



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

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## LIST OF ABBREVIATIONS

AGE	Spanish National General Administration
ANPG	<i>Asociación Nacional Presencia Gitana</i>
BOE	Spanish Official Newsletter
CCAA	Spanish Autonomous Regions
CEDRE	Council for the Elimination of Racial or Ethnic Discrimination
CEPG	National Advisory Roma Council
COE	Council of Europe
CSO(s)	Civil Society Organisation(s)
EC	European Commission
ECRI	European Commission against Racism and Intolerance
EU	European Union
EURSF	EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030
FAGIC	<i>Federación de Asociaciones Gitanas de Cataluña</i>
FRA	European Union Agency for Fundamental Rights
FSG	<i>Fundación Secretariado Gitano</i>
MDSA	Ministry of Social Rights and 2030 Agenda
MDSCA	Ministry of Social Rights, Consumption and 2030 Agenda
MSCBS	Ministry of Health, Consumption and Social Welfare
MSSSI	Ministry of Health, Social Services and Equality
NRCP	National Roma Contact Point
NRIS	National Strategy for Roma Population Social Inclusion in Spain 2012-2020
NRSF	National Strategy for Roma Equality, Inclusion and Participation 2021-2030
PK	<i>Plataforma Khetane del Movimiento Asociativo Gitano del Estado Español</i>
RCM	Roma Civil Monitor



## EXECUTIVE SUMMARY

The National Roma Strategic Framework (NRSF) has established an important reference point for advancing equality, inclusion, and participation. Key strengths include the integration of anti-discrimination measures—such as the recent reform of the Penal Code—and the incorporation of Roma history and culture into educational curricula, which together signal political and institutional recognition of Roma rights. However, the implementation has been uneven due to decentralised competencies, limited coordination between the central government and Autonomous Communities, and an overreliance on ad hoc civil society initiatives. Significant weaknesses remain in data collection, stable resource allocation, and long-term political commitment, undermining the transformative potential of the strategy.

Recent evaluations and conclusions point to a mismatch between the ambitious objectives set out in the NRSF and the practical outcomes achieved on the ground. The report highlights that while the framework has succeeded in legitimising Roma issues on the policy agenda, its actual impact is constrained by fragmented implementation, insufficient monitoring mechanisms, and gaps in accountability—factors that have curtailed the intended improvements in access to housing, education, employment, and healthcare for the Roma population. A lack of coordination with the National Institute of Statistics (INE) further complicates progress, as the planned inclusion of Roma self-identification in future surveys—outlined in the 2023–2026 Operational Plan—remains in a design phase and depends on a political and technical consensus that has yet to be reached.

### Implementation of the NRSF

The evolution of the NRSF has seen notable developments, including the adoption of a detailed Operational Plan for 2023–2026, the strengthening of an intersectional approach to tackle multiple discriminations, and the introduction of quantifiable objectives in critical areas. Nevertheless, progress remains uneven across regions due to the decentralisation of the Spanish state and resource constraints. The report recommends enhanced inter-administrative coordination, a robust monitoring framework, and the allocation of stable, dedicated budgets to transform the NRSF from a political commitment into effective, long-term policy outcomes.

### Review of country situation by area

**Fighting antigypsyism and discrimination:** Despite the formal incorporation of anti-Roma discrimination as a central pillar, concrete measures have been hindered by inadequate monitoring and a lack of comprehensive public policies. While legislative steps like the recognition of anti-Roma hate crimes are positive, their impact is diluted by fragmented implementation and reliance on outsourced interventions.

**Education:** Efforts to reform curricula and train teachers on Roma history and culture have yielded some progress. However, persistent challenges—such as high segregation rates, low educational attainment, and inadequate support mechanisms—continue to impede the full inclusion of Roma students.

**Employment:** Increased budget allocations have facilitated the rollout of key employment initiatives, many led by civil society organisations. Yet, the absence of reliable Roma-specific statistical data and comprehensive, state-driven strategies makes it difficult to assess whether these measures are effectively boosting employment rates among Roma communities.

**Healthcare:** The integrated approach adopted in the health sector shows promise, with initiatives designed to address both clinical care and the broader social determinants of health. Still, tangible improvements are closely tied to progress in other sectors, and comprehensive data remain pending from the ongoing National Health Survey.

