



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

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of the national strategic framework
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LIST OF ABBREVIATIONS

AfD	Alternative for Germany
AGG	General Equal Treatment Act
FADA	Federal Anti-Discrimination Agency (the National Equality Body)
BAMF	Federal Office for Migration and Refugees
BMBF	Federal Ministry for Education and Research
BMBFSFJ	Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth
BVSR	Federal Association of Sinti and Roma
CDU	Christian Democratic Union of Germany
CS	Civil Society
CSO	Civil Society Organisation
CSU	Christian Social Union of Bavaria
DeZIM	German Center for Integration and Migration Research
EHIC	European Health Insurance Card
ERDF	European Regional Development Fund
ESF	European Social Fund
EVZ	Foundation Remembrance, Responsibility, and Future
EURSF	European Roma Strategic Framework
FDP	Free Democratic Party
FEAD	Fund for European Aid to the Most Deprived
FRA	Fundamental Rights Agency
IntMK	Conference of the Ministers of Integration of the Länder
KMK	Standing Conference of the Ministers of Education and Cultural Affairs
LADS	Berlin State Office for Equal Treatment and against Discrimination
MEP	Member of European Parliament
MIA	Reporting and Information Centre on Antigypsyism
MP	Member of Parliament
NAP	National Action Plan on Combating Racism
NPD	National Democratic Party of Germany
NRCP	National Roma Contact Point
NRFS	National Roma Framework Strategy
PMK	Politically Motivated Crime
RCM	Roma Civil Monitor
SchulG	Berlin School Act
SPD	Social Democratic Party of Germany
UKA	Independent Commission on Antigypsyism

EXECUTIVE SUMMARY

Sinti and Roma continue to experience pervasive patterns of antigypsyism and discrimination across all aspects of life, including education, employment, housing, and interactions with police and public authorities. The rise of right-wing extremism, including within political party systems, is reflected in the increasing antigypsyism faced by these communities. Antigypsyist rhetoric at public gatherings and major events, such as football matches in stadiums, alongside propaganda from right-wing parties, further poisons the social climate and incites violence against Sinti and Roma. Minority members face discrimination in every societal sphere - at school, in the labour and housing markets, and in their interactions with police and public administration. Antigypsyism remains a central aspect of daily life for Sinti and Roma in Germany.

Despite these challenges, positive developments, including various efforts by the Federal Government, should be stressed. The Federal Commissioner against Antigypsyism, Mehmet Daimagüler, has made remarkable efforts in the fight against antigypsyism at the highest political levels. He has contributed, together with the Central Council of German Sinti and Roma, to the adoption of a resolution by the *Bundestag* (German Parliament) on 14 December 2023 (BT-Drs. 20/9779), which demanded 27 measures of the Government to address and improve the situation of Sinti and Roma in Germany.

A further milestone is the establishment of the *Bund-Länder-Kommission*, a governmental commission composed of representatives from the central government and the *Länder* (regions). The commission has been established by the Commissioner against Antigypsyism and is intended to serve as a crucial platform for exchanging information and creating initiatives in the fight against antigypsyism and promoting the rights of Sinti and Roma. This is of great relevance because critical decisions in various policy fields (e.g. education, public administration) are taken at the regional level.

It should also be noted that the Conference of the Ministers of Integration of the *Länder* (IntMK) adopted a resolution highlighting the necessity of ensuring the participation of Sinti and Roma at federal, state, and local levels, as well as identifying further opportunities for strengthening the political participation and empowerment of Sinti and Roma. The IntMK also recommends that scientific research on antigypsyism be conducted to shed light on the dark field of antigypsyist incidents and phenomena. It points out that monitoring through the civil society should play a key role in documenting experiences of discrimination. CSOs can document and carry out monitoring of antigypsyist incidents, thereby contributing to making antigypsyism more visible in German society.

Furthermore, the Federal Anti-Discrimination Agency (FADA) has started a consultation with organisations of Sinti and Roma on data collection on antigypsyist discrimination. This consultation platform is of great relevance because data collection is rejected by the communities, especially by German Sinti and Roma because of the history of persecution of the community during the Nazi regime and of stigmatisation after 1945. As a result of the consultation, the FADA will develop quality standards for collecting data on antigypsyist discrimination. The main result of the ongoing consultation with the communities is that no data collection will be accepted which would allow the collection of personal data of Sinti and Roma that could be misused to persecute the minority, e.g. how many and where Sinti and Roma live, work or attend school.

Despite these positive policy developments, Sinti and Roma continue facing antigypsyism. The Reporting and Information Centre on Antigypsyism (MIA) has documented 1,233¹ antigypsyist incidents in 2023 and 1,678 incidents in 2024.² Sinti and Roma face mostly antigypsyism and discrimination at school, at the labour and housing markets, in their neighbourhoods and in their interaction with public administration. There is also an increase in antigypsyist crimes. According to the statistics on politically motivated crime (PMK), antigypsyist crimes increased from 151 cases in 2022 to 171 in 2023.

¹ MIA – Monitoringstelle für Antiziganismus [Monitoring Centre for Antigypsyism]. (2024). *Jahresbericht 2023* [Annual Report 2023]. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

² MIA – Monitoringstelle für Antiziganismus [Monitoring Centre for Antigypsyism]. (2025). *Jahresbericht 2024* [Annual Report 2024]. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2025/06/MIA-JB-2024.pdf>

Countering antigypsyism in the police still presents a significant challenge for governmental decision makers and civil society. Antigypsyism in the police is reflected through discrimination, disproportionate use of force, racial profiling, the stigmatisation of Sinti and Roma communities in external communications and the continued 'special registration' of members of the minority by the police. A particularly damning and frequently reported form of this police suspicion is in cases where police forces did not take Sinti or Roma seriously as victims of crime, trivialised crimes with antigypsyist content or, in the worst case, even investigated the reporting Sinti and Roma instead of the suspects perpetrator-(victim-reversal).

The situation of Ukrainian Roma refugees continues to be dire, especially regarding the safeguarding of refugees and equality rights. They face everyday discrimination, which is reflected in the lack of or limited access of these people to decent housing, education, social benefits and other assistance and services. Ukrainian Roma refugees face discriminatory treatment by police officers, employees of *Deutsche Bahn* (German Railways), in administration, in social work, and in the education sector. Refugee Roma have the same rights and the same legitimate claim to support as their Ukrainian compatriots who are also seeking protection in Germany. Nevertheless, this equal protection is often denied to Ukrainian Roma refugees.

At the policy level, there have been significant setbacks, notably the substantial reduction in funding for the MIA by the Federal Ministry for Family, Elderly People, Women, and Youth (BMBFSFJ), which would have led to its closure. With the support of the Commissioner against Antigypsyism and the Central Council of German Sinti and Roma, MIA successfully carried out an advocacy campaign to convince the German Parliament to continue funding MIA.

INTRODUCTION

National Roma strategic framework

The 'Fighting Antigypsyism, Ensuring Participation! Towards the Implementation of the EU-Roma Strategy 2030 in Germany' Strategy (NRSF),³ has the character of a measure package. That means it is a compilation of existing measures aimed at the inclusion of disadvantaged Sinti and Roma and at combating antigypsyism. It lacks a clear strategy with defined goals, objectives, activities, and success indicators. Since its adoption, no changes have been introduced into its implementation; no action plans have been developed. The novelty of the NRSF is that there are new relevant measures, such as the appointment of the Commissioner against Antigypsyism, the creation of the Reporting and Information Centre on Antigypsyism (MIA) in 2022 and the moving of the National Roma Contact Point (NRCP) from the Federal Ministry of Home Affairs to the Federal Ministry for Family, Elderly People, Women and Youth (BMBFSFJ) providing it with more resources and staff. The most important impulses for designing and implementing measures have been given by the Commissioner against Antigypsyism.

For decades, the German Government has acted towards Sinti and Roma at the national, state, and local levels without any coherent strategy. There are a large number of cooperation agreements, policies, and measures. Regional associations of Sinti and Roma have state contracts; minority organisations obtain institutional or project-related funding. There are programmes, such as 'Live Democracy!';⁴ through which projects addressing antigypsyism or fostering the rights and culture of Sinti and Roma are funded. These policies, programmes, initiatives and measures are in line with the EU Roma Strategic Framework (EURSF) but have not been implemented in the framework of the NRSF. Until now, the NRSF has not played a significant role either among organisations of Sinti and Roma or in discourses of state representatives. This might change as the *Bund-Länder-Kommission*⁵ stated that it will contribute to the further development of the NRSF.

About this report

Several Sinti and Roma organisations and CSOs working with them were interviewed for this report. This monitoring report relies on qualitative secondary research analysis of studies and policy literature as well as on interviews with stakeholders.

The following documents have been analysed: policy documents, parliamentary enquiries, reports from municipal administrations, civil society organisations (CSOs) and studies of research centres. Nine semi-structured interviews have been conducted with representatives of organisations of Sinti and Roma, other CSOs, NRCP, ministries, and the FADA. Two focus groups, one on education and one on employment, housing, and health, were conducted, gathering representatives from Sinti and Roma activists in nine cities. Furthermore, the authors have participated in conferences and workshops where they gathered information and discussed various policy fields addressed in this report.

This report has been also the result of discussions among the coalition members: Central Council of German Sinti, and Roma (Heidelberg), Documentation and Cultural Centre of German Sinti, and Roma (Heidelberg), *Roma Förderverein* [Roma Support Association] (Frankfurt am Main), *Roma Büro* [Roma Office] (Freiburg), *Amaro Drom* [Our Way] (Berlin), *Amaro Foro* [Our City] (Berlin), *Sozialfabrik* [Social Factory] (Berlin), *Romano Sumnal* [Roma

³ Federal Government of Germany. (2022). *National Strategic Framework for Equality, Inclusion and Participation of Sinti and Roma in Germany (2022–2030)*. Available at: https://commission.europa.eu/system/files/2022-10/1_1_german_national_strategic_framework_2022-2030.pdf

⁴ Federal Ministry for Family Affairs, Senior Citizens, Women and Youth [Bundesministerium für Familie, Senioren, Frauen und Jugend – BMBFSFJ]. (n.d.). *Demokratie leben! – Active for Democracy and Against Extremism, Violence and Misanthropy*. Available at: <https://www.bmfsfj.de/resource/blob/93488/e2475074ed5761fddd1bfa619e68d123/demokratie-leben-aktiv-gegen-rechtsextremismus-gewalt-und-menschenfeindlichkeit-englische-version-data.pdf>

⁵ Federal-State Commission is a formal cooperation body between the German federal government (*Bund*) and the 16 federal states (*Länder*). Its purpose was to coordinate policies and jointly manage responsibilities in areas such as education, research, and science funding—fields that are primarily managed by the states but often require federal support.

Identity] (Leipzig), and the Reporting and Information Office on Antigypsyism (Berlin). MIA joined the consortium in 2024.

Jonathan Mack (Central Council of German Sinti and Roma) and Thomas Erbel (Amaro Drom) assumed the coordination, while Sozialfabrik took the lead in developing the report.

1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

1.1.1. Changes in the NRSF

No changes have been introduced into the NRSF since its adoption in 2022.

1.1.2. Progress in implementation

To review the most important developments regarding the fight against antigypsyism and the inclusion of disadvantaged Sinti and Roma, it is feasible to broaden the view beyond the stipulations in the NRSF.

The most important development is the adoption of a resolution on the recommendations of the Independent Commission on Antigypsyism (UKA) by the *Bundestag* [German Parliament] on 14 December 2023.⁶ The motion was submitted by the SPD, CDU/CSU, Alliance 90/The Greens and the FDP factions. It should be stressed that this resolution was approved by governmental and opposition parties, with the exception of the AfD. It contains 27 demands that were formulated to implement some of the recommendations of the UKA, aiming at combating antigypsyism and promoting equal treatment of Sinti and Roma in Germany.

A further milestone is the establishment of the *Bund-Länder-Kommission* on antigypsyism in June 2024,⁷ a governmental commission composed of representatives from the central government and the *Länder* (federal states). The commission was established by the Commissioner against Antigypsyism and was set up by the Prime Minister's Conference. The tasks of the Commission are, among others, to maintain the mutual exchange of information about federal and state measures; to raise awareness on antigypsyism in the society; to develop recommendations for preventing and combating antigypsyism, for the protection of Sinti and Roma, for their visibility in the economy, culture and society, for the preservation and maintenance of their cultural life and for their equal participation; to contribute with recommendations to the work of remembrance of the genocide of Sinti and Roma under National Socialism and to the comprehensive coming to terms with the injustice committed against Sinti and Roma in Germany after 1945; to encourage and, if necessary, jointly prepare projects of supra-regional importance and to maintain international exchange in the fight against antigypsyism. The *Bund-Länder-Kommission* will contribute to the further development of the NRSF to implement the EURSF 2020-2030 in Germany.⁸ Its establishment is of great relevance because a high number of policies which concern the fight against antigypsyism and the life of Sinti and Roma are the competence of the *Länder*. Until now, there has been almost no coordination between the national and regional governments. It is expected that the *Bund-Länder-Kommission* will contribute to developing coherent policies aimed at combating antigypsyism and promoting the participation of Sinti and Roma.

The Commissioner against Antigypsyism, Mehmet Daimagüler, appointed in May 2022, has played a central role in driving measures combating antigypsyism and fostering participation of Sinti and Roma. The Commissioner coordinates the activities of the German Government regarding issues concerning Sinti and Roma and the fight against antigypsyism, taking part in various committees of ministries, national programmes,

⁶ Deutscher Bundestag [German Bundestag]. (2023). *Beschlussempfehlung und Bericht des Ausschusses für Inneres und Heimat (4. Ausschuss) zu der Unterrichtung durch die Bundesregierung – Drucksachen 19/30310, 20/1207 Nr. 4 – Bericht der Unabhängigen Kommission Antiziganismus Perspektivwechsel – Nachholende Gerechtigkeit – Partizipation* [Recommendation for a decision and report of the Committee on Internal Affairs and Homeland (4th Committee) on the information provided by the Federal Government – Parliamentary Papers 19/30310, 20/1207 No. 4 – Report of the Independent Commission on Antiziganism: Perspective Change – Restorative Justice – Participation]. Available at: <https://dserver.bundestag.de/btd/20/097/2009779.pdf>

⁷ Federal Ministry for Family Affairs, Senior Citizens, Women and Youth [Bundesministerium für Familie, Senioren, Frauen und Jugend – BMFSFJ]. (2024, December 2). *Ständige Bund-Länder-Kommission gegen Antiziganismus und für das Leben der Sinti und Roma nimmt Arbeit auf* [Permanent Federal-State Commission Against Antigypsyism and for the Life of Sinti and Roma Commences Work]. Available at: <https://www.bmfsfj.de/bmfsfj/staendige-bund-laender-kommission-gegen-antiziganismus-und-fuer-das-leben-der-sinti-und-roma-nimmt-arbeit-auf-250606>

⁸ Federal Ministry of the Interior and Community (2022) *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany*. Available at: https://commission.europa.eu/system/files/2022-10/1_1_german_national_strategic_framework_2022-2030.pdf

and agencies such as the Advisory Committee on Issues of Sinti and Roma at the Ministry of Interior, bringing the perspective of Sinti and Roma into the work of the German Government towards the minority. As co-chair of the Bund-Länder-Kommission, he pushes for the implementation of the UKA recommendations. Several initiatives have been launched under the Commissioner's leadership including the establishment of the Bund-Länder-Kommission, the funding of a media monitoring project (implemented by the Central Council), a Legal Aid Network against Antigypsyism (implemented by MIA), feasibility studies on the establishment of legal funds for victims of antigypsyism and the formation of a commission to investigate the injustices committed against Sinti and Roma after 1945. These measures have contributed to strengthening the fight against antigypsyism and to mainstreaming it among federal authorities. The Commissioner has also organised a large event '*Forum Sinti und Roma*' (Sinti and Roma Forum) in 2023 and 2024,⁹ gathering organisations of Sinti and Roma and state authorities addressing issues of relevance for the communities and in the fight against antigypsyism.¹⁰

One measure included in the NRSF and where progress has been made is the dialogue with civil society organisations coordinated by the Federal Anti-Discrimination Agency (FADA) on the possibilities and conditions for collecting equality data on the living situation of Sinti and Roma.¹¹ Towards the time of issuing this report in June 2025, this consultation process is lasting now one year and a half. Over 25 Sinti and Roma organisations participated in various consultation meetings. To reach Sinti and Roma organisations, MIA supports the FADA and co-organises three platform meetings. This dialogue process is of great importance as the communities in principle reject the collection of data on the minority due to the community's history of persecution during the Nazi regime. As a result, civil society demands and quality standards for the collection of anti-discrimination and equality data on discrimination against Sinti and Roma were developed. A key requirement is compliance with the principle of non-harm. However, for the first time, common demands and conditions of civil society organisations have been formulated for a possible participatory approach to collecting anti-discrimination and equality data on Sinti and Roma. The demands and (intermediate) results were presented in a workshop at the Sinti and Roma Forum 2024.¹²

Furthermore, the National Roma Contact Point (NRCP) from the Federal Ministry of the Interior has been transferred to the Federal Ministry for Family, Elderly People, Women, and Youth (BMBFSFJ) and upgraded to the status of a specialised administrative unit (*Fachreferat*).¹³ The NRCP has obtained enlarged funding and personnel thanks to this organisational change. It has increased from a part-time position to four employees. The tasks of the NRCP include coordinating the implementation and further development of the NRSF, cooperating with the Commissioner against Antigypsyism, supporting MIA and backing projects focused on combating antigypsyism and promoting the participation of Sinti and Roma within the 'Live Democracy!' Programme.¹⁴

The fight against antigypsyism will also be addressed more strongly by the 'Live Democracy!' Programme during the 2025-2029 period. A Cooperation Network against Antigypsyism (*Kooperationsverbund gegen Antiziganismus*), comprising five organisations and five further model projects addressing antigypsyism and the empowerment of Sinti and Roma, will be funded with approximately 3 million EUR.

