Available at: https://open.overheid.nl/documenten/b6a7ec23-71f8-4caf-a73d-a0ad7a020f0f/file

address these challenges, there has been limited progress in improving the situation for Roma and Sinti in areas such as the labour market and education. In addition, the number of caravan sites remains largely invisible, and many individuals in these communities report daily encounters with racism, discrimination, and prejudice when seeking housing options.

A key recommendation put forward in the National Programme is to expand the scope of the 'Framework Convention on the Protection of National Minorities' to include Roma and Sinti. This expansion is an important step towards providing recognition and legal protection for these communities.

Another pressing issue addressed in the programme is statelessness, particularly among Roma communities. Many Roma individuals do not possess a nationality and, thus, are not recognised as citizens by any country under its laws, complicating their ability to fully participate in society. The NCDR has welcomed the introduction of a procedure to determine statelessness, which allows individuals who lack documents proving their stateless status to request a court determination. This is particularly important for Roma individuals whose children have also been born stateless in the Netherlands, as it provides a legal pathway to address their status and access rights.

3.2.3. Roma participation

To counter antigypsyism, the NRSF states that the Netherlands collaborates with equal treatment organisations. These services can conduct investigations, issue reports, and provide recommendations and advice to policymakers. For instance, the Netherlands Institute for Human Rights played a key role in drafting the policy recommendations for the Policy Framework on Municipal Mobile Homes and Pitch Policy. However, the overall impact of these efforts can be limited if Roma and Sinti are not more actively included in the processes that directly affect them.

Some of the interviewees in the current report have expressed dissatisfaction with the lack of Roma and Sinti representation in roles that directly impact their communities. Despite being invited to meetings more frequently since the appointment of a national coordinator, they still feel disconnected, having to seek information about these meetings proactively rather than being directly involved in the decision-making process. While there has been some progress in including Roma and Sinti voices, the absence of individuals from their own communities in key positions remains a concern.

CONCLUSIONS AND RECOMMENDATIONS

The implementation of the NRSF is gradually gaining momentum, but progress remains limited and uneven. Despite a growing awareness of the need for inclusion, the current approach lacks the necessary institutional backbone and Roma-specific focus to deliver tangible, measurable results. The implementation structure, primarily coordinated by the NRCP, remains insubstantial. Concrete, operational guidance is absent, including a lack of clear indicators, and timelines for implementation. As a result, national and local actors are left without a roadmap to operationalise the NRSF's goals effectively. There has been difficulty in securing consistent municipal engagement, although some municipalities have made notable efforts, particularly about non-discrimination and housing. A positive development in this area is the issuance of guidelines for municipalities aimed at preventing discrimination, which represents a promising practice and a potential model for wider adoption.

The great diversity within the Roma communities in the Netherlands, including Travellers and residents of caravan sites, poses specific challenges for inclusive policy design.

Notably, no new Roma-specific policies have been introduced since the launch of the NRSF, and there have been no substantial updates on existing policy measures. So far, the approach has leaned heavily on mainstreaming Roma inclusion without sufficiently targeting the unique barriers Roma communities face The current recommendations within the NRSF are broad and lack specificity. Future efforts must go beyond general policy statements to increase impact and move towards a results-oriented implementation strategy.

Overall, while there are some encouraging developments, including good practices at the local level, a more institutionalised, focused, and accountable approach is urgently needed to make meaningful progress toward Roma inclusion in the Netherlands.

Recommendations to national authorities

- 1. Establish a dedicated monitoring and information mechanism to register and track antigypsyist hate speech and hate crimes, drawing inspiration from Germany's MIA (Monitoring and Information Centre on Antigypsyism).
- 2. Strengthen the National Roma Contact Point (NRCP) by providing a clear implementation framework, including measurable indicators, timelines, and practical guidance to ensure effective coordination across sectors.
- 3. Increase municipal engagement through more explicit mandates, funding incentives, and knowledge-sharing platforms, ensuring consistent local commitment to Roma, Sinti, and Traveller inclusion, building on existing good practices.
- 4. Develop a National Strategy on Children's Rights with specific, targeted measures addressing the rights and needs of Roma and Sinti children, particularly in early childhood education and care (ECEC), housing, and inclusive education.
- 5. Strengthen legal anti-discrimination frameworks by explicitly including ethnicity as a protected category, thereby providing a stronger legal basis for addressing antigypsyism.
- 6. Allocate adequate resources and monitor real-world outcomes to ensure that commitments translate into tangible improvements.
- 7. Address the living conditions of Travellers and caravan dwellers through inclusive urban planning policies, securing their right to culturally appropriate housing and protecting their communities from discriminatory local policies.
- 8. The commissioning of national reports (e.g., the 'Social Inclusion Monitor') requires participatory research methodologies that actively involve Roma, Sinti, and Traveller communities in data collection, analysis, and interpretation, either through capacity-based roles or by providing training.