**Housing and essential services:** Access to dignified housing remains a critical challenge, exacerbated by persistent discrimination and a lack of targeted, well-funded initiatives. Although some regional measures have been implemented, many Roma families continue to face overcrowding, poor living conditions, and energy poverty.

**Social protection:** High rates of poverty and social exclusion persist, underscoring the need for more robust, inclusive policies. Current measures have not yet achieved the substantial improvements required to lift Roma households out of vulnerability, highlighting a pressing need for coordinated, long-term socioeconomic support.

### Focus on key issues affecting Roma

**Continuity of the State Pact Against Antigypsyism:** While the State Pact symbolises a commitment to combating antigypsyism, its effectiveness is compromised by political discontinuity and decentralised implementation. The report calls for a renewed commitment, with institutionalised oversight mechanisms to ensure sustained action.

**Critical analysis of the efficiency of the National Roma Council (CEPG):** The CEPG, intended as a key advisory body, struggles with limited resources and constrained decision-making authority. Enhancing its operational capacity and establishing clearer accountability measures are essential for it to meaningfully influence Roma policy and implementation.

**School segregation of Roma students:** Persistent segregation and educational disparities remain critical challenges. Although curricular reforms and targeted support programmes have been initiated, the continued separation of Roma students within the school system signals the urgent need for more focused and effective interventions.

### Use of EU funding instruments

EU funding instruments, including the European Social Fund Plus (ESF+) and the European Regional Development Fund (ERDF), have been mobilised to support Roma-specific initiatives. However, the overall impact of these funds is curtailed by conditionality requirements and a lack of seamless integration with national and regional strategies. The report recommends that EU funding be more strategically aligned with domestic policies to ensure that allocated resources translate into measurable improvements in Roma inclusion and equality.

# INTRODUCTION

## *National Roma strategic framework*

The ‘National Strategy for Equality, Inclusion, and Participation of the Roma 2021–2030’ (NRSF)<sup>1</sup> is a comprehensive framework adopted by the Spanish government to advance the rights and social inclusion of the Roma community. Approved in 2021, the strategy is built on several key pillars aimed at eliminating discrimination, ensuring equal opportunities, and fostering active participation in social, economic, and cultural life. The NRSF constitutes the central policy framework for addressing the longstanding social, economic, and educational exclusion of Roma communities in Spain.

The NRSF was formally approved by the Council of Ministers on November 2, 2021, and it aligns with the broader ‘EU Roma Strategic Framework’ (EURSF). Despite its comprehensive scope and strong legal underpinnings (e.g., Organic Law 3/2020, which mandates non-discrimination and effective equality in education,<sup>2</sup> or Law 15/2022, on equal treatment and non-discrimination<sup>3</sup>), our report in the previous monitoring cycle<sup>4</sup> and recent assessments have revealed mixed outcomes. While the NRSF is highly relevant and ambitious, critical weaknesses persist in its implementation—especially regarding data collection, coordination among national and regional administrations, and the meaningful participation of Roma civil society. Moreover, the disparity between the ex-ante expectations and the ex-post implementation outcomes is notable, reflecting the impact of evolving sociopolitical contexts and the challenges inherent in mainstreaming inclusive policies.

Notably, the NRSF is supported by two key documents that serve distinct functions:

On the one hand, the ‘Operational Plan 2023–2026’ sets out the concrete measures and actions to be implemented over the next four years.<sup>5</sup> The Plan represents a critical component of the NRSF, detailing specific targets, allocated budgets, and timelines for achieving improved outcomes in areas such as education, employment, housing, healthcare, and social protection. It outlines 158 programmatic measures across horizontal and sectoral dimensions—including actions to combat antigypsyism, reduce segregation, and enhance Roma participation in public decision-making.

On the other hand, the ‘Progress Reports’ provide annual updates and evaluations of how these measures are advancing, offering insights into both successes and challenges. The Progress Reports are the official documents through which the government reports on the implementation of the NRSF in every thematic area. These reports are published by the Ministry of Social Rights, Consumption and Agenda 2030 and are accessible to the public; they summarise progress and highlight contextual factors influencing implementation, such as political shifts and competing policy agendas.

