

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

in Greece







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ANI		II: NRSF-RELATED 2021-2027 EU FUNDING ALLOCATIONS IN REGIONAL RATIONAL PROGRAMMES	

LIST OF ABBREVIATIONS

CERD United Nations Committee on the Elimination of Racial Discrimination

CERV Citizens, Equality, Rights, and Values Programme

CESCR United Nations Committee on Economic, Social, and Cultural Rights

CoE Council of Europe

CSO Civil Society Organisation
DYPA Public Employment Agency
EC European Commission

ECRI European Commission against Racism and Intolerance
ECSR Council of Europe's European Committee on Social Rights

ECtHR European Court of Human Rights ENPE Union of Regions of Greece

EODY Hellenic National Public Health Organisation

ESF+ European Social Fund Plus

ERDF European Regional Development Fund EU MIDIS EU Minorities and Discrimination Survey

EURSF EU Roma Strategic Framework FRA Fundamental Rights Agency GMI Guaranteed Minimum Income

GNCHR Greek National Commission on Human Rights
HRC United Nations Human Rights Committee

ICCPR United Nations International Covenant on Civil and Political Rights

IHRA International Holocaust Remembrance Alliance

JMD Joint Ministerial Decision

KEDE Central Union of Greek Municipalities

KOMY Mobile Health Unit LAP Local Action Plan

NCHR National Commission for Human Rights

NRCP National Roma Contact Point
NRP National Roma Platform

NRSF National Roma Strategic Framework

RCM Roma Civil Monitor

RRP Resilience and Recovery Plan

UNICEF United Nations International Children's Emergency Fund

WHO World Health Organisation

EXECUTIVE SUMMARY

Greece's National Roma Strategic Framework 2021–2030 (NRSF) was prepared by the Ministry of Social Cohesion and Family, and targets poverty reduction, equal access to key services, tackling discrimination, and strengthening Roma involvement in decision-making. However, its actual implementation is substantively lagging behind.

Implementation of the NRSF

While the NRSF has introduced more robust governance structures and requires municipalities with Roma populations to prepare Local Action Plans (LAPs), its implementation remains patchy. Many municipalities have yet to finalise or adequately fund LAPs, and those submitted often lack clear budgets and timelines.

National oversight bodies, such as the NRSF Observatory, remain nonfunctional, thereby undermining systematic monitoring. Coordination across ministries and local levels is fragmented, with some responsibilities outsourced to private contractors, raising concerns about government ownership and sustainability. Across sectors, limited Roma participation and weak monitoring undermine progress. Promising pilots are not scaled up, and local-level resistance hampers delivery, especially in housing and education.

Roma participation in shaping and monitoring measures remains limited, despite the recent establishment of the Roma Forum. Although some national committees convene regularly, their practical influence on local implementation is minimal. Overall, the NRSF's impact remains far below its stated ambitions.

Review of country situation by area

Antigypsyism and Discrimination: Despite the NRSF's dedicated pillar on combating stereotypes and hate crimes, antigypsyism remains widespread and largely unaddressed in practice. Hate speech and bias-driven violence continue, with few prosecutions and limited trust in law enforcement. Some police and judicial training occurred, but monitoring mechanisms are weak. Measures to build Roma trust in justice institutions and improve complaint systems remain underdeveloped.

Education: Segregation persists, with a limited national desegregation policy. Local education authorities have taken some positive steps, such as busing and dispersal, to reduce Roma-only classes. Still, systemic barriers and high dropout rates continue, especially in junior high schools. While early childhood enrolment has improved slightly, administrative hurdles and a lack of disaggregated data hinder effective intervention.

Employment: Roma unemployment and informality remain high. Although some targeted schemes exist - such as entrepreneurship grants for young Roma - uptake is low and impact limited. Municipalities underuse available frameworks to support Roma job creation. Vocational training and awareness-raising initiatives with employers are vastly underutilised.

Healthcare: Health access for Roma communities remains precarious due to documentation barriers, physical distance, mistrust, and low literacy. Targeted actions, such as mobile units and vaccination drives, have reached some settlements, especially during disease outbreaks; however, structural gaps persist. Health mediator programmes lack stable funding and broad coverage.

Housing and Essential Services: Problems concerning substandard living conditions and forced evictions are not effectively tackled. Article 159 of Law 4483/2017 permits temporary relocations, but these remain underutilised and often perpetuate segregation. Flagship resettlement projects in Delphi and Katerini failed or stalled due to local resistance or the unsuitability of the sites. Rent subsidy programmes offer some promise for inclusion but face reluctance from landlords and low beneficiary numbers. Municipalities retain broad discretion, and many avoid applying for Roma-focused housing funds.

Social Protection: While Roma remain eligible for basic national benefits such as the Guaranteed Minimum Income, digital illiteracy and missing documentation bar many from full access. Measures like child benefit or food aid programmes are not systematically made accessible to Roma beneficiaries, making it difficult to assess success or coverage.

Social Services: Despite recognition of the need for specialised interventions - particularly for women, children, and marginalised youth - there are few tailored programmes. Gaps in psychosocial support, anti-

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addiction services, and family counselling persist, further isolating many Roma communities from mainstream social services.

Child Protection: Issues like child begging, early marriage, and children in conflict with the law receive nominal attention in the NRSF, primarily through references to broader national action plans. Clear targets or monitoring are absent, hindering any serious assessment of the impact on Roma children's welfare.

Promoting (Awareness of) Roma Arts, Culture, and History: Pilot efforts, such as teaching Romanes in select schools and commemorating Roma history, show potential but are still in the early stages. The complete integration of Roma culture into national curricula and public awareness campaigns remains limited.

Use of EU funding instruments

EU funds, notably under ESF+ and ERDF, remain the main resource for Roma inclusion in Greece, covering employment, housing, education, and basic services. However, actual fund absorption lags behind plans. Few project calls targeting Roma have opened, and municipalities often lack the capacity or political will to apply. Community Centres with Roma branches are the main visible ESF+ measure so far, but risk perpetuating segregation when located within Roma-only areas. Infrastructure upgrades funded by national budgets rather than EU instruments frequently fall short due to local opposition or poor planning. Roma civil society has formal roles in Monitoring Committees, but its capacity to shape funding priorities is limited. Despite substantial allocations on paper, EU resources have yet to deliver systemic improvements for Roma communities. Without urgent progress in publishing calls, supporting municipalities, and ensuring Roma-led oversight, Greece risks underusing EU funds and failing to meet core inclusion objectives by 2030.

INTRODUCTION

National Roma strategic framework

The Greek *National Strategy and Action Plan for the Social Inclusion of Roma, 2021–2030* (NRSF)¹ is the country's overarching framework for addressing Roma exclusion and promoting equality, inclusion, and participation. Prepared by the General Secretariat for Social Solidarity and the Fight Against Poverty of the Ministry of Social Cohesion and Family,² which also serves as the National Roma Contact Point (NRCP), the NRSF is a standalone plan rather than a repackaging of mainstream measures. While it draws on broader policy initiatives (including Greece's Recovery and Resilience Plan and various EU structural funds), it focuses on four dedicated pillars: preventing and combating Roma poverty; facilitating equal access to education, healthcare, employment, and social care; challenging stereotypes and discrimination; and ensuring meaningful Roma involvement in public and political life. Formally adopted by government decision, the strategy does not require parliamentary ratification. Its first revision was published in March 2023, adding guidelines³ for municipalities to create Local Action Plans.

Earlier Roma Civil Monitor (RCM) reports⁴ noted substantial limitations in the previous strategies, particularly inadequate local-level engagement, a lack of specific actions to address forced evictions and entrenched antigypsyism. By contrast, the new NRSF introduces more detailed measures, integrates local action planning, and aims to incorporate feedback from line ministries, local authorities, and Roma civil society. However, obstacles persist. Although the framework mandates annual progress reports, it is unclear whether they have been produced, and no report has been made available to the public.

Substantial gaps remain between national policy commitments and practical local delivery. Local political will remains inconsistent, especially regarding housing upgrades and the prevention of forced evictions. Despite multiple bodies being established - such as the Advisory Committee on Roma⁵ - coordination between the central government and local authorities is at times patchy, undermining the NRSF's implementation. Local communities and civil society organisations report that their input on implementation is sporadically acknowledged rather than systematically integrated.

Overall, the NRSF provides a more comprehensive blueprint than previous plans, notably by stipulating indicators (based on the EU Agency for Fundamental Rights) and encouraging more substantial local ownership through local action plans. The NRSF aligns with the EU Roma Strategic Framework (EURSF) 2020–2030, echoing its emphasis on inclusive education, equal employment opportunities, healthcare, housing, and anti-discrimination.

Yet its full promise – particularly for combating antigypsyism and ensuring consistent cross-ministerial cooperation – remains unrealised. Notably, major flaws remain in the absence of explicit procedures to tackle

¹ Greek Government (2023). *Greek National Strategy and Action Plan for the Social Integration of Roma 2021–2030 (1st Update, March 2023)* [Εθνική Στρατηγική και Σχέδιο Δράσης για την Κοινωνική Ένταξη των Ρομά 2021–2030 (1η Επικαιροποίηση, Μάρτιος 2023)]. Available in Greek at: https://rb.qy/sa5t7n

² Ministry of Social Cohesion and Family Affairs – MINSCFA (Greece). [Υπουργείο Κοινωνικής Συνοχής και Οικογένειας] (2024). Available at: https://minscfa.gov.qr/. Note: This is a newly established ministry, formed following the restructuring of the former Ministry of Labour and Social Affairs, now renamed the Ministry of Labour and Social Security.

³ Government of Greece (2023). *Greek National Strategy and Action Plan for the Social Integration of Roma* 2021–2030 (1st Update, March 2023) [Εθνική Στρατηγική και Σχέδιο Δράσης για την Κοινωνική Ένταξη των Ρομά 2021–2030 (1η Επικαιροποίηση, Μάρτιος 2023)], pp. 224–239. Available in Greek at: https://rb.gy/sa5t7n

⁴ Roma Civil Monitor (2022). *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Greece*. Publications Office of the European Union, Luxembourg. Available in English and Greek at: https://www.romacivilmonitoring.eu/countries/greece/

⁵ 1st Meeting of the Advisory Committee (Πρώτη Συνεδρίαση της Συμβουλευτικής Επιτροπής). Available in Greek at: https://rb.qy/aqypbi

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forced evictions and the downplaying of antigypsyism. Many of the NRSF's stated milestones lack robust monitoring tools or explicit timelines.

About this report

This report aims to assess the implementation of the Greek NRSF, with a particular focus on how stated objectives are translated into on-the-ground outcomes. It evaluates progress, identifies gaps, and offers policy recommendations aligned with the relevant EU Roma Strategic Framework (EURSF).

The report is organised into thematic chapters followed by an in-depth review of four key challenges affecting Roma communities. It concludes with a discussion on the use of EU funding instruments, additional findings, and recommendations to national authorities, European institutions, civil society, and other stakeholders.

<u>Methodology</u>

Key Informant Interviews and Letters Requesting Information: Over four months, interviews were conducted with representatives of the NRCP, ministries, and Roma civil society organisations. In total, four interviews were held – one with a central-level official from the NRCP, two with Roma CSO representatives and one with an independent expert. Letters requesting information were sent to the Hellenic Police Headquarters, the Ministry of Education and the ESF Actions Coordination and Monitoring Authority (EYSEKT): While the latter responded, the former did not respond by the date of completion of this report.

Document Review: Recent policy documents and legal provisions (published mainly between 2021 and 2024) were analysed, including the 2021–2030 Greek NRSF, ministerial circulars on housing, health, and employment, and selected Local Action Plans submitted by municipalities. Relevant international and domestic monitoring reports (e.g., European Commission, UN bodies, Ombudsperson's Office, Greek National Commission on Human Rights) were also examined.

Secondary Research: Statistical updates from FRA, Eurobarometer, and national agencies were used to contextualise the socioeconomic profile of Roma communities.

Consultations with Civil Society: Preliminary findings were presented in discussions with Roma activists, including the Roma Women Association of Dendropotamos, who provided feedback on the reported outcomes and the feasibility of proposed recommendations. These consultation forums took place in November 2024, December 2024, and February 2025 and were conducted via telephone and teleconference means.

Data analysis: The research team employed both qualitative and quantitative methods. Interview transcripts were coded for recurrent themes, especially those related to housing, forced evictions, and discrimination, while statistical indicators were used to track progress against the NRSF's targets. Findings were then triangulated to ensure consistency and reliability.

<u>Authorship and Potential Conflicts of Interest</u>

This report was jointly prepared by Georgios Tsiakalos, Attorney at Law, on behalf of the Roma Women Association of Dendropotamos and Theodoros Alexandridis, External Consultant and Human Rights Expert.

There is no conflict of interest to be reported.

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1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

Despite the NRSF (2021–2030) laying out ambitious commitments, its implementation thus far has been notably weak. Central Government efforts have fallen short of translating policy aims into concrete impact at local level. While line ministries have appointed delegates to participate in the Governmental Committee on Roma Social Inclusion⁶, set indicators, and issue guidelines, these mechanisms remain largely disconnected from each other. Coordination among ministries is patchy, and adequate resources for local action are not consistently allocated or monitored.

A fundamental design issue is the heavy reliance on municipalities in order to implement nearly every key NRSF measure, ranging from housing upgrades to targeted education schemes, without ensuring they have the capacity, funding, or legal impetus to carry them out. Many municipalities fail to submit the required Local Action Plans, whose approval by the NRCP is a prerequisite for unlocking EU funding from the Regional Managing Authorities. When they do, budget lines and timelines are often vague or non-existent. This leaves core objectives - from preventing forced evictions to tackling school segregation - in limbo.

In the absence of clear enforcement or incentives to drive local compliance, life for most Roma communities remains unchanged. Discrimination, poor housing, and inadequate access to basic services persist, undermining the very goals that the National Strategy seeks to achieve. The Greek National Commission on Human Rights – an advisory body established by law – has repeatedly warned about the 'persistently poor' implementation of the NRSF.⁷ It highlights a lack of tangible progress on the ground and calls for substantive reforms, sustained political commitment, and decisive action by all relevant authorities.

The sections that follow examine how this disconnects between central ambition and local action plays out in practice. They assess the role of newly formed national bodies, evaluate the quality and extent of local planning, and provide recommendations to both national and EU-level stakeholders to bridge the gap. Ultimately, the success of the NRSF hinges on political will, robust governance, and the effective mobilisation of resources at every level of the state.

The responsibility that local administrations carry for shaping and enacting policies for Roma communities is significant. One notable advancement in implementing and gauging the NRSF's impact lies in the introduction of Local Action Plans for Roma inclusion, equality and participation (LAPs) to be developed by municipalities which report having a Roma population in their territory. This concerns 145 municipalities out of the country's 322.8 The framework provided by the NRSF to municipalities includes a comprehensive template for Roma inclusion, equality, and participation. It guides local authorities through a detailed demographic mapping of Roma residents, a SWOT analysis, and structured mechanisms for consultation, while also requiring clear policy goals, timelines, and allocated budgets. This localised approach aims to ensure that municipal strategies are both systematic and responsive to the specific needs of Roma populations.

The NRSF describes the key stakeholders involved (including Roma organisations and civil society), the administrative responsibilities and legal foundations for such initiatives, and the four main sections of the LAP. These sections cover administrative data, existing conditions and municipal actions, an operational strategy for Roma inclusion (highlighting objectives, stakeholders, and consultation processes), and detailed tables containing proposed measures, budgets, timelines, and implementation details. The goal is to enhance Roma participation in education, employment, healthcare, and living conditions through both broad and targeted policies and actions.

⁶ Ministerial Council Act 28/2022 [Πράξη Υπουργικού Συμβουλίου 28/2022 – *Ministerial Council Act 28/2022*]. Available at: https://www.kodiko.gr/nomothesia/document/822702/p.y.s.-28-2022

⁷ Greek National Commission for Human Rights (GNCHR) (2021). Written Responses to the List of Issues in Relation to the Combined Fourth to Sixth Periodic Reports of Greece to the UN Committee on the Rights of the Child, p. 6. Available in English at: https://rb.qy/7hd1q9

⁸ Greece has seven decentralised administrations, 13 regions, and 322 municipalities.

Monitoring, evaluation, and regular updates are integral parts of these plans, which must be submitted to and coordinated by the General Secretariat for Social Solidarity and the Fight Against Poverty. A template guide for drafting these LAPs is provided in the document's appendix.

Although Greece has reported to the UN that 85 municipalities responded with completed LAPs according to the NRCP,⁹ the authors of this report were only able to find and study 14 of them, which were published in *Diavgeia*, the transparency portal where all decisions must be published.

1.1.1. Changes in the NRSF

To date, it has undergone one revision - the first update, released in March 2023. This updated version is now 239 pages long, compared to the original 190 pages.

This update added the structured templates to guide municipalities in developing LAPs. The update also adds six analytical tables - Table 12 (updated SWOT), Table 13 (consolidated strategic objectives), Table 14 (measures by strategic pillar), Table 15 (matrix linking operational goals to measures), Table 16 (detailed goals, measures, and actions per pillar) and Table 17 (indicators for monitoring and evaluation 2021-2030) - and replaces the 2017 Roma-settlement registry with fully updated 2021 data on population and settlement types.

1.1.2. Progress in implementation

Although the NRSF initially outlined a comprehensive roadmap encompassing specific pillars, objectives, and local-level actions, actual implementation thus far has been uneven, with both positive developments and notable delays. There are broader challenges in ensuring local ownership, enforcing accountability, and bridging existing resource gaps. While the establishment of additional governance bodies appears promising, the overall pace of implementation lags behind the initial strategy, underscoring an urgent need for streamlined coordination, more precise enforcement mechanisms, and robust data collection to drive more effective action.

First and foremost, the majority of funding allocated through the regions (via the Regional Operational Programmes) has not yet opened calls for applications, particularly for municipalities, to request grants targeted explicitly at Roma or that could benefit Roma communities.

Regarding local administration, key delay relates to insufficient alignment and capacity at the municipal level - many local authorities have either not completed LAPs or have stalled in implementing them. The publicly available LAPs that were studied for this report lack specific goals, clear timelines, and well-defined funding mechanisms. They also rely heavily on ESF+ and ERDF funds - reportedly allocated through the Regional Operational Programmes - instead of leveraging national or municipal resources.

Funding allocations for targeted housing projects (under Article 159 of Law 4483/2017) have also encountered setbacks, including failed relocations and reluctance among some municipalities to pursue Roma-focused interventions.

Concerns related to outsourcing NRCP's role to private companies

What is even more problematic is that the NRCP has seemingly outsourced crucial sectors of its mandate to private companies very recently.

Of particular interest are the two grants from the Ministry of Social Cohesion and Family (of which the NRCP is part), which outsource a significant portion of the NRCP's mandate to private entities.

The first is a minor direct assignment of approximately 30,000 EUR to a private company related to the implementation of the new Roma Platform, which will be analysed in Chapter 1.3.4.

The second is a grant of approximately 1 million EUR via an open call for the provision of specialised services (technical, scientific, and operational support) aimed at implementing and monitoring two national strategies: The National Strategy for Social Inclusion ($E\Sigma KE$) 2021–2027, and the NRSF ($E\Sigma KE$ $Po\mu\acute{a}$) 2021–2030. It envisions establishing robust data collection and evaluation frameworks, thereby facilitating evidence-based

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⁹ United Nations (2024). Experts of the Committee on the Elimination of Racial Discrimination Welcome Greece's Guide on Reporting Hate Crimes, Ask about Alleged Violations of the Rights of Minorities and Asylum Seekers, 4 December 2024. Available at: https://tinyurl.com/4vv8azyp

policy adjustments for Roma populations. By proposing improved coordination among national, regional, and local authorities, the call seeks to address fragmented approaches and encourage collaboration with CSOs and other agencies. Through targeted outputs, such as digital tools, technical manuals, and capacity-building initiatives for public servants, the call aims to reduce the barriers faced by Roma in housing, education, health, and employment. The task is to be funded by the ESF+ and the national budget, offering flexibility in both budget and timeline.

The decision to outsource significant parts of the NRSF to private companies raises questions regarding the adequacy of resources, expertise, or authority to implement large-scale, multifaceted interventions. Contracting external entities can be seen as a quick fix to get initiatives off the ground. Private companies may also provide more flexibility, faster results, and polished reports, in comparison to the slower machinery of public administration. However, this approach can weaken government ownership of Roma inclusion efforts and undermine the original vision of a coordinated, inter-ministerial implementation.

Outsourcing projects in the middle of NRSF implementation may also potentially disrupt continuity and may signal deeper coordination problems. When tasks initially planned for inter-ministerial cooperation are suddenly handed off to private actors, it implies not only that past approaches were faltering but that the NRCP may lack the institutional backing or political clout needed to drive the strategy. Relying on external contractors might deliver immediate outputs but can also fragment the broader effort, creating a patchwork of programmes rather than a unified, government-led approach.

Sustainability becomes a serious concern when key activities depend on temporary funding cycles or private-sector engagement. The risk is that once contracts end, critical services disappear unless the government integrates them into public administration. This 'project-based' model prevents ministries and the NRCP from developing long-term capacity or systematic solutions. True sustainability will require not only more substantial investment in the NRCP and more effective inter-ministerial coordination but also a broader shift to embedding Roma inclusion in permanent public services rather than outsourcing it as a series of one-off initiatives.

Finally, of serious concern is that Roma participation in these outsourcing efforts is not guaranteed or reflected.

On the positive side, the NRCP launched the Governmental Committee for the Social Inclusion of Roma, and the Advisory Committee on Roma has convened several times to coordinate cross-ministerial efforts. Greece's Roma governance chain is divided into four links that perform different functions. First comes the Governmental Committee for the Social Inclusion of Roma, chaired by the General Secretary for Social Solidarity & Combating Poverty, which takes the political decisions and has met about twice a year, most recently on 18 December 2024. Second, an Advisory Committee - again chaired by the same General Secretary but packing line ministries, watchdogs and Roma umbrella bodies - stress-tests policy with evidence and has convened three times so far, the latest on 14 March 2025. Third, the Roma Forum is an open platform run by elected Roma organisations (the Secretariat only hosts), giving civil society its voice. It met on 8 July, 19 November 2024, and 30 April 2025, targeting two to three sittings a year, and is funded by the new Roma Platform. The fourth link, the NRSF Observatory, is intended to provide real-time indicators for all the above, but the necessary legislation to establish it and hire staff has not yet been passed, so the monitoring layer remains dormant for

On 20 January 2023, the NRCP announced the official start of the Governmental Committee for the Social Inclusion of Roma. According to the newsletter report, this committee, led by the General Secretary for Social Solidarity and Poverty Reduction, is tasked with overseeing Greece's NRSF across multiple areas: education, employment, health, social care, and housing. According to the report, its first meeting brought together key government officials, Roma organisations, and a UNICEF advisor, emphasising a coordinated, cross-ministerial effort to tackle systemic challenges. The committee's four main priorities are reducing poverty and social exclusion, ensuring equitable access to services, combating discrimination, and boosting Roma participation in

¹⁰ Ministry of Labour (2023). First Meeting of the Governmental Committee for the Social Inclusion of Roma, 20 January 2023. Available at: https://tinyurl.com/3kpba8td

¹¹ The Governmental Committee includes the General Secretaries of the Ministries of Education and Religious Affairs, Labour and Social Affairs, Health, Environment and Energy, Citizen Protection, Justice, Interior, and the Government Presidency's Communication and Information Secretariat.

public life. Through a collaborative approach involving various ministries, the committee seeks to implement practical solutions and reinforce social indicators that support Roma inclusion.

On 22 March 2023, the NRCP convened the first meeting of the newly formed Advisory Committee for the NRSF¹² comprising representatives from multiple governmental agencies (including justice, employment, education, equality, law enforcement, and human rights bodies) as well as Roma organisations, the committee was established to guide and oversee the strategy's implementation. The committee's declared aim is to enhance the effectiveness of the national strategy by providing targeted, data-driven interventions and ensuring meaningful Roma involvement in shaping and implementing these policies.

1.1.3. Effectiveness of monitoring

Currently, the monitoring framework for NRSF in Greece is a mix of formal commitments and partially operating bodies; thus, it remains incomplete and underdeveloped. While there are formal references to structured monitoring - the NRSF Observatory, the Advisory and Governmental Committees - they are not yet functioning as a single, cohesive system.

The NRSF has envisaged the establishment of an NRSF Observatory that would become the leading public administration task force responsible for monitoring and evaluating NRSF measures in cooperation with relevant ministries and Roma representatives. However, it has not yet been formally established, and no timeline for its launch has been made public. In addition, there is no finalised indicator system for ongoing monitoring.

During the second meeting of the Advisory Committee on 9 July 2024, updates on the NRSF implementation and near-term priorities were presented, stressing the importance of robust data collection and the newly developed Indicator System for Monitoring and Evaluating progress under the NRSF. However, in reality, in the absence of the fully operational NRSF Observatory, only some monitoring activities happen on an *ad hoc* basis. For instance, the NRCP occasionally checks on whether municipalities have submitted Local Action Plans or used specific funding instruments.

The Roma Forum (for more details, see the Section 1.3.1 below) provides a bottom-up consultation channel, but it operates more like a consultative platform than a rigorous monitoring body.

Certain CSOs and civil society platforms independently track local-level developments - particularly in areas such as housing, forced evictions, and education gaps. However, these efforts are not integrated into a comprehensive, government-led system. Although the NRSF envisages annual progress reports and an indicator system, neither is currently in place: no official, standardised progress reports have been released, and the indicator framework remains incomplete. Monitoring deadlines outlined in the NRSF or initial government statements have mostly passed without fully meeting the goals, mainly due to insufficient capacity and unclear enforcement mechanisms at both national and municipal levels. The relevant NRCP webpage on the 'Monitoring and Assessment Mechanism' has no content.¹³

In practice, monitoring relies on sporadic follow-up from the NRCP and the partial engagement of civil society, with no centralised or fully transparent mechanism to track progress, measure impact, or enforce corrective action. It is worth anticipating the effect of the substantial investment on outsourcing parts of the NRCP's mandate to private entities in this domain.

In summary, the monitoring setup is formally outlined but still largely unimplemented. Although several committees and bodies are foreseen in the respective policy documents and have begun limited work, the planned monitoring activities have not started in a systematic or timely manner. Until the Observatory is established and clear reporting protocols are introduced, monitoring will remain piecemeal and heavily dependent on local will and civil society input, rather than functioning as a robust, centralised arrangement.