The most negative development regarding the measures contained in the NRSF is the significant reduction in funding for the Reporting and Information Office (MIA) in 2024. MIA's annual budget from the BMBFSFJ is around 1.25 million EUR. Nevertheless, in 2024, the BMBFSFJ delivered a financial plan to the Bundestag in which MIA has been allocated 25,000 EUR. With this budget, MIA, including its six regional offices, would be forced to close. Since summer 2024, MIA has carried out intensive advocacy to persuade the Committee on

⁹ Hecht, R. (27 November 2024). *Nicht einschüchtern lassen im Einsatz für Minderheiten [Don't Be Intimidated In The Fight For Minorities]*. SWR Aktuell. Available at: <https://www.swr.de/swraktuell/radio/nicht-einschuechtern-lassen-im-einsatz-fuer-minderheiten-100.html>

¹⁰ Interview with the Office of the Commissioner against Antigypsyism.

¹¹ Federal Government Commissioner against Antigypsyism and for the Life of Sinti and Roma in Germany. (2025). *Activity Report and Recommendations for Action*, p.12. Available at: <https://dserver.bundestag.de/btd/20/151/2015140.pdf> <https://dserver.bundestag.de/btd/20/151/2015140.pdf>.

¹² Interview with the FADA.

¹³ Written interview with the Federal Ministry of the Interior (9 December 2024).

¹⁴ Interview with the NRCP.

Budgets of the German Parliament to reconsider this decision and provide MIA with the necessary financial means to continue documenting antigypsyism and supporting victims. It should be emphasised that MIA is the first reporting and documentation office of its kind in Germany and Europe. After the government coalition collapsed at the beginning of November 2024, and therefore, the adoption of the Government's budget for 2025 was not possible, the BMBFSFJ decided to fund MIA as a special project within the national 'Live Democracy!' Programme. Nevertheless, this measure has an emergency character. The funding of MIA should be ensured beyond 2025.

At the regional level, it should be mentioned that two Länder, Thüringen and Schleswig-Holstein, have appointed Commissioners against Antigypsyism. Notably, the Thüringen Commissioner has demonstrated a strong commitment to the fight against antigypsyism; however, the position was abolished after the state elections in 2024. Berlin has appointed a contact person on antigypsyism in 2025.

Likewise, at the regional level, it is worth noting that the Bavarian government extended the state contract with the Regional Association of German Sinti and Roma in 2024. The State Government and the Regional Association of German Sinti and Roma of North Rhine-Westphalia signed a framework agreement in January 2025. The State Government and the Regional Association of German Sinti and Roma in Rhineland-Palatinate also signed state a contract in May 2025. Through these state contracts and framework agreements, the state governments declare their commitment to the promotion of the rights of Sinti and Roma and the fight against antigypsyism.

1.1.3. Effectiveness of monitoring

There is no monitoring mechanism in place for the entire NRSF..

Nevertheless, there are monitoring mechanisms for individual projects. For example, MIA was the subject of an evaluation by the Dezim Institute in 2023-2024 with a positive outcome.¹⁵ All organisations of Sinti and Roma or those which work with them that receive public funding are under the supervision of the funding bodies. These must submit continuous reports on the ongoing implementation of their projects.¹⁶

1.1.4. Data collection

In Germany, there is no data collection on ethnic grounds.

Additionally, organisations of Sinti and Roma reject it because of the history of persecution especially during the Nazi regime and of further stigmatisation after the Holocaust.

Sinti and Roma communities accept collecting data on antigypsyism. The Reporting and Information Office (MIA) began its activities in 2022, documenting 621 incidents of antigypsyism. In 2023, MIA documented 1,233 incidents, while the number increased to 1,678 in 2024. The recorded incidents are categorised into six incident types. In addition to ten cases of extreme violence, 40 assaults, 27 cases of property damage, 46 threats and 502 cases of discrimination, 600 instances of verbal stereotyping were recorded in 2023. State institutions were responsible for approximately one-quarter of the 502 cases of antigypsyist discrimination. This shows that institutional antigypsyism continues to be a blatant problem. The incidents reported to MIA highlight institutional antigypsyism in the police, job centres, youth welfare offices, immigration authorities, municipal administrations and the education sector.

Furthermore, the consultation platform for data collection has been established by the Federal Anti-Discrimination Agency (FADA) (see Section 1.1.2. above).

¹⁵ Deutsches Zentrum für Integrations- und Migrationsforschung (DeZIM). (n.d.). *Evaluation Report on the "Demokratie leben!" Programme*. Available at: https://www.dezim-institut.de/fileadmin/user_upload/Demo_FIS/publikation_pdf/FA-6206.pdf

¹⁶ In the NRSF, the Integration Monitoring refers to measuring the level of integration of citizens with a migration background. Nevertheless, since there are no statistics on ethnic grounds, there is no information on indicators concerning foreign Roma.

Integration Monitoring of the Länder [Integrationsmonitoring der Länder]. (n.d.). *Startseite Berichte* [Report Homepage]. Available at: <https://www.integrationsmonitoring-laender.de/startseite-berichte.html>

A study on the measurability of antigypsyism, which was announced in the NRSF, was published by the German Centre for Integration and Migration Research (DeZIM) in August 2022. The short study focuses on the multilevel analysis of antigypsyism based on surveys and confirms the outcomes of previous studies of negative attitudes among large parts of the majority society towards Sinti and Roma.¹⁷

1.2. NRSF's synergy with domestic and EU actions

1.2.1. Complementary policies

The Conference of the Ministers of Integration of the Länder (IntMK) adopted a resolution in March 2024, highlighting the necessity of ensuring the participation of Sinti and Roma at federal, state, and local levels, as well as identifying further opportunities for strengthening the political participation and empowerment of Sinti and Roma. The IntMK recommends that scientific research on antigypsyism should be carried out. It points out that monitoring through the civil society should play a key role in documenting experiences of discrimination and that CSOs can document and carry out monitoring of antigypsyist incidents and thus contribute to make antigypsyism more visible in the German society.¹⁸ This resolution does not have a direct effect, does not mean that monitoring offices will be set up immediately. Still, it means a political support for implementing measures fostering participation of Sinti and Roma and monitoring of antigypsyism.

Complementary to the field of fight against antigypsyism and fostering participation of Sinti and Roma, policies addressing antigypsyism are implemented especially in the fields of minority policies, antidiscrimination, antiracism, and integration.

The FADA has implemented since 2023 the Programme 'Respect*Land' in which framework counselling projects on antidiscrimination are run. The Regional Association of German Sinti and Roma in Bavaria runs a project within this programme, providing counselling on antigypsyist discrimination. In the framework of the 'Community Plus - Counselling Centres Against Racism' Programme, projects providing counselling on racism are funded. The organisation Pro Sinti and Roma, based in Baden-Württemberg, offers counselling on antigypsyism. This programme is supported by the Federal Government Commissioner for Migration, Refugees, and Integration, as well as the office of the Federal Government Commissioner for Anti-Racism.

1.2.2. Alignment with EU actions

There are projects funded in the framework of the Fund for European Aid to the Most Deprived (FEAD) which have foreign Roma as target groups. Nevertheless, organisations of foreign Roma have reported that employees of specific projects have antigypsyist attitudes towards their clients. Within FEAD, training on antigypsyism is offered. There is no information on the impact of the measures or on the projects themselves.

1.2.3. Addressing concerns of previous assessments

Concerns expressed in the previous RCM report,¹⁹ such as the improvement of antidiscrimination legislation, ensuring equal treatment of Ukrainian Roma refugees, or the improvement of the NRSF, have not been implemented so far.

¹⁷ Pickel, S. & Stark, T. (2022): *Antiziganismus als eigenständige Form des Rassismus gegenüber Sinti*zze und Rom*nja: Ergebnisse einer Pilotstudie zur mehrdimensionalen Erfassung antiziganistischer Einstellungen in der Mehrheitsgesellschaft* [Antigypsyism as an Independent Form of Racism against Sinti and Roma. Results of a Pilot Study of a Multidimensional Documentation of Antigypsyist Attitudes in the Majority Society]. NaDiRa Working Papers 3, Berlin: Deutsches Zentrum für Integrations- und Migrationsforschung (DeZIM). Available at: https://www.dezim-institut.de/fileadmin/user_upload/Demo_FIS/publikation_pdf/FA-5381.pdf

¹⁸ Ministry of Social Affairs, Health and Sport of Mecklenburg-Western Pomerania (2024) *Externe Niederschrift über die Beschlüsse der Hauptkonferenz der 19. IntMK am 20. – 21. März 2024 in Rostock-Warnemünde* [External Minutes of the Resolutions of the Main Conference of the 19th Conference of the State Ministers of Home Affairs on 20 and 21 March in Rostock-Warnemünde]. Available at: https://www.integrationsministerkonferenz.de/documents/beschlussniederschrift-der-19-integrationsministerkonferenz-2024_1713363851.pdf

¹⁹ Roma Civil Monitor. (2022). *Conclusions and Recommendations* ["Conclusions and Recommendations" in the Roma Civil Monitor on Germany 2022], p. 35. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C2-Germany-FINAL-PUBLISHED-CATALOGUE.pdf>

1.3. Roma participation in implementation and monitoring

1.3.1. Involvement of Roma CSOs in implementation

There is no official consultation mechanism for the implementation of the NRSF, as no single set of objectives and indicators has been defined in the NRSF, as explained above. Nevertheless, there are several consultation mechanisms of German authorities with organisations of Sinti and Roma. The oldest instrument is the Advisory Committee on Issues of Sinti and Roma at the Ministry of Interior. The Central Council of German Sinti and Roma, the Sinti Alliance, and, since December 2024, the Federal Association of Sinti and Roma (BVSR) participate in this committee. The Commissioner against Antigypsyism has also established a consultative board to advise the Commissioner on measures to be undertaken by his Office.

1.3.2. Sinti and Roma in public institutions implementing the NRSF and in monitoring and evaluation

In Germany, there are no statistics on ethnic grounds. Individuals are not obliged to reveal their ethnic origin. Organisations participating in the development of this report do not gather this kind of information.

1.3.3. Contribution of National Roma Platform to the NRSF implementation

In Germany, there is no single national platform for Sinti and Roma. Nevertheless, large conferences take place that serve as a platform for addressing subjects related to antigypsyism. These events are the annual conferences of MIA and of the Office of the Commissioner against Antigypsyism.

2. REVIEW BY THEMATIC AREA

2.1. Fighting antigypsyism and discrimination

Sinti and Roma face antigypsyism in all societal spheres; they face discrimination at school, in labour and housing markets and when dealing with healthcare services. They are also victims of physical and verbal attacks. Antigypsyism is also strongly present in political and media discourses and on the Internet. Memorials on the holocaust against Sinti and Roma and the graves of community members are continuously damaged. The rise in antigypsyist hate crimes, discrimination within law enforcement, and biases against Ukrainian Roma refugees and Roma asylum seekers from Moldova are significant challenges confronting the communities in Germany. The authorities responsible for the NRSF have not implemented adequate measures to address these issues.

Hate crime

The statistics on politically motivated crime (PMK) documented by the Federal Criminal Police Office and the Federal Ministry of the Interior show an increase in antigypsyist crimes. Since 2017, antigypsyist crimes have been recorded as hate crimes. The antigypsyist crimes increased from 151 cases in 2022 to 195 in 2024.²⁰

These figures only represent a fraction of antigypsyist crimes. Experts and MIA assume that the number of unreported cases is very high. Many of those affected do not report crimes because they do not trust the police due to decades of stigmatisation and persecution, especially during the Nazi era. However, this is not the only problem. A lack of knowledge about the extent of antigypsyism in society often prevents police authorities from investigating crimes motivated by antigypsyism. As a result, crimes are usually not classified as antigypsyist, although there is evidence of this. MIA has also received reports of cases in which police officers refused to initiate an investigation; these cases are not investigated or classified as crimes without any antigypsyist motivation. The incidents reported to MIA show that the official figures are just the tip of an iceberg.

There is an urgent need to build up the capacities of police authorities, judges and prosecutors on the forms of expressions of antigypsyism so that antigypsyist crimes are properly prosecuted. The fight against right-wing extremism and antigypsyism should be addressed at the highest political level and prioritised in the Federal Criminal Police Office and in all other security authorities. The numbers illustrate the increasing danger posed by right-wing extremist ideologies. Right-wing motivated crimes increased significantly by almost 48% to 42,788 cases in 2024, according to the police statistics on politically motivated crimes.²¹ These crimes continue to make up around half of all cases registered by the police.

Antigypsyism in the police

Sinti and Roma face antigypsyism through police forces. Antigypsyism in the police is reflected through discrimination, disproportionate use of force, racial profiling, the stigmatisation of Sinti and Roma communities in external communications and the continued 'special registration' of members of the minority by the police.²² There are cases where police forces do not take Sinti or Roma seriously as victims of crime, trivialised crimes with antigypsyist content or, in the worst case, even investigated the reporting Sinti and Roma instead of the suspects.²³ In the NRSF, there is no reference to antigypsyism in the police. However, it is a serious problem affecting Sinti and Roma communities throughout the country.

²⁰ Federal Criminal Police Office [Bundeskriminalamt – BKA]. (2024). *Annual Report on Politically-Motivated Crime 2023*, p. 11. Available at: https://www.bka.de/SharedDocs/Downloads/DE/UnsereAufgaben/Deliktbereiche/PMK/2024PMKFallzahlen.pdf?__blob=publicationFile&v=2

²¹ Federal Ministry of the Interior and Community [Bundesministerium des Innern und für Heimat – BMI]. (2025, May 20). *Neuer Höchststand politisch motivierter Kriminalität 2024 [New All-Time High for Politically Motivated Crime in 2024]*. Available at: <https://www.bmi.bund.de/SharedDocs/pressemitteilungen/DE/2025/05/pmk2024.html>

²² MIA were reported several cases from Lower-Saxony in which whole families are classified as 'clan members' tied to criminal activities without having any involvement in alleged crimes or offences.

²³ For a better understanding on the patterns of antigypsyism in the police. see: MIA – Monitoringstelle für Antiziganismus [Monitoring Centre for Antigypsyism]. (2024). *Antiziganistische Vorfälle 2023 in Deutschland [Antigypsyist*

In 2023, MIA recorded 83 cases of antigypsyism in which police officers were involved in various ways, including three incidents of extreme violence. All cases are based on the antigypsyist assumption that Sinti and Roma are prone to crime. In everyday police work, this assumption can be described as a generalised attitude of suspicion or at least as a greater tendency to suspect members of minorities on the part of police forces.

A usual reported practice is that young male Sinti and Roma, in particular, were checked without cause and questioned about their family relationships. This suggests that the checks are merely a police tool to exert pressure on local communities and to gather police information about those affected beyond the stated reason. The investigation of family relationships, in particular, can be seen as a clear indication of antigypsyist police data collection. The Central Council of German Sinti and Roma criticised this practice shortly after it was founded in 1982 as a continuation of National Socialist data collection practices. The measure is demonstrably still being used today to monitor alleged criminal family structures of Sinti or Roma. In recent years, this type of procedure has once again been increasingly focused on as a means of combating so-called 'clan criminality'. State police authorities use the category 'clan-criminality' to collect data on whole family members and stigmatise all of them as criminals. However, they are not suspicious at all of having committed any crime.

This also became clear on 26 June 2023, when the Lower Saxony Minister of the Interior and the Minister of Justice presented the 'Clan Crime Situation Report 2022 in Lower Saxony' at a press conference. The joint presentation listed „clan proceedings by the central office of the Hildesheim public prosecutor's office" and explicitly referred to „mass offences in the area of property and asset crime by an extended family from the Roma ethnic group in the Hanover district". It is not clear from the presentation why, in this case, reference was made to an entire 'extended family' of suspects belonging to a national minority.

The Central Council of German Sinti and Roma signed an agreement with the Federal Criminal Police Office (BKA) on 27 January 2023, titled 'Together against Antigypsyism'. Both partners agree that the ethnic origin should not be the subject of police investigations. As a result of the agreement, the Education Forum against Antigypsyism has been offering training to BKA officials to strengthen cooperation between the Central Council and the University of the BKA. Furthermore, the Central Council of German Sinti and Roma demand that the state criminal investigation offices should recognise and investigate their role in the persecution and stigmatisation of Sinti and Roma during the Nazi regime and after 1945.

Counselling on antigypsyism

There is an urgent need to develop counselling centres on antigypsyism and antigypsyist discrimination. There are organisations of Sinti and Roma, and those which have them as clients that offer social counselling to minority members. However, these organisations deal with antigypsyism because their clients face it in a large number of cases. In some cases, the counselling centres support their clients to defend themselves against antigypsyism. They write letters to the institutions that discriminate against their clients, refer them to lawyers or anti-discrimination counselling centres. Nevertheless, these social counselling services do not have the knowledge and capacities advising on antigypsyism and discrimination and do not have the funding for carrying out this activity.

Currently, two projects are officially providing counselling on antigypsyism. The first project, 'Anti-Discrimination Counselling in the context of Antigypsyism', is run by the Regional Association of German Sinti and Roma, Bavaria and is funded by the programme 'Respekt*Land' of the FADA. This project lasted from 2023 until summer 2024.²⁴ The second project, 'Counselling Plus – Advice for German and non-German Romn*ja and Sinti*zze in Baden-Württemberg' is run by the organisation, Pro Sinti & Roma e. V. from Baden-Württemberg and is funded in the framework of the programme 'Community Plus – Counselling Centres Against Racism'.²⁵ This programme is supported by the Federal Government Commissioner for Migration, Refugees, and Integration and by the office of the Federal Government Commissioner for Anti-Racism.

Incidents 2023 in Germany], p. 38 ff. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

²⁴ Respekt! Landesverband [Regional Association of Sinti and Roma – Respekt! Landesverband]. (n.d.). *Verband Sinti und Roma* [Association of Sinti and Roma]. Available at: <https://www.respektland.de/SharedDocs/projekte/DE/Verband-Sinti-Roma.html>.