## *About this report*

This report has been developed to provide a comprehensive assessment of the NRSF’s implementation and its impact on key sectors affecting Roma communities. This report is structured to offer a detailed review of both the progress made under the Operational Plan 2023–2026 and the insights derived from the national Progress

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<sup>1</sup> Government of Spain. (2021). *National Strategy for Roma Equality, Inclusion and Participation 2021–2030*. Available at: [https://www.agenda2030.gob.es/en/derechos-sociales/poblacion-gitana/docs/estrategia\\_nacional/Estrategia\\_nacional\\_21\\_30/Estrategia\\_aprob\\_cm\\_2\\_nov\\_ENGLISH.pdf](https://www.agenda2030.gob.es/en/derechos-sociales/poblacion-gitana/docs/estrategia_nacional/Estrategia_nacional_21_30/Estrategia_aprob_cm_2_nov_ENGLISH.pdf)

<sup>2</sup> See: <https://www.boe.es/buscar/pdf/2020/BOE-A-2020-17264-consolidado.pdf>

<sup>3</sup> See: <https://www.boe.es/buscar/pdf/2022/BOE-A-2022-11589-consolidado.pdf>

<sup>4</sup> Roma Civil Monitor. (2022). *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Spain*. Publication Office of the European Union. Available at: [https://www.presenciagitana.org/2022\\_11\\_02%20RCM2-2022-C1-Spain-FINAL%20PUBLISHED%20ENG.pdf](https://www.presenciagitana.org/2022_11_02%20RCM2-2022-C1-Spain-FINAL%20PUBLISHED%20ENG.pdf)

<sup>5</sup> Government of Spain. (n.d.). *Estrategia Nacional para la Igualdad, Inclusión y Participación del Pueblo Gitano 2021–2030. Primer Plan Operativo Estatal 2023–2026*. [National Strategy for the Equality, Inclusion and Participation of the Roma People 2021–2030. First State Operational Plan 2023–2026.] Available at: [https://www.dsca.gob.es/sites/default/files/consumo\\_masinfo/PLAN\\_OPERATIVO\\_2023-2026.pdf](https://www.dsca.gob.es/sites/default/files/consumo_masinfo/PLAN_OPERATIVO_2023-2026.pdf)

Reports (2021–2022,<sup>6</sup> 2023).<sup>7</sup> It further examines thematic areas—including education, employment, healthcare, housing, social protection, and child protection—as well as key problems such as antigypsyism, segregation, limited Roma participation, and the use of EU funding.

Data for this report were collected through a rigorous and multimethod approach that included in-depth interviews, focus groups, evidence-based case studies, and extensive reviews of government documents, progress reports, and publications from civil society organisations. Key informant interviews were conducted with representatives from the National Roma Contact Point, various ministries, and other public institutions, as well as with experts and Roma activists.

For example, interviews were held with María Dolores Ruíz Bautista (Ministry of Social Rights, Consumption and Agenda 2030 and National Roma Contact Point); Ismael Cortés Gómez (academic Roma expert on the State Pact against Antigypsyism); Patricia Caro Maya (Roma activist and former MEP); Ana Gil Luciano (Head of the Area of Promotion of Health and Equity, Ministry of Health); Juan Carlos Pérez Medina (Ministry of Education) and Carmen Santiago Reyes (Vice-president of the National Roma Council). Additional interviews were conducted with Fernando Macías Aranda (Director General of Equal Treatment and Non-Discrimination, Generalitat de Catalunya); Txema Ezkerra Fernández (Director of Diversity, Coexistence and Intergenerational Solidarity of the Basque Government); Beatriz Carrillo de los Reyes (Director General of Equal Treatment and Non-Discrimination, Government of Spain); Tatiana Font Miguel (Head of the Integral Plan for the Roma in Catalonia, Generalitat de Catalunya), along with several other experts and representatives from civil society and institutions.

Additionally, consultation sessions were held with entities from the National Roma Council and *Plataforma Khetane* (PK) in November 2024, and a validation session took place in January 2025. These sessions provided invaluable feedback from experts and civil society organisations, which was subsequently integrated into the final version of the document.

The report also integrates findings from recent studies and documents, such as the European frameworks for Roma inclusion, and the latest progress reports from the Ministry, as well as from key publications like the ‘Segregación Educativa’ report of 2024<sup>8</sup> or the 2024 FEIG report.<sup>9</sup> These documents, along with academic articles and other sources, provided a robust evidence base for our analysis.