As mentioned above (see the textbox), the Ministry of Social Cohesion and Family (through its Executive Structure for EU funding) has issued an international open electronic tender for specialised technical and

¹³ Greek Ministry of Labour and Social Affairs. (2025). *Monitoring and Evaluation Mechanism of the National Strategy for the Roma*. Available in Greek at: https://egroma.gov.gr/category/plaisio-stratigikis-roma/mixanismos-parakolouthisis-aksiologisis/

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operational support services to assist in monitoring and implementing Greece's National Social Inclusion Strategy (2021–2027) and the NRSF (2021–2030). With a total contract value of 976,000 EUR, the tender is co-funded by the European Social Fund under the 'Human Resources and Social Cohesion 2021–2027' Programme and by national funds. ¹⁴ It appears that this investment will enhance the monitoring setup and effectiveness of the NRSF. It remains to be seen how this outsourcing of authority will yield results.

1.1.4. Data collection

Over the past three decades, Greek authorities have repeatedly struggled to establish a robust, nationwide data-collection system for Roma communities. Early attempts date back to the mid-1990s, when the Public Enterprise for Town Planning and Housing ($\Delta E \Pi O \Sigma$) oversaw one of the first broad mappings of what they termed 'Gypsy communities' ($\tau \sigma i \gamma \gamma \dot{\sigma} v i \kappa \epsilon \zeta \kappa \sigma i v \dot{\sigma} \tau i \tau \epsilon \zeta)$, identifying settlements around the country and examining whether groups were settled or itinerant. In 2000, the 'Nationwide Intermunicipal Network for the Support of Gypsy Roma Citizens' attempted a similar data-gathering campaign, focusing on issues such as health, housing, and education status across a sample of municipalities. A further effort in 2008 under the Ministry of Labour and Social Affairs identified around 50,000 'permanently settled' Roma within recognised camps; however, this data was still limited by its narrow focus on specifically defined 'settlements'. In 2017, the Ministry coordinated a more detailed exercise that assigned 354 Roma localities to one of three 'types' based on housing quality and infrastructure.

All of these mapping efforts were required to operate within the broader Greek data collection system, which does not enquire about Roma origin in official instruments such as censuses or administrative databases. As a result, Roma do not appear as a distinct 'ethnic' category in national statistics. Successive governments have explicitly stated that collecting data on ethnic affiliation conflicts with privacy protections and Greek law, resulting in what has been termed a 'de-ethnicised' approach. Rather than inviting individuals to self-identify, Greek authorities rely on indirect data, such as how many people benefit from Roma-targeted programmes in housing or education, or how many live in known 'Roma areas. This means official numbers on the Roma are inherently partial, derived from local knowledge or programme records. In practice, no state body routinely asks, 'Are you Roma?' and includes that in a permanent database.

Because of this policy, Roma often remain statistically invisible. The census does not include an ethnicity field, so it is impossible to produce a disaggregated national count based on self-identification. Instead, large-scale mappings rely on municipalities to estimate the numbers of families in given localities or on specialised surveys conducted by CSOs or international organisations, such as the EU Fundamental Rights Agency (FRA). This approach generates a patchwork of partial data, leaving significant gaps and making it hard to compare different sources. Greek authorities themselves rely on special exercises, most recently the 2021 'Recording of Roma Settlements and Population at National Level', in which the Ministry of Labour and Social Affairs sent standardised questionnaires to all 332 municipalities and asked them to note how many Roma they believe live in camps, neighbourhoods, or scattered among the general population.

¹⁴ Ministry of Digital Governance. (2025). *Approval of the Action Plan for the Implementation of the National Strategy for the Roma for the period 2021–2030*. Available at: https://diavgeia.gov.gr/decision/view/6%CE%930846%CE%9D%CE%9B2%CE%91-%CE%A3%CE%A3%CE%A4

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This approach has long been criticised by international monitors. The United Nations Committee on the Elimination of Racial Discrimination (CERD), for instance, has repeatedly stated that Greece should collect detailed socio-economic information disaggregated by ethnicity, enabling public bodies to determine whether minority populations, such as Roma, have equal access to health, education, housing, and employment. In its 2016 and 2024 reviews, CERD emphasised that the absence of such statistics makes it impossible to evaluate anti-discrimination policies or measure any progress. Without official, self-identified ethnic data, a wide range of Roma communities remain invisible in aggregate indicators on poverty, unemployment, child welfare, or other spheres. CERD has argued explicitly that if authorities never ask about ethnicity, they cannot update their data or design interventions that adequately address inequalities.

Aside from official mappings, Greece also benefits from alternative sources. The EU Fundamental Rights Agency (FRA) conducts sample surveys (for example, in 2016 and 2021) where Roma can volunteer information on housing conditions, educational backgrounds, and experiences of discrimination. FRA's findings often show higher poverty rates and more dire circumstances than the Greek Government mappings, partly because FRA attempts a rights-based self-identification in its samples. Similarly, CSOs such as UNICEF and local civil society organisations fill some knowledge gaps, but their coverage is limited to specific localities or thematic studies. In all cases, these data remain outside the formal national statistical system and are not integrated into any continuous process that would enable policymakers to track annual changes or progress.

The consequence is that policymaking in Greece lacks comprehensive metrics on Roma. The Government can cite estimates of the total Roma population (which it places around 117,000). Still, it does not have an ongoing ethnic disaggregation for, say, unemployment benefits, school dropout rates, or health services. Municipal social programmes might know how many families in a given settlement receive a housing subsidy, but they cannot confirm how many eligible families might be missed. CSO reports likewise point to large numbers of Roma living without electricity or lacking personal documents. Still, these issues rarely appear in national data because the statistical authorities do not tag people as Roma. This creates both a practical obstacle to resource allocation - Roma may receive fewer dedicated funds than needed- and a conceptual problem for designing or evaluating any national Roma inclusion strategy.

Organisations monitoring human rights, such as the UN, have consistently underlined how these data gaps undercut efforts to hold the government accountable for advancing social inclusion. Progress on goals such as school enrolment or reduced child labour cannot be measured if there is no baseline or follow-up data for Roma communities specifically. The Ministry's 2021 mapping, for example, highlights that many localities lack adequate access to water and sanitation. Still, the data remain tied to ad hoc municipal surveys rather than integrated into a national framework. Even that exercise found that many municipalities either declined to participate or provided patchy responses. Meanwhile, the European Commission and the Greek National Commission for Human Rights (GNCHR) have also urged more consistent use of self-identification in statistical surveys, so that the results can be aligned with EU equality data standards and better reflect the real situation of vulnerable groups.

International observers, particularly CERD, have concluded that Greece's refusal to incorporate an ethnic question in official instruments or adapt a self-identification approach constitutes a serious shortcoming. Without robust and regular data, targeted interventions for Roma risk being underfunded or unmonitored, and the state lacks the evidence base needed to fulfil commitments under European and international anti-discrimination frameworks. Introducing optional ethnic self-identification under proper privacy safeguards would enable transparent, rights-based data collection, allowing genuine visibility for Roma communities and facilitating the evaluation of whether they truly benefit from social inclusion policies in a timely and equitable manner

Finally, the location-based method leads to an inherent miscalculation of the actual Roma population, and in doing so, it reflects a form of antigypsyism. Because the state relies on external labelling by non-Roma - who generally assume that 'real' Roma must live in segregated camps or visibly impoverished enclaves - only those living in perceived 'ghettos' get counted. Meanwhile, Roma individuals who reside elsewhere or whose living situation does not match the popular stereotype remain overlooked. The result is an undercount that not only minimises the true scope and diversity of the community but also perpetuates stigmatising assumptions about who 'qualifies' as Roma, reinforcing rather than dismantling prejudice.

It is worth noting that issues related to data collection are regularly discussed at meetings of the Governmental Committee on Roma (for example, on 18 December 2024) and the Advisory Committee (18 July 2024).

1.2. NRSF's synergy with domestic and EU actions

As mentioned in the previous RCM Report,¹⁵ the NRSF represents a significant improvement over the previous national strategies in several key areas. It contains more detailed measures and attempts to establish more robust synergies with relevant programmes implemented by line ministries and other state agencies.

According to the representative from the NRCP, there is no designated contact point in every ministry for Roma inclusion, equality, and participation. The coordination and synergy should be achieved through the Governmental Committee on Roma and the Advisory Committee on Roma.

1.2.1. Complementary policies

The implementation of the NRSF relies substantially on mainstream policies, other strategies and their action plans. It appears, however, that there is a lack of coordination, already from the concept phase, with line ministries having already adopted their priorities (and allocated funding) before the adoption of the NRSF, thus effectively preventing the NRSF from having an impact on the Roma-targeted policies and measures. Rather, the NRSF groups together mainstream measures and Roma-related measures. That said, the fact that under the NRSF, the NRCP is, regarding some measures, the implementing agency (i.e. the body tasked with implementing the relevant measures) is a welcome step, as this means that Roma-related concerns will be adequately reflected in those measures.

There is currently no meaningful coordination or operational mechanism to integrate Roma concerns into mainstream policies (or at least none is publicly known). Moreover, references to Roma priorities in official sectoral strategies or policy documents are virtually non-existent, which further undercuts attempts to 'mainstream' Roma inclusion into core areas such as education, health, employment, housing, and non-discrimination.

The interministerial body that convenes to track or evaluate Roma-relevant outcomes is the Governmental Committee on Roma Inclusion, which is at the level of the Secretaries Generals of the ministries, and no concrete results have been produced or are known to the public; nor are there any formal requirements compelling line ministries to incorporate Roma-specific benchmarks or adaptations into their programs. In practice, this means that rhetorical commitments to crosscutting Roma inclusion fail to translate into concrete, measurable action. The lack of both explicit policy references and institutionalised coordination - through committees or mandated consultations - leaves ministries without clear impetus or guidance to address Roma concerns. Consequently, the structural invisibility of Roma communities in mainstream policy design remains a significant barrier to achieving the objectives outlined in the NRSF.

1.2.2. Alignment with EU actions

The Greek Resilience and Recovery Plan (RRP) 'Greece 2.0' has contributed to the implementation of the NRSF, as it includes a Roma-dedicated measure titled 'Social Reintegration of the Most Vulnerable Roma Groups', with an allocated budget of 3.8 million EUR. Implemented by the Public Employment Service ($\Delta Y\Pi A/DYPA$), this initiative spans the regions of Attica, Thessaly, and Central Macedonia. It is designed to enhance the social and professional inclusion of Roma communities, particularly those facing heightened vulnerability.

A key component of the programme is a training and employment pathway for young Roma individuals aged 15 and above. In total, 477 participants (159 in each of the three cycles) will receive 145 hours of specialised instruction, concluding with certification exams, followed by six months of subsidised employment. This approach aims to ensure participants not only acquire new skills but also have structured opportunities to apply them in real work settings.

The programme claims that through consultations with Roma community organisations, the programme's vocational areas - ranging from catering staff (waiters) to car mechanics - were carefully chosen to align with both community needs and evolving labour market demands. By integrating practical training, certification, and

¹⁵ Roma Civil Monitor. (2023). *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Greece*. Publications Office of the European Union, Luxembourg. Available in English and Greek at: https://www.romacivilmonitoring.eu/countries/greece/

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on-the-job experience, the project aims to enhance employability, promote long-term workforce participation, and ultimately contribute to a more inclusive and resilient society.

Currently, the project is awaiting the issuance of the relevant Ministerial Decision (KYA) to commence its implementation. There is no information regarding the period of the programme.

1.2.3. Addressing concerns of previous assessments

As identified in our previous RCM 2022 report, the NRSF provides only limited information regarding the NRCP's efforts to enhance coordination and create synergies with other national strategies. Additionally, the framework does not sufficiently emphasise the role of local authorities in developing and implementing local action plans for Roma inclusion. The report highlights that while the NRSF acknowledges the limited capacity of Roma civil society organisations, the measures proposed to strengthen their capabilities lack the necessary ambition. Furthermore, the report mentions that the NRSF recognises existing deficiencies in coordination between the NRCP and various line ministries but fails to present a comprehensive set of measures to address these coordination challenges effectively. The National Roma Platform could potentially play a crucial role in facilitating dialogue between relevant ministries and civil society organisations, thereby improving coordination and collaboration efforts aimed at promoting Roma inclusion; however, this is not yet visible.

In the newest assessment of the European Commission from 2024,¹⁷ Greece is mentioned as one of the 15 Member States who strengthened the role of their NRCPs (e.g. by expanding their staffing or increasing the allocated budget) and as one of the 12 Member States where the NRCPs participate as full members in monitoring committees for EU co-funded programmes.¹⁸ However, this does not match our findings, as the NRCP remains understaffed – now even more so due to the discontinuation of the EEA/ Norway Grants Task Force. While the experts in that task force were not officially NRCP staff, they could be considered as such at least temporarily, as they did bolster the contact point's human resources.

Greece is also highlighted in the EC report for its good practice of setting up a Government Commission for Roma Social Inclusion aimed at strategic planning, systematic monitoring and evaluation of the 2021-2030 NRSF, as part of effort to increase the effectiveness in coordination of all involved ministries and bodies of the central government for implementing measures to promote social inclusion of Roma. However, as mentioned already before, we stress that despite the establishment of another structure, the much needed effectiveness in coordination of the NRSF implementation is not yet visible.

1.3. Roma participation in implementation and monitoring

1.3.1. Involvement of Roma CSOs in implementation

According to the Greek National Commission for Human Rights GNCHR, the strategy does not facilitate or ensure substantial participation of the Greek Roma through their representatives, thereby impeding the effective addressing of Roma challenges and needs. Currently, apart from the Roma Forum, there is no Roma involvement in implementing the NRSF. No Roma civil society organisations receive public funding, nor do they

¹⁶ Greek Government (Hellenic Republic), Ministry of Social Cohesion & Family. (2024). *Official Response to Parliamentary Inquiry No. 6746/13-09-2024*, Athens. Available at: https://www.hellenicparliament.gr/UserFiles/67715b2c-ec81-4f0c-ad6a-476a34d732bd/12729702.pdf

¹⁷ European Commission. (2024). Report From the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Implementation of the National Roma Strategic Frameworks in Light of the EU Roma Strategic Framework for Equality, Inclusion and Participation and the Council Recommendation on Roma Equality, Inclusion and Participation (COM(2024) 422 final). Available at: https://eurlex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0422

¹⁸ European Commission. (2024). Report on the Implementation of the National Roma Strategic Frameworks in Light of the EU Roma Strategic Framework for Equality, Inclusion and Participation and the Council Recommendation on Roma Equality, Inclusion and Participation (COM(2024) 422 final), 25 September 2024. Available in English at: https://tinyurl.com/3zcbt3ju

¹⁹ European Commission. (2024). Report on the Implementation of the National Roma Strategic Frameworks in Light of the EU Roma Strategic Framework for Equality, Inclusion and Participation and the Council Recommendation on Roma Equality, Inclusion and Participation (COM(2024) 422 final), 25 September 2024. Available in English at: https://tinyurl.com/3zcbt3ju

carry out any of the NRSF's planned activities – whether at the local or national level. Although not explicitly related to the NRSF implementation, in 2022-2024 there was a small-grants scheme funded by EEA/ Norway Grants and administered by the NRCP ('Empowerment of Roma Women and Youth' of the 'Social Inclusion and Empowerment of Roma' programme).²⁰ Lead beneficiaries in these projects were non-Roma CSOs and entities, with only a handful of Roma CSOs participating as partners, except 'Roma without Borders', that spearheaded a project on Roma children participating in summer camps.

The major development regarding the involvement of Roma CSOs in implementing the NRSF is the establishment of the Roma Forum. It was established with substantial delay, on 8 July 2024, two years after the adoption of the NRSF. That was envisaged in the NRSF. The Roma Forum aims to enhance Roma participation in policy development related to social inclusion, elevate public awareness, foster acceptance, and ensure equal treatment. Serving a consultative function, the Forum formulates proposals for the General Secretariat of Social Solidarity and Fight against Poverty, as well as for governmental bodies and the Advisory Committee for the Social Integration of Roma. The meeting was attended by representatives from Roma organisations, including the Panhellenic Confederation of Greek Roma 'ELLAN PASSE'. It is unclear whether Roma representation relays continuously with government action.

This initiative is funded by the European Union's Citizens, Equality, Rights, and Values Programme (CERV) 2021–2027 under the project 'Development of the National Platform for Consultation and Dialogue on Roma Issues' of the National Contact Point for Roma (RomaPlatformEL, grant number 101095343). The Forum supports the General Secretariat for Social Solidarity and Fight Against Poverty of the Ministry of Social Cohesion and Family Affairs in its role as the National Contact Point of the EU for the Social Inclusion of Roma.

According to the Ministry of Social Cohesion and Family, its policy focuses on utilising EU funding instruments by designing and implementing systemic actions to strengthen the social empowerment and inclusion of Roma citizens.

1.3.2. Roma in public institutions implementing the NRSF

There is no information available regarding the direct involvement of Roma in public institutions implementing the NRSF. Two young Roma trainees participated in a six-month internship at the NRCP in 2022-2023 within the framework of the Roma Platform 2020.

1.3.3. Roma participation in monitoring and evaluation

There is no apparent involvement of Roma CSOs, activists, communities and individuals in monitoring and evaluation of the NRSF. The newly established Roma Forum, as discussed above, has yet to rectify this issue.

1.3.4. Contribution of National Roma Platform to the NRSF implementation

Under the previous EC-funded project 'Roma Platform 2020' (grant number 101008467), which was concluded on 31 May 2023, a national-level mapping of institutions and services available to the Roma population was conducted. This effort also identified key stakeholders whose work supports the social inclusion of Roma communities. The main objective of this initiative was to develop an evaluation tool that would enable targeted interventions in line with the new NRSF. Through the mapping tool, according to the NRCP, users can locate all stakeholders who completed the online questionnaire, including their contact information, the services and actions they offer, and the areas in which they operate. The tool also allows users to discover examples of good practices being implemented.

²⁰ EEA Grants Programme. (2022). *Small Grant Scheme 1: Empowerment of Roma Women and Youth* under the "Social Inclusion and Empowerment of Roma" initiative (call published 15 July 2022; extended until 31 October 2022). This funding stream aimed to support three categories of activities focused on raising awareness, empowering Roma civil society organizations, and providing counselling services, targeting women and youth in regions with high Roma populations across Greece. Available at: https://eeagrants-roma.gr/index.php/en/calls/52-small-grant-scheme-1-empowerment-of-roma-women-and-youth-of-the-social-inclusion-and-empowerment-of-roma-programme

²¹ Greek Government. (2020). *Stakeholders Mapping – Roma Platform 2020 Project (WP2)*. Available at: https://egroma.gov.gr/stakeholders-mapping-roma-platform-2020-project-wp2/

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According to the NRCP, all data are maintained in a digital database, categorised by type of organisation and by the nature of the services provided.²² However, as of 13 July 2025, the authors of this report were unable to access this website, and it does not appear to be functional.

Another initiative within Roma Platform 2020 was a hybrid training, where Roma participants and trainees had the opportunity to learn about the Roma Platform 2020, the preparation of the new NRSF, budgeting, and other related strategies. On the second day of the training, the young Roma, with the support and technical backstopping of representatives of the Task Force teams on Roma Inclusion and Empowerment, had the opportunity, through interactive participatory strategic planning, to draft policy proposals, which they presented to the NRCP. Among the objectives of the Roma Platform 2020 is the selection of two young Roma trainees for an internship at the NRCP.²³

According to the official project description published on the European Commission's website, Greece's Roma Platform aims to facilitate public dialogue and cooperation to strengthen the monitoring and implementation of NRSF, while creating and reinforcing a nationwide platform where policymakers and Roma delegates - including women and youth - can actively contribute to the NRSF's goals. Furthermore, it promises to boost Roma representation in operational mechanisms, ensuring that elected officials, activists, and entrepreneurs influence decision-making, and to promote a holistic approach to their inclusion in social, economic, and cultural spheres.

However, the project's effect needs to be examined in the near future. As the recent contractual appointment to a private company demonstrates, it relies heavily on external consultants for crucial tasks, such as data collection and the development of FRA-based indicators, progress assessment, and policy recommendations, raising questions about the NRCP's capacity and commitment to developing its expertise. While these external contracts may offer valuable analyses, they also risk weakening inter-ministerial collaboration by sidestepping the public administration's role.

In a more sustainable model, these responsibilities would be integrated into a cohesive in-house effort, supported by stronger information sharing and skill building across relevant ministries. Such an approach would help ensure that strategies align with the needs of Roma communities and foster meaningful accountability. Suppose Greece's new Platform is to live up to its name. In that case, it should strike a better balance between external support and robust internal coordination, ensuring that progress endures long after consulting contracts end.

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²² Greek Government. (n.d.). *Roma Society [Poμά Society Digital Platform*]. Available at: https://roma-society.dgk.com.gr/

²³ Roma Civil Monitor. (2023). *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Greece*, op. cit., p. 13.

2. REVIEW BY THEMATIC AREA

2.1. Fighting antigypsyism and discrimination

Despite Greece's adoption of a more robust NRSF, which contains a separate pillar on combating discrimination and the National Action Plan against Racism and Intolerance, antigypsyism remains deeply entrenched. Multiple surveys show that discrimination against Roma has grown worse: 86% of Greeks, as per the latest Eurobarometer, now view anti-Roma bias as 'very widespread', well above the EU average. Equally concerning are high levels of racist harassment, hate speech, and violence against Roma, including fatal police shootings in recent years. While the Greek authorities have created specialised police departments and introduced training programmes to address these problems, the reported lack of sustained activity in many of these offices, along with low hate-crime reporting and even fewer convictions, undermines their intended impact.

No comprehensive data exist on the progress of targets in the NRSF, though some measures under the dedicated pillar of the NRSF have been partly realised to combat Roma discrimination.

2.2. Education

Roma segregation in education remains widespread in Greece. While the central government has shown reluctance to tackle the issue of 'Roma-only' classes and schools, various local authorities have launched projects to disperse Roma pupils and improve inclusivity. Recent data from the Fundamental Rights Agency point to slight improvements in early childhood education attendance (rising from 21% in 2016 to 32% in 2021), and fewer children attend schools where most pupils are Roma (down from 46% in 2016 to 34% in 2021).

At the policy level, the NRCP and the Ministry of Education appear to differ on whether de facto Roma-only schools constitute discrimination that requires targeted desegregation measures. In practice, local educational authorities have been more proactive, using busing and dispersal strategies to prevent or reduce the concentration of Roma pupils in specific schools. While these interventions have shown promise, national-level support and coordination remain limited. Moreover, the absence of ethnically disaggregated data, coupled with administrative barriers (e.g., lack of documentation), impedes both accurate assessment of needs and the effectiveness of existing programmes. Consequently, while local measures are making incremental progress, systemic reforms and consistent national policies are necessary to dismantle segregation and reduce Roma dropout rates truly.

In December 2024, during the 3rd Meeting of the Governmental Committee on Roma,²⁴ particular emphasis was placed on the role of specialised educational institutions located in regions with high concentrations of Roma populations, particularly in the realms of vocational training and lifelong learning. It was recommended that the operational frameworks of elementary school classes be enhanced to accommodate Roma students better.

School dropout among Roma, especially in junior high school, continues to be alarmingly high, and there are still numerous cases of de facto segregation in certain municipalities. Due to the absence of statistics, the NRSF's impact on Roma school dropout remains unclear. However, anecdotal evidence suggests that measures such as the special benefit for attending pupils have a limited effect. Persistent high dropout rates despite the benefit imply that eligibility barriers or stronger socioeconomic pressures, such as child labour, undermine its intended impact.

2.3. Employment

According to the NRCP's data, the work situation of Roma is characterised by a high unemployment rate (64%) and high informal employment (54%).

Two main problems are identified in the NRSF regarding the employment of Roma. On the one hand, there is a high percentage of young Roma who are unemployed or do not attend vocational training. On the other hand,

²⁴ Greek Government (2024). Δελτίο Τύπου για την 3η Συνεδρίαση της Κυβερνητικής Επιτροπής για την Κοινωνική Ένταξη των Poμά [Press Release on the 3rd Meeting of the Government Committee for the Social Inclusion of the Roma], 18 December 2024. Available in Greek at: https://tinyurl.com/4jdkuk2v

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if Roma are employed, it is usually in seasonal jobs; otherwise, they are generally excluded from the labour market. Most Roma community members interviewed for this report agreed with this assessment, which is also supported by the FRA 2021 Roma survey findings.²⁵

Members of Roma communities interviewed for the purpose of this report claimed that employment seminars rarely lead to any form of employment, and municipalities do not take advantage of the relevant framework that allows them to award tenders to companies/entrepreneurs from socially excluded groups, such as (but not only) the Roma.

2.3.1. Effectiveness of the NRSF in addressing the problems

Under its second pillar, 'Strengthening the Equal Access of Roma to Basic Services and Goods', the NRSF introduces mainstream and targeted measures aimed at addressing the challenges faced by Roma in the employment sector. In terms of mainstream measures, the NRSF refers to a 12 to 24-month programme for the reintegration into the labour market (Measure 2.4.12), as well as employment initiatives relating to members of vulnerable groups (including Roma) to be implemented in some Greek Regions (Measure 2.6.5). Among the targeted measures are the promotion of young entrepreneurship (Measure 2.5.1), vocational training/ subsidised employment in jobs such as recycling (Measure 2.5.2), and digital literacy courses to enable Roma to re-enter the labour market (Measure 2.6.1). The NRSF also provides for awareness-raising activities targeted at both private employers and the state, which will be designed and implemented jointly with Roma associations (Measure 3.1.5).

Despite the ambitious scope of these measures, there are currently no reports available detailing the progress of their implementation, apart from the DYPA (Public Employment Agency) programme, under Measure 2.6.5.

It entailed grants for business initiatives to employ young freelancers aged 20 to 44 years old, belonging to marginalised social groups such as Roma. The grants aimed at Roma citizens, amounting to 14,800 EUR for the operation of a sole proprietorship for 12 months. The DYPA programme has been implemented since 2023 in eight out of 13 regions (Attica, Peloponnese, Sterea Ellada, Western Greece, South Aegean, North Aegean, Thessaly, and Epirus), with a total budget of 5.9 million EUR. Disbursements to date for this programme amount to 222,000 EUR, with the creation of 8 businesses in Attica.²⁶

The NRSF does not contain any measures for the appointment of Roma in the civil sector, with the partial exception of two positions for paid internships for young Roma scientists at the NRCP, under the 'Roma Platform 2020' Project (Measure 4.1.5 (b)), which has been implemented in 2022-2023.