²⁵ ProSinti und Roma – Community Plus [ProSinti and Roma – Community Plus]. (n.d.). *Community Plus*. Available at: <https://www.prosintiundroma.de/deutsch/community->

These projects are insufficient and time-limited. There is an urgent need to build a system of counselling centres on antigypsyism. Antidiscrimination offices are often unaware of the phenomenon of antigypsyism; they are unfamiliar with its forms of expression and lack connections to the communities. Additionally, because of the history of persecution and stigmatisation, Sinti and Roma are often reluctant to go to state counselling centres of the majority society. MIA and organisations of Sinti and Roma state that there is an urgent need to provide victims of antigypsyism with professional advice and legal support. The Office of the Commissioner against Antigypsyism has commissioned a feasibility study on establishing of a legal aid network and fund for antigypsyism. A survey carried by the Institute for Democracy and Civil Society (Jena), found an urgent need for establishing this legal aid fund.²⁶ By this study's key recommendations, a Legal Aid Network is currently established by MIA; however, the project's budget does not allow MIA to cover lawyer and court costs. The project's funding is currently set to expire by the end of 2025. A large part of victims of discrimination, offences and hate crimes do not have the financial means to afford lawyer costs. Through a legal aid fund, victims of antigypsyism would have better access to legal support.

Reform of the General Equal Treatment Act (AGG)

One critical avenue for combating discrimination is through the improvement of the General Equal Treatment Act (AGG). Enacted in 2006, the AGG aims to prevent discrimination on the grounds of race, ethnic origin, religion, gender, disability, age, and sexual orientation. However, in practice, the AGG has significant limitations. Victims of discrimination frequently encounter high evidentiary thresholds, short filing deadlines, and insufficient enforcement mechanisms, making it difficult to seek justice and hold perpetrators accountable.

Reforming the AGG was a declared priority of the current Federal Government, as outlined in its coalition agreement. Proposed improvements included reducing the burden of proof for victims, extending complaint deadlines, and strengthening institutional frameworks to support anti-discrimination efforts. However, these reforms have not materialised, despite increasing evidence of systemic discrimination and antigypsyism. The lack of progress has been attributed to political inertia, competing legislative priorities, and resistance from stakeholders who oppose stricter regulatory measures.

To effectively combat antigypsyist discrimination, two reforms in the AGG should be implemented. First, the scope of the AGG should be extended to the public sphere. It is not possible to lodge a case of discrimination against the police, a public school or public administration, unless the law is changed at the federal level to include the public sphere. Second, the AGG needs to be amended, and its scope broadened so that associations and organisations working in the field of anti-discrimination are granted the right to undertake collective action on behalf of victims (legal standing). In this way, organisations of Sinti and Roma would be able to file complaints against discrimination faced by individuals.

Institutional antigypsyism against asylum seekers from Moldova

In December 2023, the German Government declared the Republic of Moldova and Georgia to be safe countries of origin under asylum law, disregarding the situation of Roma in these countries. Asylum seekers from both countries could be deported more easily in the future. Asylum applications from people from a so-called 'safe country of origin' are usually rejected as 'obviously unfounded'.

Numerous reports show that Roma are severely disadvantaged in Moldova.²⁷ This discrimination is the result of deep-rooted antigypsyism. Roma are systematically discriminated against in the areas of education, health, work, and housing, as well as in dealings with public administration and the police. Roma are very often victims

²⁶ Sondermann, R. & Helmert, C. (n.d.) *AufRecht gegen Unrecht: Eine Studie zur Notwendigkeit und Machbarkeit einer juristischen Unterstützungsstruktur für Betroffene von Antiziganismus. [Standing Up for Justice Against Injustice: A Study on the Necessity and Feasibility of a Legal Support Structure for Victims of Antigypsyism.]* Institute for Democracy and Civil Society (Jena). Available at: https://www.idz-jena.de/fileadmin/user_upload/Projektberichte/IDZ_Forschungsbericht_MRA.pdf

²⁷ Pro Asyl. (2022). *Diskriminiert und Abgelehnt – Zur Situation schutzsuchender Rom*nja aus der Republik Moldau [Discriminated and Rejected – On the Situation of Protection Seekers Roma from the Republic of Moldavia]*. Available at: <https://www.proasyl.de/material/diskriminiertundabgelehnt-situationschutzsuchenderromnja/>

U.S. Department of State. (2022). *2022 Country Reports on Human Rights Practices: Moldova*. Available at: <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/moldova/>

of violent antigypsyism. These circumstances create a permanent threat to the protection of the human rights of Roma in Moldova.

Nevertheless, systematic discrimination against ethnic minorities is not recognised as a reason for fleeing in German asylum law and evidence of targeted violence and state failure to protect Roma populations is often dismissed under the presumption of 'safety'. The Federal Constitutional Court has consistently upheld this interpretation in numerous cases. This means that Moldovans seeking asylum are rejected at a rate higher than average. The classification of Moldova as a safe country of origin is irresponsible because the safety of Roma in Moldova is not guaranteed. Asylum seekers from these countries live in precarious conditions in reception centres; in addition, they face short appeal deadlines, minimal access to legal aid, and limited resources to challenge deportation decisions. The burden of proof often falls disproportionately on applicants to demonstrate persecution, which is challenging without access to sufficient documentation or support.

The Federal Government's website states: "This makes Germany less attractive as a destination country for asylum applications made for reasons that are not asylum-related. Federal, state and local governments are relieved. More capacity is available for asylum seekers who are truly in need of protection".²⁸

In 2022, there were 5,218 asylum applications from Moldovan citizens in Germany. That represents 2% of all asylum applications submitted in Germany.²⁹ This measure will have little impact on the total number of refugees arriving and is an example of populist symbolic politics at the expense of fleeing Roma.

Sinti and Roma organisations reject all deportations of Roma to Moldova and call for the creation of secure residence opportunities for Roma seeking protection in Germany, establishing a minority-specific review mechanism to evaluate claims from individuals belonging to vulnerable groups, regardless of their country's designation, including language courses, and housing assistance, as well as effective measures against antigypsyism and support for those affected. They also explicitly refer to Germany's historical responsibility for the protection of Sinti and Roma who were persecuted and murdered under National Socialism.

2.2. Education

Sinti and Roma children and young people face antigypsyism and discrimination at school. They are victims of harassment by their classmates, teachers and school personnel. Often, Sinti and Roma pupils are placed in special schools although they do not have special needs.³⁰ This decision is taken on antigypsyist grounds. Foreign Roma children and youngsters are often placed in separate classes for learning German; in many cases, they spend disproportionately long periods in those classes, separated from their classmates in the regular classes. CSOs claim that this happens often on discriminatory grounds. In the NRSF, there are general references to the right of all citizens to equal access to education. There are no references to the problems that Sinti and Roma face in the education sector, and no goals are established to address these issues. The issues that Sinti and Roma face in education are directly related to structural, individual and institutional antigypsyism they face. The NRSF does not address antigypsyism at school. Since the publication of the NRSF, no major measure has been introduced in this field.³¹

²⁸German Federal Government [Bundesregierung]. (n.d.). *Republic of Moldova and Georgia Are Safe Countries of Origin [Republik Moldau und Georgien sind sichere Herkunftsstaaten]*. Available at: <https://www.bundesregierung.de/breg-de/aktuelles/sichere-herkunftsstaaten-moldau-georgien-2216818>

²⁹ Federal Office for Migration and Refugees [Bundesamt für Migration und Flüchtlinge – BAMF]. (2022). *Asylum Statistics (01–12/22) [Asylgeschäftsstatistik (01–12/22)]*. Available at: <https://www.bamf.de/SharedDocs/Anlagen/DE/Statistik/Asylgeschaeftsstatistik/hkl-antrags-entscheidungs-bestandsstatistik-kumuliert-2022.html>

³⁰ MIA. (2025). *Antiziganismus im Bildungsbereich. Am Beispiel Schulen und Kitas [Antigypsyism in the Education Sector. The examples of Schools and Kindergartens]*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2025/03/MIA_Schule_Internet.pdf

³¹ For a more comprehensive analysis of the patterns of discrimination and exclusion faced by Sinti and Roma in Germany, see the 2019 and 2022 RCM reports on Germany. The situation has not changed substantially since then.

Roma Civil Monitor. (2019). *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Germany. Assessing Progress in Key Policy Areas of the Strategy*. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-germany-2018-eprint-fin-3.pdf>

2.2.1. Effectiveness of the NRSF in addressing the problems

Education is under the jurisdiction of the Länder, which have exclusive competence for school policies. Nevertheless, the Federal Government can make recommendations to the Länder concerning implementing measures, mainly within the framework of the Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States (KMK). As it was stated in the first monitoring report, the German Government includes no reference in the NRSF to the structural, institutional and direct discrimination that Sinti and Roma children are facing in the education system. There are no specific measures to prevent and counter antigypsyism at school.

Despite the lack of a strategy for fighting antigypsyism in the school system, a positive development should be stressed. A joint working group of CSOs was set up in 2018, hosted by KMK, for developing recommendations on the treatment of the history of Sinti and Roma and their persecution in the school curricula of the federal states. This working group, composed of organisations representing Sinti and Roma, presented recommendations in December 2022 that served as the basis for a Joint Declaration by the KMK, the Central Council of German Sinti and Roma, and the Alliance for Solidarity with the Sinti and Roma of Europe. The central aim of this joint declaration is 'that Sinti and Roma as members of German and European societies, in particular as citizens of Germany and other European countries, are addressed as an integral part of German and European history and cultural history in school lessons'.³²

The Joint Declaration does not have a compulsory character but contains a set of recommendations focussing on raising awareness on the various forms of expression of antigypsyism, the treatment of the holocaust against Sinti and Roma, stressing the contribution of Sinti and Roma to the construction of democracy in Europe and to Germany's culture; the cooperation with organisations of Sinti and Roma and with antidiscrimination offices is strongly recommended as well. CSOs should advocate for their implementation at the federal state level. The KMK is not yet aware of the implementation status of the Joint Declaration. As the revision of curricula and other requirements in the federal states generally occurs every seven years, and the periodicity thereof varies among the federal states, the KMK believes that it would probably be too early to conduct a survey of the federal states at this time. However, it assumes that corresponding measures are being taken or are planned in the federal states. In addition, the KMK has adopted recommendations for dealing with antigypsyism in schools in December 2024 that were developed with the Central Council of German Sinti and Roma.³³

In some cases, such as in Hesse and Saarland, the ministries work closely with Sinti and Roma associations to implement the Joint Declaration or to develop new teaching materials. However, there is still a lot to be done in terms of implementing the Joint Declaration. In a study, the Georg Eckert Institute GEI found that only 13% of the 200 curricula examined made any reference at all to Sinti and Roma, even though the two groups are officially recognised as a national minority in Germany. In some federal states, there is still no explicit reference to Sinti and Roma in the curricula, for example, in Saxony.³⁴

Roma Civil Monitor. (2022). *Roma Civil Monitor 2022 Report on Germany*. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C2-Germany-FINAL-PUBLISHED-CATALOGUE.pdf>

See also: MIA. (2025). *Antiziganismus an der Schule. Im Fokus von Schulen und Kitas [Antigypsyism at the School. In the Focus of Schools and Kindergartens]*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2025/03/MIA_Schule_Internet.pdf

³² Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States in the Federal Republic of Germany [Kultusministerkonferenz – KMK]. (2022). *Joint Declaration on Sinti and Roma Education*. Available at: <https://zentralrat.sintiundroma.de/en/wp-content/uploads/sites/2/2022/12/final-online-joint-declaration-sinti-roma-2022-12-08.pdf>

³³ Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States in the Federal Republic of Germany [Kultusministerkonferenz – KMK]. (2025). *Empfehlung zum Umgang mit Antiziganismus in Schule und Bildung [Recommendation on Dealing with Antigypsyism in Schools and Education]*. Available at: https://www.kmk.org/fileadmin/veroeffentlichungen_beschluesse/2025/2025_03_20-Empfehlung-Antiziganismus.pdf

³⁴ See article in the taz of 8 April 2024, which evaluates the study by the Georg Eckert Institute. die tageszeitung (taz). (2024, April 8). *Antiziganismus im Bildungssystem [Antigypsyism in the Education System]*. Available at: <https://taz.de/Antiziganismus-im-Bildungssystem/!6000369/>

2.2.2. Addressing the problems beyond the NRSF

Despite this positive development concerning the Joint Declaration, there is an urgent need to develop measures for addressing antigypsyism in schools. Sinti and Roma face everyday antigypsyism at school, from teachers, other school personnel, classmates and school authorities. The Antigypsyism Reporting and Information Centre (MIA) has developed a report on antigypsyism in the education sector. In 2023 and 2024, 484 antigypsyist incidents were reported. This report shows that antigypsyist bullying, violence and attacks at schools are widespread phenomena; Sinti and Roma face structural, individual and institutional antigypsyism in education. These 484 cases in educational institutions included 256 cases of discrimination, 161 instances of verbal stereotyping, three cases of extreme violence and 40 physical attacks. More than 17% of the antigypsyist incidents recorded by MIA in 2023 occurred in educational institutions.³⁵ It is noticeable that most cases of discrimination originate from teachers and other school personnel.

According to the NRSF, all citizens have the right to education. This rule does not always apply to disadvantaged foreign Roma. Roma EU citizens and Roma refugees are often denied schooling for an extended period of time.

Access to school places is not guaranteed for people without permanent residence status. This primarily affects asylum seekers from the Republic of Moldova, which was declared a 'safe country of origin' by the German Bundestag in November 2023 despite the widespread institutional and structural antigypsyism there. It is not uncommon for schools to justify the non-allocation of places on the grounds of uncertain residence status. The children would 'be deported anyway'. However, the state and authorities must ensure that all children receive an education, regardless of their immigration status. This results from the laws of the federal states, for example, § 2 of the Berlin School Act (SchulG), Article 20, Paragraph 1 of the Berlin Constitution and Article 28 of the UN Convention on the Rights of the Child.³⁶

One of the major problems Sinti and Roma are still facing at school is school segregation. One form of expression of segregation is the unjustified placement of Sinti and Roma pupils in special schools (see Chapter 3.2. on special schools).³⁷

A further form of segregation is when foreign Roma children are placed in separate classes. A similar form of segregation also affects Roma EU citizens, who are initially taught in so-called 'welcome classes' with other foreign pupils instead of in mainstream classes. This system reinforces exclusion and makes it more difficult for young people to learn German. Youngsters at secondary school get even stuck in this system and leave school without a qualification.³⁸ This form of education violates Article 10 of Regulation (EU) No. 492/2011, which guarantees children and young people from migrant families education under the same conditions as children and young people who are nationals of a host Member State.³⁹

Sinti and Roma children should be given equal access to the regular school system and be treated equally at school. One instrument for achieving this goal would be the nationwide extension of the scope of the anti-discrimination law (which currently does not include the public sector) to school authorities and staff beyond the city of Berlin.

There should be a comprehensive plan to strengthen and expand school counselling/mediator programmes, which have proven to be a useful tool in supporting disadvantaged students and countering structural and institutional discrimination in schools. School counselling must be designed in such a way that not only

³⁵ MIA – Melde- und Informationsstelle Antiziganismus. (2024). *Antiziganistische Vorfälle 2023 in Deutschland* [Antigypsyist Incidents 2023 in Germany], p. 26. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

³⁶ Amaro Foro Berlin (2024) *Antiziganistische Vorfälle. Rückblick und Auswertung 2023* [Antigypsyist Incidents. Review and Assessment 2023], p. 17.

³⁷ Information provided by Roma Büro Freiburg, Amaro Foro (Berlin), and Roma Förderverein (Frankfurt).

³⁸ Similar to this phenomenon, MIA reported that Roma children refugees from Ukraine were sent into separate classes only for Roma refugees, see: MIA – Melde- und Informationsstelle Antiziganismus. (2024). *Antiziganismus gegen ukrainische Roma-Geflüchtete in Deutschland* [Antigypsyism against Ukrainian Roma Refugees in Germany], p. 7. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

³⁹ Amaro Foro Berlin. (2024). *Antiziganistische Vorfälle. Rückblick und Auswertung 2023* [Antigypsyist Incidents. Review and Assessment 2023], p. 90.

members of the minority are supported, but also all those involved in the school context, including teachers, social workers, school management, pupils, and parents. The majority of school personnel have little to no knowledge, or even incorrect information, about Sinti and Roma. This can lead to current discrimination, reinforcing the transgenerational traumas that burden the relationship of many members of the minority with the education system. School counsellors and mediators provide information in this regard and make a significant contribution to counter antigypsyist prejudices.⁴⁰ Workshops on antigypsyism targeting school personnel are also helpful. Furthermore, projects that promote dialogue between pupils of different origins and cultural backgrounds should be implemented. These projects must include autochthonous and allochthonous Sinti and Roma.⁴¹

2.3. Employment

According to Sinti and Roma organisations and experts, people affected by antigypsyism work disproportionately under precarious, often life-threatening conditions and are disproportionately affected by unemployment. Also, EU citizens from Eastern Europe, especially from Romania and Bulgaria, labelled as 'Roma', are victims of exploitative working conditions or even human trafficking in Germany; they are rarely offered job protection, are poorly paid and are therefore dependent on the subsistence economy. Some of those affected have no employment contracts, which makes them vulnerable to blackmail and substitution and can, in turn, lead to problems with the benefits authorities.⁴² In the NRSF, antigypsyism faced by Sinti and Roma in employment is not addressed. Consequently, no measure has been formulated to counter this phenomenon.

The main reason for the disadvantaged position of parts of Sinti and Roma in the labour markets is the structural and direct discrimination they face both in Germany and in any countries of origin (in the case of foreign Roma), and the resulting low level of education or lack of school or vocational qualifications among several community members. In the case of foreign Roma, poor knowledge of German is an additional obstacle. Employers also take advantage of their difficult access to the labour market since Germany is currently facing the challenge of having to recruit large numbers of (cheaper) workforce from abroad to keep the economy going. Examples of such exploitative structures include the low-wage sectors, such as construction, meat production, shipping, and cleaning.