The 2024 Roma Civil Monitor Report has been prepared by the *Asociación Nacional Presencia Gitana* (ANPG), the *Federación de Asociaciones Gitanas de Cataluña* (FAGIC), and the *Plataforma Khetane del Movimiento Asociativo Gitano del Estado Español* (PK), with the participation of the following professionals: Fabián Daniel Sánchez García and Gonzalo Montaña Peña (ANPG), Carolina de Diego Heredia (PK), and Iñaki Vázquez Arencón and Annabel Carballo Mesa (independent).

The aim of the report is to furnish policymakers, Roma communities, and all stakeholders with robust monitoring on the effectiveness of the NRSF, identify strengths and weaknesses, and offer concrete recommendations to enhance the impact of policies promoting Roma equality, inclusion and participation.

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<sup>6</sup> See in: [https://www.agenda2030.gob.es/en/derechos-sociales/poblacion-gitana/docs/estrategia\\_nacional/po\\_23\\_26/IP\\_2021\\_2022\\_vf.pdf](https://www.agenda2030.gob.es/en/derechos-sociales/poblacion-gitana/docs/estrategia_nacional/po_23_26/IP_2021_2022_vf.pdf)

<sup>7</sup> See in: Government of Spain. (2024). *Estrategia Nacional para la Igualdad, Inclusión y Participación del Pueblo Gitano 2021–2030. Informe de progresos 2023*. [National Strategy for the Equality, Inclusion and Participation of the Roma People 2021–2030. Progress Report 2023.] Available at: [https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe\\_progresos\\_2023\\_VF.pdf](https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe_progresos_2023_VF.pdf)

<sup>8</sup> See in: Macías-Aranda, F., & Borràs-Batalla, M. (2024). *Estudio sobre discriminación y racismo estructural hacia el Pueblo Gitano en educación. Informe final*. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas. Available at: <https://federacionkamira.com/wp-content/uploads/2024/09/SegregacionEducativaPG.pdf>

<sup>9</sup> See in: Foro Estratégico Interautonómico Gitano. (n.d.) *Informe FEIG 2024 sobre la implementación de la Estrategia Nacional Gitana en las Comunidades Autónomas*. [FEIG 2024 Report on the Implementation of the National Roma Strategy in the Autonomous Communities.] Available at: [https://www.presenciagitana.org/2024\\_12\\_31\\_Informe\\_FEIG\\_2024.pdf](https://www.presenciagitana.org/2024_12_31_Informe_FEIG_2024.pdf)

# 1. IMPLEMENTATION OF THE NRSF

## 1.1. Key developments and effectiveness of implementation

In general terms, the National Strategy for Equality, Inclusion and Participation of the Roma 2021-2030 (NRSF) has represented a significant milestone in placing policies targeted at the Roma on the public agenda and in guiding the actions of various administrations. According to the sources consulted (FEIG Report 2024, interviews), this framework has achieved, at least on paper, a political and institutional consensus on key aspects such as the fight against anti-Roma discrimination, the incorporation of the Roma perspective in historical memory, and the adoption of more specific indicators in critical areas (education, employment, housing, and health).

However, the actual effectiveness of its implementation remains limited for several reasons:

- Autonomous decentralisation: Many of the essential competencies (education, housing, health, social services) fall under the jurisdiction of the Autonomous Communities, and coordination with the General State Administration is not always smooth. Each region prioritises, funds, and develops measures in an unequal manner, resulting in a very heterogeneous implementation of the NRSF.
- Lack of political continuity: The turnover of public officials in ministries and regional departments, as well as the absence of stable parliamentary oversight, has hindered the consolidation of medium- and long-term plans. Several interviews (e.g., with Ismael Cortés) emphasise the importance of maintaining a subcommittee or dedicated commission in Congress to ensure the continuity of measures agreed upon following the March 2023 approval of the report for studying a State Pact against anti-Roma discrimination.
- Scarcity of resources and personnel: According to interviews with technical and political managers, the teams responsible for driving the NRSF in each administration are very small. Although there are European funds and state budget lines available, as Carmen Santiago notes, “there is no specific budget defined for the implementation of the NRSF or the operational plans.” The budget allocated to the Roma development plan (*Plan de Desarrollo Gitano*)<sup>10</sup> is insufficient (barely 2 million EUR annually) and is not guaranteed in all regions.