2.3.2. Addressing the problems beyond the NRSF

According to the European Commission's 2023 Assessment Report,²⁷ the NRSF lacks targeted measures aimed at reducing obstacles (e.g., lack of time, family responsibilities, and costs) for adults to participate in education and training. The NRSF lacks more information on baselines, benchmarks, and funding allocation regarding the reduction of the proportion of Roma who are not in education, employment, or training (NEETs).

In December 2024, the Governmental Committee on Roma²⁸ recommended the establishment of targeted specialisations within vocational training schools, tailored to the specific interests and needs of the Roma community, with actions proposed to be implemented through collaborative initiatives. In the employment

²⁵ European Union Agency for Fundamental Rights (FRA). (2022). *Roma in 10 European Countries – Main Results. Roma Survey 2021*. Publications Office of the European Union. Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2022-roma-survey-2021-main-results2 en.pdf

²⁶ Ministry of Social Cohesion and Family. (2024). Πολιτικές Κατά Της Εγκληματικότητας Που Προέρχεται Από Τους Poμά [Policies Against Criminality Arising From The Roma]. Athens: Ministry of Social Cohesion and Family.

²⁷ European Commission. (2023). Αξιολόγηση των Εθνικών Στρατηγικών Πλαισίων για τους Ρομά των Κρατών Μελών [Assessment Report of the Member States' National Roma Strategic Frameworks]. COM(2023) 7 final. Brussels: European Commission. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:ece09ce3-9006-11ed-b508-01aa75ed71a1.0001.02/DOC 1&format=PDF

²⁸ Government of Greece, Ministry of Social Cohesion and Family. (2024). 3η Συνεδρίαση της Κυβερνητικής Επιτροπής για την Κοινωνική Ένταξη των Ρομά [3rd Meeting of the Government Committee for the Social Inclusion of the Roma]. Available at: https://egroma.gov.gr/2652-2/

sector, the existing programmes administered by the National Agency for the The promotion of Vocational Education and Training, which is designed to support vulnerable social groups, was highlighted as an essential mechanism for facilitating the integration of Roma individuals into the workforce.

According to the NRCP's Newsletter, following an invitation from the Roma Forum, a representative from DYPA (Public Employment Service) participated in the second Roma Forum meeting that took place on 19 November 2024, presenting the current and upcoming employment and training programmes that focus on enhancing participation in the labour market among Roma citizens or communities. The discussion centred on ways to further disseminate information about these programmes among all stakeholders.²⁹

Empirical evidence suggests that certain local authorities, utilising of relevant mainstream legal provisions, provide temporary employment to a small portion of the Roma population; however, no data are available.

2.4. Healthcare

Roma communities in Greece face severe health risks due to poor socioeconomic and environmental conditions, compounded by discrimination³⁰ and barriers to services. The COVID-19 pandemic highlighted deep inequalities, with quarantined camps and limited means to maintain hygiene and distancing.^{31,32} Despite the extension of the free healthcare to all uninsured citizens in 2016, many Roma are not aware of this possibility;³³ moreover, access of many is hindered by lack official documentation or permanent addresses. Informal settlements far from health centres and scarce public transport hinder regular medical visits. Language and cultural gaps, especially among older Roma, complicate communication with healthcare providers³⁴ while discrimination by staff discourages trust and preventive care. Low health literacy, driven by high school dropout rates, reduces awareness of regular check-ups and fuels mistrust toward public health initiatives like vaccinations.³⁵ As a result, Roma often resort to emergency departments for treatment, escalating tensions. Maternal and child health remain worrying, with inadequate prenatal care, higher infant mortality, and low vaccination coverage leading to preventable disease outbreaks.^{36,37} Mental health and addiction issues persist unaddressed due to limited access and stigma.³⁸

Healthcare-specific policies within the NRSF aim to ensure Roma can access mainstream health services while also benefiting from targeted programs, such as mobile health units or health mediator initiatives. However, cited reports document that almost 20% of the requests in Roma branches of the Community Centres that were received concerned issues related to health and mental health.³⁹

²⁹ Government of Greece, Ministry of Social Cohesion and Family. (2023). *Press Release On The 2nd Roma Forum Meeting: Cooperation Strategies And Social Inclusion [Δελτίο Τύπου για τη 2η Συνάντηση του Φόρουμ Τσιγγάνων: Στρατηγικές Συνεργασίας και Κοινωνική Ένταξη].* Available at: https://egroma.gov.gr/2nd-roma-forum-meeting-cooperation-strategies-and-social-inclusion/

³⁰ Minority Rights Group International. (2022). Roma In Greece: Discrimination And Access To Services.

³¹ Voice of America News. (2020). Greek Roma Camp Quarantined To Limit Spread Of COVID-19.

³² Ministry of Social Cohesion and Family, Hellenic Republic. (2023). *Greek National Roma Strategic Framework* (NRSF) 2021–2030, p. 5. Available in Greek at: https://rb.qy/sa5t7n

³³ Interview with a Roma activist, 1 March 2025

³⁴ Idem

³⁵ Nasika, E., et al. (2023). *Measles Immunity Status of Greek Population after the Outbreak in 2017–2018: Results from a Seroprevalence National Survey.* Vaccines Journal, 11(7). Available in English at: https://www.mdpi.com/2076-393X/11/7/1220

³⁶ Idem

³⁷ Iden

³⁸ Kotrotsiou, E., et al. (2022). *Investigation of Healthcare Satisfaction of Roma Living in Camps or Urban Complex of Central Greece*. Materia Socio-Medica, 34(1). Available in English at: https://www.ejmanager.com/mnstemps/16/16-1642345608.pdf?t=1752442424

³⁹ Ministry of Social Cohesion and Family, Hellenic Republic. (2023). *Greek National Roma Strategic Framework (NRSF) 2021–2030*, p. 168. Available in Greek at: https://rb.gy/sa5t7n

2.4.1. Effectiveness of the NRSF in addressing the problems

Beyond the NRSF, only a handful of scattered CSO-led projects address these problems - and they focus almost exclusively on vaccination and other emergency public health interventions, such as controlling communicable diseases. Other Government-led initiatives, primarily from the Ministry of Health, focus on rapid responses that prevent public-health crises. In December 2023, the World Health Organisation's (WHO) European office issued a statement highlighting a concerning surge in measles cases across countries in the WHO European Region. The uptick in measles is primarily attributed to a decline in vaccination coverage during the COVID-19 pandemic.

As part of the response, Greek health authorities launched a mass vaccination campaign in Roma camps, working closely with Mobile Health Units (KOMY). To support this effort, the Hellenic National Public Health Organisation (EODY) procured measles—rubella—mumps (MMR) vaccines. This targeted initiative aims to protect vulnerable populations, address gaps in immunisation, and stem the further spread of measles in Greece and throughout the region.⁴⁰

Regarding general vaccination schemes, the 'Health for All' CSO ($Yy\varepsilon$ ia yia ' $O\lambda$ o $v\varsigma$), under the auspices of the University of Athens and supported by the government, continued its nationwide programme providing primary healthcare to vulnerable groups. In Roma settlements, this programme conducts paediatric examinations, immunisations, and health screenings. As of 2023, the 'Health for All' CSO had reached thousands of Roma children – for instance, as of 2020, over 11,800 children (90% of them Roma) had been vaccinated through its campaigns, dramatically improving vaccination coverage in these communities. 41

There are several Roma branches of municipal Community Centres, but only a few municipalities have invested in them for bettering access to healthcare, for example, via hiring nurses or medical professionals, or even investing in positions of Roma health mediators.

The health mediator programmes, which train individuals (often from Roma backgrounds) to help community members navigate services, are not yet broadly institutionalised, relying on patchwork funding rather than permanent state support. However, the institutionalisation is envisaged by the Ministry of Social Cohesion and Family.

2.4.2. Addressing the problems beyond the NRSF

In 2022, Greece introduced a major overhaul of primary healthcare - often referred to as the 'Personal Doctor' or 'Doctor for All' Law (Law no. 4931/2022) - to enhance access for vulnerable populations. ⁴² Each citizen is now assigned a personal or family doctor who serves as the first point of contact. This law obligates primary care providers to conduct outreach to marginalised groups. Registration requirements have been simplified, and additional general practitioners have been recruited in underserved regions, with the goal of including Roma families into continuous primary care.

Early data from 2023 indicate that, while millions of individuals have enrolled in the system, the practical implementation in marginalised communities remains challenging. Some clinics are overburdened, and mistrust of official structures persists among certain Roma groups. Nonetheless, authorities plan to complete enrolment for all uninsured or undocumented individuals by 2025, potentially benefiting communities that have historically been left out.

⁴⁰ National Organisation for Public Health (EODY), Greece. (2024). Δράσεις Ενημέρωσης και Μαζικού Εμβολιασμού Ρομά [Information and Mass Vaccination Actions for Roma]. Available at: https://eody.gov.gr/draseis-enimerosis-kai-mazikoy-emvoliasmoy-roma/

^{41 P}atrisNews. (2020). The Chairman of 'Health for All' on Roma Pupils: Parents Should Not Be Afraid... [Ο Πρόεδρος του «Υγεία για Όλους» για τους μαθητές Ρομά: οι γονείς δεν πρέπει να φοβούνται...], 12 September 2020. Available at: https://rb.gy/ppyqqb

⁴² Government Gazette A 94/27.05.2022. 'Doctor for All' Law (Law no. 4931/2022). Available at: https://www.et.gr/api/DownloadFile/DownloadFile/2022/94/A94-2022.pdf

2.5. Housing, essential services, and environmental justice

Recent data show that the proportion of Roma living in substandard or overcrowded housing has increased. While some municipalities have access to funding for relocation or infrastructure improvements, these initiatives are often stalled or cancelled. Flagship projects, such as the ones in Delphi and Katerini, were derailed due to local opposition or unsuitable relocation sites, underscoring the reluctance of some municipalities to implement Roma-targeted measures. Furthermore, while the 'Rent Subsidy' Programme⁴³ and mainstream housing policies, like the Housing Benefit⁴⁴ or the 'Coverage' Programme,⁴⁵ could benefit Roma, many face barriers, such as a lack of documentation and discriminatory attitudes from landlords, that undermine their effectiveness.

In parallel, the majority of Roma communities living in makeshift settlements continue to face poor living conditions, given that local authorities retain considerable discretion in requesting and using available funds. Even if funding is approved, interventions under Article 159 of Law no. 4483/2017 risk perpetuating segregation by relocating Roma to remote areas or improving already isolated settlements. Additionally, the absence of ethnically disaggregated data makes it difficult to evaluate whether Roma benefit from mainstream housing programmes. Finally, while there are mechanisms for Roma participation in designing and implementing housing measures, concerns persist regarding the inclusiveness and representativeness of such consultations.

Forced evictions of Roma communities remain a serious concern in Greece, as development projects often prioritise urban renewal over residents' rights. Despite local court rulings that occasionally halt these evictions and European Court of Human Rights interventions mandating alternative housing, many Roma families continue to face displacement without meaningful safeguards or relocation plans. These challenges persist primarily due to limited municipal engagement, inadequate funding, and the absence of specific provisions on forced evictions in NRSF – all of which compound the precarious living conditions of Roma and perpetuate their marginalisation.

2.6. Social protection

Roma in Greece face a particularly acute poverty risk, regardless of whether they live in segregated communities. This is acknowledged in the NRSF, which observes that the vast majority of Roma live below the poverty line and are thus entitled to the guaranteed minimum income (GMI) that was introduced on a wide scale in 2017.⁴⁶ Roma, as all Greek citizens, are also entitled to birth and child benefits, as well as to benefits for families having children in preschool education and assistance.

Regarding GMI, as part of a global shift toward 'social investment', this social protection scheme is intended to address gaps in Greece's historically fragmented social protection system. However, strict fiscal constraints, complex eligibility criteria, and reliance on the informal economy undermine its transformative potential. Because many Roma families are large, a common misconception - another expression of antigypsyism - is that there are social welfare benefits specifically designated for Roma people.

In terms of measures, the NRSF contains almost exclusively mainstream ones, such as ensuring the access of Roma to the different entitlements under the GMI (Measures 1.1.1-1.1.4), childcare/ motherhood benefits (Measures 1.2.1-1.2.3); measures that explicitly target Roma activities regarding child begging (Measure 1.2.6) and benefits payable to persons with disabilities (measures 1.3.1-1.3.2).

⁴³ Ministry of Labour and Social Affairs. (2022). *Measure 2.14.1: Roma Housing Rehabilitation (Rent Subsidy, Improvement of Living Conditions, Infrastructure Creation, and Replacement of Slums with Settlements)*. Available at: https://egroma.gov.gr

⁴⁴ Ministry of Social Cohesion and Family. (2025). *Housing Allowance Program for Rent Subsidy*. Available at: https://www.epidomastegasis.gr/

⁴⁵ Ministry of Social Cohesion and Family. (2025). *Coverage Program for Free Housing of Vulnerable Young Beneficiaries of the Minimum Guaranteed Income*. Available at: https://opeka.gr/stegasi/programma-kalypsi/

⁴⁶ For more information on GMI, see: Burgi, N., & Kyramargiou, E. (2021). *Regulating the Poor: The Greek Guaranteed Minimum Income*. Available at: https://www.athenssocialatlas.gr/en/article/regulating-the-poor/

However, Roma face serious barriers to accessing the GMI. Firstly, Roma without the relevant documents (e.g. social security number, personal tax identification number – an issue raised by many respondents) might not be able to access these benefits. Secondly, while beneficiaries can apply for most of these benefits online, the majority of Roma lack the necessary digital literacy skills. As a result, they would have to visit the municipal authority to assist them in applying for these benefits, and the assistance received varies. That said, as there are Roma branches of the Municipal Community Centres, where Roma can receive meaningful assistance, this risk is limited only to smaller Roma communities/families living in municipalities without a Roma branch.

Regarding access to the mainstream, the vast majority of municipalities have applied to their respective Regions for the continuation of the Community Centres with (or without) Roma Branches in the new ESF+ programming period.

Turning to targets, the NRSF aims at reducing the percentage of Roma at risk of poverty and the number of Roma children facing poverty to 80%, reduce the rate of Roma and Roma children living in substantially materially deprived households to 58% and reduce the percentage of Roma in households with members who did not eat for at least one day to 35%.

Regarding the targets above, no data is available on the progress made. The forthcoming FRA Roma Report may be of value in that regard.

2.7. Social services

The primary challenge for Roma communities in relation to social services is accessibility - social workers, for instance, rarely (if ever) visit severely impoverished Roma settlements.

The NRSF identifies several challenges, notably the need to empower young Roma and Roma women by offering counselling on social and personal development, preventing and responding to violence against women and children, raising awareness of gender equality and early marriage, and tackling factors contributing to delinquency and substance abuse (especially among younger Roma).

Regarding the measures set out in the NRSF, there are mainstream, targeted, and exclusive approaches. Mainstream provisions include establishing counselling centres for women and individuals facing domestic abuse or multiple discrimination (Measure 2.12.6), providing shelters for emergency or short-term housing (Measure 2.12.7), and offering counselling to help restore work-life balance and strengthen family cohesion (Measure 2.12.10). Childcare options, including services for children with disabilities, are also encompassed (Measure 2.13.1).

Depending on identified needs, Roma-specific activities will be carried out within general programmes aimed at preventing substance use and new forms of addiction such as gambling (Measures 2.8.7 and 2.8.8). The significance of addressing substance abuse cannot be overstated; alarming reports have long documented the widespread use of drugs, alcohol, and sedatives among Roma women as well as men.

The NRSF introduces several mainstream social-service measures for the first time in Greece. However, no practical implementation or progress on these measures has been observed thus far. Moreover, while the NRSF highlights the necessity of addressing multiple forms of exclusion -particularly for youth and women in areas of substance abuse prevention, violence, and early marriage - these objectives remain largely aspirational.

In the case of domestic abuse, mainstream measures, such as counselling centres or short-term emergency accommodation, may technically include Roma but lack tangible roll-out in communities where they are most urgent. Meanwhile, targeted or exclusive programmes, such as peer networks and street-work interventions for substance abuse, have also not moved beyond planning. Although the Ministry of Labour and Social Affairs has hired a consultancy to design indicators and targets for these measures, no concrete milestones or timelines have been enforced. In effect, neither the underlying access barriers nor the structural lack of social-service outreach to Roma communities have changed since the NRSF was adopted.

Roma branches of municipal community centres are the central tool for providing many public services, including social services, to Roma living in marginalised and segregated settings. However, many municipalities and local politicians are reluctant to set up these Roma branches:

"Unfortunately, while there is money available from the regions through the European Social Fund, it is not being used. Yet Roma branches are the only tool for consultation and integration, with a

specialised scientific team that can help municipalities to develop targeted policies and staff their services appropriately." (MP Georgios Stamatis, former NRCP).

The current orientation of many Roma branches reveals a disproportionate emphasis on facilitating applications for social welfare benefits, rather than fostering the broader and more transformative objectives of social inclusion, economic empowerment, and access to mainstream social services. This functional skew creates a risk of perpetuating a dependency dynamic, whereby Roma beneficiaries primarily interact with the Branches to access financial assistance, potentially overshadowing interventions aimed at enhancing employability, community development, and long-term integration. Furthermore, the physical location of some Roma Branches within or immediately adjacent to segregated Roma neighbourhoods or encampments can inadvertently reinforce residential and social isolation. By situating services in spaces that are effectively disconnected from mainstream urban hubs, there is a missed opportunity to cultivate shared environments that might encourage inter-ethnic interaction, reduce stigma, and strengthen social cohesion.

In addition, the reliance of the Roma branches on external, time-bound funding - particularly that provided under the European Social Fund (ESF+), during the 2011–2020 period, and currently the ESF+ fund - raises critical concerns about the sustainability and stable funding of these initiatives for their continuous operation. With the shift toward regional financing in the current programming cycle, the continuity of services may remain subject to fluctuating political and economic priorities at both national and local levels. This precarious funding structure can undermine the long-term planning that is essential for addressing complex, systemic issues such as educational deficits, discrimination, and structural unemployment.

Additionally, it should be emphasised that initiatives potentially perpetuating segregation may contravene the EU Charter of Fundamental Rights, and, at the same time, are predominantly financed through ESF+. This raises concerns that EU funding itself could be deployed in ways that violate the principles enshrined in the Charter. Hence, while the existence of Roma branches can be viewed as a positive step toward targeted support, their operational design and funding mechanisms must be critically re-evaluated to ensure that they do not unintentionally perpetuate segregation or foster dependency, but rather contribute to a genuinely inclusive and enduring framework of social integration.

2.8. Child protection

As per the 2021 registration of the Roma population and sites by the NRCP, it is estimated that children under the age of 15 represent around 34.4% of the entire group - about 40,421 Roma children. In addition, 8.64% of these children are enrolled in early childhood education, and 66.42% attend compulsory education. Lastly, there is a notable and pressing occurrence of early marriages.⁴⁷ Roma children are largely affected by severe housing deprivation, such as overcrowding, lack of running water or toilets, while a significant proportion of the Roma population lives in makeshift shelters slums, with inadequate or no connection to power and water grids, and basic shortfalls in infrastructure.⁴⁸

Roma children face various challenges and hardships, mainly due to poor and unhealthy living environments, geographic isolation, the continuation of outdated social practices (including early marriages), and limited physical access to services. In addition, discrimination, stereotypes, and stigma - coupled with insufficient knowledge about the mechanisms and procedures for participating in social, economic, and political spheres - further hinder their integration. Poorly addressed urban and municipal issues, high levels of illiteracy, lack of information, and barriers in language and communication also significantly impact the scope and circumstances of their social inclusion.⁴⁹

⁴⁷ National Action Plan for the 'European Child Guarantee' (September 2022). Available in English at: https://ekka.org.gr/images/SYNTONISMOY
ORGANOSIS/%CE%94%CE%97%CE%9C%CE%9F%CE%A3%CE%99%CE%A9%CE%9D %CE%A3%CE%A7%CE%95%CE%A3%CE%95%CE%A9%CE%A9%CE%PD/National Action Plan-Child Guarantee in English.pdf

⁴⁸ Iden

⁴⁹ National Action Plan for the 'European Child Guarantee' (September 2022). Available in English at: https://ekka.org.gr/images/SYNTONISMOY

Greece has recently reformed its foster care system to move children out of institutions and into family-based care, which could benefit Roma children who are in state care. However, CSOs and observers note that Roma children are over-represented in public care (especially institutional care) relative to their population.⁵⁰

2.8.1. Effectiveness of the NRSF in addressing the problems

While the NRSF does acknowledge these issues - especially the need to empower young people and women through social counselling, awareness-raising on gender equality, and curbing substance abuse - it provides only a handful of measures to tackle them. It refers to the 'National Action Plan for the Rights of the Child 2021–2023', which includes improving detention conditions for juveniles and establishing temporary hostels. Still, neither of these efforts explicitly targets Roma communities or sets measurable benchmarks.

Within the NRSF itself, relevant actions mostly address child begging (Measure 1.2.6), psychosocial support (Measure 2.7.3), and activities promoting work-life balance, parental counselling (Measure 2.12.20), and awareness campaigns on early marriage and children's rights (Measure 4.1.6).

At present the Roma branches of community centres are in charge for the development of regional interventions to strengthen the participation of preschool and school children/Roma adolescents in experiential workshops (e.g. mother-child workshop), children's camps and kindergartens. ⁵¹ However, if these services are offered depends on the human resources available at each Roma Branch as well as priorities set by the municipalities in which they belong.

2.8.2. Addressing the problems beyond the NRSF

A worth mentioning initiative from academia was the 'Support Educational Interventions in Roma Communities to Enhance Children's Access to Education and Reduce Early Dropouts' project. This project was implemented within the framework of the Operational Programme 'Human Resources Development, Education, and Lifelong Learning' and is co-financed by ESF+ and national resources. Implemented by the Laboratory of Intercultural Education at the National and Kapodistrian University of Athens (*EKPA*), it provides comprehensive, supportive interventions for Roma children, teenagers, and adults. Activities include after-school tutoring to improve students' academic performance, summer lessons to keep students engaged beyond the school year, and adult literacy classes with information on Second Chance Schools and Evening Gymnasiums for those wishing to continue their education. Additionally, the programme provides teacher training on interculturality and burnout prevention, collaborates with other organisations and governmental bodies to share best practices, and even hosts cultural events, such as a shadow puppet show in the Roma community. An online initiative called 'Little Voices in the Web' connects students from across Greece with each other, educators, ministry officials, and university faculty, fostering exchange and dialogue about the program's various supportive measures.

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

As highlighted in the previous 2022 RCM report on Greece, there is a lack of Roma representation in Greek school textbooks, despite coverage of immigrant communities. The NRSF plans to address this through awareness initiatives (Measure 3.1.1), such as public meetings, Roma commemoration days, and cultural events. It also includes a pilot project (Measure 2.1.14) to teach 'Romanes' in schools, involving curriculum development and teacher training for Greece's Romani dialects. Additionally, the history curriculum will include the 'Porajmos', the Roma genocide during the Fascist era. The NRSF promotes local consultations, youth and women's empowerment, and recognition of Roma contributions to Greek folk culture, alongside an annual Roma Conference. However, no specific targets are attached to these measures.

⁵⁰ European Roma Rights Centre (ERRC). (2021). *Romani Children in State Care and Other Abuses of the Fundamental Right to a Safe, Happy and Healthy Childhood*. Available at: https://www.errc.org/news/romani-children-in-state-care-and-other-abuses-of-the-fundamental-right-to-a-safe-happy-and-healthy-childhood

⁵¹ UNICEF (2022). Greece – Roma Children, Multidimensional Poverty and the Greek National Strategy for Roma Inclusion [Roma children in Greece and multidimensional poverty – The National Strategy and Action Plan for Social Inclusion of Roma 2021–2030], pp. 224–239. Available in English at: <a href="https://ekka.org.gr/images/SYNTONISMOY-ORGANOSIS/%CE%94%CE%97%CE%9F%CE%A3%CE%999%CE%A3%CE%99MCE%A3%CE%97MCE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%95%CE%A3%CE%A7%CE%B5%CE%A7%CE%B5%C

2.9.1. Effectiveness of the NRSF in addressing the problems

Greece has been a member of the International Holocaust Remembrance Alliance (IHRA) since 2005 and has broadened its Holocaust remembrance to acknowledge Roma victims in Europe. The Greek Parliament established 27 January as the National Remembrance Day for Greek Jewish Martyrs and Heroes of the Holocaust (Law no. 3218/2004). While the emphasis is on the Jewish Holocaust, the genocide of the Roma is occasionally mentioned in related events and educational activities. Because schools are closed for summer on 2 August (the European Roma Holocaust Memorial Day), that date has not been observed in Greek schools. Instead, the Ministry of Education issued guidelines for 27 January, when schools were asked to dedicate two teaching hours to Holocaust-related learning, in which references to the Roma holocaust have been observed on occasion on the initiatives of teachers.⁵²

The Holocaust is a mandatory topic in Greek history classes, and curriculum updates (overseen by the Institute of Educational Policy) mention the Roma as one of the groups that were victims of the Holocaust in selected learning material. However, the systematic introduction of 'Poraimos' in the history curriculum has not been incorporated yet. For example, in the 6th grade, history includes in its curriculum only learning of the Holocaust and of the categories of prisoners/internees in Nazi camps (Jews, Roma, homosexuals, Slavic origin, communists, resistance fighters, Jehovah's Witnesses, etc.) and to understand what they represented for the Nazis.

2.9.2. Addressing the problems beyond the NRSF

Other activities are dependent on the teacher's willingness. For example, in the Examilia elementary school in fifth grade, students explored the life and art of Ceija Stojka - an Austrian Romani painter and Holocaust survivor - through educational activities about the Holocaust, ultimately creating their paintings inspired by her distinctive symbolism and themes.⁵³

Although there is no apparent governmental support for initiatives in Roma art and cultural Expression in Greece, grassroots projects have emerged. On the island of Lesvos, the 'Art Bridges' CSO hosted 'Roma Fluxus', an avant-garde mail art exhibition in 2024 that explored the evolving nature of Roma identity and culture. This exhibit featured artwork by local students and Roma youth, demonstrating how collaborative art can bridge communities and celebrate Roma heritage in a contemporary way.⁵⁴

The 'Romáland' theatrical performance aspires to tell an inverted journey through Greece's contemporary history from the perspective of Roma.[3] 'Romáland' is a piece of documentary theatre in which Greek Roma protagonists stand on stage and tell their own stories live. Mixing testimony, video and music, it overturns the usual 'gypsy-folklore' cliché. It confronts audiences with systemic racism, police violence and everyday exclusion while insisting on the community's resilience and creativity. Up until today, the play has been performed in Athens, Amsterdam, Berlin, and Strasbourg.