Measures to contrast this phenomenon, such as labour market integration courses offered by public employment offices, often do not meet the needs of disadvantaged, low-skilled migrants, including Roma, who remain trapped within this cycle of exploitation. The German Institute for Human Rights describes this displacement of migrant workers as a cycle of severe labour exploitation, "in which some of those affected believe they have 'no other choice' than to enter into the next exploitative employment relationship".⁴³ Institutional frameworks, such as the legal linking of residence permits and employment in conjunction with the establishment of repressive migration policy instruments, such as the restriction of labour market access, also have the effect of disenfranchising EU citizens with equal rights under EU law.⁴⁴

⁴⁰ Regional Association of German Sinti and Roma – Bavaria [*Landesverband Deutscher Sinti und Roma – Bayern*]. (2024, December 4). *Conclusions of the Regional Conference of MIA-Bavaria on Antigypsyism in the School System*, Nuremberg. Information provided by the Regional Association of German Sinti and Roma – Bavaria.

⁴¹ Regional Association of German Sinti and Roma – Bavaria [*Landesverband Deutscher Sinti und Roma – Bayern*]. (2024). *Which Problems Do Disadvantaged Sinti and Roma Children Have in the Education System* [*Welche Probleme haben benachteiligte Sinti- und Roma-Kinder im Bildungssystem*]. Position paper submitted to the focus group on education on 26 September 2024.

⁴² Amaro Foro Berlin. (2024). *Antiziganistische Vorfälle. Rückblick und Auswertung 2023* [Antigypsyist Incidents. Review and Assessment 2023], p. 29 ff.

⁴³ German Institute for Human Rights [*Deutsches Institut für Menschenrechte*]. (2018). *Entwicklung der Menschenrechtssituation in Deutschland Juli 2017 – Juni 2018. Bericht an den Deutschen Bundestag gemäß § 2 Absatz 5 DIMRG* [Development of the Situation of Human Rights in Germany, July 2017–June 2018. Report to the German Bundestag According to §2 Paragraph 5 DIMRG], p. 43. Available at: https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/Publikationen/Menschenrechtsbericht_2018.pdf

⁴⁴ Neuburger, T. & Hinrichs, Ch. (2021). *Mechanismen des institutionellen Antiziganismus: Kommunale Praktiken und EU-Binnenmigration am Beispiel einer westdeutschen Großstadt. Forschungsbericht für die Unabhängige Kommission Antiziganismus* [Mechanisms of Institutional Antigypsyism: Practices of City Administrations and EU Internal Migration Taking as Example a Western German Large City. Research Report for the Independent Commission Antigypsyism], p. 87 ff. Available at: https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/Publikationen/Menschenrechtsbericht_2018.pdf

Another problem for EU citizens from Romania and Bulgaria, including Roma, is that their employment contracts are often questioned by the employment offices (Jobcentres). These are often regarded as forgeries, and therefore, it becomes more challenging to apply for supplementary benefits. It is a centuries-old prejudice that Sinti and Roma live at the expense of others and abuse social benefits. Since the debates about so-called 'poverty migration' following the accession of Romania and Bulgaria to the EU in 2007 and the removal of restrictions on the free movement of labour for these countries in 2014, these antigypsyist claims have been increasingly spread by politicians from various parties and many media outlets. These prejudices are reflected, among other things, in the actions of employees of the employment offices. Although there is an obligation to provide benefits as part of the fulfilment of public duties, these are often wholly or partially denied.

In addition to the catastrophic conditions under which many migrants, including many Roma, have to work, everyday antigypsyist discrimination in the workplace is also a widespread reality. Sinti and Roma are highly discriminated against in the workplace, both in dealings with superiors and employers as well as among colleagues. This is why many do not disclose their minority status. In 2022 and 2023, MIA recorded 66 incidents⁴⁵ related to discrimination in the workplace in Germany. For example, a highly qualified Rom who was looking for a job was only invited to interviews once he had removed the Romani language from his CV. The employer forbade another Rom to go to the doctor and take sick leave, even though he was ill, because, according to the employer, 'his people' would always take the opportunity to avoid work. In a similar case, the employee was even dismissed because he went to the doctor anyway.⁴⁶

2.3.1. Effectiveness of the NRSF in addressing the problems

The issues described above, which are a reality for many disadvantaged Sinti and Roma, are addressed in the chapter 'Access to High-Quality and Sustainable Employment' of the NRSF.⁴⁷ The content of this document is highly vague, makes no reference to the specific situation of disadvantaged Sinti and Roma and never mentions specific goals to overcome the current situation. For example, the text states: "The promotion of vocational training is a central component of labour market policy measures. This is because it is precisely these support services that are suitable for improving the effective and equal access of Sinti and Roma to sustainable and high-quality employment".⁴⁸ The extent to which the vocational training of disadvantaged Sinti and Roma is promoted is not specified, nor are specific measures mentioned that also recognise the widespread antigypsyism these people face daily. Furthermore, only people with a 'migration or refugee background' are addressed, which, on the one hand, denies the specificity of the issue of antigypsyism and, on the other hand, excludes German Sinti and Roma.

Moreover, although according to the document, the Federal Government explicitly supports the new strategy's increased focus on combating antigypsyism, there is no mention of antigypsyism as one of the reasons for the disadvantaged position of many Sinti and Roma on the labour markets. Institutional antigypsyism, which is widespread in social security administrations,⁴⁹ is not addressed at all. For example, the document states: "The

menschenrechte.de/fileadmin/Redaktion/PDF/UKA/Forschungsbericht_Mechanismen_des_institutionellen_Antiziganismus.pdf

⁴⁵ The number of reports must be analysed qualitatively, indicating an enormous dark field in this area, which must be shed light on in the future.

⁴⁶ MIA - Melde- und Informationsstelle Antiziganismus. (2024). *Antiziganistische Vorfälle 2023 in Deutschland* [Antigypsyist Incidents 2023 in Germany], p. 30. Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

⁴⁷ Federal Ministry of the Interior and Community [Bundesministerium des Innern und für Heimat – BMI]. (2022). *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany (2022–2030)*, p. 55 ff. Available at: https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/heimat-integration/minderheiten/eu-roma-strategie-2030.pdf?__blob=publicationFile&v=6

⁴⁸ Federal Ministry of the Interior and Community [Bundesministerium des Innern und für Heimat – BMI]. (2022). *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany (2022–2030)*, p. 56. Available at: https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/heimat-integration/minderheiten/eu-roma-strategie-2030.pdf?__blob=publicationFile&v=6

⁴⁹ Interviews with Amaro Foro, Roma Büro Freiburg, MIA, Central Council of German Sinti and Roma, Roma Förderverein e.V.

overarching goal is to recognise structural restrictions on the free movement of workers through close and cooperative exchange with practitioners and to find practicable solutions in cooperation with other actors in order to reduce such restrictions”.⁵⁰

The NRSF also mentions the so-called Western Balkans regulation (*Westbalkanregelung*) as an aid programme. In 2015, Albania, Kosovo and Montenegro were declared ‘safe countries of origin’ in an asylum compromise, after Bosnia and Herzegovina, (North) Macedonia and Serbia had already been declared as such in 2014. This decision, which entailed restrictive measures for future asylum applications, was highly controversial given the antigypsyism towards Roma and the structural discrimination in these countries. The Western Balkans Regulation was therefore introduced at the same time to reduce asylum applications from the Western Balkan states by creating legal labour migration opportunities for nationals of the Western Balkan countries. The possibility was explicitly created for non-qualified persons to enter Germany legally for gainful employment. This easier access to the German labour market is also aimed at Roma from these countries. However, no special efforts were made to facilitate the inclusion of disadvantaged Roma in the Western Balkans regulation. Many of those who have immigrated for gainful employment are well-qualified skilled workers. In contrast, today, access to Germany is hardly possible for the “marginalised social groups in the Western Balkan countries (...) living on the edge of subsistence”.⁵¹ This means that disadvantaged Roma hardly utilise this offer. Given the high number of Roma among asylum applicants from the area and the fact that structural discrimination in the Western Balkans largely excludes Roma from the labour market and equal participation in the education system, the German Government should have taken active measures to include them. Information campaigns or preparatory courses together with civil society would have been a first step. As it is, Roma from the Western Balkans are left with only informal migration or informal activities within the framework of the three-month tourist visa.⁵²

The European Social Fund (Plus) is also presented in the NRSF as a “special funding instrument for the integration of people with placement barriers”. In the 2021 - 2027 funding period, the European Social Fund is presented as the EU's most important financing instrument for investing in people.⁵³ The FEAD programme is also presented in the NRSF as a further instrument with which particularly disadvantaged newly immigrated EU citizens can be advised on labour market-related content at a low-threshold level by accessing and making use of support services. In both cases, the practical situation is different and not as low threshold as suggested. For example, the problem of illiteracy among many of the target groups is neither considered nor addressed.

A central problem that CSOs have been highlighting for a long time is the difficulty for organisations of Roma with a migration background in applying for funding under FEAD. The application procedure and financial accounting are quite complicated. Large parts of the organisations mentioned above cannot apply for and implement it. CSOs have been demanding the simplification of application and accounting procedures, as well as the provision of capacity-building courses for grassroots organisations. ESF has always stated that grassroots organisations should apply jointly with larger, well-established organisations.⁵⁴

In addition, other CSOs report that public/ municipal support regarding placement or employment opportunities is usually completely absent in the search for practical positions. However, this would be extremely useful for users of the programmes.⁵⁵ The concepts and measures presented should be oriented towards the educational

⁵⁰ Federal Ministry of the Interior and Community [Bundesministerium des Innern und für Heimat – BMI]. (2022). *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany (2022–2030)*, p. 60. Available at: https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/heimat-integration/minderheiten/eu-roma-strategie-2030.pdf?__blob=publicationFile&v=6

⁵¹ Information provided by the Central Council of German Sinti and Roma on 16 October 2024

⁵² *Idem*

⁵³ Federal Ministry of the Interior and Community [Bundesministerium des Innern und für Heimat – BMI]. (2022). *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany (2022–2030)*, p. 57. Available at: https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/heimat-integration/minderheiten/eu-roma-strategie-2030.pdf?__blob=publicationFile&v=6

⁵⁴ Interview with the Hildegard-Lagrenne-Foundation

⁵⁵ Information provided by Roma Förderverein e.V.

needs as well as the social and economic realities of the people involved. This is not the case. One example from the COVID-19 era is that distance learning was always offered as a format for further education programmes, but no one bothered to provide internet access or devices. This means that many people were unable to take advantage of the programmes.⁵⁶

According to the *Förderverein Roma e.V.* (Roma Support Association), there were also many dropouts from vocational training courses. Dropouts are often an indicator that a project is considered unsuccessful. Nevertheless, a differentiated monitoring or an evaluation of the possible reasons for the dropout rates should be put in place. The organisations' opinion is that measures to improve living conditions and the scope of social counselling should be implemented in the offer or given more consideration. For example, the general experience of discrimination, racism and exclusion should also be addressed and included in the pedagogical concept of the education programmes. This has not been the case so far.

The NRSF emphasises that disadvantaged Sinti and Roma have (equal) access to all programmes. However, there are no low-threshold participation requirements. Programmes to strengthen equal treatment, promote integration into the labour market, and support professional recognition, as mentioned in the NRSF, should in the future be geared more towards the needs of foreign Roma. Antigypsyism should be recognised as the leading cause of their migration. Support structures for victims of antigypsyist exclusion and discrimination on the labour market must be permanently strengthened. Training on antigypsyism has been offered within the framework of FEAD. Nevertheless, these trainings should be extended and become compulsory for organisations implementing ESF and FEAD projects, taking into account that a large number of the clients of these programmes are disadvantaged Roma from EU member states.

2.3.2. Addressing the problems beyond the NRSF

No mention is made here of the challenges caused by antigypsyism within the social security authorities to which EU citizens from Romania and Bulgaria are exposed, such as the discriminatory measures like the 'Working aid to combat gang-related benefit abuse in the specific context of EU freedom of movement' (*Arbeitshilfe Bekämpfung von bandenmäßigem Leistungsmissbrauch im spezifischen Zusammenhang mit der EU-Freizügigkeit*),⁵⁷ newly issued by the Federal Employment Agency in 2022. Based on this internal work aid, benefit applications from Roma are scrutinised much more strictly than applications from Germans or other foreign nationals. Such practices often turn Sinti and Roma into fraudulent poverty migrants. As a result, many labour migrants from these EU countries repeatedly have problems, for example, getting their self-employment recognised or starting it, as they are not issued trade licences.⁵⁸ Another problem with obtaining trade licenses is that in order to get it, one must have a permanent residence permit. Many Roma asylum seekers from the Balkans only have a tolerance permit (*Duldung*) and therefore cannot work as self-employed persons. This prevents many people living in Germany from entering the labour market.⁵⁹ Issues do not end once a trade licence is obtained. Disadvantaged individuals who are self-employed often struggle to earn enough to cover their living expenses. They, therefore, apply for supplementary benefits from the employment offices. However, as gainful employment is only recognised as such if there is a minimum income, and many disadvantaged Sinti and Roma do not always reach this minimum income, many people are excluded from receiving top-up benefits. There are doubts as to whether they are self-employed at all and are implicitly accused of fraud.⁶⁰

⁵⁶ *Idem*

⁵⁷ Federal Ministry of Labour and Social Affairs [Bundesministerium für Arbeit und Soziales – BMAS]. (2022). *Arbeitshilfe "Bekämpfung von bandenmäßigem Leistungsmissbrauch im spezifischen Zusammenhang mit der EU-Freizügigkeit"* [Handbook "Fighting Gang-like Abuse of the Social Security System in the Specific Relation to EU Freedom of Movement"]. Available at: <https://tacheles-sozialhilfe.de/files/Aktuelles/2022/Arbeitshilfe-Leistungsmissbrauch-EU-Buerger-Jan22.pdf>

⁵⁸ Ruiz Torres, G., Striethorst, A. & Gebhardt, D. (2014) *Monitoring der Zivilgesellschaft zur Umsetzung der 'Integrierten Maßnahmenpakete zur Integration und Teilhabe der Sinti und Roma' in Deutschland* [Civil Society Monitoring of the Implementation of the 'Integrated Measures Package for the Integration and Participation of Sinti and Roma' in Germany], p. 69 ff. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/2924/decade-monitoring-germany-2013.pdf>

⁵⁹ Information provided by Roma e.V.

⁶⁰ Information provided by Roma Büro Freiburg

2.4. Healthcare

Sinti and Roma, especially those disadvantaged, face discrimination in the health sector. Often, they do not get medical appointments at private medical practices; they are often offended by medical personnel referring to their origin or culture. Disadvantaged EU citizens, Roma among them, often face difficulties accessing health services because of the legal burden German authorities have made no substantial changes to counter these problems.

2.4.1. Effectiveness of the NRSF in addressing the problems

Theoretically, every person in Germany has the right to medical care regardless of their residence status. Equal access to the German healthcare system is enshrined in Article 2, Paragraph 2, Sentence 1 of the Basic Law as the right to life and physical integrity. In addition, since 2007, all people living in Germany have been subject to a general insurance obligation. However, the practical implementation of this is complicated, especially for disadvantaged Roma from foreign countries. For them, access to the healthcare system depends on several factors, above all, their residence status and employment, which are subject to compulsory insurance.

There is no ethnicity-based data available on the healthcare system in Germany. However, counselling centres estimate that the proportion of disadvantaged EU citizens, including Roma, facing difficulties accessing to healthcare is very high.⁶¹ EU citizens must have health insurance if they live in Germany permanently. Those who are only staying in Germany temporarily must have a European Health Insurance Card (EHIC).⁶² The prerequisite in both cases, however, is that the EU citizen should have health insurance in the home country, which is often not the case for disadvantaged Roma. In many cases, it is very difficult for disadvantaged Roma to obtain the documents required to access health insurance in the country of origin. Further problems in this context are that they simply cannot afford health insurance; additionally, if they do take out statutory health insurance, they incur high premium debts. CSOs like Amaro Foro report that rejection by health insurance companies and slow admission processes in Berlin likewise nationwide are widely used bureaucratic practices.⁶³ Even the Health Department of the Senate Administration for Science, Health and Care in Berlin writes very openly on its website that many Roma are affected by difficulties in accessing health insurance benefits as EU citizens.⁶⁴

Furthermore, the Federal Government requires 'conditions under Union law' for the exercise of the right to freedom of movement even before EU citizens entitled to freedom of movement enter Germany. This also includes existing health insurance cover. A revocation of the right to freedom of movement can, for example, be determined by the foreigners' authority based on Section 2 (4) of the Freedom of Movement Act/EU that the right to freedom of movement does not exist.⁶⁵ Non-working EU citizens only have a right of residence if they have adequate health insurance cover and sufficient financial means.

⁶¹ Recognising this problem, the Equal Treatment Office for EU Workers published the brochure 'Access to the Healthcare System for EU Citizens, EEA Nationals and Swiss Nationals', which was last updated in November 2022.

German Association of Free Welfare Organizations [Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege – BAGFW]. (2022). *Zugang zum Gesundheitssystem für Menschen mit Migrations- und Fluchtgeschichte* [Access to the Healthcare System for People with a Migration and Refugee Background]. Available at: https://www.bagfw.de/fileadmin/user_upload/Veroeffentlichungen/Publikationen/Zugang_Gesundheitssystem_2022_bf.pdf

⁶² Federal Government Commissioner for Migration, Refugees and Integration / EU Equal Treatment Office. (n.d.). *Health Care Insurance in Germany*. Available at: <https://www.eu-gleichbehandlungsstelle.de/eugs-de/eu-buerger/infothek/krankenversicherung/krankenversicherung-1813494#Vor%C3%BCbergehender>

⁶³ Amaro Foro Berlin. (2024). *Antiziganistische Vorfälle. Rückblick und Auswertung 2023* [Antigypsyist Incidents. Review and Assessment 2023], p. 86.