Overall, the main value of the NRSF lies in serving as a reference framework that legitimises the importance of equality and inclusion for the Roma in public policy. Nevertheless, the materialisation of this framework into effective policies largely depends on the will and resources of each territorial administration.

### 1.1.1. Changes in the NRSF

The adoption of the operational plan 2023-2026 entailed specifying objectives and actions for the coming years based on the pillars defined in the NRSF.<sup>11</sup> Among the most notable changes are:

- Strengthening of the intersectional approach: Greater attention is intended to be paid to multiple discrimination, especially affecting Roma women and youth, as well as to the situation of migrants and people with disabilities within the Roma community.
- Increased emphasis on anti-Roma discrimination: The plan includes more detailed lines of action to prevent, detect, and sanction discrimination against the Roma, in line with the reform of the Penal Code (Law 15/2022), which recognises anti-Roma discrimination as an aggravating factor in hate crimes.

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<sup>10</sup> See in: <https://www.dsca.gob.es/es/derechos-sociales/poblacion-gitana/colaboracion-ccaa/plan-desarrollo-gitano>

<sup>11</sup> Government of Spain. (n.d.). *Estrategia Nacional para la Igualdad, Inclusión y Participación del Pueblo Gitano 2021-2030. Primer Plan Operativo Estatal 2023-2026*. [National Strategy for the Equality, Inclusion and Participation of the Roma People 2021-2030. First State Operational Plan 2023-2026.] Available at: [https://www.dsca.gob.es/sites/default/files/consumo\\_masinfo/PLAN\\_OPERATIVO\\_2023-2026.pdf](https://www.dsca.gob.es/sites/default/files/consumo_masinfo/PLAN_OPERATIVO_2023-2026.pdf)

- More specific operational indicators: Unlike previous strategies, the plan incorporates quantifiable objectives in areas such as employment, health, education, and housing. This should allow for a more objective evaluation of progress, provided that the necessary data can be collected.

However, several interviewees (e.g., Fernando Macías, Beatriz Carrillo) point out that these changes have not always been translated into regional and local plans with allocated budgets. In many cases, governance reforms (changes in senior positions, creation of new directorates) have slowed down the implementation of actions. Additionally, the lack of a clear timeline and the absence of a monitoring body with effective powers create uncertainty about the consolidation of these changes.

On the other hand, civil society organisations have positively valued the new provision to include Roma self-identification in certain official surveys and to reinforce collaboration with entities such as the National Institute of Statistics (INE). This could, in the future, improve the quality of data and the capacity to monitor the results of the operational plan.

### 1.1.2. Progress in implementation

Despite the structural obstacles mentioned above, some tangible progress has been observed in the implementation of the NRSF and its operational plan:

- Legislative and symbolic sphere: The inclusion of anti-Roma discrimination in the Penal Code—recognised by various stakeholders as a fundamental milestone—has helped to bring visibility to the specific discrimination faced by the Roma. The introduction of Roma history and culture into the school curriculum, which is currently in progress, and the reference to Roma memory in the Democratic Memory Law—with the establishment of the ‘Commission for Memory and Reconciliation’ with the Roma—have reinforced the institutional recognition of the Roma’s contribution to Spanish society, as well as advanced the principles of truth, justice, and reparation.
- Education and awareness: In some Autonomous Communities, initiatives for academic support and pilot projects to promote educational inclusion have been launched. According to interviews with technical managers (Ana Gil, Lola Ruiz), there is a perceived increase in educational materials on Roma culture and some improvement in teacher training to address diversity. Various mediation and mentoring programmes, in collaboration with Roma organisations, aim to reduce early school leaving and promote educational continuity beyond compulsory secondary education.
- Collaboration with civil society: The FEIG Report 2024,<sup>12</sup> the 2023 NRSF progress report,<sup>13</sup> and several interviews document joint initiatives between administrations and Roma organisations aimed at developing projects for labour market insertion, discrimination prevention, or health improvement, which have been successful in certain contexts. Although these are isolated experiences, they represent examples of fruitful collaboration that could serve as a model on a larger scale.