Recommendations to European institutions

9. Support Roma-specific monitoring: Develop Roma-specific indicators to track progress in EU child and social policies.

Recommendations to the civil society

- 10. Push for Roma representation in policymaking and ensure Roma-specific needs are addressed in national and EU policies.
- 11. Increase accessibility to support: Help Roma families access resources such as the National Child Aid Fund and housing support.
- 12. Monitor policy implementation: Track and assess the effectiveness of policies and funds targeting Roma communities.
- 13. Request and support the collection of data
- 14. Advocate for the active participation of Roma and Sinti voices in public debate, monitoring mechanisms, and policy evaluation processes, including through capacity-building and training.
- 15. Partner with municipalities and national bodies to co-design inclusion projects that reflect the diversity within Roma communities, ensuring culturally responsive and community-led approaches.

Recommendations to other stakeholders

- 16. Promote workplace inclusion: Employers should adopt inclusive hiring practices and support targeted Roma employment initiatives.
- 17. Inclusion measures should be embedded in existing public services, supported by trained, permanent staff with cultural competence, and go beyond intermediaries.
- 18. Researchers and consulting firms engaged in Roma inclusion monitoring should actively encourage the participation of Roma and Sinti individuals as researchers or co-facilitators or, at minimum, ensure their presence during research activities. This approach strengthens the quality and relevance of the research and helps build trust and foster meaningful relationships with the communities involved.
- 19. All stakeholders should invest in community-level dialogue and trust-building, particularly with traditionally underrepresented groups such as Travellers and caravan dwellers, to ensure their full inclusion in service provision and policy design.

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ANNEXE: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions:	Significance:	ldentified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Antigypsyism not recognised as a specific problem in national policy frameworks	Significant problem	Understood with limitations	Present but insufficient	Absent	Adopted measures National programme, Strenghtened anti-discrimination laws Measures' effectiveness No baseline for comparison, slow progress, limited impact Measures' outreach Limited community involvement, insufficient targeted engagement Data collection Limited disaggregated data mostly from EU level sources, insufficient Romaspecific reporting
Prejudice against Roma	Significant problem	Irrelevant	Absent	Absent	N/A
Hate crimes against Roma	Significant problem	Irrelevant	Absent	Absent	N/A
Hate speech towards and against Roma (online and offline)	Significant problem	Irrelevant	Absent	Absent	Adopted Measures: Support EU proposal, alignment with law. Effectiveness of Measures: Pending updates, no clear impact.

					Measures Outreach: Letter to House of Representatives. Data Collection: No mention of disaggregated data collection on Roma and Sinti
Weak effectiveness of protection from discrimination	Significant problem	Irrelevant	Absent	Absent	N/A
Misconduct and discriminatory behaviour by police (under-policing/over- policing)	Significant problem	Irrelevant	Absent	Absent	N/A

Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Secondary education/vocational training disconnected from labour market needs	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Absent	Adopted Measures Decentralisation allowance, intermediary roles. Effectiveness of Measures: Lack of monitoring, no data. Measures Outreach: Network meetings, educational support. Data Collection: No data on outcomes
Misplacement of Roma pupils into special education	Significant	Irrelevant	Absent	Absent	N/A

	problem				
Low level of digital skills and competences and limited opportunities for their development among adults	Significant problem	Irrelevant	Absent	Absent	N/A

Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Youth not in employment, education, or training (NEET)	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Absent	Adopted Measures: Municipal funding, support for youth. Effectiveness of Measures: No recent updates, limited focus. Measures Outreach: Support for youth, no Roma focus. Data Collection: Unemployment data, no Roma-specific.
Discrimination on the labour market by employers	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Absent	Adopted Measures: Equal opportunities bill submitted Effectiveness of Measures: Motion rejected, recommendation unimplemented. Measures Outreach: N/A

		Data Collection: No specific data provided.

Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Child protection not considered in the NRSF	Critical problem	Understood with limitations	Present but insufficient	Absent	N/A
Specific vulnerability of Romani children as victims of violence not considered	Significant problem	Understood with limitations	Present but insufficient	Absent	Adopted Measures: Child protection, anti-poverty initiatives, financial literacy lessons. Effectiveness of Measures: Inconsistent implementation, limited monitoring, unaddressed structural causes. Measures Outreach: Targeted support for vulnerable children. no Roma focus Data Collection: Lack of detailed data, monitoring gaps
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	Significant problem	Irrelevant	Absent	Absent	N/A

Barriers to children's registration; statelessness	Significant problem	Irrelevant	Absent	Absent	Adopted Measures: Court ruling for stateless status, ability to apply for nationality. Effectiveness of Measures: Increased rights for stateless individuals, enhanced participation. Measures Outreach: Targeted support for stateless Roma. Data Collection: No detailed data provided yet.
Inadequate child/ adolescent participation	Significant problem	Irrelevant	Absent	Absent	N/A

Promoting (awareness of) Roma arts, culture, and history

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Absent	Adopted Measures: Cultural initiatives, exhibitions, "Cultural Bridge Builders." Effectiveness of Measures: Limited systemic support, gaps in integration. Measures Outreach: Roma youth focus, public awareness. Data Collection: Lack of public data on outcomes.
Exclusion of Roma communities from national cultural	Significant	Irrelevant	Irrelevant	Absent	N/A

narratives	problem				
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	Significant problem	Irrelevant	Irrelevant	Absent	N/A
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	Significant problem	Irrelevant	Irrelevant	Absent	

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