⁵² Ministry of Education Blogs. (2025). *Ολοκαύτωμα των Ρομά [The Roma Holocaust].* Available at: https://blogs.sch.gr/gymekom/2025/03/14/olokaytoma-ton-roma/

⁵³ Ministry of Education Blogs. (2021). Μαθαίνοντας για τη Ρομά ζωγράφο Ceija Stojka που επέζησε από το Ολοκαύτωμα [Learning About the Roma Painter Ceija Stojka Who Survived the Holocaust]. Available at: https://blogs.sch.gr/dimexamil/2021/06/29/mathainontas-gia-ti-roma-zografo-ceija-stojka-poy-epezise-apo-to-olokaytoma/

⁵⁴ LesvosNews.net. (2024). Works by 1st and 4th Elementary Schools of Mitilini pupils to be Presented at the Roma Fluxus Exhibition in Berlin, 12 December. Available in Greek at: https://tinyurl.com/2kpwfkwt

3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

3.1. Housing: relocation schemes and rent subsidies for Roma in Greece

In the previous RCM May 2022 report, reference was made to the different yet concordant findings by a series of international bodies as to the appalling living conditions of many Roma in Greece, particularly those living in settlements.⁵⁵ It is recalled that, based on the 2021 Roma settlements and population survey, there are 77 'Type 1' settlement, i.e. settlements with substandard living conditions and without access to basic infrastructure/ services. Approximately 12,216 Roma live in those settlements.⁵⁶ Since then, the situation has remained unchanged, if it has not worsened.

In FRA's 2021 survey (findings published in October 2022), the percentage of Roma living under conditions of housing deprivation had increased from 50% in 2016 to 68% in 2021, while the percentages of Roma living in households not having the minimum number of rooms as per EUROSTAT's definition of overcrowding had also increased from 92% to 94% – it was only the percentage of Roma living in households without tap water inside the dwelling that had been reduced from 9% to 7%.57 Similarly, in its December 2024 Concluding Observations, UN Committee on the Elimination of all forms of Racial Discrimination (CERD) expressed its concerns over the "extreme poverty and substandard living conditions faced by the Roma in informal settlements with no proper infrastructure and limited access to basic services".58

The NRSF and related mainstream policies outline several measures for the housing of Roma communities. Arguably, the more important measure is that foreseen by Article 159 of Law no. 4483/2017, entitled 'Temporary Relocation for Special Social Groups'. Under Article 159(1), Roma living in makeshift settlements can be temporarily relocated to properly equipped settlements. The relocation procedure is as follows: the relevant Municipality addresses a request, along with the necessary documentation, to the Committee for the Temporary Relocation of Special Social Groups, a working group affiliated with the Ministry of Labour and Social Security. The said Committee is assisted in its work by an ad hoc technical group of experts. If the Committee issues a positive recommendation for relocation, then, using a Joint Ministerial Decision (JMD), the relocation and its modalities, including infrastructure, facilities, and other relevant details, are approved. One of the conditions for a relocation site is that it must be located at a distance of at least 500 meters from protected areas, such as archaeological sites, among other requirements. Funding for such programmes is drawn exclusively from national funds; no European funds are used.

Under Article 159(8), should the relocation under section (1) not be possible, then even without a request by the Municipality, the Committee mentioned above can adopt a plan for the improvement of the infrastructure in the already existing makeshift settlement; the plan is then implemented following its adoption through a JMD. As of 2022 (when the source study was published, no updated data is available), eleven municipalities had applied for funding for either the relocation of a Roma community under Article 159(1) or for infrastructure measures under Article 159(8).⁵⁹

⁵⁵ LesvosNews.net. (2024). Works by 1st and 4th Elementary Schools of Mitilini pupils to be Presented at the Roma Fluxus Exhibition in Berlin, 12 December, p. 20. Available in Greek at: https://tinyurl.com/2kpwfkwt.

⁵⁶ Government of Greece. (2023). Εθνική Στρατηγική και Σχέδιο Δράσης για την Κοινωνική Ένταξη των Ρομά 2021–2030 (1η Επικαιροποίηση, Μάρτιος 2023) [Greek National Strategy and Action Plan for the Social Integration of Roma 2021–2030 (1st Update, March 2023)], p. 24. Available at: https://rb.gy/sa5t7n

⁵⁷ European Union Agency for Fundamental Rights – FRA. (2022). *Roma in 10 European Countries – Main Results, Survey 2021*, pp. 52–55. Vienna: FRA. Available in English at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2022-roma-survey-2021-main-results2_en.pdf.

⁵⁸ United Nations Committee on the Elimination of Racial Discrimination – UN CERD. (2024). *Concluding Observations on the Combined Twenty-Third and Twenty-Fourth Periodic Reports on Greece*, CERD/C/GRC/CO/23-24, paragraph 22(b). Available in English at: https://tinyurl.com/ywn56det

⁵⁹ European Commission against Racism and Intolerance – ECRI. (2022). *Report on Greece (Sixth Monitoring Cycle)*, paragraph 98. Published on 22 September 2022. Available in English at: https://rm.coe.int/ecri-first-report-on-greece-adopted-on-28-june-2022-published-on-22-se/1680a818bf

Last, under Article 12 of Ministerial Decision PO 64/2018 (which sets out the conditions and technical details for measures under Article 159 of Law no. 4483/2017), the maximum period for staying at such a temporary settlement is ten years; by the end of that period, Roma residents should have been integrated into the local society. Interestingly, no similar time limit exists for settlements in which only infrastructure work under Article 159(8) has taken place.

Case study: the Delphi and Katerini Roma communities failed resettlements

Both resettlement projects can be considered flagship initiatives and pilot projects for the implementation of Article 159(1) of Law no. 4483/2017.

Approved through a 2018 Joint Ministerial Decision (JMD) following a request by the Delphi Municipality, Delphi Roma community relocation project was the first initiative selected to be implemented based on Article 159(1) Law no 4483/2017; it is (still) referenced in great detail on the NRCP site.⁶⁰ Initially stalled due to reaction by the local ethnic Greeks as to the relocation of the Roma community,⁶¹ the project was in limbo until January 2024. Then, the Delphi Municipality addressed a request to the General Secretary for Social Solidarity and Fight against Poverty to visit the Municipality to discuss the relocation of the Roma community. The Municipality also informed him that it was looking for new relocation sites (even though one had already been identified and approved using the 2018 JMD).⁶² Thus, it effectively signalled its intention not to proceed with the relocation. To his credit, in April 2024 and following a visit to the Municipality, the General Secretary responded by reminding that the 2018 JMD had already designated a relocation site. Somewhat oddly, and responding to concerns raised by the Municipality to the effect that the proposed relocation site was within a protected archaeological zone, the General Secretary informed the Municipality that they could challenge the 2018 JMD on that ground; as of the date of writing, it is not clear if the Municipality has done or intends to do so. According to press reports, however, the Delphi Mayor was unwilling to proceed with the relocation.⁵³

The relocation of the Katerini Roma community was the third relocation project based on Article 159(1) of Law no. 4483/2017. Approved by means of a JMD in 2019, it was listed as a separate measure in both the original and updated NRSFs, where it was also described as a more ambitious project than that of 'ordinary' relocation of Roma communities under Article 159(1) Law no. 4483/2017.⁶⁴ Moreover, its special nature is attested to by both its increased funding (approximately 5 million EUR drawn from both EEA and national funds) and the number of stakeholders; while 'ordinary' relocations are to be implemented exclusively by the Municipalities in question, the Katerini relocation enjoyed support by both a 'strategic stakeholder' (namely the General Secretary for Social Solidarity and Fight against Poverty and his staff had visited the area 15 times within four years and had extensive consultations with local and national stakeholders regarding the modalities of its implementation)⁶⁵ and an 'international stakeholder', namely the EU FRA.⁶⁶ Moreover, it was the only one adduced by the Greek Government to the Council of Europe's European Committee on Social Rights (ECSR) as a concrete example of a (then ongoing) Roma community resettlement, with the ECSR noting that while some

⁶⁰ Ministry of Labour and Social Affairs. (2025). *Roma Housing and Social Inclusion Portal*. Available in Greek at: https://egroma.gov.gr/stegasi/

⁶¹ Ministry of Social Cohesion and Family. (2025). *Updated National Roma Strategic Framework (NRSF)*, pp. 164–165.

⁶² TV Star News Portal. (2024, January 25). *Delphi Municipality: Survey of Areas for the Relocation of Roma*. Available in Greek at: https://tvstar.gr/2024/01/25/dimos-delfon-dierevnisi-choron-gia-tin-metegkatastasi-ton-roma/

⁶³ Ora Fokidos. (2024, April 30). *The Roma to be Relocated to the "Kaminos" Area – Total Somersault by the Mayor.* Available in Greek at: https://tinyurl.com/3vavj6mn

⁶⁴ Ministry of Social Cohesion and Family. (2025). *Updated National Roma Strategic Framework (NRSF)*, Measure 2.14.3, p. 109. Described as a "Comprehensive pilot project for the temporary resettlement of a settlement of special social groups of the Katerini Municipality on the basis of social housing standards".

⁶⁵ Ministry of Labour and Social Affairs. (2023, April 21). Response to Parliamentary Question, Ref. No. 320/E.

⁶⁶ Ministry of Social Cohesion and Family. (2025). Updated National Roma Strategic Framework (NRSF), p. 109.

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progress had been made in Katerini, information was lacking as to similar measures regarding Roma communities in other areas.⁶⁷

Surprisingly, the Katerini Municipality informed in 2023 that the proposed relocation area was unsuitable for housing purposes as it was a former rubbish tip, and that neither the Municipality nor the Committee foreseen under Article 159(1) of Law no. 4483/2017 had been aware of it. As a result, the relocation was cancelled, and the Municipality is currently looking for a new relocation site.⁶⁸

In December 2023, the Ministry of Interior issued a call for proposals to Municipalities; under the terms of the call, municipalities can apply for funding in order to either relocate a Roma community to a temporary organised settlement or improve an existing settlement's infrastructure; funding is capped at 3.5 million EUR and 1.75 million EUR, respectively. The total budget allocated for both types of projects is 15 million EUR (recently increased to 18 million EUR),⁶⁹ and the estimated number of beneficiaries is 1,250. The deadline for application was 31 December 2024.⁷⁰ This measure has been the only one referred to regarding the right to housing of Roma by the Greek delegation during the recent review of Greece's report under the UN International Covenant on Civil and Political Rights (ICCPR), according to which seven requests by municipalities had been approved.⁷¹

Nevertheless, in an interview for this report, an NRCP representative mentioned that only three such proposals by municipalities were at an advanced stage and would be granted. It is therefore not clear on what basis the Greek government referred before the UN ICCPR to seven approved requests. Be that as it may, even if seven such requests have been approved, it is recalled that the number of makeshift settlements without basic infrastructure – the so-called Type-1 areas under the NRSF – is 77 (with an estimated population of 12,216 individuals). This means that the measures to be implemented in the seven municipalities concern fewer than one out of seven settlements. However, given the estimated number of 1,250, these measures, if implemented, will improve the living conditions of one in ten inhabitants of such settlements. Accordingly, in its November 2024 Concluding Observations, the UN HRC called upon Greece to "Ensure that the National Roma Integration Strategy and the Action Plan for the Social Integration of the Roma 2021–2030, are fully implemented, including by allocating them sufficient human and financial resources and ensure their regular monitoring, evaluation and reporting with meaningful participation of the Roma".⁷³

Another Roma-targeted housing measure is the 'Rent Subsidy for Roma' Programme, funded from EU and national funds; several municipalities have already applied and secured relevant funding, while others have set targets as to how many Roma will benefit from it. An interesting (and welcome) feature of the programme is that the rental agreement will be signed between the municipality and the private landlord.

Delta Municipality plans to relocate 40 Roma families to a temporary organised settlement (under Article 159(1) of Law no. 4482/2017) and provide a rent subsidy to ten Roma families. In particular, the municipality will assist Roma families in finding suitable homes and will pay the landlords an agreed-upon rent for three years. In return, the beneficiaries will undertake, among other things, to enrol and ensure the attendance of their children in compulsory education schools (kindergarten, primary, and lower secondary school).

⁶⁷ European Committee of Social Rights. (2021). *Follow-up to Decisions on the Merits of Collective Complaints: Findings 2021*, p. 79. Available at: https://rm.coe.int/findings-2021-en/1680a5eed8

⁶⁸ Ministry of Labour and Social Affairs. (2023). Response to Parliamentary Question, Ref. No. 320/E.

⁶⁹ General Secretariat for Social Solidarity and Fight against Poverty. (2025). *Comments on the Council of Europe Commissioner's Memorandum on Human Rights of Roma in Greece*. Available in English at: https://rm.coe.int/comments-on-memorandum-by-the-general-secretariat-for-social-solidarit/1680b6244b

⁷⁰ Ministry of Social Cohesion and Family. (2025). *Call for Roma Relocation and Infrastructure Support*. Available in Greek at: https://tinyurl.com/hsbah62f

⁷¹ UN Human Rights Committee. (2024). *Summary Record of the 4159th Meeting, 28 October 2024*. Available in English at: https://tinyurl.com/4upaekhu: "To improve that situation, the legislative framework provided for temporary relocation and infrastructure improvements, to be funded with €15 million from the public purse. More than 200 families were currently being relocated, and seven municipalities had been approved for infrastructure funding."

⁷² Interview with the NRCP, 8 November 2024.

⁷³ UN Human Rights Committee. (2024). *Concluding Observations on the Third Periodic Report of Greece*, CCPR/C/GRC/CO/3, paragraph 11(d). Available in English at: https://tinyurl.com/23nscedr

Beneficiaries should have no property that could serve as housing, nor should they have received a loan for buying a house.⁷⁴

3.1.1 Effectiveness of the NRSF in addressing the problem

The emblematic Katerini Roma community resettlement has failed. At the same time, other municipalities are not particularly willing to request funding for the relocation of Roma communities – indeed, some of them (such as the example of Delphi Municipality above) might even entertain second thoughts about whether they want to proceed with the agreed-upon relocation. In terms of the adequacy of resources, then based on the allocated funding (namely the 18 million EUR referred to above), even if all of it were to be taken up and – what is more challenging- put to good use, the vast majority of Roma living in makeshift settlements would still not experience any improvement in their housing and living conditions.

In addition to the lack of resources for Roma-targeted housing measure (a lack which however can be partly mitigated by measures foreseen under mainstream policies – see following paragraph) the main problem continues to be that no measures are foreseen for improving the housing and living conditions of Roma in Municipalities which, for several reasons (that can range from racism to simple inability to put together an adequate proposal for funding such measures) will not apply for funding.

Already in 2005, the ECSR had found a violation of Article 16 of the European Social Charter (the right of the family to social, legal and economic protection – which includes housing) on account, among others, of "the insufficient means for constraining local authorities or sanctioning them". The 2022 RCM report, it was mentioned that most respondents (except the Ombudsperson) considered that it was not possible under domestic law to force a local authority to implement Roma-related measures. This was also repeated during an interview with the NRCP, where it was stated that the central administration cannot force local authorities to take some measures but can only assist them by providing guidelines and funding. This in turn means that the implementation of the NRSF – or at least, of its housing component – is to a large extent left at the discretion of local authorities.

Another issue that raises concerns is the disparity between the cost of some interventions, their temporary nature and the relatively low number of beneficiaries. By way of example, the Municipality of Lokroi applied for and was granted 1.6 million EUR to improve the infrastructure and public utilities networks in five small Roma settlements, apparently numbering 200 persons. The project includes the reconstruction of the water mains system and installation of a device to measure the arsenic in the water – an implicit yet explicit acknowledgment that the water provided to Roma in those settlements to date is unfit for human consumption. While any measure improving the living conditions of Roma is to be welcomed, it is quite difficult not to think that such a significant amount of funding could be put to better use, such as e.g. buying (if pooled with additional funding) houses in the area (which is a predominantly rural one and therefore real estate prices are likely low) and leasing them back at a low rent to the Roma – indeed a Social Housing Programme with a similar approach is currently in the works. Such an approach in the case of the Roma would clearly be a more cost-effective solution and would also promote their social inclusion.

⁷⁴ Delta Municipality. (2018, June 13). *Approval by the Municipal Council of the Local Action Plan for the Social Inclusion of Roma*. Available in Greek at: https://tinyurl.com/yehfnck6

⁷⁵ European Committee of Social Rights. (2005). *Complaint No. 15/2003, European Roma Rights Centre v. Greece.* Available in English at: https://hudoc.esc.coe.int/eng/?i=cc-15-2003-dmerits-en

⁷⁶ *Idem*, pp. 35-36.

⁷⁷ Interview with the NRCP, 8 November 2024.

⁷⁸ Ministry of Interior. (6 December 2024). Amendment of the Measure "Extension and Upgrading of the Infrastructure Networks for the Improvement of the Living Conditions of Special Social Groups of the Lokroi Municipality". Available in Greek at: https://tinyurl.com/584h63t2

⁷⁹ Capital.gr News Portal. (5 November 2024). *The Planning for Accessible Housing Is Underway – The EIB Also Joins In*. Available in Greek at: https://tinyurl.com/33u99pp3

Issue of concern

A concern regarding all interventions under Article 159 of Law no. 4483/2017 is that they can directly or indirectly promote/ perpetuate the housing segregation of Roma. The ongoing relocation of a small Roma community in Kalamata, Peloponnesus, is a case in point. The Kalamata Municipality has requested funding, under Article 159(1) Law no. 4483/2017, to relocate 66 families living in the suburbs to the area of Birbita, located outside the city, where a temporary (and currently derelict) Roma camping site was established in the past.⁸⁰ Already in 2015 however, the Ombudsperson had noted that these families had already achieved a degree of social inclusion and that their relocation to the Birbita area (located away from the city of Kalamata) would undermine it. The Ombudsperson also noted that their relocation there would further segregate them, and called for their non-relocation.⁸¹ While the currently proposed relocation is accompanied by a series of measures for the rehabilitation and improvement of the existing infrastructure, it does not address the main tenor of the Ombudsperson's findings, equally valid in 2025, that the community's relocation there would constitute a regression in terms of the Roma community's efforts towards its social inclusion. Similar considerations apply regarding infrastructure improvement projects under Article 159(8) of Law no. 4483/2017, such as the one that will be implemented in the Lokroi Municipality; rather than putting an end to their residential segregation, by improving the settlements' infrastructure, the project is in effect perpetuating their segregation in the settlement.

Regarding the 'Rent Subsidy for Roma' Programme, the review of the seven available Local Action Plans indicates that all municipalities are aware of it (indeed, some municipalities had implemented similar schemes in the past). They have plans to take advantage of it, with some of them having already decided on the number of beneficiaries. This appears to be a particularly positive development, because rent subsidies promote the inclusion of Roma in their local societies more than their temporary (up to ten years) relocation to organised settlements.

However, a series of potential pitfalls can already be ascertained.

The first concerns the low number of beneficiaries; in most Local Action Plans surveyed, the number of beneficiaries is around 10-20 families (though some municipalities have set the number of beneficiaries higher to 60 families).⁸²

The second relates to the different approaches adopted by other municipalities. The programme provides that the municipality will act as a broker between the Roma and the landlord. It involves the municipality, which will make the rent payments to the landlord directly. This can help alleviate concerns that Roma tenants might fall into arrears, as the rent subsidy will be payable for three years. Nevertheless, in at least one case, the municipality expects Roma themselves to find a place to rent, while the rent subsidy will be payable for at least two years. Another municipality opted to first to assess the interest by private landlords to join the scheme and would then hold a bidding process. This municipality would act as a guarantor (in case the Roma defaulted) while the subsidy was capped at 5.5 EUR per square meter. The rent subsidy would be payable for a period of

80 Eleftheria Online News Portal. (19 October 2024). The File for the Relocation of the Roma to Birbita Has Been Submitted to the General Secretariat for Social Solidarity. Available in Greek at: https://tinyurl.com/232ptt22

General Secretariat for Social Solidarity and Fight against Poverty. (September 2022). Survey of Settlements and Population of Roma Nationwide (2021). Available in Greek at: https://tinyurl.com/4p8j4tjh. With an average of four members per household, the beneficiaries of these 60 rent subsidies are estimated to be around 240 persons, or approximately 1/8 of the total Roma population living in the Municipality.

⁸¹ Ombudsperson. (2 April 2015). Letter to the General Secretary of the Decentralised Administration of Peloponnese and Ionian Islands, Ministry of Labour, Head of the Peloponnese Region, Ref. No. 19755/05.2.9. Available in Greek at: https://tinyurl.com/z2bftu5t

⁸² Municipality of Mesolonghi. (18 January 2023). *Local Action Plan for the Social Inclusion of Roma to the Holy City of Mesolonghi*, p. 47. Available in Greek at: https://tinyurl.com/2vhzeh9w. According to the 2021 Roma Census, the Roma population of Mesolonghi numbered approximately 2,000 persons (General Secretariat for Social Solidarity and Fight against Poverty).

⁸³ Municipal Council of Chios. (2018, June 13). *Approval of the Local Action Plan for the Social Inclusion of Roma to the Chios Municipality*, p. 17. Available in Greek at: https://tinyurl.com/47rbz6bx

three years. In addition, an additional subsidy (based on the size of the family) for the payment of public utilities was also foreseen.⁸⁴

The third – and arguably more difficult to tackle – relates to the fact that such measures do not take place in a vacuum; in light of the prevalent and deeply entrenched stereotypes against Roma, coupled with the ineffective application of ADL in the field of provision of services, it is very likely that despite assurances, prospective landlords might not to take part in such programmes. The danger has already materialised in at least one Municipality, which noted in its Local Action Plan that no private landlords expressed interest to join the scheme and that it is "very difficult for Roma to find houses to rent". By This in turn highlights yet again the housing predicament of Roma in Greece is not exclusively due to their poverty/ lack of resources but also due to discrimination against them.

3.1.2 Synergy with other actions

Roma can also, in principle, benefit from mainstream housing policies. The most important among them are the following.

The beneficiaries of the 'Housing Benefit' Programme are eligible for a rent subsidy ranging from 70 to 210 EUR per month. The policy has a total budget of 396 million EUR per year and is funded exclusively from national funds (in 2021, the programme's budget was 402 million EUR, and the number of beneficiaries was 262,000). Applications are made either by the beneficiaries themselves or with the assistance of Municipal Social Services or Community Centres staff. As noted in the updated NRSF, due to their low income, a large percentage of Roma are eligible for the programme.

Another such measure is the 'Coverage' Programme, which envisions leasing at least 1,000 housing units to individuals aged 25-39 who meet specific eligibility criteria (they must be recipients of the minimum guaranteed income and belong to vulnerable social groups). Beneficiaries are exempted from the obligation to pay rent for three years. Currently, 44 municipalities in which private landlords have expressed an interest in renting out their properties (at an agreed rent) are part of the programme, some of which also contain Roma communities.

A similar measure is the 'Housing and Work for Homeless People' Programme, funding for which is also drawn from national funds; its beneficiaries are currently 800 individuals making up 600 households. The programme consists of a rent subsidy for a period of up to 18 months, as well as money subsidies for paying public utilities bills and purchasing necessary home appliances. Moreover, at least 20% of the beneficiaries will benefit from a series of employment-related measures (such as the payment of a subsidy to the persons who agree to employ them).⁸⁶

Regarding the relevance of such mainstream programmes to Roma, and quite apart from the issue of whether the funding allocated to them is adequate, it is noted that their impact on assisting Roma meet their housing needs cannot be assessed for the following reasons.

First, applying for such programmes requires documentation that many Roma, though in principle eligible, might not have at their disposal, such as a resident certificate – an issue already noted by ECRI.⁸⁷ As also indicated

⁸⁴ Municipality of Patras. (2025). *Municipal Website Post on Roma Relocation and Social Inclusion*. Available in Greek at: https://tinyurl.com/2s388khv

⁸⁵ Municipality of Patras. (2023, January 16). *Local Action Plan for the Social Inclusion of Roma to the Patreon Municipality*, p. 26. Available in Greek at: https://tinyurl.com/y5vuj7mh

⁸⁶ For all three programmes, see: Ora Fokidos. (2024). *The Roma to Be Relocated to the "Kaminos" Area – Total Somersault by the Mayor*. Referenced in the Updated NRSF, pp. 63–65.

An additional programme is the 'My House' Programme, currently in its second iteration ("My House II"), which will run from January 2025. It provides for the granting of low-interest housing loans to 20,000 beneficiaries. Proto Thema. (2024, December 20). *My Home II: 32 Questions – Answers and Examples*. Available in English at: https://tinyurl.com/3x9p757p

⁸⁷ European Commission against Racism and Intolerance (ECRI). (2022). *Report on Greece (Sixth Monitoring Cycle)*, paragraph 99. Available at: https://rm.coe.int/ecri-first-report-on-greece-adopted-on-28-june-2022-published-on-22-se/1680a818bf

in the updated NSRF, Roma also face issues such as non-registration in local municipal rolls, difficulties in securing their tax or social security numbers, 88 which are prerequisites for applying for such programmes.

Second, as the authorities do not retain programme beneficiaries' statistics disaggregated by ethnic origin, it is impossible to ascertain if such programmes are accessible in practice to Roma. UN CERD in its recent (December 2024) Concluding Observations called again upon the Greek state to produce disaggregated statistics on the socioeconomic situation of and access to housing of different ethnic groups, including the Roma,⁸⁹ a concern also echoed by, among others, the Greek National Commission for Human Rights – GNCHR the Greek National Human Rights Institution, which recalled that all UN bodies have requested that Greece set up such a data collection and reporting system.⁹⁰ Nevertheless, the Greek State continues to refuse (officially) collect such data (though it does unofficially collect such data in the field of education arguing that Roma are Greek citizens and therefore no separate data are collected.

3.1.3 Roma participation

As noted above, there are various mechanisms that enable the consultation and participation of Roma in the design, monitoring, and implementation of Roma-related measures. Nevertheless, several concerns can be raised.

The first is that, as noted by the GNCHR, the NSFR "neither provides for nor ensures a substantial participation of the Greek Roma through their representatives". 91

The second issue is that, according to ECRI Roma interlocutors. In contrast, cooperation at the level of central administration can be considered adequate; however, this is not the case at the local level.⁹² This is a fundamental failing, all the more so since, as seen, the Roma-targeted housing-related measures are to be launched by the municipalities. As a result, there is a real risk that measures adopted and implemented by municipalities will not adequately meet the needs of the Roma communities.