⁶⁴ Senate Department for Health, Berlin [Senatsverwaltung für Gesundheit, Berlin]. (n.d.). *Health Care Entitlements and Access for EU Citizens without Health Insurance in Berlin* [Krankenversicherung für EU-Bürgerinnen und –Bürger ohne Krankenversicherung in Berlin]. Available at: <https://www.berlin.de/sen/gesundheit/gesundheitswesen/menschen-ohne-krankenversicherung/eu-buerger-1367084.php>

⁶⁵ Riedner, L. (2017). *Aktivierung durch Ausschluss. Sozial- und migrationspolitische Transformationen unter den Bedingungen der EU-Freizügigkeit* [Activation through Exclusion. Social and Migration Policy Transformations under the Conditions of EU Freedom of Movement], in: *movements. Journal für kritische Migrations- und Grenzregimeforschung*

The current NRSF also incomprehensibly follows this ‘logic of preconditions’, which is why it was already criticised in the last Roma Civil Monitor report on Germany. With this NRSF, Germany claims to thoroughly implement the EU Roma Strategy 2030 at the national level in terms of ensuring the participation of Sinti and Roma in order to combat marginalisation and poverty, which also includes the health sector.⁶⁶

In the NRSF is also stated that for EU citizens residing in Germany under the right to freedom of movement, there are ‘extensive possibilities’ to ‘obtain cover in the event of illness’.⁶⁷ However, this one-dimensional assumption of the complex reality of EU-migration fails to recognise the fact that solid social security is very difficult to achieve. As a part of administrative defence mechanisms against migration, which are in line with a general worsening of the political and social stance on migration, Authorities can undermine the freedom of movement by excluding immigrants from other EU countries from any social services for up to three months. This is considered an indirect deportation tactic by most CSOs active in the field.⁶⁸

The right to comprehensive healthcare for EU citizens living in Germany is directly linked to employment. As long as EU citizens are not employed and subject to compulsory insurance, they must take out private healthcare insurance by paying the current minimum monthly contribution of 185 EUR. Disadvantaged foreign Roma often cannot afford this payment.

An EU citizen in Germany seeking employment does not have the right to statutory health insurance, but only to emergency treatment. Restrictions for EU citizens with regard to social benefits, including healthcare, were further tightened in 2017.⁶⁹ The draft law aimed to “exclude entitlement to social benefits if persons without a substantive right to freedom of movement or residence or who are in Germany solely to look for work are not entitled to social benefits”.⁷⁰ These have been in force since then and meanwhile the right-wing party AfD is aiming at a further worsening of the law.⁷¹

2.4.2. Addressing the problems beyond the NRSF

According to MIA, Sinti and Roma experience discrimination in the German healthcare sector. Besides the structural problems, which are a result of underlying antigypsyist law practices, Sinti and Roma, especially those disadvantaged, are regularly excluded when trying to get access to health services, either in the form of doctors’ practices or in hospitals. This includes especially refusals of appointments or medical treatments.

[*Journal for Critical Migration and Border Regime Studies*], Year 3, Issue 1/2017, p. 103. Available at: <https://movements-journal.org/issues/04.bewegungen/06.riedner--aktivierung-durch-ausschluss.pdf>

⁶⁶ Roma Civil Monitor. (2022). *Civil Society Monitoring Report On The Quality Of The National Strategic Framework For Roma Equality, Inclusion, And Participation In Germany*, p. 23 ff. Available At: <https://romacivilmonitoring.eu/wp-content/uploads/2023/07/RCM2-2022-C2-Germany-FINAL-PUBLISHED-CATALOGUE.pdf>

⁶⁷ Federal Ministry of the Interior and Community. (2022). *Tackling Antigypsyism, Ensuring Participation. National Strategic Framework to Implement the EU Roma Strategic Framework in Germany*, p. 61. Available at: https://commission.europa.eu/system/files/2022-10/1_1_german_national_strategic_framework_2022-2030.pdf

For a critical analysis of this policy, see: Roma Civil Monitor. (2019). *Civil Society Monitoring Report On Implementation Of The National Roma Integration Strategy In Germany: Assessing The Progress In Four Key Policy Areas Of The Strategy*, p. 27 ff. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-germany-2018-eprint-fin-3.pdf>

⁶⁸ Interview with Förderverein Roma e.V. on 11 November 2022

⁶⁹ Roma Civil Monitor. (2019). *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Germany: Assessing the Progress in Four Key Policy Areas of the Strategy*, p. 29. Available at: https://www.bqbl.de/xaver/bqbl/startxav?start=%2F%2F%5B%40attr_id%3D%27bqbl116s3155.pdf%27%5D#_bqbl_%2F%2F%5B%40attr_id%3D%27bqbl116s3155.pdf%27%5D_1728042355423

⁷⁰ Federal Ministry of Labour and Social Affairs [Bundesministerium für Arbeit und Soziales – BMAS]. (n.d.). *Ansprüche ausländischer Personen nach dem SGB II und SGB XII: Stellungnahme des Deutschen Städtetages [Entitlements of Foreign Nationals under SGB II and SGB XII: Statement by the German Association of Cities]*. Available at: https://www.bmas.de/SharedDocs/Downloads/DE/Gesetze/Stellungnahmen/sqb-ii-sqb-xii-ansprueche-auslaendischer-personen-dt-staedtetq.pdf?__blob=publicationFile&v=2

⁷¹ German Bundestag. (2024). *Motion by Members of Parliament and the AfD Parliamentary Group: Safeguard the Welfare State – Limit Citizen's Benefit for EU Citizens and Third-Country Nationals*. Printed Matter 20/10063, 20th Legislative Period, 16 January 2024. Available at: <https://dserver.bundestag.de/btd/20/100/2010063.pdf>

Organisations of Sinti and Roma, such as Amaro Foro (Berlin), report no changes in the health sector for foreign Roma over the last ten years.⁷² Anyone who is not guaranteed healthcare in the regular system is dependent on available extraordinary health care programmes. In the best-case scenario, treatment is provided via outpatient care in two or three different locations that are overcrowded, such as in Frankfurt (Hessen). Here too, Roma migrants are met with rejection and are 'offered' to leave the country.⁷³ The public clinic for disadvantaged Sinti and Roma at the municipal health department in Frankfurt has been closed down completely for several years.⁷⁴

In recent years, clearing centres have been established as best practices for individuals without health insurance or with an unclear insurance status. The aim is to facilitate access to the German healthcare system. Their task is to clarify the conditions for individual access to health insurance. If this is not possible, the clearing centres check whether, in the event of an acute illness, the costs of medical treatment, e.g. via emergency aid under SGB II, are covered. If neither is possible, patients are referred to non-governmental initiatives for basic medical care. Those seeking advice in the clearing centres are EU citizens, asylum seekers, Germans and third-country nationals with or without status. Hence, clearing centres are one of the rare healthcare concepts from which Roma with EU citizenship can benefit. The challenge here lies in the sabotage strategies of the right-wing party Alternative for Germany (AfD, *Alternative für Deutschland*). In 2022, the party tried to undermine this important project. Through a political petition in the state parliament of North Rhine-Westphalia, the AfD parliamentary group aimed to cut out the clearing centres from any state funding. The petition stated that Roma, as poverty migrants from Bulgaria and Romania, would abuse the EU Freedom of Movement Act.⁷⁵ In addition, the AfD blamed the clearing centres for undermining the Freedom of Movement Act since having a health insurance is a prerequisite of the act. Thus, the clearing centres would help migrants obtain the right of residence, although they are not legally entitled persons according to the act.

2.5. Housing, essential services, and environmental justice

Housing remains a central issue for Sinti and Roma in Germany, closely tied to discrimination, antigypsyism, and structural inequalities.⁷⁶ Although German housing policies have made some progress through social housing projects in several cities, there are still significant barriers preventing Sinti and Roma from accessing safe, affordable, and dignified housing.⁷⁷ Discrimination in the housing markets, deprived housing and antigypsyism in refugees' accommodations are the most common problems Sinti and Roma face in the housing sector. No targeted policies or measures have been implemented in the last two years for direct and structural antigypsyism in housing.

2.5.1. Effectiveness of the NRSF in addressing the problems

No significant policies have been implemented to address antigypsyism in the housing sector. An improvement of the General Equal Treatment Act (AGG), as proposed in the governments' coalition treaty, could have amended this. However, this had not been pursued. Often, housing is denied through openly antigypsyist remarks or covert indicators. A concrete example of this discrimination occurred in 2023 in North Rhine-Westphalia, where a Roma family was demonstrably denied a rental apartment after the landlord discovered their Roma identity. Despite the AGG, which aims to prohibit discrimination in the housing market, legal loopholes still exist in practice. The AGG's exception (Section 3, Art. 19, no. 3) allows landlords to treat applicants

⁷² Amaro Foro. (2024). *Antiziganistische Vorfälle: Rückblick und Auswertung 2023 [Antigypsyist Incidents: Review and Assessment 2023]*, p. 26.

⁷³ Interview with Förderverein Roma e.V. on 11 November 2022.

⁷⁴ Roma Civil Monitor. (2019). *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Germany: Assessing the Progress in Four Key Policy Areas of the Strategy*, p. 38.

⁷⁵ See: <https://www.landtag.nrw.de/portal/WWW/dokumentenarchiv/Dokument/MMD18-983.pdf>. See also: <https://www.landtag.nrw.de/portal/WWW/dokumentenarchiv/Dokument?Id=MMP18%2F8%7C43%7C49>, <https://afd-fraktion.nrw/allgemein/clearing-beratungsstellen-sind-brutstaetten-des-unrechts/>.

⁷⁶ Attia, I., Randjelovic, S., Ortega, J., & Gerstenberger, K. (2020). *Racism Experiences of Romani and Sinti People: Discrimination Against Sinti and Roma in the Housing Market*, p. 93. Alice Salomon University Berlin.

⁷⁷ European Parliament (2022). *Resolution Of 5 October 2022 On The Situation Of Roma People Living In Settlements In The EU*. Available at: [https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2022/2662\(RSP\)](https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2022/2662(RSP))

differently if this serves to "create and maintain socially stable housing structures" but only when the rental property comprises fewer than 500 flats. While this exception was originally intended to protect housing stability, it cannot legally be applied as a pretext for racial or ethnic discrimination. However, human rights organisations argue that this provision fosters indirect discrimination against minorities such as Sinti and Roma, as it leaves room for abuse under the guise of maintaining social balance. Consequently, the rule is increasingly criticised as outdated and insufficient, with calls for reform to close these legal loopholes and ensure that such discriminatory practices are not tolerated in any context. The improvement of the AGG was a project of the current government; however, it has not been implemented.

2.5.2. Addressing the problems beyond the NRSF

Sinti and Roma continue to face antigypsyism in the housing area. The Fundamental Rights Report 2023 by the Fundamental Rights Agency (FRA)⁷⁸ provides information that across Europe, including Germany, Sinti and Roma are often excluded from housing opportunities because of their ethnic background. Landlords and real estate agents frequently reject applications once they learn that the applicants belong to this minority.

In recent years, the issue of *Schrottimobilien* (deprived housing) in Germany has disproportionately affected marginalised communities, particularly disadvantaged Sinti and Roma. These properties are characterised by overcrowded, poorly maintained living conditions, which exacerbate the social exclusion of their inhabitants. A recent article⁷⁹ from the *Deutscher Städtetag* (German Cities Association) highlighted efforts to combat the persistent issue of *Schrottimobilien* in Germany, particularly in regions with high levels of immigration and housing demand, such as the Ruhr area. These neglected properties are often bought during forced auctions by investors with no intention of renovation, but rather to exploit tenants, frequently marginalized communities such as disadvantaged Roma and Sinti, especially foreign Roma, who are often funnelled into these substandard housing units due to widespread antigypsyism in the housing market, where discriminatory practices prevent them from accessing adequate housing.

Reports from the Reporting and Information Centre on Antigypsyism (MIA)⁸⁰ have highlighted the persistence of these issues, noting that Sinti and Roma are frequently subjected to derogatory treatment, particularly in the context of housing. In 2022, antigypsyism was reported not only in overt ways but also through subtle forms of unequal treatment, such as scrutinising looks, avoidance, or covert observation, as highlighted by the study on "Racism experiences of Romani and Sinti people in Germany".⁸¹ These behaviours were especially pervasive in the housing sector. Approximately 20% of 621 documented cases in 2022,⁸² and a significant 15% of 1,233 reported cases in 2023 were documented by MIA in the residential context. Due to these findings, MIA will publish a focus report on this topic in early 2026.

Over half of the reported cases took place in refugee accommodations. Members of the minority who fled to Germany from their Ukrainian homeland to escape the Russian full-scale invasion remain in inhumane accommodation for particularly long periods. Ukrainian Roma refugees face antigypsyism and discrimination in accommodation centres (see Chapter 3 on antigypsyism against Ukrainian refugees).⁸³

MIA received reports of Sinti and Roma being systematically insulted in an antigypsyist manner by their neighbours and, in some cases, physically threatened. Those affected were forced to move as a result. In one

⁷⁸ FRA (2023). *Fundamental Rights Report 2023: Roma Equality And Inclusion*, p. 133. Available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2023-fundamental-rights-report-2023_en_1.pdf

⁷⁹ German Association Of Cities (2024). *Wirksames Instrument Gegen Krumme Geschäfte Mit Schrottimobilien* (Effective Instrument Against Shady Dealings With Junk Real Estates). Available at: <https://www.staedtetag.de/presse/pressemeldungen/2024/gesetzentwurf-wirksames-instrument-gegen-krumme-geschaefte-mit-schrottimobilien>

⁸⁰ MIA. (2023). *Antigypsyist incidents in Germany 2023 – Second annual report*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2024/10/MIA_Bericht_ENG.pdf

⁸¹ *Idem*

⁸² MIA. (2022). *Antigypsyist incidents in Germany 2022 – First annual report*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2023/12/Kurzfassung-Jahresbericht-2022_MIA_ENG.pdf

⁸³ MIA. (2024). *Antiziganismus gegen ukrainische Roma Geflüchtete in Deutschland [Antigypsyism against Ukrainian Roma Refugees in Germany]*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2024/04/Ukrainebericht_internet-15.4.pdf

instance, neighbours loudly banged on doors at night, creating an unsafe environment that left parents too afraid to let their children play outside or travel alone.⁸⁴

Disadvantaged Roma people who have become homeless have to live in overcrowded accommodations, in poor hygienic conditions or improvised shantytowns and tent settlements. It can be assumed that the number of such dwellings is increasing in many German cities, as the total number of homeless people in Germany is also rising significantly.⁸⁵

Sinti and Roma continued to face discrimination when seeking accommodation. Individuals frequently faced rejection based on their perceived minority status. Some landlords openly refused to rent to Sinti and Roma without further explanation. In contrast, others covertly denied applications by relying on discriminatory assumptions.⁸⁶ This applies to German citizens as well as EU migrants and Roma refugees. They are often denied housing if property owners attribute their minority status to them.

In October 2024, the building Iduna Centre in Dortmund became the site of a disturbing incident, highlighting the continued threats that Sinti and Roma face in Germany. A series of 80 swastikas⁸⁷ were discovered within the building, symbolising the ongoing presence of fascism and its specific targeting of marginalised communities, including Sinti and Roma. This incident underscores the persistent dangers that fascist ideologies pose to Sinti and Roma communities, especially in the context of housing, where they are often relegated to unsafe or inadequate living conditions. The Iduna Centre, already known for its deteriorating state, now also stands as a reminder of the rising tide of far-right extremism that seeks to intimidate and marginalise these vulnerable groups.

The incident brings into focus the broader issue of housing discrimination against Sinti and Roma, who often face institutional neglect and are forced to live in areas that are not only physically degrading but also rife with social and political hostility. The presence of such fascist symbols in residential areas further alienates these communities, making them targets of both social exclusion and hate crimes.

The housing crisis in Germany continues to worsen, disproportionately affecting disadvantaged Sinti and Roma. In major cities like Berlin, Hamburg, and Frankfurt a. M., where the rental market is especially strained, Roma families struggle to secure housing due to systemic discrimination. A 2023 report by Berlin HYP & CBRE highlights that rising rental prices (by 30% in the last five years) and insufficient social housing disproportionately affect minorities in Berlin, particularly low-income families, migrants, and refugees. The intense competition for rental units, coupled with loopholes that allow landlords to increase rents, creates additional challenges for these groups. With migration driving demand and regulatory gaps persisting, minorities often face discrimination, informal rental agreements, or are pushed into precarious housing situations.⁸⁸

Disadvantaged Roma from Eastern Europe living in Germany are particularly affected. Many of them are working in precarious employment, making it almost impossible to gain a foothold in the private housing market. Access to social housing is often denied due to lengthy long bureaucratic processes, and many individuals lack permanent residency status. Public authorities have been observed using arbitrary discretion in housing allocations, excessively scrutinising or questioning the authenticity of documents. Families are often placed in neighbourhoods with poor infrastructure, reinforcing segregation and perpetuating stereotypes about large families and so-called parallel societies.⁸⁹ This isolation extends beyond housing, as addresses in such

⁸⁴ Interview with Förderverein Roma, October 2024

⁸⁵ Deutsche Welle. (2023). *Wealthy Germany Fails to Slash Homelessness*. Available at: <https://www.dw.com/en/germanys-government-fails-to-slash-growing-homelessness/a-67777139>

⁸⁶ Interview with Sinti Verein Ostfriesland

⁸⁷ Roma Antidiscrimination Network. (2024). *80 Hakenkreuze im Iduna-Zentrum. Der Faschismus bedroht Roma weiterhin [80 Swastikas in Iduna-centre. The Fascism Still Threatens Roma]*. Available at: https://ran.eu.com/80-hakenkreuze-im-iduna-zentrum-der-faschismus-bedroht-roma-weiterhin/?fbclid=IwY2xjawGFzf1leHRuA2FlbQlXMQABHbtHXIhIQ59HE1p-VJilVy_9Ziq1rh_xk4PMYCX5Qjs7jkxXL_yRZr5A_aem_DMRON2CZpVXvlwjFDpc1mw

⁸⁸ Berlin HYP & CBRE. (2023). *Housing Market Report Berlin 2023*. Available at <https://tinyurl.com/ycp8apn6>

⁸⁹ Interview with Romano Sumnal e.V., Saxony, October 2024

areas can trigger discrimination in employment, education, and vocational opportunities. However, as stated in the 2022 Roma Civil Monitor Report on Germany,⁹⁰ many Roma households still experience housing deprivation, further limiting their access to essential services such as education and healthcare.