The third issue is whether Roma representatives who participate in different initiatives can be considered truly representative of their communities. The former General Secretary for Social Solidarity and Fight against Poverty stressed this issue, particularly in a speech at a recent event, that the collective representation of Roma was not effective and that it was not human-rights oriented. He did not hesitate to label the participation of Roma representatives in consultation during his tenure as disappointing, noting that their demands focused primarily on the issue of Roma housing loans and made no meaningful suggestions as to potential solutions. ⁹³

3.2. Education: Roma school segregation and drop-outs

Roma segregation in education is widespread, and there is an ostensible reluctance of the central administration to address the issue. However, various local educational authorities are implementing a series of educational interventions for Roma, which have desegregation as a key component.

FRA 2021 survey findings in the field of education paint a more nuanced overall picture noting some progress; the percentage of Roma children attending (mandatory in Greece) early childhood education rose from 21% in 2016 to 32% in 2021, while the percentage of Roma children aged 6 to 15 attending schools where all or most

⁸⁸ Ministry of Social Cohesion and Family. (2025). Updated National Roma Strategic Framework (NRSF), p. 40.

⁸⁹ *Idem*, paragraph 5.

⁹⁰ Greek National Commission for Human Rights (GNCHR). (September 2024). *Additional Information on the List of Themes for Greece's Review of Its Combined 23rd and 24th Periodic Report by the Committee on the Elimination of Racial Discrimination (CERD) in Its 114th Session*, p. 3. Available in English at: https://tinyurl.com/ypdwiuxw

⁹¹ Greek National Commission for Human Rights (GNCHR). (August 2024). Written Contribution for the List of Themes Prior to Greece's Review of Its Combined 23rd and 24th Periodic Report by the Committee on the Elimination of Racial Discrimination (CERD) in Its 114th Session, paragraph 38, emphasis in the original. Available in English at: https://tinyurl.com/2cjua6pc

⁹² European Commission against Racism and Intolerance (ECRI). (2022). *Report on Greece (Sixth Monitoring Cycle)*, paragraph 100.

⁹³ Author's Notes. (18 October 2024). Presentation by Mr. Georgios Stamatis, Former General Secretary, at the Council of Europe's EQUIROM – Greece Concluding Event Held in Athens.

of the other pupils are Roma dropped from 46% in 2016 to 34% in 2021. ⁹⁴ At the same time, 38% of Roma attended classes where their schoolmates were exclusively or mostly Roma. ⁹⁵

ECRI, in its 2022 report on Greece, noted that in 2020-2021, the percentage of Roma aged 18-24 who had dropped out of school was 92%. However, Greek authorities claimed that by 2022, the number had decreased. ECRI also noted that, based on CSO reports, there were still 'Roma-only' classes in some schools, with the Greek authorities noting that, as per Greek law, pupils are enrolled on the school which is closest to them. ECRI recommended that Greek authorities should undertake measure to significantly increase the number of Roma children (making explicit reference to Roma girls) completing mandatory education.⁹⁶ In Xanthi Municipality, and the two Roma-only schools located in the Roma settlement, the dropout rate (consisting of both pupils who stopped attending school – i.e. did not participate in regularly for two years – and those who had to repeat a year because they did not participate in regularly the previous year) reached in school year 2021-2022 48%.⁹⁷

At the same time, in its December 2024 Concluding Observations, the UN Committee on the Elimination of Racial Discrimination (CERD) expressed its concern over the educational segregation of Roma and called upon the Greek authorities to put an end to the de facto school segregation, intensify efforts to ensure Roma children's access to quality and inclusive education, to increase school enrolment and combat school dropout. To that end, CERD called upon Greek authorities to strengthen the support system for Roma children and families, as well as to conduct awareness-raising campaigns among Roma on the importance of education.⁹⁸

When queried on the issue of school dropout by the UN Human Rights Committee (UN HRC), the Greek state responded that the main tool for addressing school dropout among Roma was the payment of a special child benefit (payable to all parents based on income criteria); thanks to it, the number of Roma pupils in compulsory education had increased from 15,000 in 2022 to more than 19,000 in 2024. Anecdotally the problem is particularly serious, particularly in mandatory junior high classes. Thus, in the Filis Municipality, it was reported that out of the 1,616 Roma pupils attending primary school, only 310 reached the mandatory junior high and then only six reached (the nonmandatory) senior high school, which is, however, very important for employment prospects. 100

Pending the response of the Ministry of Education to a request for information filed by the authors of the study, the assessment of the situation in this field can be carried only based on proxy indicators and media sources, Thus for example, in response to the Deputy Ombudsperson for Children's Rights' own-initiative inquiry into school dropout among vulnerable pupils, the Ministry of Education reported that it had assigned social workers

⁹⁴ European Union Agency for Fundamental Rights (FRA). (2022). *Roma in 10 European Countries – Main Results, Survey 2021*, pp. 37, 40.

⁹⁵ European Union Agency for Fundamental Rights (FRA). (2022). *Roma Survey 2021 Dataset*. Available at: https://tinyurl.com/bdzybs79

European Commission against Racism and Intolerance (ECRI). (2022). Report on Greece (Sixth Monitoring Cycle), paragraphs 91–96.

⁹⁷ Papadakis, T. (2024). *The Education of Roma: The Case of Drosero, Xanthi. ERKYNA – Review of Educational and Scientific Issues*, Vol. 28, pp. 55–56. Available in Greek at: https://tinyurl.com/ycv4c2wf

It is of interest to note that in a response to the European Commission in 2019, the Ministry of Labour mentioned a series of desegregation measures for this settlement, such as the construction of a 'magnet school' in the city that would also have Roma pupils and that already in 2019, 30 Roma pupils from the settlement were attending classes in schools outside the settlement.

Ministry of Labour and Social Affairs. (4 August 2019). *Response to the European Commission Regarding the Letter by the Elpida Association*, Ref. No. 13483/191. Available in Greek at: https://tinyurl.com/39fb7z2k

⁹⁸ UN Committee on the Elimination of Racial Discrimination (CERD). (2024). *Concluding Observations on the Combined Twenty-Third and Twenty-Fourth Periodic Reports on Greece*, paragraphs 22(e) and 23(i).

⁹⁹ UN Human Rights Committee. (28 October 2024). Summary Record of the 4159th Meeting.

¹⁰⁰ Ditiki Ochti News Portal. (5 July 2024). *Filis Municipality: Special Vocation Junior / Senior High School, School Boards and Roma School Dropout – Topics of a Meeting of the Western Attica Secondary Education Directorate*. Available in Greek at: https://tinyurl.com/4rfrdmv3

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to 47 primary schools attended by Roma children - a number that was later increased to 49.¹⁰¹ Anecdotal evidence gathered based on background information regarding those schools¹⁰² and additional research suggests that a significant proportion of these 49 schools (at least 20) is made up by schools where Roma are more than 30% of the school population.

It appears, therefore, that rather than designing and implementing effective desegregation policies, the Greek state limits itself to appointing social workers to schools with a Roma population. While a welcome step, such a measure cannot address the main issue, namely, the continuing educational segregation of Roma.

Regional Roma school desegregation initiatives

Combating Roma school segregation as well as school dropout is an objective of the NRSF. ¹⁰³ Nevertheless it is not clear to what extent the NRCP has assigned priority to this issue; during interviews conducted for this report, representatives of the NRCP told that they are flat-out against the need to desegregate and do not agree with the EU or the Council of Europe on this issue – however, the primary responsibility for this policy lies with the Ministry of Education.

Thus, it appears to consider that in cases where education segregation is the result of sizeable Roma communities living in a school's catchment area, then no issue of discrimination arises nor is there a need for desegregation measures as all pupils, including Roma, should attend the schools that are closer to the place of residence. The NRCP considers that any special desegregation measures for Roma might end up backfiring and leading to their stigmatisation. Overall, the focus should be on improving the quality of education provided. 104

The Greek authorities have voiced similar arguments before ECRI,¹⁰⁵ even during the examination of the latest reports by Greece by the UN CERD, and despite an explicit question by one of the Committee's members on Roma segregation in education, the Greek delegation effectively failed to respond, focusing instead on presenting measures to boost school attendance;¹⁰⁶ similarly, while responding to a question by a member of

Ministry of Social Cohesion and Family. (2025). *Updated National Roma Strategic Framework (NRSF)*, p. 71.

interview with the NRCP, 6 November 2022

¹⁰¹ Ministry of Education. (27 December 2023). *Monitoring of Enrolment and School Dropout for the 2018–2022 Reference Period*, Ref. No. Φ.6/ΦΔ/141950/148207/Δ1. Available in Greek at: https://tinyurl.com/ydrnn75b

The most recent decision of the Ministry of Education. (5 August 2024). *Decision No. 89876/\Delta 1: List of Schools Employing Social Workers.* Available in Greek at: https://edu.klimaka.gr/sxoleia/genika/2664-sxoleia-gia-koinwnikous-leitourgous, includes a list of these 49 schools, the majority of which are either well-known to be Roma-only schools (e.g. the 4th Sofades Primary School, for the failure to desegregate which Greece was found in violation of Article 1, Protocol 1 (right to education) of the European Convention of Human Rights in *Lavida and Others v. Greece* (no 7973/10, 30 May 2013) or are located next to Roma communities and there is anecdotal information that they have already been turned to Roma-only schools (such as the 4th Amaliada Primary School, for which already in 2017 the Ombudsperson had noted that due to "white flight", it was turning into a Roma-only school). Similarly, on the basis of survey by the Region of Thessaly in January 2022, four primary schools and four kindergartens are attended exclusively by Roma pupils. See: Regional Observatory for Social Inclusion, Region of Thessaly. (2022 January). *Survey: Educational Problem of Roma Children in Thessaly and the Contribution of the Roma Branches Towards Addressing Them.* Available in Greek at: https://tinyurl.com/yvv27xfa. Similarly, all three primary schools (one of which is the 4th Amaliada Primary school referred to above) participating in the Council of Europe Romani-Plurilingual Policy Experimentation (RPPE) project currently under implementation are effectively Roma-only schools. See: Council of Europe. (2025). *RPPE Participating Countries: Greece.* Available in English at: https://www.coe.int/en/web/lanquage-policy/greece

 $^{^{103}}$ Thus, the Operational Objective under Measure 2.1. of the Second Pillar is that of "Eliminating the school segregation of Roma children and reinforcing the inclusive general and professional education and training and continuous education".

¹⁰⁴ Interview with the NRCP, 8 November 2024.

¹⁰⁵ European Commission against Racism and Intolerance (ECRI). (2022). *Report on Greece (Sixth Monitoring Cycle)*, paragraph 94: "According to the Greek authorities, all children, as a rule, and based on Greek legislation, are enrolled in the school located closest to their place of residence, thus the composition of school classes reflects the population living in any given area and there may therefore be high proportions of Roma children in certain schools."

¹⁰⁶ United Nations. (2024, December 4). Experts of the Committee on the Elimination of Racial Discrimination Welcome Greece's Guide on Reporting Hate Crimes, Ask About Alleged Violations of the Rights of Minorities and Asylum Seekers. Available in English at: https://tinyurl.com/ye29kk7w

the UN HRC on any measures taken to prevent and eliminate all forms of discrimination of, among others, Roma, the Greek delegation referred exclusively to measures to reduce the early school dropout rate. 107

Also in the context of a Council of Europe Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), the Greek representative did not present any information as to desegregation measures adopted by the Greek state, despite the numerous references in the report to the three European Court of Human Rights judgments on Roma school segregation in Greece. Indeed, one of the main findings of the report was that "educational desegregation has not reached a systemic level and had not been part of integrated policies". It can therefore be safely asserted that school desegregation is not a priority for the Greek state, even though it is a nominal objective under the NRSF.

This, however, does not tally with the reality on the ground, where numerous regional educational authorities are implementing various desegregation measures. For example, in the city of Volos, 43 Roma of junior high school age will be distributed to four different schools (roughly ten students per school) located in the centre of the city. What is interesting is that apparently it was the Roma parents who requested this measure, and that the educational authorities not only granted the request but also took a series of supporting measures, such as informing the parents of the non-Roma students first. At the same time, staff from these schools attended a special training course. The local Bishop (who is supporting the initiative) noted that this was a long-standing request and that it is crucial for Roma and non-Roma to learn to coexist and that they both belonged to 'our society'. 110

Similarly, in the area of Tirnavos, educational authorities have taken measures to avoid the concentration of Roma pupils in a few schools. Thus in 2022, Roma were allocated to six kindergartens, five primary schools and two junior high schools. It would appear that with two exceptions, in no case did Roma pupils amount to more than 30% of the school population (in one kindergarten and one primary school the Roma children were 40% of the school population).¹¹¹ The policy of dispersal of Roma pupils and students has been considered as

¹⁰⁷ United Nations Human Rights Committee. (28 October 2024). *Summary Record of the 4159th Meeting*. Palais Wilson, Geneva. Available at: https://digitallibrary.un.org/record/4064863

¹⁰⁸ European Court of Human Rights. (5 June 2008). *Sampanis and Others v. Greece* (Application No. 32526/05). Available at: https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-2378798-2552166&filename=003-2378798-2552166.pdf

European Court of Human Rights. (11 December 2012). Sampani and Others v. Greece (Application No. 59608/09). Available at: https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-4192106-4967450.pdf

European Court of Human Rights. (30 May 2013). *Lavida and Others v. Greece* (Application No. 7973/10). Available at: https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-4378378-5255719&filename=Lavida%20and%200thers%20v.%20Greece%20-%20school%20placements%20for%20Roma%20children.pdf

¹⁰⁹ Council of Europe, Committee on Anti-Discrimination, Diversity and Inclusion (CDADI). (Undated). *Feasibility Study on Desegregation and Inclusion Policies and Practices in the Field of Education for Roma and Traveller Children – Report* (CDADI(2024)19rev – Restricted). Available at: https://tinyurl.com/5n7n57t5

¹¹⁰ ThessaliaTV.gr. (5 September 2024). *43 Roma Students of First Grade Junior High Schools to Be Allocated to Four Schools in Volos: The Teachers of the Host Schools Go Back to School* [News article]. Available at: https://tinyurl.com/bdd56s4a

¹¹¹ Regional Observatory for Social Inclusion, Region of Thessaly. (1 November 2022). *The Intermittent School Attendance and School Dropout of Roma Students of Tirnavos Were Discussed in a Meeting Organised by the Regional Observatory for Social Inclusion* [Press release]. Available at: https://tinyurl.com/57mjbwvx

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a good practice¹¹² - an assessment that seems to be shared by the Ministry of Education.¹¹³ A similar desegregation initiative is underway in the Municipality of Farsala.¹¹⁴

The extent of busing Roma children in the Municipalities of Tirnavos and Larisa can be estimated from the fact that, based on Ministry of Education statistics, the relevant school district had 19,466 primary school pupils in the school year 2023-2024, out of which 1,060 were Roma. About 1,233 non-Roma pupils (i.e. 6.7%) and 383 Roma pupils (i.e. 36%) were being provided with transport to and from school.¹¹⁵

Even in the schools of Tirnavos and Larissa – and despite the numerous positive measures undertaken, such as the busing of Roma pupils – education staff and officials agree that the school dropout of Roma is a serious issue that ought to be tackled. 116

Last, it is interesting to note that in one case, in the town of Zevgolatio, it was the non-Roma parents who requested – and ultimately achieved the distribution of Roma pupils in different schools in the area. 117

3.2.1. Effectiveness of the NRSF in addressing the problem

There is a divergence of opinion between the NRCP and the Ministry of Education regarding Roma-only schools, as noted above. The NRCP does not appear to advocate for any concrete desegregation policies. In contrast, the Ministry of Education seems to tolerate at least desegregation policies, such as those adopted by regional educational authorities in Thessaly. In that respect, it should be noted that in the case of the desegregation of a Roma-only school, while the regional education authorities promptly put together a desegregation plan and were ready to implement, it was the Ministry of Education that overruled the education authorities and put a stop to the desegregation measures; it was precisely this Ministry of Education's decision that led to finding of a violation of the right to education, together with the right to nondiscrimination. 118

Turning to the issue of Roma school dropout, and given the lack of statistics, it is challenging to assess the effectiveness of NRSF in this area. Nevertheless, based on anecdotal evidence, these measures (among which the most important is probably the payment of a special benefit to Roma pupils attending school) are not entirely effective. It is recalled in this connection that the aforementioned high school dropout rates are observed in years when the payment had been instituted and was available to Roma parents. This would, in turn, suggest either that many Roma are not eligible for it (primarily due to a lack of relevant documentation) or that other reasons (e.g., the need for children to work to support their families) far outweigh the benefits of receiving it..

¹¹² Regional Observatory for Social Inclusion, Region of Thessaly. (1 November 2022). *The Intermittent School Attendance and School Dropout of Roma Students of Tirnavos Were Discussed in a Meeting Organised by the Regional Observatory for Social Inclusion* [Press release]. Available at: https://tinyurl.com/57mjbwvx

¹¹³ Ministry of Education. (2 August 2024). Response to Parliamentary Question, Ref. No. 89740/ Φ 1. Available at: https://tinyurl.com/3xwtmzkk. According to the Ministry's response, the desegregation policy in Tirnavos has been implemented during the last ten years.

¹¹⁴ Idem

¹¹⁵ Idem

¹¹⁶ Regional Observatory for Social Inclusion, Region of Thessaly, Social Welfare Directorate. (January 2022). Survey: Educational Problem of Roma Children in Thessaly and the Contribution of the Roma Branches Towards Addressing Them, pp. 15–17. Available at: https://tinyurl.com/yvv27xf

Regional Observatory for Social Inclusion, Region of Thessaly. (1 November 2022). The Intermittent School Attendance and School Dropout of Roma Students of Timavos Were Discussed in a Meeting Organised by the Regional Observatory for Social Inclusion [Press release]. Available at: https://tinyurl.com/57mjbwvx

¹¹⁷ Gnomi Politon. (26 February 2023). *Great Vindication for the Parents' Association of Junior and Senior High of Zevgolatio – It Achieved the Dispersal of Roma Students* [News article]. Available at: https://gnomipoliton.com/2023/02/26/megalh-dikaiwsh-gia-ton-syllogo-gonewn-gymnasioy-lykeioy-zeygolatioy-petyxe-thn-diaspora-ma8htwn-roma/

¹¹⁸ European Court of Human Rights. (30 May 2013). *Lavida and Others v. Greece* (Application No. 7973/10), paragraphs 19–23, 68–69. Available at: https://hudoc.echr.coe.int/enq?i=001-119974

3.2.2. Synergy with other actions

As a general note, in both fields - combating school segregation and school dropout - the key problem is the lack of statistics, which reflects the Greek authorities' conscious choice not to collect disaggregated data. One of the questions addressed to Greece by the UN Human Rights Committee (UN HRC) was precisely whether Greece intended to gather statistical data regarding its minorities. In its response, Greece noted that only one ethnic group is classified as a minority (and that is a religious one) and that it does not collect statistical data on grounds of protection of personal data. That said, it stated that it made use of 'alternative methods' to gather such data, namely proxy indicators. Moreover, and particularly in the field of education, staff carry out their surveys as to the origins of the school population and their findings are registered and communicated to the Ministry of Education. By way of example, school principals should collect and register statistical data regarding immigrants, Greek repatriates and Roma pupils. Presumably, therefore, the processing of such data by school authorities is not in breach of the relevant legal and regulatory frameworks.

Notably, the Greek National Action Plan for the EU Child Guarantee does not address the issue of Roma school segregation and instead refers to the NRSF. Additionally, none of the other national policies related to education, to the authors' knowledge, have any reference to Roma.

3.3. Fighting antigypsyism and discrimination

A striking illustration of the persistence of anti-Roma prejudice, racism and discrimination in Greece emerges from the latest Eurobarometer surveys. In 2023, 86% of Greek respondents reported that such discrimination was 'very widespread'¹²² – a figure that has risen from 82% in the 2019 Eurobarometer, and far above the EU average of 65% (61% in 2019).¹²³ This pronounced disparity points to the depth of anti-Roma sentiment in Greece and underscores the pressing need for more robust measures to combat discrimination.

According to the FRA 2021 survey on Roma across eight EU member states, 25% of respondents reported experiencing discrimination in everyday situations over the previous year – a rate that is essentially unchanged from the 26% recorded in the 2016 survey (EU MIDIS II).¹²⁴ In Greece, however, the corresponding figures were notably higher, rising from 48% in 2016 to 53% in 2021. Similarly, 30% of Roma across the eight member states said they had experienced at least one form of racist harassment in the past year (the exact figure as in 2016), whereas Greece's rate stood at 41% in 2021, down from 50% in 2016.

As mentioned in the previous RCM Report, various international bodies highlight that the widespread racism, hate speech, and discrimination faced by Roma communities in Greece remain a pressing issue. ¹²⁵ The NRSF and other official state documents recognise the discrimination encountered by Roma. However, references to the concept of antigypsyism itself are comparatively scarce in both the national Roma strategy and the National Action Plan against Racism and Intolerance. Where they do appear, it is primarily in the form of definitions and mentions of corresponding EU and international frameworks. Admittedly, there is one measure in the national

¹¹⁹ United Nations Human Rights Committee. (2 December 2021). *List of Issues Prior to Submission of the Third Periodic Report of Greece* (CCPR/C/GRC/QPR/3), paragraph 27. Available at: https://tinyurl.com/3yb6rhf2

¹²⁰ United Nations Human Rights Committee. (13 September 2023). Reply to Paragraph 1 of the List of Issues Prior to the Submission of the Third Periodic Report of Greece on the Implementation of the ICCPR (CCPR/C/GRC/\$), paragraphs 251, 282. Available at: https://tinyurl.com/3j6h9e7f

¹²¹ Ministry of Education. (23 September 2024). Entering of Data in the Myschool Information System for the School Year 2024–2025, Ref. No. 10911/ Γ Δ4. Available at: https://tinyurl.com/3e2yf3n9

¹²² Eurobarometer. (December 2023). *Discrimination in the European Union: Country Factsheet – Greece.* Available at: https://europa.eu/eurobarometer/surveys/detail/2972

¹²³ Eurobarometer. (September 2019). *Discrimination in the European Union: Country Factsheet – Greece.* Available at: https://europa.eu/eurobarometer/surveys/detail/2251

¹²⁴ Fundamental Rights Agency (FRA). (25 October 2022). *Roma in 10 European Countries – Main Results: Roma Survey 2021*. Available at: https://fra.europa.eu/en/publication/2022/roma-survey-findings

¹²⁵ Roma Civil Monitor. (2023). *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Greece*. Available at: https://www.romacivilmonitoring.eu/monitoring-reports/

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Roma strategy that explicitly addresses antigypsyism. Still, it seems to be framed under the broader umbrella of discrimination rather than as a distinct phenomenon in its own.

In only three years, between 2021 and 2023, three young Roma died during police pursuit under police fire. As the president of Ellan Passe, the Panhellenic Greek Roma Federation attested in the aftermath of the death of Christos Michalopoulos, the third young Roma to fall dead after police fire:

"The only thing we can say with certainty, after the times we have witnessed such tragic incidents where human lives, young children, are lost by police officers, is that there is racism. There is a deep-rooted antigypsyism, which manifests itself in various forms, turning into violence, police arbitrariness, etc., even leading to hate crimes." 126

What is also of great concern, are narratives and manifestations of high ranked officials, especially from the current Minister on Citizen Protection, who voiced that "We bring a regulation to stop the release of recidivist Roma" and "The Roma cannot live off crime in Greece" or the visit of the former Minister of Citizen Protection to the seven police officers when detained temporarily following the death of a young Roma, Nikos Sampanis, during their pursuit. 129

Recently, the UN Committee on the Elimination of Racial Discrimination (CERD)¹³⁰ expressed concern over the prevalence of hate crimes and hate speech directed at Roma and non-citizens, pointing to low reporting rates attributable to victims' distrust of law enforcement agencies, fear of retaliation, limited awareness of complaint mechanisms, and the normalisation of hate incidents within marginalised communities. Equally troubling, according to the Committee, is the low rate of convictions for such offences and the inconsistent recognition of racist motives by prosecutors and courts. In light of these issues, the Committee urged the Greek authorities to take proactive measures to encourage the reporting of hate speech and hate crimes, ensure that reporting channels are secure and accessible, and provide targeted training for justice officials – including police, prosecutors, and judges – on effectively identifying, documenting, and addressing racial discrimination and hate-based offenses.

The Committee's latest observations on Greece highlight the relentless grip of antigypsyism, which continues to drive the marginalisation and social exclusion of Roma communities. Despite noting the updated NRSF and the push for local action plans, the Committee warns that harmful stereotypes, prejudice, and intolerance toward the Roma remain pervasive. These deep-rooted attitudes help maintain extreme poverty, substandard living conditions in informal settlements, and forced evictions that offer no alternative shelter or compensation.

The Committee also flags how delayed civil registration and difficulties in acquiring identity documents keep many Roma from accessing education, healthcare, housing, and employment. Chronic unemployment, low school attendance, high dropout rates, and continued school segregation underscore how ingrained antigypsyism shapes Roma life chances. In response, the Committee urges Greek authorities to strengthen their efforts across all policy areas, including boosting coordination, establishing reliable indicators and data systems, and allocating sufficient resources for the effective implementation of the updated Strategy and Action Plan.

¹²⁷ Chrysochoidis, M. (18 June 2025). Τέλος η Ανοχή στους Ρομά – Στις Προτεραιότητές Μας να Καταπολεμήσουμε το Οργανωμένο Έγκλημα [No More Tolerance for Roma – Combating Organised Crime Is One of Our Priorities]. Available at: https://tinyurl.com/349wzt4w

¹²⁹ Theodorikakos, T. (24 October 2021). Επισκέφθηκα στη ΓΑΔΑ τους 7 Αστυνομικούς, Κανονικά οι Πειθαρχικές Διαδικασίες [I Visited the 7 Policemen at GADA, Disciplinary Procedures Proceed Normally]. Available at: https://tinyurl.com/2e3jbk8a

¹²⁶ Pantzos, V. (19 November 2023). *There Is a Deep-Rooted Antigypsyism.* Available at: https://tinyurl.com/45rx87kh

¹²⁸ Chrysochoidis, M. (June 2025). Οι Ρομά Δεν Μπορούν να Ζουν από το Έγκλημα στην Ελλάδα [Roma Cannot Live off Crime in Greece]. Available at: https://tinyurl.com/jzb6r2kb

¹³⁰ United Nations Committee on the Elimination of Racial Discrimination (CERD). (4 December 2024). *Concluding Observations on the Combined Twenty-Third and Twenty-Fourth Periodic Reports on Greece*. Available at: https://tinyurl.com/ye29kk7w

Notably, the Committee expresses concern that overall conditions for the Roma have not improved. It stresses that they still face barriers to basic social services, suffer from negative stereotypes, and are often targets of frequent identity checks and arbitrary arrests. The Committee calls on Greece to step up its work to ensure the Roma can enjoy economic, social, and cultural rights on an equal footing and to confront unlawful conduct by police and other law enforcement officials.

The Hellenic Police Report on Organised Crime 2022: Stereotypes, Misinterpretations & Impact on Society

In September 2024, a single article set off widespread reactions on social media and beyond. It cited the 2022 Hellenic Police report on organised crime, claiming that "86% of those involved in burglaries and robberies are Roma." That distorted the report's actual findings. According to the text itself, only 4% of all thefts and burglaries nationwide are carried out by organised groups. Yet the headline fixated on Roma and left out the bigger picture: the report does not even mention Roma in other crimes like money laundering or arms trafficking.

This selective focus fuelled familiar stereotypes and revived antigypsyist rhetoric. Media stories, local officials' statements, and even parliamentary questions from MPs of the opposition and of the governing party followed, and reinforcing the idea that 'Roma equals crime'. The episode also raises a broader question: why does the state gather ethnic data on Roma when it involves criminality, while at the same time omitting to collect data on vital areas of inclusion, equality, and participation.

3.3.1. Effectiveness of the NRSF in addressing the problem

The European Commission's Assessment Report in 2023 raises significant concerns regarding the approach to combating antigypsyism, hate speech, and hate crime. According to the EC, the NRSF does not indicate a targeted approach to tackling antigypsyism. Therefore, this is insufficiently addressed in the sectoral areas. Even though hate speech and hate crime are mentioned in the overall objective, the NRSF could have proposed a more targeted approach to tackle these matters. According to the EC, the proposed measures do not appear ambitious enough to address the needs and scale of the challenges on the ground. In addition, the strategy fails to address intersectional discrimination, as according to the EC, measures targeting vulnerable groups of Roma who are exposed to multiple forms of discrimination are not explicitly included. Gender responsive and child/ age-sensitive targets and measures need to reflect the principle of intersectionality and multivulnerability (targeted measures for Roma women, Roma with disabilities, older Roma, younger Roma, LGBTIQ Roma, etc.)

'Preventing and Combating Stereotypes and Discrimination against Roma' is one of the four pillars of the NRSF. The strategy also encompasses more 'drastic' measures under its third pillar 'Preventing and Combating Stereotypes and Discrimination against Roma', such as activities for building trust between prosecutors and communities that are victims of hate crime (Measure 3.1.8), alongside the continuing operation of the Hellenic

¹³¹ MP Dimitris Markopoulos, along with MP Athanasios Plevris, both from the governing party (Nea Dimokratia), have submitted a series of parliamentary questions addressed to key government ministers. The focus of these questions is on the high levels of criminal activity attributed to the Roma community in Greece, as highlighted by recent data from the Hellenic Police. According to the report, 84% of burglaries and thefts are committed by Roma, citing the article. The MPs express concern over the increasing media coverage and public disturbances, including daily conflicts, threats, property damage, and the presence of illegal settlements in various municipalities. They highlight that many of the involved Roma individuals are young and marginalised, lacking proper integration into Greek society, which poses risks of social unrest and further complications. The MPs inquire about the actions and strategies the government has implemented in recent years to mitigate Roma-related crime, plans to address the issue, the consideration of deploying experienced police personnel to relevant security departments for preventive measures, and the existence of a comprehensive integration policy for the Roma community in areas such as employment, housing, education, and broader societal inclusion.

Ministry of Education. (23 September 2024). *Entering of Data in the Myschool Information System for the School Year 2024–2025*, Ref. No. 10911/ΓΔ4. Available at: https://tinyurl.com/2y8stadu

¹³² European Commission. (9 January 2023). Assessment Report of the Member States' National Roma Strategic Frameworks (COM(2023) 7 final), p. 79. Available at: https://commission.europa.eu/publications/assessment-report-member-states-national-roma-strategic-frameworks-full-package_en

Police's anti-racism departments and offices (Measure 3.1.11) and the investigation into online hate crimes (Measure 3.1.14).

In terms of operational objectives, the NRSF sets out the following: "eradication of crimes and hate speech, racism, and the multiple discrimination against Roma", "lowering the percentage of Roma experiencing discrimination", and "ensuring the capacity of Roma to file discrimination-related complaints" (Measure 3.1). In terms of targets, the NRSF aims to increase by 8% the number of Roma who report instances of discrimination against them, lower by 35% the number of Roma experiencing racism during the last 12 months, lower by 38% the number of Roma being discriminating against when seeking to rent a house in the previous five years and lower by 10% the number of non-Roma not feeling comfortable having Roma as neighbours. Additional information on targets might be available, including in the relevant operational programme(s) of the competent agencies (Ministries of Justice and Citizen Protection), which are currently pending approval by the European Commission.

Pillar III 'Prevention and Combat of Stereotypes and Discrimination Against Roma' and Action 3.1 'Actions to prevent and combat racism, hate crimes, and discrimination against Roma' have several operational objectives:

- I. Elimination of crimes and hate rhetoric, racism, and multiple forms of discrimination against Roma.
- II. Reduction of the percentage of Roma who experience discrimination.
- III. Promotion of the smooth social coexistence of Roma and non-Roma in the local community
- IV. Reduction of the percentage of the general population who feel uncomfortable having Roma neighbours.
- V. Ensuring Roma's ability to report discrimination.
- VI. Raising public awareness on issues of acceptance of diversity and Roma culture.
- VII. Promotion of Roma cultural and historical elements.

Regarding the progress on the targets mentioned above set in the NRSF, no data are available.

Based on the NRCP interview, several measures under Pillar III have been implemented or partially implemented to combat discrimination against Roma. Since the Strategy is set to be concluded in 2030, many measures will be implemented over the following years. One is Measure 3-1-4, which involved a training programme for municipal staff working in municipalities with Roma branches; this training has not yet been extended more widely in the public sector. Measure 3-1-6 is said to have been carried out, although without further detail. Under Measure 3-1-8, prosecutors and judges received training on discrimination issues, accompanied by a relevant leaflet. In contrast, Measure 3-1-9 introduced a European 'Rights, Equality, Citizenship' Programme that helped develop the National Action Plan against Racism and Intolerance. The interviewee also cited Measure 3-1-10, which produced the leaflet 'Public Administration against Racist Crimes' for government personnel, Measure 3-1-11, referring to the Racist Violence Departments within the Hellenic Police that are currently operational, and Measure 3-1-12, a special telephone hotline and online complaint portal available to report racist or hate-related incidents.

By contrast, no significant progress was reported for Measures 3-1-1, 3-1-2, 3-1-5, and 3-1-7, although some are 'planned' or have seen only sporadic activities. For Measures 3-1-13 and 3-1-14, which pertain to mechanisms for recording racist violence and investigating online racist or hate-speech incidents, the interviewee did not provide detailed updates. Data on these initiatives appear scattered across ministries and local authorities, and many are still in a planning stage rather than fully executed. According to the interviewee, the measures envisaged in the NRSF have a timespan until 2030, so it is not expected that all measures would be implemented today.¹³³

3.3.2. Synergy with other actions

The third pillar of the NRSF is highly dependent on the progress of the National Action Plan against Racism and Intolerance (2020–2023).

¹³³ Ministry of Social Cohesion and Family. (13 December 2024). *National Roma Strategic Framework (NRSF)*, pp. 112–115. Available at: https://tinyurl.com/ydrnn75b

In its latest Concluding observations on the combined twenty-third and twenty-fourth periodic reports of Greece, the Committee on the Elimination of Racial Discrimination, ¹³⁴ whilst recognising the National Action Plan against Racism and Intolerance (2020–2023) and the role of the National Council against Racism and Intolerance in combating racial discrimination, the Committee remains concerned about the plan's limited implementation - chiefly due to inadequate coordination among government bodies, insufficient resources, and weak monitoring indicators. It also notes the inactivity of the Council between May 2023 and June 2024. Accordingly, the Committee urges the State to promptly adopt a new action plan with specific timelines promptly, ensuring robust consultation with civil society groups - particularly Roma, migrants, and other non-citizens - throughout the policymaking and monitoring processes. It further calls on the authorities to devise effective systems for tracking policy outcomes and to reinforce the National Council against Racism and Intolerance by providing the necessary institutional, financial, and technical support to fulfil its mandate.

Despite recognising the statistics presented by the delegation concerning Roma communities, refugees, and asylum-seekers, the Committee remains troubled by the absence of comprehensive data on the population's demographic makeup, disaggregated by ethnicity. This gap encompasses ethnic and ethno-religious minorities, as well as non-citizens (e.g., migrant workers, undocumented migrants, asylum-seekers, refugees, and stateless persons). It hinders meaningful evaluation of these groups' living conditions and the impact of targeted policies. Equally concerning is that current socioeconomic data collection methods do not account for self-identification, rendering it difficult to obtain accurate, nuanced insights into the status of marginalised communities.

In light of the recent tragic incidents involving the deaths of three young Roma during police pursuits between 2021 and 2023, the Committee's concerns and recommendations take on particular urgency. It expresses alarm over the absence of a clear legal prohibition on racial profiling, as well as over continuing reports of Roma and non-citizens (such as migrants, asylum-seekers, and refugees) being subjected to police stops and checks based on their perceived ethnicity or national origin. Additionally, the Committee highlights troubling accounts of racially motivated and disproportionate use of force by law enforcement agencies, including the police and border guards, and notes a stark lack of detailed information on investigations, prosecutions, and convictions in such cases. This deficiency underscores the need for more robust mechanisms and accountability measures to address potential racial bias among law enforcement officials. Recalling its General Recommendation No. 36 (2020) on preventing and combating racial profiling, it urges the State to adopt legislation explicitly prohibiting racial profiling, conduct thorough and impartial investigations into allegations of excessive force including strengthening the Ombudsperson's mandate – and gather systematic data on complaints, prosecutions, sanctions, and reparations in such cases.

The Committee acknowledges Greece's enhanced efforts to address racial discrimination and hate crimes, including the appointment of specialised prosecutors, the establishment of dedicated police departments in major cities, and the creation of numerous additional offices nationwide. Legislative progress is evident in the adoption of laws that provide support to victims of these offences.

However, significant challenges remain. Many of the newly established police offices are reportedly inactive, undermining the infrastructure intended to protect vulnerable groups. Reporting rates for hate crimes remain low due to mistrust in law enforcement, fear of retaliation, inadequate anti-discrimination frameworks, and a lack of awareness about available support channels. These factors contribute to the normalisation and widespread perception of hate crimes, discouraging victims from coming forward.

Prosecution and conviction rates for hate crimes are disappointingly low, reflecting insufficient recognition and investigation by authorities. The inconsistent application of legal provisions further diminishes the effectiveness of judicial responses. Additionally, the judicial data collection system fails to provide comprehensive insights from investigation to final adjudication, limiting the Committee's ability to monitor progress and enforce accountability.

Support services for victims remain inadequate, with the implementation of supportive legislation hampered by limited resources. This inadequacy poses significant barriers for victims in accessing justice and support. The Committee emphasises the urgent need for Greece to activate all specialised police offices, enhance training for justice officials, promote accessible reporting mechanisms, and ensure robust support services for

¹³⁴ United Nations Committee on the Elimination of Racial Discrimination (CERD). (13 December 2024). Concluding Observations on the Combined Twenty-Third and Twenty-Fourth Periodic Reports on Greece (CERD/C/GRC/CO/23-24). Available at: https://www.ecoi.net/en/document/2119304.html

victims. Public education campaigns aimed at dismantling stereotypes and fostering trust in the judicial system are essential to create an environment where victims feel safe and empowered to seek justice.

Ultimately, the persistence of racial discrimination and hate crimes within Greece's judicial and law enforcement frameworks underscores the necessity for comprehensive and sustained efforts to eradicate discrimination and ensure the protection of individuals' rights in accordance with Article 16 of the European Social Charter.

With regards to progress made in this front, although it is not clear if it is directly linked with the NRSF, it is important to look at the Action Plan submitted by the Greek Government before the Committee of Ministers of the Council of Europe with regards to the implementation of the Sidiropoulos and Papakostas group of cases.¹³⁵

Recent Greek government training programmes for police and coast guard personnel explicitly recognise Roma as a vulnerable group, aiming to reduce discrimination and improve rights protections. However, a CSO submission under Rule 9.2 raises doubts about the programmes' effectiveness, citing recent fatal shootings of young Roma men and persistent secrecy around police procedures such as the 'Memorandum of Actions;. ¹³⁶ It highlights the lack of transparency on racist motives in law enforcement misconduct, the absence of disaggregated data on disciplinary or criminal investigations, and questions whether tactics in Roma neighbourhoods are causing more harm than building trust. The CSO urges the Committee of Ministers to demand concrete evidence of how Greece monitors and enforces protocols designed to protect Roma rights and to maintain enhanced supervision until measurable accountability is achieved.

Finally, for this report, a list of questions was submitted to the Hellenic Police Headquarters, with statistical, qualitative, quantitative data, and any other data available concerning racially motivated crimes against Roma from the year 2017 to date. Secondarily, if available, statistics, qualitative, quantitative data and any other data that are available and relate to the conduct of disciplinary investigations into racist behaviour or racially motivated crimes against Roma in disciplinary offences under review and/ or investigations by the Internal Affairs Department of the National Police and whether any and how many disciplinary sanctions were imposed on them.

In response to the above-mentioned document, the following statistical data are forwarded, concerning incidents with a probable racist motive against Roma (crimes with racist characteristics under Article 82A of the Penal Code, and hate speech under Law no. 927/79 as amended and in force), as recorded by the competent services of the Hellenic Police.

YEAR / PERPETRATORS	2017	2018	2019	2020	2021	2022	2023	1st HALF of 2024
Civilians	6	3	7	2	2	1	1	2
Police Officers	2	1	3	6	1	0	0	0

As one can notice, the recorded incidents with a probable racist motive against Roma have declined from 2020 onwards. It is especially worrisome that no incidents regarding Police Officers have been recorded for the years 2022-2024, despite the fatal shootings of young Roma.

3.3.3. Roma participation

As noted above in the housing section, there are significant concerns as to the degree of Roma participation in this field. It is recalled that, as indicated by none other than the GNCHR, the NSFR "neither provides for nor

¹³⁵ Council of Europe, Committee of Ministers. (31 October 2023). Summary of the Developments in the Execution of the Case Sidiropoulos and Papakostas v. Greece. Available at: https://tinyurl.com/nhj4unr8

¹³⁶ Council of Europe, Committee of Ministers. (31 October 2023). *Communication from an NGO (Pro Bono Publico) in the Case of Sidiropoulos and Papakostas v. Greece* (Application No. 33349/10). [Submission authored by Georgios Tsiakalos]. Available at: https://tinyurl.com/33vd4ntx

ensures a substantial participation of the Greek Roma through their representatives".¹³⁷ It remains to be seen if the Roma Forum will have an impact in this regard.

3.4. Forced evictions

Case study: Tsairia settlement

A recurrent phenomenon in Europe and Greece, documented by Kuletz and Valerie, 138 is that when development projects appear in central urban areas, Roma communities often face displacement due to rising property values and pressure from developers. A telling example of this is the ongoing judicial struggle in Tsairia, a segregated Roma settlement in eastern Thessaloniki, which the author of this chapter has litigated.

Recent urban development plans along Thessaloniki's coastal front have renewed threats of forced evictions for Tsairia's Roma residents. Authorities and other stakeholders emphasise the area's potential for recreational and technological development, effectively framing the relocation of Roma families as both inevitable and expedient. Studies tied to these projects label the Roma presence as a 'nuisance', citing environmental concerns, such as alleged pollution and fire hazards, as justification for removal.

On the ground, Tsairia's Roma community faces dire living conditions, with no running water, sewage, or waste disposal systems. During the pandemic, water access was restricted, forcing residents to carry water by hand under threat of lockdown fines. The settlement's flood-prone, unmaintained roads have contributed to injuries and even a child's tragic death. Illegal dumping by non-Roma individuals and companies has turned the area into a *de facto* landfill, escalating environmental harm and intensifying stigma against the settlement.

Tensions rose when a local citizens' initiative, initially focused on environmental protection, was co-opted by extremist elements, and the newly elected mayor promised in 2019 to build a wall around the settlement. Numerous makeshift homes were destroyed, followed by an administrative protocol for mass eviction with no provision for alternative accommodation.

Although the County Court revoked this eviction protocol, the Court of First Instance (acting in appellate capacity) later reinstated eviction rulings. In 2022, the European Court of Human Rights (ECtHR) intervened, granting interim measures (Rule 39) to halt evictions until suitable housing could be secured. As of this writing, these forced removals have not occurred.

Meanwhile, another area that hosts thousands of Roma residents causes alarm for future evictions. The development of the property in the former Gonou camp in Northern Greece, where the Agia Sofia settlement is located, is slated to establish a modern business park that will supposedly enhance combined transport and benefit both the local community and the national economy. It remains unclear how Roma living in or near these areas might be affected or protected during such developments.

Forced evictions of Roma communities in Greece have repeatedly been the focus of international legal scrutiny, with multiple proceedings concluding that such practices - when carried out without adequate safeguards - violate fundamental human rights. Two collective complaints brought before the European Committee of Social Rights (ECSR) under the European Social Charter, ¹³⁹ together with separate rulings by the UN Human Rights

¹³⁷ Greek National Commission for Human Rights (GNCHR). (August 2024). Written Contribution for the List of Themes Prior to Greece's Review of Its Combined 23rd and 24th Periodic Report by the Committee on the Elimination of Racial Discrimination (CERD) in Its 114th Session, paragraph 38 [emphasis in the original]. Available at: https://www.nchr.gr/images/pdf/apofaseis/diakriseis/GNCHR PLoT Report CERD 2024.pdf

¹³⁸ Kuletz, V. (1998). *The Tainted Desert: Environmental and Social Ruin in the American West.* New York: Routledge. Available at: https://doi.org/10.2307/2654948

¹³⁹ European Committee of Social Rights. (8 June 2005). *Decision on the Merits: European Roma Rights Centre v. Greece* (Complaint No. 15/2003). Available at: https://www.coe.int/en/web/european-social-charter/processed-complaints

European Committee of Social Rights. (26 May 2010). *Decision on the Merits: International Centre for the Legal Protection of Human Rights (INTERIGHTS) v. Greece* (Complaint No. 49/2008). Available at: https://www.coe.int/en/web/european-social-charter/processed-complaints

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Committee, ¹⁴⁰ found that Greece failed to protect Roma families from these unlawful evictions. In European Roma Rights Centre (ERRC) v. Greece (Complaint No. 15/2003), the ECSR ruled in December 2004 that Greece had breached Article 16 of the 1961 Charter due to inadequate permanent housing and forced eviction of Roma families. Similarly, in International Centre for the Legal Protection of Human Rights (INTERIGHTS) v. Greece (Complaint No. 49/2008), the Committee concluded in December 2009 that Greece again violated Article 16 by not considering the particular circumstances of Roma families and by perpetuating living conditions below minimum standards. Both decisions highlighted systematic shortcomings in Greece's ability to ensure secure housing and protect Roma communities from unlawful evictions.

In ongoing follow-up assessments, the ECSR continues to find that Greece falls short of compliance with Article 16, citing the persistence of sub-standard dwellings and forced evictions. ¹⁴¹ The Committee on the Elimination of Racial Discrimination (CERD), in its most recent Concluding Observations, ¹⁴² urged Greece to halt the forced eviction of Roma communities, suggesting that informal settlements be legalised or, when evictions cannot be avoided, families be provided alternative adequate housing and compensation. When a CERD expert inquired about how Greece prevents forced evictions and addresses fines for illegal construction, the Greek Delegation did not offer a specific response on that matter.

Forced evictions in Greece take many forms, from officially sanctioned operations by municipal authorities to unauthorised 'cleaning actions'. There are also indirect evictions caused by fines and prosecutions related to electricity theft, unauthorised construction, and illegal occupation – conditions often beyond the control of Roma families living in impoverished, segregated areas. Although the National Roma Strategic Framework (NRSF) remains mostly silent on forced evictions, the phenomenon is widely acknowledged. The former Secretary General of the National Roma Contact Point (NRCP) once cautioned that any eviction carried out without a formal judicial process and without providing adequate alternative housing would likely expose Greece to proceedings before the European Court of Human Rights. He stressed that authorities must determine where Roma families can safely relocate before any eviction measures are taken.

In 2021, the ECSR re-examined its earlier conclusions in ERRC v. Greece and INTERIGHTS v. Greece, reiterating that forced evictions continue to be common and that the shortage of permanent housing for Roma persists. ¹⁴³ Greece, in its follow-up responses, did not supply fresh data beyond its third simplified report, merely restating that violent expulsions should not take place except under exceptional legislative circumstances and that responsible municipalities must propose facilities meeting minimal standards. Officials also pointed to Article 159 of Law no. 4483/2017 - on temporary relocation of vulnerable groups - as a potential solution to forced evictions. However, there is scant evidence of this law being effectively enforced, and the budget allocated for temporary relocation falls far short of addressing the broader housing crisis faced by Roma communities. There is no connection between this provision and forced evictions, as forced evictions often occur without providing alternative accommodation, thereby violating international standards. Furthermore, activating Article 159 is not a prerequisite for the municipality's decisions or actions to evict Roma from occupied municipal land, nor is it required in other cases where individuals are evicted from private land. In practical terms, the activation of this article has failed for several reasons.

Government reports to the ECSR highlight various constitutional and legal provisions that theoretically protect Roma from forced eviction. Article 21(4) of the Greek Constitution enshrines the right to adequate housing, while municipalities are entrusted with creating decent living conditions for vulnerable populations. Additional laws, including Law no. 3463/2006, Law no. 3852/2010, Law no. 2790/2000, and Law no. 3448/2006, classify Roma as a 'special social group' and assign local authorities the responsibility of assisting them with education, health, and employment programmes. Article 20 of the Constitution guarantees Roma, as Greek citizens, the right to challenge administrative actions that threaten their rights. In practice, though, the protection offered

¹⁴⁰ United Nations Human Rights Committee. (3 November 2016). *Views Adopted in Cultural Association of Greek Gypsies Originating in Halkida and Suburbs "I Elpida" and Mr. Stylianos Kalamiotis v. Greece* (Communication No. 2242/2013). Available at: https://juris.ohchr.org/casedetails/2180/en-US

¹⁴¹ European Committee of Social Rights. (January 2022). *Follow-Up to Decisions on the Merits of Collective Complaints: Findings 2021*. Available at: https://rm.coe.int/findings-2021-en/1680a5eed8

¹⁴² Idem

¹⁴³ Idem

¹⁴⁴ Idem

by these statutes is frequently undermined by inconsistent enforcement and the limited resources available at the local level.

Subsequent Greek Government submissions to the ECSR, particularly its 4th and 6th reports, refer briefly to initiatives under the EEA/Norway Grants programme in Katerini and present a vision of social inclusion through the new National Roma Strategic Framework (2021–2030).¹⁴⁵ This NRSF aims to upgrade housing and infrastructure in degraded settlements claiming to be employing 'housing first' approach. However, this does not qualify as such, and linking social benefits to school attendance, and coordinating with municipalities on relocation or improvement projects. While the government has highlighted Katerini as a pilot for integrated social housing that uses both national and European funds, it has offered no meaningful information on whether such efforts effectively prevent forced evictions in other regions.

In reality, no formal protocol exists to stop forced evictions apart from general legal constraints. The NRCP often intervenes informally upon learning of imminent evictions, advising municipalities to follow the correct legal process and ensure that alternative accommodations are provided. The former Secretary General of Social Solidarity and Fight against Poverty, Mr Georgios Stamatis, consistently reminded local authorities of these responsibilities when presenting the NRSF before the Central Union of Municipalities of Greece. However, the strong autonomy of local self-government significantly limits the actions that national authorities can take. While there is an expectation that municipalities provide alternative housing before demolishing Roma settlements, it is unclear how often this occurs. Roma organisations have informed the European Commission against Racism and Intolerance (ECRI) that evictions frequently proceed without such safeguards and that local officials are often complicit or indifferent. National officials may be more receptive to Roma issues, but this does not consistently translate to local-level compliance.

ECRI's General Policy Recommendation No. 13, on combating antigypsyism and discrimination against Roma, ¹⁴⁶ advises Greek authorities to ensure that Roma are not subjected to illegal evictions without adequate notice or the chance of rehousing in decent conditions. It also advocates for robust legal aid to challenge potentially unlawful evictions. ECRI emphasises that truly effective measures must be in place before any eviction is executed and that they must genuinely include accessible alternatives for Roma families.

Beyond overt evictions, local authorities often use indirect mechanisms, such as continuous prosecutions and accumulating fines for unauthorised construction or electricity theft, to push Roma out. These penalties frequently lead to criminal records, making it more difficult for Roma to find lawful employment, and trapping them further in poverty. High fines, if unpaid, can prevent individuals from obtaining the clearances needed for tax and social insurance, perpetuating a cycle of exclusion. Roma thus face punishments for conditions that are not of their making, in settlements that offer minimal infrastructure or permanent housing options, an issue also raised by the Greek Ombudsman who also highlighted the exorbitant amount of these fines, as Roma shacks are effectively considered as proper buildings when assessing the fines. These realities contradict the NRSF's stated objective of fostering full inclusion and intensify marginalisation by layering financial and legal barriers on top of poor living conditions.