Accessing housing often requires digital literacy, devices, and language proficiency – resources that are not readily available to disadvantaged communities arriving in Germany. This exclusivity limits housing options, especially in cities where demand outstrips supply. In urban centres like Frankfurt, Munich, or Berlin, rising rents have made it impossible for even middle-class families to afford adequate housing. Large apartments suitable for families with more than two children are primarily found in high-price segments, pushing many Sinti and Roma into overcrowded or substandard conditions.

The NRSF, developed within the broader EURSF, acknowledges that housing is a critical factor in addressing the social exclusion of Roma communities. This strategy aims to enhance access to social housing and promote anti-discrimination measures in the housing market, ensuring Roma families have equal opportunities. The European Commission's assessment of the strategy, however, notes that while progress is being made, significant challenges remain, particularly in combating antigypsyism and ensuring housing security.⁹¹

2.6. Social protection

Sinti and Roma, especially those disadvantaged, often face discrimination when they have to deal with public employment offices (*Agentur für Arbeit* and Jobcenters), Social Welfare Offices (*Sozialämter*), Youth Welfare Offices (*Jugendämter*) and Foreigners Offices. No measures have been undertaken in these fields to address the discrimination faced by Sinti and Roma, especially those disadvantaged in the fields of social protection and income support. The absence of measures is alarming, taking into consideration the high number of incidents of discrimination faced by Sinti and Roma by civil servants of those institutions.

2.6.1. Effectiveness of the NRSF in addressing the problems

A significant problem is that Sinti and Roma, who are victims of discrimination by civil servants of public institutions, cannot resort to the General Equal Treatment Act (AGG) because it does not apply to the public sphere. The only exception is Berlin, which passed an anti-discrimination law applicable to the state sphere. That means that when someone faces discrimination by a public institution, they cannot file a complaint with the AGG.

2.6.2. Addressing the problems beyond the NRSF

Institutional antigypsyism continues to be a blatant problem. It exists in unemployment offices, youth welfare offices, immigration authorities, municipal administrations, and the education sector. Disadvantaged Sinti and Roma face discrimination when they have to access social support because they are unemployed, or they have to apply for top-up benefits.

Legislation and mechanisms should be implemented to enable Sinti and Roma to encounter institutional discrimination. Independent complaint offices should be set up in public institutions. In some public institutions, there are complaint offices; nevertheless, these are not independent bodies and do not guarantee an impartial complaining proceeding. Additionally, the AGG should be developed so that it will be applicable to the state sphere. The unemployment offices and Youth Welfare Offices are under the jurisdiction of the *Länder*. Thus, the fight against institutional antigypsyism should be a priority to be addressed at the *Bund-Länder-Kommission*.

⁹⁰ Zentralrat Deutscher Sinti und Roma; Sozialfabrik; Amaro Drom (2022)

⁹¹ European Commission. (2023). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Assessment report of the Member States' national Roma strategic frameworks* (SWD(2023) 3 final). Available at: https://www.eeas.europa.eu/sites/default/files/documents/Assessment%20report%20of%20the%20Member%20States%E2%80%99%20national%20Roma%20strategic%20frameworks.pdf?utm_source=chatgpt.com

2.7. Social services

Disadvantaged Sinti and Roma face discrimination in social services and by social workers. The NRSF does not address this serious problem. No measures have been undertaken after the publication of the NRSF.

2.7.1. Effectiveness of the NRSF in addressing the problems

Disadvantaged Sinti and Roma resort to social services because they need support to claim their social rights. Often, they face discrimination in social services and by social workers. Although the field of social work is one of the societal fields where disadvantaged Sinti and Roma face discrimination, in the NRSF, there are no measures foreseen for addressing antigypsyism in social services. Since the publication of the NRSF, no significant measures have been taken to address this phenomenon.

2.7.2. Addressing the problems beyond the NRSF

MIA has recorded a high number of antigypsyist incidents in social services and by social workers. Discrimination victims report on disrespectful treatment by social workers and employees of social services, from both public and private institutions. As stated in the previous report, a common thought among some social workers is that the disadvantaged Sinti and Roma are in this situation because of their culture, and that they are not capable of escaping the vicious circle of social exclusion.

Most Sinti and Roma organisations provide social counselling to community members who feel more secure using this service. Regional and local governments fund these counselling services. Additionally, there are several FEAD projects targeting disadvantaged EU citizens, mainly from Bulgaria and Romania. A part of these EU citizens are Roma.

2.8. Child protection

Children are particularly vulnerable people whose right to protection, promotion and participation should be safeguarded by the United Nations Convention on the Rights of the Child. The ban on discrimination is one of four basic principles. For children from Sinti and Roma families, the NRSF also attempts to strengthen their civil and social rights, such as their right to (pre-)school education. Nevertheless, Sinti and Roma children are particularly often affected by discrimination and racism.

2.8.1. Effectiveness of the NRSF in addressing the problems

The NRSF does not foresee any measures for countering antigypsyism and discrimination faced by Sinti and Roma children and young people, especially in education and housing. No significant policy or measure has been developed since the previous monitoring. Disadvantaged Roma children from foreign countries benefit from the FEAD programme. A large number of FEAD projects have disadvantaged Roma, who are EU citizens, as clients.

The evaluation of the past FEAD implementation period has yielded positive outcomes.⁹² Nevertheless, CSOs have criticised that Roma have faced discrimination by organisations implementing FEAD projects (see the above chapter on employment).

2.8.2. Addressing the problems beyond the NRSF

MIA documents antigypsyist incidents in Germany since 2022. Particular attention is also paid to children who are affected by antigypsyism. The experience of antigypsyism in childhood and youth makes equal participation more difficult at an early age, increases social inequality and increases the risk of lifelong disadvantage and recurring experiences of discrimination. We use data from MIA to show in which areas Sinti and Roma children and young people are particularly affected by antigypsyism.

⁹² Federal Ministry of Labour and Social Affairs. (n.d.). *Evaluation Plan of FEAD 2021–2027*. https://www.esf.de/portal/DE/ESF-Plus-2021-2027/Monitoring_Evaluation/inhalt.html

CSOs report continuously cases that youth welfare offices take children into care, although there is often no evidence that the well-being of the children is affected; decisions are often taken on discriminatory grounds.⁹³

In around one in four cases MIA has documented, children and young people are directly affected by antigypsyism, which means that they are directly addressed, being discriminated against or even physically attacked. In approximately 65% of these cases, the individuals affected are under 14 years old. In addition, there are cases in which children and young people are indirectly affected, for example, when their parents are discriminated against, including in the authorities, in the work context or in the residential context.

In approximately 60% of the antigypsyist incidents documented by MIA, children and young people were subject to antigypsyist discrimination – on an individual or institutional level. In 18% of cases, children and young people have faced verbal attacks, i.e. primarily insulted as ‘Gypsy’, which in German is a very offensive term. In around 12% of cases, Sinti and Roma children are even physically attacked or threatened with physical violence. In most cases, the attacks and threats come from people of the same age.

Sinti and Roma children face antigypsyism and discrimination, especially in the education sector and in the housing context. Approximately 45% of incidents recorded by MIA occur in the education sector, in many cases involving discrimination. Even in preschool age, children's access to daycare places is made difficult, and discrimination often continues at school, usually on complex levels: bullying by classmates, antigypsyist discrimination by teachers and denial or downplaying of antigypsyist incidents by school management.

Sinti and Roma children are particularly exposed to antigypsyist discrimination in housing, in 24% of cases documented by MIA. It occurs on an individual level, primarily through neighbours or landlords. The affected children and young people are insulted; they are excluded from social contacts because other children are forbidden to play with them; they are also driven out of their homes through harassment. They are also affected if their parents cannot find suitable housing due to antigypsyist discrimination. The children who live in refugee accommodation are also particularly disadvantaged. The inhumane accommodation often lasts for a long time.

Overall, the incidents MIA has documented in the educational and housing context show that the principles of protection, support and participation of Sinti and Roma children are often not safeguarded. In the NRSF, no measure is foreseen to counteract discrimination or bullying at school to prevent child poverty. In Germany, one in every five children continues to be at risk of falling into poverty.

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

Sinti and Roma perspectives are still underrepresented, and the few existing cultural projects are, in most cases, driven by organisations of Sinti and Roma and rarely make it into mainstream cultural institutions. The Arts and Culture sector must become far more comprehensive, including minority perspectives, the representation of Sinti and Roma cultures, and a more accurate portrayal of their history. Additionally, the inclusion of cultural experts from Sinti and Roma communities in decision-making roles is crucial. Above all, we need more public sustainable long-term funding and strategies on the part of the Federal Government.

2.9.1. Effectiveness of the NRSF in addressing the problems

With regard to the field of arts and culture, the NRSF states that:

“Equally important for the Federal Government in the fight against antigypsyism is the promotion of historical and cultural education. Art, culture, and historical reappraisal as well as the teaching of media skills make a decisive and lasting contribution to strengthening democratic values and social order. [...] The Federal Government will continue to provide appropriate structural and financial support for the promotion of art and culture and the historical reappraisal of the Sinti and Roma in Germany.”

Moreover, it also states that:

“Despite the size and importance of this European population group, the history, culture, and language of the Roma are largely unknown or only barely known to the majority population.”

⁹³ Information provided through interviews and direct communication by MIA, Roma Förderverein Frankfurt, Amaro Foro, and a group of Ukrainian Roma refugees in Brandenburg

Prejudices and a lack of knowledge about minorities often foster an environment of intolerance, ignorance and exclusion.”

On the one hand, the NRSF appears to acknowledge that the deconstruction of prejudices involves knowledge circulation and is fundamental for the Sinti and Roma minority to be represented and included within the cultural field. On the other hand, it does not elaborate on any concrete steps necessary for this to happen. Only a few initiatives for the promotion of cultural-political education are mentioned, such as the Documentation and Cultural Centre of German Sinti and Roma, which is institutionally funded with about 2 million EUR per year and promotes historical knowledge on Sinti and Roma, and projects such as the RomArchive, a platform initially financed by the German Federal Cultural Foundation and soon by the Federal Agency for Civic Education, established in 2019 to collect and showcase the arts and cultures of Sinti and Roma as part of European cultural history,⁹⁴ or the project ‘Jekhipe – Together’ by Amaro Drom⁹⁵ or the project ‘Together emPö-wern! Resilience Strategies Against Racism’ by RAA Berlin.⁹⁶

There are also funded projects on remembrance. A very important project in this field, funded by the Federal Foreign Office, is the Encyclopaedia of the Nazi Genocide of the Sinti and Roma in Europe, the first comprehensive overview of the existing knowledge on the persecution and murder of the Sinti and Roma under National Socialism.⁹⁷

In the field of media, film and literature, the Federal Ministry for Education and Research (BMBF) finances the project ‘Medial Antigypsyism – From the Interdisciplinary Analysis to the Critical Media Competence’ (MeAviA) that is carried out by the University of Heidelberg and the Pedagogical College. It lasts from 2023-2026 and deals with the antigypsyist representation in literature, film and public media coverage.⁹⁸

2.9.2. Addressing the problems beyond the NRSF

Most of the existing initiatives have been initiated by organisations of Sinti and Roma themselves and are mainly concentrated in the capital city. To mention the more relevant ones: since 2022, the Berlin-based self-organisation RomaTrial has been running and curating the ‘Grüner Salon’ (Green Salon) at the *Volksbühne*, a theatre in the city centre.⁹⁹ There is an ongoing programme as well as events and festivals dedicated to combating antigypsyist stereotypes and prejudices. The EVZ Foundation supports this project. Additionally, the Maxim Gorki Theatre, another mainstream theatre in Berlin, regularly features plays and contributions in its programme that address antigypsyism. The Berlin-based organisation Amaro Foro has been organising the Hederlezi Roma Festival in Berlin-Neukölln for many years with almost no public funding. Hederlezi is a spring festival and, at the same time, a meeting place for Roma and non-Roma alike.

In addition to Berlin, there are also isolated cultural initiatives in other federal states. For example, the Rhineland-Palatinate Regional Association of German Sinti and Roma has been organising the ‘AVEN’ (‘Come’ in Romani language) cultural festival in Landau since 1988. In the city of Dortmund, the ‘Djelem Djelem Festival’ (‘I Went, I Went’ Festival) has been organised for over ten years now, the largest festival of Romani cultures in Germany, with the participation of Roma organisations, to present the diversity and beauty of this minority and to promote understanding of Roma and Sinti cultures. This initiative is financed by various sponsors, including the Dortmund Cultural Office and the Roma Education Fund. Romano Sumnal has organised the cultural festival ‘Latcho Dives’ (Safe Journey) since 2020, taking place every second year. There are also other small realities of this kind scattered throughout Germany, but the overall cultural landscape remains very weak.

⁹⁴ Information on the award-winning project available at: <https://www.romarchive.eu/de/>

⁹⁵ See Amaro Drom’s project archive: <https://amarodrom.de/projekte/abgeschlossene-projekte/jekhipe-gemeinsam/>.

⁹⁶ See RAA’s archive: <https://raa-berlin.de/projekt-2-4-6>.

⁹⁷ Encyclopaedia of Gender and Sexuality in Roma Communities. Available at: <https://encyclopaedia-gsr.eu/>

⁹⁸ Pädagogische Hochschule Heidelberg [University of Education Heidelberg]. (n.d.). MEAVIA – Antiziganismus Prevention Project [Projekt MEAVIA – Prävention von Antiziganismus]. Available at: <https://www.ph-heidelberg.de/antiziganismuspraevention/projekte/meavia/>

⁹⁹ For events archive and project description see: RomaTrial e.V. (n.d.). *Grüner Salon Project at the Volksbühne – An Interdisciplinary Platform for Roma* [Projekt Grüner Salon an der Volksbühne – Eine interdisziplinäre Plattform für Roma]. Available at: <https://romatrial.org/projekte/gruener-salon/>

Another noteworthy initiative is the work of ERIAC - the European Roma Institute for Arts and Culture, a milestone in the recognition of Sinti and Roma arts and culture in Germany and Europe. ERIAC opened in Berlin in 2017 and is now located both in Berlin and Belgrade. ERIAC obtains funding from the Ministry of Foreign Affairs. It exists to increase the self-esteem of Roma and to decrease negative prejudice among the majority population towards Sinti and Roma through the arts, culture, history, and media. ERIAC also frequently collaborates with the Gallery Kai Dikhas, another space in Berlin dedicated to promoting Sinti and Roma art and culture.

The only worth-mentioning development on cultural-political level is that in December 2022 the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany (short in German: KMK), together with the Central Council of German Sinti and Roma and the Alliance for Solidarity with the Sinti and Roma of Europe, adopted a joint declaration on teaching the history and present of Sinti and Roma in schools, to intensify the study of the history and present of Sinti and Roma both in the classroom and extracurricular activities.

Although this is undoubtedly good news, the agreement primarily focuses on school education. A similar agreement should be stipulated, addressing both extracurricular education and cultural policy. It is time to enhance the visibility of Sinti and Roma history and culture, and to promote the inclusion of Sinti and Roma artists and cultural workers. Additionally, a comprehensive federal plan would be vital to strengthening and expanding the showcasing of Sinti and Roma cultural heritage within mainstream arts and culture institutions, thereby raising awareness among the majority society about Sinti and Roma history. Only through contact points and knowledge production generated by the minority's point of view is it possible to tackle everyday, structural, and institutional discrimination. Not only is it essential to develop measures for addressing antigypsyism through the arts and culture, but also to preserve the intangible legacy of this minority, such as language and tradition, both aspects that are slowly disappearing. Similarly, it is essential to maintain and promote the Culture of Remembrance. Despite successful implementations, the above-mentioned initiatives are certainly not enough to shape and improve the German cultural landscape in the long term.

3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

3.1. Antigypsyism against Roma refugees from Ukraine

Case study

Roma from Ukraine fled to Germany after the beginning of the full-scale invasion by Russia. The residence and rights of Ukrainian refugees are governed by the temporary protection system, specifically paragraph 24 of the Residence Law. In general, they obtain more rights than those in the asylum system, e.g., regarding choosing their place of residence, access to the labour market, and education.

Large parts of Ukrainian Roma experience antigypsyism by German authorities, by other refugees from Ukraine or by the local population in the places they live now. They have been experiencing direct, structural and institutional antigypsyism. Everyday discrimination is reflected in the lack or limited access to proper housing, education, social benefits, and other assistance and services for this group. Ukrainian Roma refugees face discriminatory treatment by police officers, employees of Deutsche Bahn, in administration, in social work and the education sector. They are segregated in refugee accommodation. In many accommodation centres for refugees, Ukrainian Roma received worse care than Ukrainians, who are perceived as 'white'. Social workers, interpreters, shelter managers, security personnel and volunteers were frequently involved in such incidents, with behaviours ranging from derogatory remarks to the refusal of services or even violent discourses and practices. For example, some interpreters refused to translate for Roma, and volunteers distributed fewer hygiene products to Roma refugees compared to others. Antigypsyist stereotypes – often involving accusations of poor hygiene, wasteful behaviour, noise disturbances, and even criminality – were routinely perpetuated in both refugee accommodations and private housing.¹⁰⁰

There are reports that local or district authorities rejected the reception of Ukrainian Roma refugees. In some parts of Germany, there were media campaigns against Roma refugees from Ukraine, claiming that they are bogus refugees or that they are not actually from Ukraine. These campaigns were fuelled by irresponsible, antigypsyist statements of politicians and restrictive regulations of authorities, which targeted only Roma to be controlled in order to determine if they are eligible for temporary protection.