Overall, despite the government's assurances, forced evictions remain a critical challenge for many Roma communities in Greece. Central officials can advise local authorities on best practices, but municipal autonomy often translates into inconsistent or outright disregarded protections for Roma. While the principle that alternative housing should be available before any demolition of Roma settlements is frequently cited, reports from Roma organisations and ECRI suggest this guideline is often ignored. Indirect eviction tactics, involving fines and legal penalties, compound the hardships faced by Roma families, saddling them with debt and criminal records that further obstruct employment and integration. Consequently, Greece continues to risk legal disputes at international forums and faces ongoing condemnation for its inadequate response to the structural exclusion of Roma communities. Unless the commitments outlined in the NRSF take concrete form through

¹⁴⁵ European Committee of Social Rights. (January 2022). *Follow-Up to Decisions on the Merits of Collective Complaints: Findings 2021*. Available at: https://rm.coe.int/findings-2021-en/1680a5eed8

¹⁴⁶ European Commission against Racism and Intolerance. (2020). *ECRI General Policy Recommendation No. 13 on Combating Anti-Gypsyism and Discrimination Against Roma* (CRI(2011)37rev). Available in English at: https://rm.coe.int/ecri-general-policy-recommendation-no-13-on-combating-anti-gypsyism-an/16808b5aee

¹⁴⁷ Greek Ombudsman. (2025). *2024 Annual Report on Equal Treatment,* pp. 49–50. Available in Greek at: https://www.synigoros.gr/el/category/default/post/eidikh-ek8esh-or-ish-metaxeirish-2024

consistent, well-resourced, and enforced measures, the cycle of forced evictions and the deep inequalities they produce will almost certainly persist.

3.4.1. Effectiveness of the NRSF in addressing the problem

As highlighted in the previous RCM report, despite representing an improvement over earlier national strategies, the NRSF continues to exhibit significant limitations, most notably, the lack of mechanisms for effectively engaging local authorities, who play a pivotal role in devising and implementing housing-related projects for the benefit of Roma communities. Compounding this issue is the omission of any reference to forced evictions in the NRSF, despite explicit concerns raised by the United Nations Human Rights Committee (UNHRC), the UN Committee on the Elimination of Racial Discrimination (UNCERD), and ECRI regarding the poor living conditions, residential segregation, and evictions that Roma in Greece continue to face.

3.4.2. Synergy with other actions

The only action that is also mentioned in the NRSF that could have the potential to support evicted residents is the 'Coverage' Programme.¹⁴⁸ One of the categories that receive extra scores in their applications are "Households that have been notified of an enforceable court order of eviction from a rental property or an order to pay rent".

However, Roma residents of illegally occupied settlements, who are evicted via an administrative protocol of eviction issued by the municipality, appear to be excluded by the wording of the law.

3.4.3. Roma participation

As noted above in the housing section, there are significant concerns as to the degree of Roma participation in this field. It is recalled that, as indicated by none other than the GNCHR, the NSFR "neither provides for nor ensures a substantial participation of the Greek Roma through their representatives". ¹⁴⁹ It remains to be seen if the Roma Forum will have an impact in this regard.

¹⁴⁸ Ministry of Labour and Social Affairs. (2022). *Coverage Programme: Social Housing for Vulnerable Youth* (Law 5006/2022, Government Gazette A' 239). Terms and conditions defined by Decree No. 24777/2023 (Government Gazette B' 1315). Implemented in cooperation with Local Authorities and linked to housing allocations under the ESTIA II programme (Joint Ministerial Decision No. 13348/2.4.2020, Government Gazette B' 1199) and ESTIA 2021 programme (Joint Ministerial Decision No. 270/2.2.2021, Government Gazette B' 451).

The 'Coverage' Programme, as established by Law no. 5006/2022 (239 A), aims to implement a social housing programme. The terms and conditions for implementing the housing assistance Programme 'Coverage' are defined by Decree No. 24777/2023 (Government Gazette 1315B). The Programme aims to use private housing for the housing of vulnerable young people aged 25-39 years old who are beneficiaries of the Minimum Guaranteed Income. For the implementation of the Programme, the Ministry of Labour and Social Affairs cooperates with first degree Local Authorities, within the administrative boundaries of which there are private houses allocated for the housing of applicants for international protection under the 'ESTIA II' Programme of the 'ESTIA II' Programme of the Ministry of Labour and Social Affairs. 13348/2.4.2020 of the Joint Decision of the Ministers of Development and Investment and Migration and Asylum (B' 1199) and the 'ESTIA 2021' Programme of Joint Decision No. 270/2.2.2021 of the Ministers of Development and Investment and Migration and Asylum (B' 451). The Programme is implemented in specific municipalities, provided that interest is expressed by homeowners.

¹⁴⁹ Greek National Commission for Human Rights (GNCHR). (August 2024). Written Contribution for the List of Themes prior to Greece's review of its combined 23rd and 24th periodic report by the Committee on the Elimination of Racial Discrimination (CERD) in its 114th Session, para. 38 (emphasis in original).

4. Use of EU funding instruments

Greece's EU Structural Funds for 2021–2027 are managed through a combination of centrally administered national programmes and decentralised regional programmes. The national Partnership Agreement (ESPA) allocates responsibilities between sectoral Operational Programmes (OPs) managed by central authorities (covering themes like human resources, social inclusion, infrastructure, etc.) and 13 regional OPs managed by each Region. This blended management model means that some Roma inclusion measures are planned and coordinated at the national level, while others are designed and implemented at the regional level. All programmes align with the EU's Policy Objectives and Specific Objectives. Notably, under Policy Objective 4 (A More Social Europe), Greece has adopted Specific Objective 4.10, which focuses on the socio-economic integration of marginalised communities, such as the Roma.

Each OP is guided by a Monitoring Committee, where relevant stakeholders participate; for example, the General Secretariat for Social Solidarity and the Fight Against Poverty (NRCP), housed in the Ministry of Social Cohesion and Family, sits as a full member on the monitoring committees of EU-funded programmes. Some regions have followed suit by including Roma representatives in their OP committees (the Peloponnese Region, for instance, appointed the president of the nationwide Greek Roma confederation Ellan Passe to its monitoring committee). This structure reflects a multi-level governance approach: strategy and oversight are coordinated centrally (e.g. via a Government Commission for Roma Inclusion established in 2022), while implementation is partly devolved to regional and local authorities in line with the partnership principle. Operational Programmes in Greece are typically multi-fund (combining European Social Fund Plus – ESF+ and European Regional Development Fund – ERDF resources) or closely coordinated between ESF+ and ERDF so that 'soft' measures (training, services) complement 'hard' investments (infrastructure). In summary, EU funds for Roma inclusion are neither exclusively centralised nor fully regionalised – Greece employs a hybrid management model to align national strategic goals with local needs, using the OP structure as the delivery mechanism.

4.1. Conditions for EU funds implementation for Roma equality

Investments in Roma inclusion in Greece rely primarily on EU funds and are complemented by the national budget. Greece's 2021-2027 ESPA (Partnership Agreement for Regional Development) is the country's flagship EU-funded programme for driving economic expansion, aimed at boosting social cohesion and strengthening regional growth. Overall, it carries a total budget of 26.2 billion EUR (20.9 billion EUR from EU funds and 5.3 billion EUR from national resources).

On the other hand, investments in hard infrastructure pertaining to Roma inclusion are an exception. The relocation of settlements and improving infrastructure scheme, which is the official housing policy for Roma settlements, relies solely on the national budget (Ministry of Interior, 33 million EUR recently).

ESPA 2021-2027 channels EU and national resources into 22 targeted programmes that fuel Greece's economic expansion, reinforce social cohesion, and balance regional growth:

- 9 Sectoral Programmes: Tackle nationwide policy priorities.
- 13 Regional Programmes: Tailored to each region's specific needs and potential.
- Interreg Programmes: Strengthen cross-border and transnational cooperation with neighbouring countries

The sectoral programme Social Cohesion and Human Resources 2021-2027 repeatedly references the Roma population, treating them as a priority target group whenever actions focus on poverty, social exclusion, unemployment, or youth who are neither in employment, education, nor training (NEETs). Roma are mentioned by name in the descriptive parts of three key specific objectives and in the accompanying lists of 'vulnerable or special population groups' that those objectives must serve. The Roma population is also mentioned in the section that links the programme with the NRSF, signalling that every Roma-related action will be aligned with that national framework. The following section outlines measures intended to benefit the Roma community; however, these gains currently exist only on paper. Tangible calls and projects that deliver real results have yet to materialise.

Under Priority 4, Specific Objective ESO 4.8 (Social Innovation for Active Inclusion), the text notes that integrated projects can be designed "to remove the multiple barriers Roma face in education, training and the labour market". Although the financial table for this objective shows a relatively modest envelope of 3.8 million EUR,

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it is reserved for genuinely experimental solutions. Roma organisations, Roma mediators, and CSOs could potentially obtain direct EU support to pilot new methods of outreach, counselling, or social entrepreneurship that address needs identified by local Roma communities.

Under Priority 5, Specific Objective ESO 4.1 (Youth Employment and the Reinforced Youth Guarantee), Roma benefit through the entire menu of measures that target young NEETs aged 15-29. Those measures range from subsidised first jobs (the 'first stamp' scheme), wage-cost incentives for firms that hire NEETs, and sixmonth work-experience placements, to tailored vocational-training vouchers, apprenticeship places and start-up grants for self-employment or social-enterprise creation. The overall EU allocation for ESO 4.1 is substantial, amounting to approximately 669.8 million EUR. As Roma youth are explicitly identified as one of the hardest-to-reach NEET subgroups, they are potential beneficiaries of every line of expenditure under this heading.

Still within Priority 5, but now under Specific Objective ESO 4.12 (Social and Labour-Market Inclusion of NEETs at Risk of Poverty or Exclusion, the programme sets out a package designed expressly for Roma NEETs aged up to 29 years old. It promises professional training adapted to occupations where Roma already possess comparative advantages (e.g. trade, recycling, music, and culture), wage subsidies for private firms that hire Roma, and start-up grants for Roma who wish to become self-employed. The EU budget earmarked for ESO 4.12 is 80.7 million EUR; while this money is not reserved exclusively for Roma, they are named as a primary beneficiary group and can therefore theoretically absorb a significant share.

Priority 6, Specific Objective ESO 4.13 (Food and Basic Material Assistance/ TEBA), continues the large-scale distribution of food parcels and hygiene items to households in extreme poverty. Programme statistics from 2017 to 2021 show that Roma formed a steadily increasing share of beneficiaries; the new period maintains this entitlement and complements it with 'accompanying measures' (language courses, counselling, and referral to activation schemes). The TEBA allocation amounts to roughly 360 million EUR, and Roma households that meet the income criteria can draw directly on this support.

Finally, Roma CSOs, unions and community associations can improve their managerial capacity through Priority 1 (Horizontal and Systemic Actions), which reserves about 24 million EUR for the institutional strengthening of social partners and civil-society organisations; that, in turn, should enable Roma actors to participate more effectively in project design and monitoring throughout the whole programme cycle.

In sum, Roma are woven into the programme's logic at every stage where exclusion, poverty and youth unemployment are tackled. They may benefit from pilot social innovation grants under Priority 4, the broad Youth Guarantee envelope of almost 670 million EUR under Priority 5, a further 80 million EUR for targeted NEET inclusion actions that specifically cite Roma, and the country-wide TEBA scheme worth approximately 360 million EUR. Parallel capacity-building funds under Priority 1 ensure that Roma organisations themselves are equipped to manage, implement, and monitor these investments.

Having said this, the promised support has yet to materialise in reality: no concrete funding allocations, measurable financial investments, or targeted project calls for Roma or those including Roma are evident so far. The amounts earmarked for Roma inclusion - highlighted across a range of regional Operational Programs - illustrate the theoretical scale of support available. Yet the question remains how quickly and effectively those sums can be translated into tangible outcomes once the calls finally open. Timing is critical, given the finite window for committing and disbursing EU cohesion funds. As the midterm review phase approaches, some observers express concern that late publication of calls may compress implementation schedules, potentially reducing project quality or risking under-expenditure.

According to the NRCP, the NRSF is essential for effectively leveraging EU funds aimed at Roma inclusion. However, projects targeting Roma communities are frequently integrated into broader policy frameworks, making it challenging to determine the precise extent of funding that directly benefits Roma populations. This issue is exacerbated by the complexity of Greek administrative structures and the multitude of EU-funded operational programmes, whether sectoral or regional, which complicate the tracking of allocations specifically designated for Roma-related measures.

The NRCP already in 2022 invited the local authorities to prepare Local Action Plans for Roma Inclusion, Equality and Participation (LAPs). These plans aim to plan actions at local level and are linked to the funding of projects under the programming period 2021-2027 (ESF+ and ERDF). For this reason, they should contain targeted proposals with specific funding and timing in the areas of education, access to employment and healthcare, as well as for improving the living conditions of Roma citizens. So far, of the 145 municipalities that have declared that Roma populations live within their administrative boundaries, more than half have sent their LAPs. Under

the Regional Operational Programmes, municipalities cannot access funding until their Local Action Plans (LAPs) are approved. Yet it remains unclear how many LAPs have received approval and what progress, if any, has been made in helping municipalities refine or strengthen them.

Despite the detailed budget outlines provided by the Ministry and regional authorities, the practical rollout of calls remains static. The large majority of the anticipated calls have not yet been launched, despite almost half of the funding period having elapsed. The only call in most regions that has opened and secured funding through ESF+ regional programmes are the Community Centres with or without Roma Branches. These are calls published by the regions with municipalities as beneficiaries. This creates significant concern among municipalities and other stakeholders who must wait for the official calls to be published, and all planning remains theoretical. The situation is particularly pronounced in areas such as housing, where infrastructural upgrades, relocation initiatives, or improvements to existing settlements require long lead times and close coordination among multiple levels of government.

From the perspective of many Roma communities, the lack of open calls and the limited capacities of potential beneficiaries to apply for these calls once they are open represent another missed opportunity for meaningful investment in education programs, employment pathways, or structural improvements to living conditions. The only call opened at the time of writing this report concerns the Roma Branches of the community centres in municipalities, within the Regional ESF+ funding programmes.

The establishment of certain Roma Branches in close proximity to segregated Roma settlements - ostensibly to facilitate access for residents - raises significant concerns as to why the local authorities do not invest, for example, in better access to means of public transport to develop more links and desegregate these communities. At the most fundamental level, clustering services in marginalised areas can inadvertently perpetuate spatial and social segregation, rather than promoting meaningful integration within the broader urban environment. What is even more troubling is that early in their conceptualisation, Roma Branches were instructed to be foundered near the Roma settlements/localities by the central government itself. This guidance was later updated in 2023, stipulating that:

"It is recommended that the Roma Branch be located in the Roma concentration area (enclave, settlement, camp, etc.). In areas where high concentrations of Roma are found, more than one Branch may operate near the Roma concentration points. The more specific/specialised services provided by the Roma branches." ¹⁵¹

Situating these service points away from the mainstream community centres, which are typically located within the established urban fabric, not only violates the Charter, but is counterproductive to inclusion, equality and participation. Rather than anchoring these branches within segregated zones, channelling EU resources to integrate Roma-focused support within mainstream community centres could better reflect these norms. Doing so would not only fulfil the legal requirements of EU funding instruments but also more robustly advance the aim of dismantling entrenched inequalities and bridging the gap between marginalised groups and the general population.

4.2. Roma civil society in EU funds implementation

On a positive note, there are signs of engagement by Roma civil society in the monitoring committees for the regional and sectoral programs. Formal confirmations state that the Confederation of Greek Roma, Ellan Passe holds voting rights in these bodies. However, their capacity and knowledge on how to influence funding priorities or expedite the launch of calls are limited. Nonetheless, the principle of structured Roma participation, accompanied by plans to foster 'capacity building' for Roma and other civil society groups, retains the potential to bolster the inclusiveness and responsiveness of these programmes once further calls become operational.

If Greece is to realise the ambitious targets set out in the National Roma Strategic Framework (2021–2030), the next months will be pivotal. Ensuring that all pending calls are opened promptly would allow local

¹⁵⁰ Municipality of Athens. (n.d.). *Guide for the Implementation and Operation of Athens Community Centers* (pp. 10–11) [in Greek]. Available at: https://tinyurl.com/ms6jtz6v

¹⁵¹ ESF Actions Coordination and Monitoring Authority (EYSEKT). (January 2024). *Community Centers Implementation and Operation Guide – Updated* [in Greek]. Available at: https://www.espa.gr/el/Pages/elibraryFS.aspx?item=2606

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governments and civil society organisations to submit much-needed proposals in sectors such as housing, education, and employment, taking advantage of resources already approved in principle. Such acceleration, complemented by technical support for municipalities in formulating projects and capacity building for Roma and Pro-Roma CSOs, could help sustain momentum and prevent the unfortunate outcome of unspent and misspent funds. Ultimately, turning the existing theoretical approvals and allocated budgets into actionable projects will be decisive for fulfilling the Roma inclusion commitments that Greece has embedded in its ESF+ and ERDF allocations.

The establishment of the Roma Forum could serve as an important corrective by creating a structured platform for direct Roma input. Its potential effectiveness, however, will depend on several factors: the extent to which it receives genuine decision-making authority, the consistency with which it is involved in every phase of programme development, and the capacity of Roma participants and their representatives to engage on equal footing with national and regional authorities. Should the Forum be relegated to a purely consultative or symbolic role, it will neither remedy the GNCHR's critique nor ensure that EU funding mechanisms reflect grassroots priorities.

In a broader sense, the question of Roma participation is crucial for the integrity and sustainability of EU-funded measures, including those under instruments such as the ESF+ and the broader cohesion policy framework. If the Roma Forum assumes a substantive role in monitoring and guiding the allocation of these resources, then the principles of inclusivity and equitable governance could more concretely translate into on-the-ground improvements in Roma communities. Conversely, continued marginalisation in decision-making risks exacerbating inequalities and undermining the credibility of national and EU-level commitments to social cohesion. It thus remains to be seen whether the Roma Forum will act as an effective catalyst for ensuring that the NSRF, alongside EU funds, truly addresses and rectifies the deep-seated barriers facing Roma communities and to what extent a state-level Roma Forum will be able to comprehend and consult on local level issues, which are paramount for Roma inclusion, equality and participation.

CONCLUSIONS AND RECOMMENDATIONS

The implementation of the NRSF so far has revealed a pattern of delayed local adoption, despite robust national commitments. Although the framework's design is relatively strong, much of its success depends on effective engagement from municipalities. Many local authorities have yet to draft or implement Local Action Plans, including budget allocations. This delay creates a clear gap between the national objectives outlined in the NRSF and the actual progress on the ground. Compounding this issue is the lack of meaningful enforcement and incentives; there are few mechanisms to compel reluctant municipalities to address Roma integration, particularly in housing matters. Despite the availability of EU and national funds, local projects are frequently stalled by lack of political will or limited capacity: regarding the formerly emblematic and much publicised Katerini relocation project for example, FRA (one of the development partners in the project) noted in 2020 the "limited administrative resources and capacity, including technical expertise, both at national level (General Secretariat for Social Solidarity and Combatting Poverty) and at municipal level (Municipality of Katerini)". ¹⁵²

A further obstacle lies in the uneven alignment of all stakeholders, including line ministries, local authorities, civil society, and Roma communities themselves. While new monitoring bodies, such as the National Advisory Committee, the Forum Roma, and the NRSF Observatory, are being established, they lack fully developed mandates and clear reporting procedures. This institutional ambiguity weakens the collective effort to coordinate and implement the strategy effectively.

The lack of disaggregated data, especially relating to forced evictions, school segregation, employment and health indicators, undermines evidence-based policymaking. Although the NRSF envisions an indicator system aligned with EU/FRA frameworks, translating this into practice remains unfinished. Funding mechanisms are also underutilised. Delays in finalising allocations from instruments like ESF+ and ERDF create further uncertainty, and the absence of detailed timelines and resource mapping hampers efforts to keep both mainstream and targeted measures for Roma at the forefront of local policy agendas.

Lastly, a problem encountered by the authors of the present study was the lack of access to potentially crucial information held by either Greek authorities or the FRA/EEA grants FMO (Financial Mechanism Office). Regarding the former, a request for access to an evaluation of the NRSF's implementation to date has gone unanswered for months. As to the latter, while to its credit, FRA disclosed a wealth of (highly redacted) documents, FMO was against the disclosure of relevant (and presumably critical of the Greek authorities) materials.

Recommendations to National Authorities

To strengthen Local Implementation and Accountability:

- 1. Require each municipality with a Roma population to adopt a Local Action Plan (LAP) within a specified timeframe and ensure that the LAPs are approved by the municipal council and published in the transparency portal (Diavgeia).
- 2. Establish enforceable criteria for approving these plans, ensuring that they feature clear goals, timelines, budgetary commitments and genuine consultation procedures with the affected Roma communities. One suggestion could be introducing national 'enabling conditions' for example, setting a percentage of mandatory investment on Roma in each project funded under ESF+, ERDF, or national funds, incentivising local authorities to comply with the NRSF.
- 3. Oblige municipalities to publish annual progress updates on the implementation of their LAPs.
- 4. Encourage citizen oversight by making these reports easily accessible (e.g., on Diavgeia or municipal websites) and by establishing complaint/feedback mechanisms.
- 5. Add a municipal representation to the national working group on Roma reporting, which should collaborate with the national Statistics Office and the FRA.
- 6. Add a capacity-building mechanism to municipalities, focused on Roma-relevant indicators and reporting.

¹⁵² European Union Agency for Fundamental Rights (FRA). (2020). *Annual Reporting, April 2019–March 2020* [on file with the authors].

- 7. Provide targeted technical assistance and capacity-building resources (for example, a 'Rapid Response Team' under the NRCP) to municipalities that show genuine willingness but lack expertise.
- 8. If a municipality repeatedly fails to act or mismanages funds, empower the central administration (in close consultation with a body such as the Advisory Committee on Roma) to intervene directly or to reallocate resources to more effective projects.
- 9. Offer spaces for mutual learning and exchange of experiences between local authorities.

To Enhance Mechanisms for Preventing Forced Evictions:

- 10. Include clear legal obligations for local authorities according to legal obligations as established by Greek constitutional provisions and international standards of social rights to propose suitable, alternative accommodation or rent-support schemes before any demolition.
- 11. Strengthen Article 159 of Law no. 4483/2017 by spelling out enforceable rules on relocation, community involvement, grievance redress, and post-relocation support.
- 12. Mandate that local governmental authorities conduct a comprehensive assessment of the ramifications associated with the recurrent imposition of fines and prosecutions for alleged acts of 'illegal occupation' or electricity theft. Furthermore, require the adoption of a reparative justice framework by enacting statutory provisions that effectively pardon and nullify all preceding fines and criminal penalties imposed under such charges.
- 13. Develop, in collaboration with the Ministry of Interior, an amnesty or reduced-fine scheme for impoverished households with no housing alternatives, ensuring that vulnerable families are not permanently indebted.
- 14. Create a specific working group on forced evictions and housing within the Governmental and Advisory Committees, bringing together the NRCP, Ombudsperson's Office, Roma CSOs, and relevant ministries (Interior, Health, Environment). Municipal representation, likely from champions of change, should be ensured.

To Ensure Robust Data Collection and Monitoring:

- 15. In line with recent CERD recommendations, systematically gather disaggregated data on housing, education, employment, and health, ensuring adherence to privacy and self-identification standards.
- 16. Centralise data in a secure platform (NRSF Observatory or equivalent), so policymakers can regularly track progress and identify areas in need of urgent intervention.
- 17. Finalise the set of structural, process, and outcome indicators aligned with EU/FRA guidance. Provide formal training for municipal staff, Roma mediators, and civil servants on how to collect and report data accurately.
- 18. Release an annual 'Implementation Scorecard' detailing progress on key indicators, including forced evictions, school dropout and attendance rates, mainstreaming in health services, and employment outcomes
- 19. Involve the Advisory Committee and Forum Roma in shaping the scorecard's content and in verifying findings through community consultations.

To Deepen Inter-Ministerial Coordination and Empower the National Contact Point:

- 20. Formally designate high-level focal points in the relevant line ministry with explicit mandates related to Roma inclusion, ensuring each ministry develops sector-specific action steps that are compatible with the NRSF.
- 21. Introduce routine inter-ministerial meetings, mandated at least quarterly, to expedite decisions on funding and policy alignment.
- 22. Increase staff and budget for the NRCP to enable it to conduct field visits, provide technical assistance, and oversee large-scale data projects.
- 23. Instruct line ministries to treat NRCP guidance as binding for Roma-related interventions, ensuring that local authorities receive consistent messages from all State institutions.

To Support Effective Roma Participation in Decision-Making:

- 24. Clearly define how these bodies shape policy design, oversee LAPs, and review national-level progress reports.
- 25. Provide them with operational budgets covering travel, capacity-building, and communication, especially for smaller or grassroots Roma CSOs.
- 26. Introduce small grants for grassroots projects (e.g., community-based tutoring, micro-credit for Roma entrepreneurs, local advocacy campaigns) to stimulate bottom-up solutions.
- 27. Encourage municipalities to collaborate closely with the affected Roma communities and ensure joint decision-making processes when designing or revising local measures, ensuring that interventions reflect the community's needs.

Recommendations to European and Other International (e.g. EEA Grants FMO) Institutions

Link EU Funding to Concrete Implementation Milestones:

- 28. During approval of operational programmes under ESF+ and ERDF, the Greek authorities are required to meet explicit benchmarks, for example, a set percentage of municipalities adopting Local Action Plans with robust housing measures.
- 29. When reviewing midterm reports, verify that issues related to forced evictions and segregation have been genuinely addressed.

Facilitate Flexibility and Reallocation:

30. Provide the possibility for reassigning funds if certain municipalities or ministries fail to meet agreed targets, and encourage adaptive programming so that well-performing local authorities or CSOs can quickly receive increased funding where results are evident.

Bolster Technical Assistance and Peer Learning:

- 31. Foster forums or study visits where Greek municipalities can learn from cities elsewhere in the EU that have successfully tackled school segregation, forced evictions, or community-led housing initiatives.
- 32. Focus on supporting capacity-building for local authorities and Roma CSOs on data collection, fundraising, and impact evaluation.
- 33. Offer guidance and resources to ensure Greece's newly proposed indicator systems align with EU best practices.
- 34. Advocate that Greece disaggregates data in a manner consistent with EU privacy and self-identification standards to track better progress on equality, inclusion, and participation of Roma.
- 35. Adopt a proactive policy on the disclosure of documents/ correspondence with the Greek state authorities and publish regularly progress reports on the implementation of the NRSF.

Recommendations to the Civil Society

- 36. Actively track whether municipalities adhere to their Local Action Plans, if they exist, and push for adoption where such plans are lacking. Publicly raise cases of forced evictions or discriminatory school segregation practices, and consider strategic litigation or formal complaints to bodies like the Ombudsperson.
- 37. Collaborate with mainstream human rights CSOs, academics, and legal experts to amplify Roma voices in debates on forced evictions, youth unemployment, and environmental justice and pool resources for more consistent dialogue and unify demands when engaging the NRCP or government committees.
- 38. Train the next generation of Roma leaders in policy advocacy, project management, and communications, ensuring they can hold local authorities accountable and develop mentorship schemes that pair experienced activists with emerging community leaders.