Refugee Roma have the same rights and the same legitimate claim to support as their Ukrainian compatriots. Nevertheless, this equal protection is often denied to Ukrainian Roma refugees. Furthermore, Roma are suspected of not being 'real war refugees'. Roma were and are suspected by the German authorities of concealing their Ukrainian-Hungarian dual citizenship or entering Germany with forged Ukrainian passports. In some cases, Roma families who fled the war were pressurised by the authorities to leave Germany and return to their homeland, the Ukrainian war zone. German authorities have delivered instructions for denying Roma refugees with dual citizenship the protection status: 14 April 2022, the Federal Ministry of Interior issued an instruction to the authorities of the Länder stating that dual citizens are excluded from Temporary Protection, if and as long as they exercise their right to freedom of movement within the EU. Thus, the instruction implies that as long as they don't exercise their right to freedom of movement as an EU citizen, they are entitled to temporary protection. And Ukrainian refugees didn't exercise 'Freedom of Movement' when they fled Ukraine. On 5 October 2022, the Ministry issued a new instruction. This time, clearly stating that dual citizens are not entitled to assistance under temporary protection, and refusing access to accommodation and financial aid, as other refugees from Ukraine receive.

An enquiry by the Central Council of German Sinti and Roma to the Federal Office for Migration and Refugees (BAMF) has revealed that the Hungarian authorities had investigated a total of 5,794 suspected cases as of 8 May 2024. Hungarian citizenship was confirmed in 414 cases at this time. This corresponds to a rate of just around 7%. Cases were reported of Ukrainian Roma refugees who did not obtain any allowances or were not even allowed to live in refugee accommodation because they were suspected of having Hungarian citizenship.

This antigypsyist discrimination against Ukrainian Roma refugees should stop; the federal and state authorities should immediately stop providing instructions targeting dual citizens, as it disproportionately impacts Roma

¹⁰⁰ MIA. (2024). *Antiziganismus gegen ukrainische Roma-Geflüchtete in Deutschland [Antigypsyism Against Ukrainian Roma Refugees in Germany]*. Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2024/04/Ukrainebericht_internet-15.4.pdf

refugees, and withdraw the corresponding requests. The measures are disproportionate and result in Roma being pressured to return to the war zone. The Ukrainian Roma are descendants of Holocaust survivors and a few survivors of the genocide of Sinti and Roma in Nazi-occupied Europe. The Federal Government must recognise them as a group particularly worthy of protection.

3.1.1. Effectiveness of the NRSF in addressing the problem

The arrival of Roma refugees from Ukraine occurred after the release of the NRSF; therefore, the issue cannot be addressed by the NRSF.

Comprehensive measures countering antigypsyism and discrimination faced by large parts of Ukrainian Roma refugees are missing.

Policies addressing refugees are the competence of states and local governments. There have been some positive developments, such as an improvement in the schooling of Ukrainian Roma children in Mecklenburg-Western Pomerania.¹⁰¹ Unfortunately, this represents an isolated case. There is an urgent need to address the problems of Ukrainian Roma refugees, especially in the fields of housing, education and employment. For example, Roma children are facing structural antigypsyism in the education sector. They are experiencing segregation, general neglect and indifference on the part of the teachers and the school management.

Hence, there is insufficient awareness and political will among authorities at different levels, national and municipal alike, schools, administrations, and even welfare associations, in tackling the prevailing problems. Legislative obstacles are hindering Ukrainian Roma refugees in getting a secure residence status, especially when they have a Hungarian-Ukrainian dual citizenship or are suspected of having one, or even when they are speaking Hungarian. Few relevant political champions are advocating for their needs. On the contrary, politicians often provoke antigypsyist discourses about Ukrainian Roma refugees in public.

Also, Germany needs to fully acknowledge their status as a war refugee and raise awareness concerning their historical responsibility towards Ukrainian Roma Refugees. Furthermore, the government, like the BAMF and municipalities, must promote and finance a variety of measures to help refugees fully integrate and participate in their local communities. This includes providing more substantial support to children and young people in the education sector, primarily through measures that foster inclusion in regular schooling and aim to ban bullying at school. Mothers with children and elderly people should also be strongly supported, especially in healthcare issues. Awareness-raising training targeting civil servants working in the field of refugee services support should be urgently implemented. There should also be a focus on building up organisations which enable and empower Ukrainian Roma Refugees to advocate for their interests.

3.1.2. Synergy with other actions

There are no targeted policies, strategies and measures addressing antigypsyism and exclusion faced by Ukrainian Roma refugees. Ukrainian Roma refugees can access all (social) services provided to other refugees or other citizens that they can benefit from.

3.1.3. Roma participation

Supporting measures are often implemented by organisations of Sinti and Roma who try to reach out to the community of Ukrainian Roma refugees in Germany. However, those organisations are also struggling to secure proper funding to continue supporting refugees.

3.2. School segregation of Sinti and Roma children and young people

Sinti and Roma children are still facing segregation at school. One form of expression of segregation is the unjustified placement of Sinti and Roma pupils in special schools. This affects immigrant and refugee Roma as well as members of the autochthonous German Sinti and Roma minority. The criteria used by teachers and education authorities to make these decisions are not transparent and are often motivated by antigypsyism. Sinti and Roma are frequently placed in special schools and classes. This placement is, in almost all cases, based on discriminatory grounds. In these cases, school authorities allege that Sinti and Roma children have

¹⁰¹ Participation in a meeting with the Commissioner for Integration of Mecklenburg-Western Pomerania at the Office of the Federal Commissioner against Antigypsyism and for the Life of Sinti and Roma.

“language deficits”, “inability to work in a group”, “inappropriate social behaviour” and “learning problems”. These are no reasons to place a child in a special school. Regular schools should provide students with the necessary support to succeed academically. “Children from a migration background are often placed in special schools because of their insufficient German language skills, which are often misinterpreted as “language deficit” and then reinterpreted as “generally retarded development”. Not having attended a kindergarten can be misinterpreted as “not being able to work in a group” and as “lack of social skills”. Children are also placed in special education when they are unable to follow the class in a regular school, when they allegedly exhibit peculiar behaviour or when they disturb the class. All these are classified as children with “learning problems”.¹⁰²

Parents are either not informed at all, or not sufficiently informed about the consequences or are pressurised into agreeing to a transfer to a special school. This decision has devastating consequences for the young people's future. Generally, they are unable to complete vocational training after attending a special school.

3.2.1. Effectiveness of the NRSF in addressing the problem

The German Government includes no reference in the NRSF to the structural, institutional and direct discrimination that Sinti and Roma children are facing in the education system. Sinti and Roma face everyday antigypsyism at school, from teachers, other school personnel, classmates and school authorities. There are no specific measures to prevent and counter antigypsyism at school.

The NRSF states that all educational programmes offered by the Federal Government, the federal states, and the municipalities will always be open to German Sinti and Roma, as well as those who have immigrated from the EU and third countries, provided they have the right to permanent residence. This rule does not always apply to disadvantaged foreign Roma. Roma EU citizens and Roma refugees are often denied schooling for an extended period of time.

The NRSF does not formulate any goals aiming at preventing Sinti and Roma from segregation. The NRSF states that the German Federal Government attaches great importance to improving the educational participation and success of people with special educational needs. It will therefore continue to promote corresponding measures in the future. On the other hand, the assertion in the NRSF that Sinti and Roma as an entire group have special educational needs is an antigypsyist prejudice and should therefore be revised. Instead, the NRSF should include the goal that Sinti and Roma children have equal access to the regular school system and are treated equally at school.

The first step towards countering segregation of parts of Sinti and Roma pupils would be the recognition of the unjustified placement of Sinti and Roma children and young people in special schools. The Länder must be demanded to examine the criteria according to which Sinti and Roma children are placed in special schools. Organisations of Sinti and Roma, as well as anti-discrimination offices, should be involved in the evaluation of these criteria and the decision-making processes for placing Sinti and Roma children in special schools. All efforts should be made to avoid this drastic measure, which will negatively affect the further development of the concerned children and young people. Awareness-raising trainings on the history of Sinti and Roma and antigypsyism targeting teachers and school personnel should also be implemented.

A comprehensive plan to strengthen and expand school counselling/ mediator programmes should be implemented, including mandatory antigypsyism training for school personnel. These have proven to be a useful tool in supporting disadvantaged students and countering structural and institutional discrimination in schools. School counselling must be designed in such a way that not only members of the minority are supported, but also all those involved in the school context, including teachers, social workers, school management, pupils, and parents. The majority of these people engaged in the school context have little or even incorrect knowledge about Sinti and Roma. This can lead to current discrimination, reinforcing the transgenerational traumas that burden the relationship of many members of the minority to the education system. School counsellors and mediators provide information in this regard and make a significant contribution to counter antigypsyist prejudices.

¹⁰² Roma Civil Monitor (2019). *Civil Society Monitoring Report on Implementation of the National Roma Integration Strategy in Germany. Assessing the Progress in Four Key Policy Areas of the Strategy*, p. 42. Available at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-germany-2018-eprint-fin-3.pdf>

Furthermore, projects should be implemented that promote dialogue between pupils of different origins and cultural backgrounds. These projects must include autochthonous and allochthonous Sinti and Roma.

3.2.2. Synergy with other actions

At the community level, several projects aim to counteract discrimination in schools. For example, in Munich, there is a monitoring office dedicated to addressing discrimination in schools. In Berlin, Lower-Saxony and Bremen, there are counselling centres on discrimination at school. These initiatives also address antigypsyism and collaborate with MIA and its regional offices. Nevertheless, these initiatives have not dealt with the unjustified, discriminatory placement of Sinti and Roma into special schools until now.

Taking into consideration the dimension of antigypsyism at school, there is an urgent need to implement further projects of this kind. No mainstream policies or strategies have been adopted or implemented in this area that could have been aligned with the NRSF. Major problems such as the school segregation of Sinti and Roma are not dealt with in the NRSF.

3.2.3. Roma participation

Major problems such as the school segregation of Sinti and Roma are not dealt with in the NRSF. Sinti and Roma organisations provide social counselling, they also deal with antigypsyist discrimination at school, and they often intervene before school authorities. Some Sinti and Roma organisations, such as the Regional Association of German Sinti and Roma Schleswig-Holstein, the Sinti Verein Ostfriesland in Lower-Saxony or Bildungsverein and ROMED in Hamburg, have their school mediators. This programme should be supported by state governments across Germany to improve access to education for Sinti and Roma. The recommendations listed in the two declarations by the KMK and the Central Council of German Sinti and Roma must become the guidelines for developing appropriate strategies to combat antigypsyism in schools.

Organisations of Sinti and Roma support families who oppose their children being placed into special schools. They intervene before school authorities when Sinti and Roma children are supposed to be placed in special schools without justifiable reasons. To address this issue, independent structures should be established that comprise Sinti and Roma CSOs and Antidiscrimination offices, which review the special school recommendations.

CONCLUSIONS AND RECOMMENDATIONS

Since the NRSF is not a strict strategy, no changes have been introduced into its implementation. Although the document is called a strategy, it has the character of a package of measures. That means, it is the compilation of existing measures aiming at the inclusion of disadvantaged Sinti and Roma and at fighting antigypsyism. It is not a strategy with goals, objectives, activities and success indicators. Nevertheless, there are a few new relevant measures as the appointment of the Commissioner against Antigypsyism, the creation of the Reporting and Information Centre on Antigypsyism (MIA) and the moving of the National Roma Contact Point (NRCP) from the Federal Ministry of the Interior to the Federal Ministry for Family, Elderly People, Women and Youth (BMFSFJ) where it now has the status of a special administrative unit.

The most significant developments have been the adoption of the Bundestag's resolution of 13 December 2023 on implementing the UKA recommendations and the establishment of the *Bund-Länder-Kommission* on antigypsyism. Despite positive developments in terms of rights recognition and policy issues, the problems faced by MIA due to its funding reduction showed that the fight against antigypsyism is not a priority among certain politicians and policymakers.

The main challenge is to ensure and strengthen the institutional setting that has been built up over the last four years. The initiated political processes in the framework of the fight against antigypsyism and guaranteeing the rights of Sinti and Roma should be continued independently of changing political constellations. This implies the implementation of the UKA's recommendations and the demands of the Bundestag to the German government as of 13 December 2023. To achieve this goal, it is crucial to ensure the continuation of the office of the Commissioner against Antigypsyism. The Commissioner has been driving the most important initiatives in the fight against antigypsyism and has contributed significantly to placing the fight against antigypsyism on the agenda of state structures. The appointment of a new Commissioner, Michael Brand, on 18 June 2025, has been a significant signal.

The further development of the German NRSF should include setting goals, measures and success indicators. Adequate funding and resources should be put in place. The federal system in Germany presents a significant challenge for coordinated policymaking. State and federal ministries, as well as local authorities, have been granted the authority to act independently. The *Bund-Länder-Kommission* offers a significant opportunity for policy coordination and coherent policy design of the different administrative levels (national state, regional state, municipalities). It is expected that the Commissioner against Antigypsyism and the NRCP will submit initiatives to the said commission for undertaking measures fostering participation of Sinti and Roma and in the fight against antigypsyism.

The participation of Sinti and Roma in decision-making processes is crucial for effective policy development and implementation. To contribute to this goal, organisations of Sinti and Roma should be more strongly supported. Local initiatives led by Sinti and Roma activists should be supported to develop effective structures. This will contribute to their further development and empowerment, enabling them to develop capacities for more effective participation in decision-making processes.

Recommendations to national authorities

1. Extending the scope of the antidiscrimination law: The AGG should be extended to the Länder level, or federal states should adopt their antidiscrimination laws aligned with the EU anti-discrimination law. Moreover, it should include the possibility of addressing conflicts with state actors.
2. Strengthening the Office of the Commissioner against Antigypsyism: Consolidate and secure long-term funding for the Office of the Commissioner against Antigypsyism. The office should be insulated from political shifts and adequately staffed with personnel to ensure its effective functioning.
3. Ensuring the continued funding and expansion of MIA: The Reporting and Information Centre (MIA) should be provided with sufficient funding to continue monitoring antigypsyism after 2025. The Länder should finance MIA with sufficient resources in the regions where it already exists; they should establish MIA offices where it does not yet exist.
4. Full implementation of UKA recommendations: Ensure that the recommendations of the Independent Commission on Antigypsyism (UKA), particularly those in the Bundestag's December 2023 Decision-Recommendation, are implemented within defined timelines. This includes regular reporting on

progress and providing necessary resources for implementation. The federal and state governments should align their efforts to guarantee comprehensive action.

5. Developing and implementing a National Action Plan against Antigypsyism: The Federal Government should develop and implement a comprehensive National Plan against Antigypsyism. This plan should encompass all policy fields and commit ministries at both the national and state levels.
6. Fighting antigypsyism in the police: The Länder should undertake comprehensive measures to counter antigypsyism and discrimination in the police. These measures should address discrimination, disproportionate use of force, racial profiling, the stigmatisation of Sinti and Roma in external communications and the continued 'special registration' of members of the minority by the police. The removal of the discriminatory and useless category 'clan-criminality' should be central in measures fighting antigypsyism against the police.
7. Establishing counselling centres for discrimination and on antigypsyism: The Länder should set up regionally accessible counselling centres on discrimination with a focus on antigypsyism. Organisations of Sinti and Roma should run these counselling centres to ensure that they are trusted and accessible for affected communities. The centres should offer support in cases of discrimination, provide information on legal rights, and assist in resolving conflicts.
8. Addressing segregation in education: Implement policies that directly address the school segregation of Sinti and Roma children, including the unjustified placement in special schools. This should involve creating transparent, anti-discriminatory criteria for school placements, offering training on antigypsyism for teachers, and involving organisations of Sinti and Roma, as well as anti-discrimination offices, in the placement process for special schools. Programmes of school counsellors should be extended to support Sinti and Roma families to encounter antigypsyism at school and advocate for their children's inclusion in regular schools. Monitoring mechanisms for racism in schools should be implemented; studies on racism and antigypsyism in schools should be developed; and counselling centres on discrimination in schools should be established in all federal states, as in Lower Saxony, Berlin, and Bremen. These counselling centres should collaborate with organisations representing the Sinti and Roma communities.
9. Improve access to sustainable and high-quality employment: Develop tailor-made programs to address the specific issues Sinti and Roma face in accessing the labour markets. This includes awareness-raising measures and anti-bias training for employees of social security agencies, as well as the strengthening of Customs Officers tasked with combating mandatory minimum wage fraud and exploitative work contracts. Moreover, FEAD-Plus measures should be more accessible to Sinti and Roma CSOs, and specific issues of the communities must be acknowledged. The 'Working aid to combat gang-related benefit abuse in the specific context of EU freedom of movement' must immediately be abolished as it proves a high risk for antigypsyist discrimination.
10. Ensure access to health insurance and treatment: At the very least, the concept of *Anonymer Krankenschein* (anonymous healthcare access note) should be implemented nationwide to make sure that treatment is accessible in emergencies. For EU-migrants and refugees, many of them Roma, an approach should be implemented that prevents exclusion from basic social services, among them a guaranteed healthcare, at all costs.
11. Tackle the various housing issues: Rolling out a Federal Programme to renovate traditional Sinti settlements in accordance with the communities' needs, including access to communal infrastructure; abolish the various 'problem house task-forces' that cause the eviction of Roma families from their homes, predominantly in high-density population areas; end segregation of Roma refugees from Ukraine and migrants from the Western Balkans and EU member states; implement the recommendations of the FRA's report.
12. Acknowledge antigypsyism as a form of structural persecution in asylum cases: Reassess the status of Serbia, Montenegro, Bosnia and Herzegovina, Kosovo, (North) Macedonia, Albania, and Moldova as safe countries of origin. Roma face apartheid-like structural discrimination and exclusion from fundamental rights as well as public infrastructure in these countries daily. This is not acknowledged in the German asylum system, necessitating a policy change to ensure a detailed examination of individual cases.

Recommendations to European institutions

13. Fighting against antigypsyism against Ukrainian Roma refugees: European institutions should advocate for push measures to combat antigypsyism in Member States and Candidate Countries, particularly to strengthen their efforts in the fight against antigypsyism against Ukrainian Roma refugees. These individuals face discrimination, particularly in the housing and education sectors. Member States should be encouraged to provide equal treatment for these refugees, with a focus on preventing discrimination in housing, education, and social services. The European Union should also ensure that countries receiving Roma refugees adhere to antidiscrimination standards and provide adequate support.

Recommendations to the civil society

14. Support through CSOs: Pro Sinti and Roma CSOs should commit resources to the fight against antigypsyism and provide additional support to organisations of Sinti and Roma in this effort. This can include providing funding, technical assistance, and supporting Sinti and Roma organisations to advocate for their rights. Partnerships between organisations of Sinti and Roma and other CSOs, such as churches, welfare, migrant, anti-racist, and women's organisations, should be strengthened to mainstream the fight against antigypsyism and promote Roma inclusion.
15. Promoting education and public awareness: CSOs should expand their civic-education programmes to raise awareness about the history of Sinti and Roma, the Holocaust, and contemporary forms of antigypsyism. These programmes should be targeted at schools, local communities, and public officials, with an emphasis on dispelling myths and stereotypes about Roma. CSOs should also advocate for the inclusion of Sinti and Roma representatives in decision-making bodies at the local, regional, and national levels. This includes appointments to advisory councils, educational boards, and government commissions. Ensuring Sinti and Roma participation will help shape policies and initiatives that reflect the lived experiences and needs of the Roma community.

Recommendations to other stakeholders

16. Participation of Sinti and Roma in the Broadcasting and State Media Authorities: Appoint representatives from Sinti and Roma communities to the broadcasting councils and state media authorities. These representatives should be directly involved in decision-making processes related to media representation and should advocate for more balanced, accurate portrayals of Sinti and Roma communities. This is a socio-political and legal obligation that should be a consequence of Germany's recognition of Sinti and Roma as an autochthonous national minority in Germany.

REFERENCES

List of interviews

1. Interview with representative of the Ministry of the Interior, 9 December 2024, email
2. Interview with representative of the Ministry for Family, Elderly People, Women, and Youth (BMBFSFJ), 16 January 2025, in person
3. Interview with representative of the Federal Anti-Discrimination Agency (FADA), telephone, 18 November 2024, telephone
4. Interview with the Office of the Commissioner against Antigypsyism, 9 January 2025, telephone
5. Interview with the Sinti Association of Ostfriesland, Lower-Saxony, 28 November 2024, in person
6. Interview with Rom e.V., Cologne, 26 September 2024, telephone
7. Interview with the Regional Association of Rhineland-Palatinate, 14 November 2024, telephone
8. Interview with the Regional Association of Bavaria, 9 December 2024, telephone
9. Interview with Roma Integrationszentrum (RIZ) of North Rhine-Westfalia, 14 November 2024, telephone
10. Interview with ROMED Deutschland, 10 January 2025
11. Interview with the Hildegard-Lagrenne-Foundation and Madhouse (Munich), 26 January 2025, in person

Focus group on education. Participants: Regional associations of German Sinti and Roma of Hesse, Rhineland-Palatinate and Schleswig-Holstein, MIA Bund, Amaro Foro, Roma Förderverein (Frankfurt), Romano Sumnal. 26 September 2024, online.

Validation workshop. Participants: Regional associations of German Sinti and Roma of Hesse, Rhineland-Palatinate and Schleswig-Holstein, Amaro Foro, Romano Sumnal. 16 December 2024, in Berlin

Participation in following events:

1. Sinti and Roma Forum organised by the Commissioner against Antigypsyism (November 2023)
2. 'Antigypsyism Against Ukrainian Roma Refugees' organised by MIA (April 2024)
3. Panel on 'Antigypsyism in the Police' during the Annual Conference of MIA (18 June 2024)
4. Meeting on education of Roma refugees children from Ukraine in Mecklenburg-Western Pomerania with the Commissioner of Integration of Mecklenburg-Western Pomerania at the Office of the Commissioner against Antigypsyism (29 September 2024)
5. Workshops on data collection and on antigypsyism against Ukrainian refugees during the Sinti and Roma Forum organised by the Commissioner against Antigypsyism (28 November 2024)
6. 'Antigypsyism at School' organised by the Regional Association of German Sinti and Roma Bavaria (4 December 2024).

Key policy documents and reports

Amaro Foro (2024). *Dokumentation. Antiziganistischer Vorfälle. Ein Rückblick Und Auswertung 2023* [Documentation. Antigypsyist Incidents. A Review And Assessment 2023]. Available at: https://amaroforo.de/wp-content/uploads/2024/10/Amaro-Foro_Dokumentation_Screen_10-Jare-DOSTA.pdf

Bundesministerium des Innern und für Heimat [Federal Ministry of the Interior and for Homeland Affairs] (2022). *Nationale Strategie „Antiziganismus Bekämpfen, Teilhabe Sichern!“ Zur Umsetzung Der EU-Roma-*

Strategie 2030 In Deutschland [National Strategy "Combating Antigypsyism, Ensuring Participation!" For the Implementation of the EU Roma Strategy 2030 in Germany].

Bundestag [German Federal Parliament] (2024). *Beschlussempfehlung Und Bericht Des Ausschusses Für Inneres Und Heimat (4. Ausschuss) Zu Der Unterrichtung Durch Die Bundesregierung, – Drucksachen 19/30310, 20/1207 Nr. 4 –, Bericht Der Unabhängigen Kommission Antiziganismus Perspektivwechsel – Nachholende Gerechtigkeit – Partizipation [Recommendation And Report Of The Committee For Internal Affairs And Homeland (4th Committee) On The Information Provided By The Federal Government – Printed Papers 19/30310, 20/1207 No. 4 –, Report Of The Independent Commission Against Antigypsyism Perspective Change – Catch-Up Justice – Participation].* Available at: <https://dserver.bundestag.de/btd/20/097/2009779.pdf>

Melde- Und Informationsstelle Antiziganismus – MIA [Reporting and Information Office on Antigypsyism – MIA]. (2023). *Antiziganistische Vorfälle 2022 In Deutschland [Antigypsyist Incidents 2022 In Germany].*

Melde- Und Informationsstelle Antiziganismus – MIA [Reporting and Information Office on Antigypsyism – MIA]. (2024). *Antiziganismus gegen ukrainische Roma-Geflüchtete in Deutschland [Antigypsyism Against Ukrainian Roma Refugees in Germany].* Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2024/04/Ukrainebericht_internet-15.4.pdf

Melde- Und Informationsstelle Antiziganismus – MIA [Reporting and Information Office on Antigypsyism – MIA]. (2024). *Antiziganistische Vorfälle 2023 in Deutschland [Antigypsyist Incidents 2023 in Germany].* Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2024/06/MIA-JB-2023-Internet.pdf>

Melde- Und Informationsstelle Antiziganismus – MIA [Reporting and Information Office on Antigypsyism – MIA]. (2025). *Antiziganismus im Bildungsbereich. Am Beispiel Schulen und Kitas [Antigypsyism in the Education Sector. The Example of Schools and Kindergartens].* Available at: https://www.antiziganismus-melden.de/wp-content/uploads/2025/03/MIA_Schule_Internet.pdf

Melde- Und Informationsstelle Antiziganismus – MIA [Reporting and Information Office on Antigypsyism – MIA]. (2025). *Antiziganistische Vorfälle 2024 in Deutschland [Antigypsyist Incidents 2024 in Germany].* Available at: <https://www.antiziganismus-melden.de/wp-content/uploads/2025/06/MIA-JB-2024.pdf>

Ministerium für Soziales, Gesundheit und Sport Mecklenburg–Vorpommern [Ministry of Social Affairs, Health and Sports Mecklenburg–Western Pomerania]. (2024). *Externe Niederschrift über die Beschlüsse der Hauptkonferenz der 19. IntMK am 20. – 21. März 2024 in Rostock-Warnemünde [External Minutes of the Resolutions of the Main Conference of the 19th Integration Ministers' Conference on 20–21 March 2024 in Rostock-Warnemünde].* Available at: https://www.integrationsministerkonferenz.de/documents/beschlussniederschrift-der-19-integrationsministerkonferenz-2024_1713363851.pdf

ANNEXE: 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:
Fight against antigypsyism	significant problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	<p>1)</p> <ul style="list-style-type: none"> - adopted measure Resolution of the Bundestag on Antigypsyism and Fostering participation of Sinti and Roma - measures effectiveness This resolution is not binding but it is a great reference for advocacy. - measures outreach It is not possible to assess yet to what extent it has had any impact in policy making. - data collection No data: It is not possible to assess yet to what extent it has had any impact in policy making. <p>2)</p> <ul style="list-style-type: none"> - adopted measure The Commissioner against Antigypsyism has initiated various relevant initiatives, including the establishment of the <i>Bund-Länder-Kommission</i>, funding a media monitoring project, and conducting feasibility studies on the establishment of legal funds for victims of antigypsyism and a commission to investigate the injustices committed against Sinti and Roma after 1945. - measures effectiveness These measures have contributed to strengthening the fight against antigypsyism and to mainstreaming

					<p>it among federal authorities.</p> <ul style="list-style-type: none"> - measures outreach <p>The work of the Commissioner has had an outreach among policy makers, media and organisations of Sinti and Roma that are participated in the Commissioner's activities</p> <ul style="list-style-type: none"> - data collection <p>No data available. Nevertheless, the Commissioner has participated in a high number of activities of organisations of Sinti and Roma throughout Germany, and these have participated in the annual event of the Commissioner.</p> <p>3)</p> <ul style="list-style-type: none"> - adopted measure <p>Establishment of the <i>Bund-Länder-Kommission</i></p> <ul style="list-style-type: none"> - measures' effectiveness <p>It has recently been set up; therefore, no assessment is possible at this time. However, the fact that it has been established within a relatively short period is a significant success.</p> <ul style="list-style-type: none"> - measures' outreach <p>Representatives of all Länder take part in the Commission</p> <ul style="list-style-type: none"> - data collection <p>No data available</p>
Collecting data on antigypsyism	significant problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	<p>1)</p> <ul style="list-style-type: none"> - adopted measure <p>Support of the Reporting and Information Office on Antigypsyism (MIA): Although MIA has faced significant challenges in securing funding, it has been secured for 2025.</p> <ul style="list-style-type: none"> - measures effectiveness <p>MIA has been successfully evaluated. It has contributed to a stronger addressing of the subject of</p>

					<p>antigypsyism in the public discussion.</p> <ul style="list-style-type: none"> - measures outreach <p>MIA is reaching out to large parts of the Sinti and Roma communities and has a wide network of cooperation partners. Its reports have had an impressive media coverage</p> <ul style="list-style-type: none"> - data collection <p>MIA has recorded 621 antigypsyist incidents in 2022 and 1,233 in 2023.</p> <p>2) adopted measure</p> <p>Consultation on data collection on antigypsyist discrimination by the Federal Antidiscrimination Agency (FADA)</p> <ul style="list-style-type: none"> - measure effectiveness <p>A paper gathering the interim results has been developed. In 2025, a final document containing recommendations and standards for collecting data on antigypsyist discrimination will be gathered.</p> <ul style="list-style-type: none"> - measure outreach <p>Over 20 Sinti and Roma organisations have taken part in the consultation. This represents a success because there is a great reluctance among minority organisations to collect data.</p> <ul style="list-style-type: none"> - data collection <p>Over 20 Sinti and Roma organisations have taken part in the consultation.</p>
Hate crimes against Roma	significant problem	understood with limitations	present but insufficient	some targets but not relevant	<ul style="list-style-type: none"> - adopted measure <p>Support of the Reporting and Information Office on Antigypsyism (MIA)</p> <ul style="list-style-type: none"> - measures effectiveness <p>MIA contributes to shedding light on the dark number of antigypsyist crimes and supports victims of hate</p>

					<p>crimes.</p> <ul style="list-style-type: none"> - measures' outreach <p>MIA reaches out to a large part of Sinti and Roma organisations.</p> <ul style="list-style-type: none"> - data collection
Hate speech towards and against Roma (online and offline)	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	<ul style="list-style-type: none"> - adopted measures <p>Project on media monitoring run by the Central Council of German Sinti and Roma, funded by the Office of the Commissioner against Antigypsyism.</p> <ul style="list-style-type: none"> - measures' effectiveness <p>Through the project, all relevant antigypsyist articles are gathered and made available to the public audience to raise awareness about antigypsyism in the media.</p> <ul style="list-style-type: none"> - measures' outreach <p>In the project's framework, newsletters are periodically disseminated, providing information on antigypsyism in media and political discourses. Stakeholders find it a valuable instrument for obtaining information and advocacy.</p> <ul style="list-style-type: none"> - data collection <p>No data available yet</p>
Weak effectiveness of protection from discrimination	significant problem	irrelevant	absent	absent	No measure adopted
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	significant problem	irrelevant	absent	absent	No measure adopted

Barriers to <i>de facto</i> exercise of EU right to free movement	significant problem	mentioned but not analysed sufficiently	absent	absent	No measure adopted
Antigypsyism against Ukrainian Roma refugees	significant problem	irrelevant	absent	absent	<p>- adopted measure</p> <p>There are two projects targeting Ukrainian Roma refugees. One is a hotline run by the Documentation Centre of German Sinti and Roma by <i>Aktion Deutschland Hilft</i> [Germany's Relief Coalition]. The second was a counselling project carried out in 2024 by the Roma Centre Göttingen.</p> <p>- measures' effectiveness</p> <p>A high number of Roma refugees got counselling on social issues. Nevertheless, the need is much higher.</p> <p>- measures' outreach</p> <p>A high number of Ukrainian Roma refugees have used the counselling service.</p> <p>- data collection</p> <p>No data available</p>

Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Antigypsyism at school	critical problem	irrelevant	absent	absent	No measure adopted
Misplacement of Sinti and Roma pupils into special education	critical problem	irrelevant	absent	absent	No measure adopted

Education segregation of foreign Roma pupils	significant problem	irrelevant	absent	absent	No measure adopted
Treatment of the history of Sinti and Roma in school curricula	significant problem	identified and analysed sufficiently	appropriate	relevant targets well defined	<ul style="list-style-type: none"> - adopted measures Recommendations of the KMK on addressing the history of Sinti and Roma in school curricula. The Länder should implement them. - measures' effectiveness Until now, no Land has implemented the recommendation. But it is very useful for advocacy at the Land level. - measures' outreach The recommendation has reached the decision-makers: the Länder. - data collection <p>No data available</p>

Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Discrimination on the labour market by employers	critical problem	irrelevant	absent	absent	No measure adopted
Disadvantaged foreign Roma as victims of trafficking in labour markets	significant problem	irrelevant	irrelevant	absent	No measure adopted

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Poor access to or low effectiveness of public employment services	significant problem	irrelevant	absent	absent	No measure adopted
Youth not in employment, education or training	significant problem	irrelevant	absent	absent	No measure adopted
Lack of activation measures, employment support	significant problem	irrelevant	absent	absent	No measure adopted

Healthcare

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Discrimination/ antigypsyism in the health care sector	Significant problem	Irrelevant	absent	absent	No measure adopted
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	significant problem	irrelevant	absent	absent	No measure adopted

Unrecognised historical injustices, such as forced sterilisation	significant problem	irrelevant	absent	absent	No measure adopted
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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:
Discrimination in the housing markets	crucial problem	irrelevant	absent	absent	No measure adopted
Poor physical security of housing (ruined or slum housing)	significant problem	irrelevant	absent	absent	No measure adopted
Lacking or limited access to social housing	significant problem	irrelevant	absent	absent	No measure adopted
Overcrowding (available space/room for families)	significant problem	irrelevant	absent	absent	No measure adopted
Antigypsyism in neighbourhoods	significant problem	irrelevant	absent	absent	No measure adopted

Social protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	significant problem	irrelevant	absent	absent	No measure adopted
Discrimination by agencies managing income-support programmes	critical problem	irrelevant	absent	absent	No measure adopted

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 comprehensiveness of help provided by social services	significant problem	irrelevant	absent	absent	
Limited access to social services: low awareness of them, low	significant problem	irrelevant	absent	absent	

accessibility, (e.g., due to travel costs) or limited availability					
Services providers do not actively reach out to those in need	significant problem	irrelevant	absent	absent	
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	significant problem	irrelevant	absent	absent	
Discrimination by social service providers	significant problem	irrelevant	absent	absent	

Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Child protection not considered in the NRSF	critical problem	irrelevant	absent	absent	
Large-scale and discriminatory	critical problem	irrelevant	absent	absent	

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placement of Romani children in early childhood care institutions					
Biased treatment of Roma youth by security and law enforcement	significant problem	irrelevant	absent	absent	
Inadequate child/ adolescent participation	significant problem	irrelevant	absent	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:
Poor or lacking awareness of the general population of the contribution of Sinti and Roma art and culture to national and European heritage	significant problem	mentioned but not analysed sufficiently	present but insufficient	absent	<ul style="list-style-type: none"> - adopted measure Funding of various institutions and projects, such as the Documentation Centre on German Sinti and Roma or the European Roma Institute for Arts and Culture - measures effectiveness The institutions and projects funded make a significant contribution to raising awareness among the wider public audience about the contributions of art and culture by Sinti and Roma. - measures outreach The institutions and projects funded reach a considerable audience; nevertheless, it is not enough to raise awareness among the wider public about the contributions of art and culture by Sinti and Roma. - data collection

					No data available
Exclusion of Sinti and Roma communities from national cultural narratives	critical problem	mentioned but not analysed sufficiently	present but insufficient	absent	
Sinti and Roma history and culture not included in school curricula and textbooks for both Roma and non-Roma students	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	<ul style="list-style-type: none"> - adopted measures Recommendations of the KMK on addressing the history of Sinti and Roma in school curricula. The Länder should implement them. - measures' effectiveness Until now, no Land has implemented the recommendation. However, it represents a very useful tool for advocacy at the Local level. - measures' outreach The recommendation has been communicated to the decision-makers: the Länder. - data collection No data available
Lack of memorialisation of Sinti and Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problem	mentioned but not analysed sufficiently	present but insufficient	absent	<ul style="list-style-type: none"> - adopted measure The Encyclopaedia of the Nazi Genocide of the Sinti and Roma in Europe has been published. - measures effectiveness It is the first comprehensive overview of the existing knowledge on the persecution and murder of the Sinti and Roma under National Socialism. - measure outreach It is expected that the Encyclopaedia will be accessible to organisations of Sinti and Roma, researchers, and a wide audience. - data collection No data available

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