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39. Strengthen ties with Roma mediators already working in education, employment, or healthcare, and ensure that feedback from mediators informs a broader evidence base for advocacy, particularly regarding day-to-day issues such as evictions or discrimination in public services.

Recommendations to Other Stakeholders

Academia and Research Institutes:

- 40. Collaborate with the NRCP and municipalities to design rigorous studies of existing measures (e.g., rent subsidies, vocational training).
- 41. Offer methodological assistance in creating a robust indicator system or evaluation framework for the NRSF.
- 42. Provide training modules on topics like housing rights, gender equity, and inclusive education for Roma mediators and local officials.
- 43. Publish periodic independent evaluations of NRSF measures, highlighting both good practices and persistent challenges.

Media and Communications Platforms:

- 44. Shed light on positive local models, such as effective rent-subsidy schemes or successful integration in schools, alongside investigative reporting on forced evictions or segregated settlements.
- 45. Promote constructive dialogues between local authorities, Roma communities, and the general public, debunking stereotypes and promoting evidence-based debate.
- 46. Work with Roma CSOs to design campaigns that highlight Roma contributions to Greek cultural heritage, thereby countering antigypsyism and negative stereotypes against Roma.
- 47. Utilise accessible formats (radio, social media, and TV short segments) to reach both Roma communities and the broader public, promoting awareness and recognition of shared interests.

Foundations and Private Donors:

- 48. Offer micro-grants enabling small-scale pilot solutions in housing, education, or employment (e.g., community-managed savings and loans, sports and arts programmes for Roma youth).
- 49. Encourage the documentation and dissemination of success stories, which inspire replication in other municipalities.
- 50. Identify areas where EU or national funds are not reaching, such as legal aid for families facing eviction or specialised programmes for Roma with disabilities, and invest strategically to fill those gaps.
- 51. Provide long-term core funding for established Roma-led organisations to strengthen their institutional capacity and advocacy efforts.

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A written request was submitted to the Ministry of Education for the provision of information, but it was not answered.

Telephone interview with ESF+ Actions Coordination and Monitoring Authority

Telephone interview with human rights CSO, Greek Helsinki Monitor

Video interview with FMO/EEA Grants

In-person interview with a representative of the Roma community of Eastern Thessaloniki

In-person interview with a representative of the Roma community of Western Thessaloniki

In-person interview with a representative of the Roma community of Northern Athens

Telephone interview with a representative of the Roma community of Pieria

Telephone interview with a representative of the Roma community from one of the Ionian Islands

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ANNEXE I: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Hate-speech & racist harassment (online/offline)	critical	understood with limitations	present but insufficient	some targets but not relevant	Training for police & judiciary Hot-line & online portal opened but little publicity; no data on caseload. 3-1-4 (training of municipal staff) & 3-1-6 (public-sector awareness) – no follow-up data. 3-1-11 (Racist-Violence Police Depts) formally 'operational', but do not appear efficient; caseload not published. Observatory not running.
Racial profiling & police violence	critical	mentioned but not analysed sufficiently	absent	absent	3-1-8 (trust-building between prosecutors and communities) 3-1-13 (recording racist violence) & 3-1-14 (online hate monitoring) still 'under development' (NRCP letter, April 2025); zero disaggregated statistics on police use of force.
Under-reporting/ low trust in justice	critical	understood with limitations	present but insufficient	absent	3-1-12 (24/7 hotline & e-portal) No budget yet for victim-support offices promised under 3-1-8.
Media stereotyping/ stigmatising statistics	significant	mentioned but not analysed	absent	absent	No dedicated action:

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Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Lack of available and accessible preschool education and ECEC services for Roma	significant problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Various mainstream measures (with the exception of a support programme that was under planning when the NRSF was updated that would have a Roma focus; no further information is available) Lack of publicly available data on the nature of these measures/ their effectiveness/ outreach in Roma communities
High dropout rate before completion of primary education	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Roma-targeted, mainstream and mainstream-Roma focused measures Lack of publicly available data on the nature of measures/ their effectiveness/ outreach in Roma communities
Early leaving from secondary education	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Mainstream support measures. Lack of publicly available data on the nature of these measures/ their effectiveness/ outreach in Roma communities
Secondary education/ vocational	significant problem	identified and analysed sufficiently	adequate but with room for	absent	Roma-targeted, mainstream and mainstream-Roma focused measures Lack of publicly available data on the nature of measures/ their

training disconnected from labour market needs			improvement		effectiveness/ outreach in Roma communities
Education segregation of Roma pupils	critical problem	mentioned but not analysed sufficiently	present but insufficient	absent	No relevant measures identified in the NRSF; anecdotal evidence of such measures by regional education authorities Lack of publicly available data on the nature of measures/ their effectiveness/ outreach in Roma communities
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	significant problem	understood with limitations	absent	absent	No relevant measures identified in the NRSF; anecdotal evidence of such measures by regional education authorities Lack of publicly available data on the nature of measures/ their effectiveness/ outreach in Roma communities
Limited access to second- chance education, adult education, and lifelong learning	significant problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	Mainstream measures Lack of publicly available data on the nature of measures/ their effectiveness/ outreach in Roma communities

Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor access to or low effectiveness of public	significant problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream measures (mostly support measures/ training courses/ drawing up of an individual action plan for each unemployed person) – that said, some measures claim that they will have targeted actions for Roma
employment services					Roma-targeted measures: vocational training/ employment subsidies for Roma regarding some professions (e.g. work in the recycling field), promotion of entrepreneurship)
					Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Youth not in employment, education or training (NEET)	significant problem	understood with limitations	adequate but with room for improvement	relevant targets well defined	Mainstream measures (mostly support measures/ training courses/ drawing up of an individual action plan for each unemployed person) – that said, some measures claim that they will have targeted actions for Roma
					Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Poor access to	significant	understood with	adequate but	adequate but with	Mainstream and Roma-targeted measures
(re-)training, lifelong learning and skills development	problem	limitations	with room for improvement	room for improvement	Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Discrimination on the labour market by employers	significant problem	understood with limitations	present but insufficient	adequate but with room for improvement	Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities

Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	significant problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement	Mainstream and Roma-targeted measures (training courses, employment subsidies/ subsidies to Roma entrepreneurs) Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Lack of activation measures, employment support	significant problem	understood with limitations	present but insufficient	absent	Mainstream and Roma-targeted measures (the latter under planning when the NRSF was updated); these include the drawing up of an individual action plan, outselling, vocational training and rent subsidy to Roma) Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities

Healthcare

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor access to primary care	critical	identified & analysed	present but insufficient	absent	Targeted actions like mobile units and vaccination drives reached some settlements, especially during disease outbreaks, but structural gaps persist.
Documentation barriers	critical	understood with limitations	absent	absent	Despite the extension of the free healthcare to all uninsured citizens in 2016, many Roma are not aware of this possibility; moreover, access of many is hindered by lack [of] official documentation or permanent addresses.

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Low health literacy & mistrust	significant	mentioned but not analysed	present but insufficient	some but not relevant	Health mediator programmes lack stable funding and broad coverage.
Maternal & child health gaps	critical	mentioned but not analysed	absent	absent	Maternal and child health remains worrying, with inadequate prenatal care, higher infant mortality, and low vaccination coverage leading to preventable disease outbreak
Mental-health/ addiction services	significant	understood with limitations	absent	absent	Gaps in psychosocial support, anti-addiction services, and family counselling persist, further isolating many Roma communities from mainstream social services

Housing, essential services, and environmental justice

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor physical security of housing (ruined or slum housing)	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream (some of which are under planning) and Romatargeted measures (improvement of living conditions in settlement, rent subsidies, temporary settlement relocation) No significant living conditions improvement projects/ temporary settlement relocations carried out to date Lack of data regarding other measures (rent subsidies/ provision of social housing), their effectiveness/ outreach in Roma communities
Lack of access to drinking water	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream (some of which are under planning) and Romatargeted measures (improvement of living conditions in settlement, rent subsidies, temporary settlement relocation) No significant living conditions improvement project/ temporary settlement relocations carried out to date

					Data available only on number improvement of living conditions and temporary settlement relocation
Lack of access to sanitation	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream (some of which are under planning) and Romatargeted measures (improvement of living conditions in settlement, rent subsidies, temporary settlement relocation) No significant living conditions improvement projects/ temporary settlement relocations carried out to date Data available only on number improvement of living conditions and temporary settlement relocation
Lack of security of tenure (legal titles are not clear and secure)	critical problem	understood with limitations	adequate but with room for improvement	Absent	No measures foreseen (to be indirectly addressed through provision of housing/ temporary community relocation)
Lacking or limited access to social housing	critical problem	identified and analysed sufficiently	adequate but with room for improvement	Absent	Mainstream measures Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Overcrowding (available space/ room for families)	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream and Roma-targeted measures Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Housing-related indebtedness at levels which may cause eviction	critical problem	irrelevant	absent	Absent	Mainstream measures (on over-indebted households) Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities

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Housing in segregated settlements/ neighbourhoods	critical problem	understood with limitations	present but insufficient	Absent	No measures foreseen (to be indirectly addressed through provision of housing/ rent subsidies). Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities Concerns that temporary settlement relocation might perpetuate segregation
Housing in informal or illegal settlements/ neighbourhoods	critical problem	understood with limitations	present but insufficient	absent	No measures foreseen (to be indirectly addressed through provision of housing/ rent subsidies/ provision of social housing/ temporary settlement relocations).
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	critical problem	understood with limitations	present but insufficient	absent	No measures foreseen (to be indirectly addressed through provision of housing/ rent subsidies/ provision of social housing/ temporary settlement relocations).
Lack of relevant framework/ reluctance on the part of the central administration to oblige local authorities to implement Roma related housing projects	critical problem	irrelevant	absent	Absent	No measures foreseen

Exorbitant fines for illegal construction	critical problem	irrelevant	absent	Absent	No measures foreseen
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Social protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
High at-risk-of- poverty rate and material and social deprivation	critical problem	identified and analysed sufficiently	appropriate	relevant targets well defined	Mainstream measures (guaranteed minimum income/ shelters/ food banks/ participation in sports and cultural activities) Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Income support programmes fail to guarantee an acceptable level of minimum income for every household	critical problem	identified and analysed sufficiently	appropriate	adequate but with room for improvement	Mainstream measure but with some Roma-targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar)). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a need appraisal. Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Limited access to income support schemes (low awareness, barrier of administrative	significant problem	identified and analysed sufficiently	appropriate	adequate but with room for improvement	Mainstream measure but apparently with some Roma targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar)). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a need appraisal.

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burdens, stigma attached)					Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities
Low flexibility of income support programmes for addressing changing conditions of the household	significant problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	Mainstream measure but apparently with some Roma targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar)). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a need appraisal.
					Lack of publicly available data on the extent of these measures/ their effectiveness/ outreach in Roma communities

Social services

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Limited quality, capacity and comprehensiven ess of help provided by social services	critical problem	understood with limitations	adequate but with room for improvement	absent	Mainstream measures but apparently with some Roma targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a needs appraisal and referral to appropriate services.
					Continuing operation of the Roma Branches to the Community Centres; the latter keep statistics on number of beneficiaries/ types of assistance rendered which are not currently publicly available
Limited access	critical problem	understood with	adequate but	absent	Mainstream measure but apparently with some Roma targeting

to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability		limitations	with room for improvement		(under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a needs appraisal and referral to appropriate services. Continuing operation of the Roma Branches to the Community Centres; the latter keep statistics on number of beneficiaries/ types of assistance rendered which are not currently publicly available
Services providers do not actively reach out to those in need	critical problem	understood with limitations	adequate but with room for improvement	absent	Mainstream measure but apparently with some Roma targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar). The Municipal Social Service/ Community Centre will play a key role in providing information/ carrying out a needs appraisal and referral to appropriate services. Continuing operation of the Roma Branches to the Community Centres; the latter keep statistics on number of beneficiaries/ types of assistance rendered which are not currently publicly available
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	critical problem	understood with limitations	adequate but with room for improvement	absent	Mainstream measure but apparently with some Roma targeting (under planning when NRSF was updated: it will encompass guaranteed minimum income (first pillar)/ provision of information on other benefits e.g. housing benefit as well as goods (second pillar), plus referral to employment services (third pillar). The Municipal Social Service / Community Centre will play a key role in providing information/ carrying out a needs appraisal and referral to appropriate services. Continuing operation of the Roma Branches to the Community Centres; the latter keep statistics on number of beneficiaries/

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

					types of assistance rendered. It is expected that will have data on referrals to other agencies which are not currently publicly available.
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	critical problem	Irrelevant	absent	absent	Mainstream measures Continuing operation of the Roma Branches to the Community Centres; the latter keep statistics on number of beneficiaries/ types of assistance rendered. It is expected that under the measure under planning when the NRSF was updated, they will also provide legal support. It is expected that they will have data on cases where they provided legal support (when the measure outlined above will be adopted) which are not currently publicly available.

Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Early/ forced marriage	critical	mentioned but not analysed	present but insufficient	absent	Within the NRSF itself, relevant actions mostly address awareness campaigns on early marriage and children's rights (Measure 4.1.6).
Child begging/ street work	critical	identified & analysed	present but insufficient	absent	Within the NRSF itself, relevant actions mostly address child begging (Measure 1.2.6)
Over-representa tion in care	significant	understood with limitations	absent	absent	CSOs and observers note that Roma children are over-represented in public care (especially institutional care) relative to their population.
Lack of	significant	present but	some but not	adequate but with	Roma branches of municipal Community Centres are in charge for

after-school safe spaces		insufficient	relevant	room for improvement	the development of local interventions to strengthen the participation of Roma adolescents in experiential workshops (e.g. mother-child workshop), children's camps and kindergartens.
No Roma-sensitive juvenile justice	significant	irrelevant	absent	absent	Issues like child begging, early marriage, and children in conflict with the law receive nominal attention in the NRSF. Clear targets or monitoring are absent.

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:
Curriculum silence on Roma	significant	mentioned but not analysed	present but insufficient	some but not relevant	It includes a pilot project (Measure 2.1.14) to teach 'Romanes' in schools, involving curriculum development and teacher training for Greece's Romani dialects.
Limited funding for Roma culture	significant	understood with limitations	present but insufficient	absent	The NRSF plans to address this through awareness initiatives (Measure 3.1.1) like public meetings, Roma commemoration days, and cultural events.
Low media visibility/ positive narratives	significant	mentioned but not analysed	absent	absent	integration of Roma culture into national curricula or public awareness campaigns remains limited.

ANNEXE II: NRSF-RELATED 2021-2027 EU FUNDING ALLOCATIONS IN REGIONAL OPERATIONAL PROGRAMMES

These tables present allocated amounts but calls for beneficiaries are not open yet.

Region of Attica

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

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Budget	Actions
1,036,318	4.1.1 Action: Integrated programmes for the socio-economic integration of Roma into the community [Actions for labour market inclusion, housing assistance]
1,992,000	4.1.2 Action: Other support actions for the Roma to improve living conditions (Living Conditions Improvement Groups)
3,349,600	4.i.3 Action: Development of interventions to support Roma infants, school-age children/teenagers in experiential workshops and children's camps
500,000	4.1.4 Action: Capacity building for bodies/ agencies involved in social inclusion of Roma
2,050,000	4.i.5 Action: NEE (<i>Νέοι Ελεύθεροι Επαγγελματίες</i> / New Self-Employment) for employment and self-employment of Roma
1,069,372	4.1.6 Action: Actions to empower Roma women with the aim of combating multiple discrimination and enhancing their active participation in the labour market

Region of Eastern Macedonia and Thrace

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

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Budget	Actions
3 million	 Grant support for entrepreneurial employment initiatives for New Self-Employed (NEE) aged 20 to 44, belonging to marginalised social groups such as the Roma New job positions for marginalised social groups such as the Roma Integrated programmes for the integration of Roma into the labour market, including measures to tackle digital exclusion (counselling & training services, rent subsidy, awareness & information for the Roma population as well as the wider community, aiming at the beneficiaries' inclusion in employment)
2 million	Other support actions for the Roma to improve living conditions (Management Teams for resettlement areas and Living Conditions Improvement Groups)

ERDF/ Specific Objective 4.5: 'Ensuring Equal Access to Healthcare and Enhancing the Resilience of Healthcare Systems, Including Primary Healthcare, and Promoting the Transition from Institutional Care to Family- and Community-based Care' – Subsection: 'Creation, Expansion, and Modernisation of Social Welfare and Inclusion Infrastructures'

Budget	Actions
1 million	This type of action involves the construction of new and the upgrade of existing infrastructure (open-air, day-care), including the purchase of necessary equipment, for the social welfare of vulnerable population groups (PWD, Roma, migrants, people with intellectual disabilities and multiple disabilities, supported living for PWD, day care for PWD and children with disabilities of preschool age, etc.). Within this action, and depending on the maturity progress of identified needs, interventions may be further specified and included to integrate populations residing in particularly disadvantaged settlements in the Region of Eastern Macedonia and Thrace, such as the Roma. It is noted that these interventions (e.g., improvement of infrastructure and living conditions) will be part of integrated local plans, adhering to the principle of non-discrimination. It is noted that all ERDF actions for the Roma will be duly justified within the framework of the relevant Integrated Local Action Plan.

Region of North Aegean

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
1,500,000	Action 4.10.1 – Integrated programmes for the integration of the Roma into the labour market, including tackling digital exclusion and promoting employment (NEE, NOE).
800,000	Action 4.10.2 – Other support actions for the Roma to improve living conditions (Management Teams for resettlement areas and Living Conditions Improvement Groups)

Region of Western Greece

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
4,500,000	4B.i.1: Interventions to promote the active inclusion of the Roma: Integrated programmes and other actions for the integration of the Roma into the labour market
1,955,000	4B.i.2: Interventions to promote the active inclusion of the Roma: Creation of Management Teams for organised resettlement areas and Living Conditions Improvement Groups
495,000	4B.i.3: Interventions to promote the active inclusion of the Roma: Development of interventions to support Roma infants, school-age children/ teenagers in experiential workshops and children's camps
200,000	4B.i.4: Interventions to promote the active inclusion of the Roma: Capacity building for bodies/agencies involved in the social inclusion of Roma

ERDF/ Specific Objective 4.3:' Promotion of the Socio-Economic Integration of Marginalised Communities, Low-income Households, and Disadvantaged Groups, Including Persons with Disabilities, through Integrated Actions that Include Housing and Social Services'

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Budget	Actions
1,000,000	4A.iii.2: Infrastructure for Roma: Interventions to improve living conditions such as baths, laundries, etc.
1,000,000	4A.iii.2: Infrastructure for Roma: Other interventions in communal areas such as squares, etc.

Region of Central Macedonia

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
650,000	Support for the Roma to improve living conditions (Management Teams for resettlement areas and Living Conditions Improvement Groups)
3,000,000	NEE, NOE, and related actions for employment and self-employment focused on the Roma
1,050,000	Integrated programmes for the integration of the Roma into the labour market, including tackling digital exclusion
300,000	Capacity building for bodies/ agencies involved in the social inclusion of Roma

ERDF/ Specific Objective 4.5: 'Ensuring Equal Access to Healthcare and Enhancing the Resilience of Healthcare Systems, Including Primary Healthcare, and Promoting the Transition from Institutional Care to Family- and Community-Based care'

Budget	Actions
12,000,000	Infrastructure and equipment in the field of social infrastructure. These are developed in complementarity with the ESF+ actions of the Programme and include the following indicative types of projects: Modernisation of Social Welfare structures, EKKA, and Social Welfare Centres. Building infrastructure and procurement of equipment serving social
	inclusion structures, supported living for PWD and elderly (only Day-Care Centres). Projects to improve living conditions for marginalised communities, such as the Roma. All ERDF actions for the Roma will be duly justified in the context of the relevant Integrated Local Action Plan.

Region of Western Macedonia

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma"

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Budget	Actions
1,000,000	4B.10.01 Integrated interventions for the integration of the Roma into the labour market
1,000,000	4B.10.02 Support actions for the Roma to improve living conditions and/ or for resettlement
500,000	4B.10.03 Interventions to support Roma infants, children/ teenagers in experiential workshops
	and children's camps

ERDF/ Specific Objective 4.5: 'Ensuring Equal Access to Healthcare and Enhancing the Resilience of Healthcare Systems, Including Primary Healthcare, and Promoting the Transition from Institutional Care to Family- and Community-based Care' – Subsection: 'Creation, Expansion, and Modernisation of Social Welfare and Inclusion Infrastructures'

	
Budget	Actions

4,000,000	Development/ upgrading of social welfare infrastructure. This action aims at the development/improvement of facilities providing Social Welfare services to socially vulnerable groups, taking into account the National Strategy for Social Inclusion and Poverty Reduction. Indicative categories of actions: Creation and upgrading of infrastructure and equipment for
	social welfare of vulnerable population groups. This includes actions to strengthen the resilience of social welfare facilities to address crises (e.g., the COVID-19 pandemic). Actions to improve the accessibility of persons with disabilities in public infrastructure (public buildings, common areas, parks, squares). Actions to improve housing/living conditions for the Roma. These actions for the Roma will be duly justified under the relevant Integrated Local Action Plan and will have synergy/complementarity with the Roma actions supported by ESF+ under SO 4B.10 (4.1).

Region of Epirus

ESF+/ ESO 4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
600,000	4B.i.1: Interventions to promote the active inclusion of the Roma (Integrated Programmes for the integration of the Roma into the labour market)
350,000	4B.i.1: Interventions to promote the active inclusion of the Roma (Actions to improve the living conditions of the Roma)
50,000	4B.i.1: Interventions to promote the active inclusion of the Roma (Capacity building for bodies/agencies involved in the social inclusion of Roma)

ERDF/ Specific Objective 4.3: 'Promotion of the Socio-Economic Integration of Marginalised Communities, Low-Income Households, and Disadvantaged Groups, Including Persons with Disabilities, through Integrated Actions that Include Housing and Social Services'

Budget	Actions
500,000	4A.iii.2: Interventions to improve the living conditions of the Roma (Structure providing social services)
500,000	4A.iii.2: Interventions to improve the living conditions of the Roma (Small-scale interventions to improve the quality of life for the Roma)

Region of Thessaly

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
800,000	NEE, NOE, and related actions for employment and self-employment focused on the Roma
1,200,000	Integrated programmes for the integration of the Roma into the labour market, including tackling digital exclusion
500,000	Support actions for the Roma: Living Conditions Improvement Groups, Management Teams for organised resettlement areas
500,000	Development of interventions to support Roma infants, school-age children/ teenagers in experiential workshops and children's camps
220,000	Capacity building for bodies/ agencies involved in the social inclusion of Roma

ERDF/ Specific Objective 4.5: 'Ensuring Equal Access to Healthcare and Enhancing the Resilience of Healthcare Systems, Including Primary Healthcare, and Promoting the Transition from Institutional Care to Family- and Community-based Care' – Subsection: 'Creation, Expansion, and Modernisation of Social Welfare and Inclusion Infrastructures'

Budget	Actions
3,000,000	Interventions under Integrated Local Action Plans for the inclusion of Roma at local level

Region of the Ionian Islands

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

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Budget	Actions
1,000,000	4B.(ı).1: Interventions to promote the active inclusion of the Roma: Programmes for the integration of the Roma into the labour market
1,200,000	4B.(ı).1: Interventions to promote the active inclusion of the Roma: Actions to improve living conditions
69,172	4B.(ı).1: Interventions to promote the active inclusion of the Roma: Capacity building for bodies/agencies involved in social inclusion of Roma

Region of South Aegean

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Actions
Δ .5.8. Interventions for the social inclusion of the Roma, such as Living Conditions Improvement
& Organised Resettlement Site Management Teams/ Improving housing conditions/ Rent subsidy
Δ.5.9. Integrated programmes for the integration of the Roma into the labour market, including the fight against digital exclusion

Region of Crete

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

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Budget	Actions	
850,000	Support for Roma Self-Employment (NOE)	
850,000	Integrated programmes for the integration of the Roma into the labour market	
1,275,000	Roma Living Conditions Improvement Groups	

Region of Peloponnese

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
2,094,118	NEE, NOE, and similar actions for employment and self-employment focused on the Roma
423,529	Integrated programmes for the integration of the Roma into the labour market, including tackling digital exclusion
423,529	Development of interventions to support Roma infants, school-age children/ teenagers in experiential workshops and children's camps
94,118	Capacity building for entities implementing actions for the Roma

ERDF/ Specific Objective 4.3: 'Promotion of the Socio-Economic Integration of Marginalised Communities, Low-Income Households, and Disadvantaged Groups, Including Persons with Disabilities, through Integrated Actions that Include Housing and Social Services'

Budget	Actions
5,734,502	This Specific Objective is expected to contribute to the upgrade and expansion of infrastructure for strengthening social cohesion and active inclusion, with emphasis on vulnerable social groups and marginalised communities (low-income households, substance abusers, ex-prisoners, homeless persons, people with disabilities, Roma, etc.). Within this framework, the following categories of actions are foreseen: Creation, expansion, and modernisation of social welfare and inclusion infrastructures. All investments will follow the principles of eliminating segregation and prohibiting discrimination and aim at promoting equal access to basic services without exclusions for all marginalised groups, such as the Roma, persons with disabilities, people with a migrant background, etc., which will also serve as selection criteria for the projects. All services and/or investments will address all
	marginalised groups and must not maintain or lead to segregation and their isolation.

Region of Central Greece (Sterea Ellada)

ESF+/ ESO4.10: 'Promotion of the Socio-Economic Integration of Marginalised Communities such as the Roma'

Budget	Actions
352,941	4.i.1 – Integrated programmes for the socio-economic integration of the Roma in the
	community [Actions for labour market inclusion, housing assistance]
1,245,000	4.1.2 – Other support actions for the Roma to improve living conditions (Living Conditions
	Improvement Groups)
495,000	4.1.3 – Development of interventions to support Roma infants, school-age children/ teenagers
	in experiential workshops and children's camps
588,235	4.1.4 – Capacity building for bodies/ agencies involved in the social inclusion of Roma
588,235	4.1.5 – NEE for employment and self-employment for Roma
588,235	4.1.6 – Actions to empower Roma women with the aim of combating multiple discrimination
	and enhancing their active participation in the labour market

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