However, as Beatriz Carrillo pointed out in her interview, there is an excessive reliance on civil society for implementing essential programmes. Instead of relying on solid public policies and stable public resources, many key projects (e.g., health mediation, academic support programmes, or housing assistance) continue to depend on temporary agreements or grants to Roma NGOs. Although these initiatives have proven effective and close to the communities in some cases, as Carmen Santiago notes, “the State and the Autonomous Communities should assume a more proactive role and provide greater continuity to the actions, promoting multiyear projects and avoiding that the implementation is largely based on the will and effort of CSOs.”

Overall, progress in the implementation of the strategy is uneven across territories. As noted in the FEIG Report 2024, most Autonomous Communities have not yet fully adapted their local plans to the new strategy or have done so only partially. Decentralisation hinders the effective implementation of the NRSF across the entire national territory, and many measures depend on the political will and budget availability in each region.

According to the 2023 Progress Report, only eight regions (Andalusia, Aragon, Catalonia, Castile and León, Navarre, the Basque Country, the Region of Murcia, and the Valencian Community) have developed their own

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<sup>12</sup> See in: [https://www.presenciagitana.org/2024\\_12\\_31\\_Informe\\_FEIG\\_2024.pdf](https://www.presenciagitana.org/2024_12_31_Informe_FEIG_2024.pdf)

<sup>13</sup> See in: [https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe\\_progresos\\_2023\\_VF.pdf](https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe_progresos_2023_VF.pdf)



specific strategic plans aligned with the national NRSF. Others, such as the Community of Madrid and Galicia, have implemented partial measures or transversal strategies but lack Roma-specific frameworks.

Disparities are also significant when it comes to budget allocations. For example, Andalusia dedicated over 5 million EUR in 2022 to actions targeting the Roma population, while Castile-La Mancha allocated 1.7 million EUR, and Catalonia committed around 1.3 million EUR. In contrast, several regions—including Asturias, Cantabria, and the Balearic Islands—either did not report Roma-specific budget lines or allocated significantly lower amounts, limiting their ability to implement impactful measures.

These variations also reflect differing political will and prioritisation. Regions like Aragon and Andalusia stand out for their proactive and well-structured efforts, including actions related to education, housing, and employment, while others fall short in their implementation or fail to report on their progress entirely.

While there are positive examples—especially in the cooperation between administrations and Roma CSOs—the lack of a solid financing strategy and the excessive reliance on civil society raise doubts about the sustainability of the advances that have been achieved and the ability to meet the objectives of the NRSF.

Likewise, these achievements do not conceal the persistence of structural problems. Access to dignified housing, educational segregation, labour precarity, and everyday discrimination continue to be realities for a large part of the Roma. Current efforts, although valuable, still do not have the necessary scope to reverse centuries of inequality.

### 1.1.3. Effectiveness of monitoring

The monitoring of the strategy and the operational plan is organised around several pillars:

- National contact point (NCP): Responsible for preparing periodic reports to the European Commission and coordinating the information submitted by the Autonomous Communities and local entities.
- National Roma Council (CEPG): This body could play a more active role in monitoring, but its resources and competencies are limited. Although new working groups have been established, there is no strong accountability mechanism that compels administrations to meet their commitments.
- Annual and biannual progress reports: These reports compile data and actions undertaken; however, in practice, they depend on each territory's willingness to provide accurate and updated information. Interviews (e.g., with Fernando Macías or Beatriz Carrillo) highlight the lack of independent verification and evaluation programmes.

The absence of a parliamentary subcommittee or dedicated commission to ensure continuity of the State Pact against anti-Roma discrimination and the NRSF further undermines the effectiveness of monitoring and political follow-up. According to former Roma MP Ismael Cortés, after the 2023 elections, the departure of the Roma MPs who had actively promoted the pact has left the process in a prolonged “stand by”. Therefore, supervision is considered insufficient to guarantee the homogeneous fulfilment of the objectives. Most Autonomous Communities submit questionnaires (Excel sheets) with information that is difficult to verify, and, according to several interviewees, there is no ‘qualitative evaluation’ that reflects the true impact on the lives of the Roma.

### 1.1.4. Data collection

Data collection is one of the main obstacles to measuring the progress and effectiveness of the strategy:

- Absence of disaggregated official statistics: Ethnic data is not systematically collected in administrative records. This makes it difficult to identify gaps in education, employment, or health, forcing reliance on partial surveys (FRA, specific studies by entities such as Kamira or FSG). Much of the data on housing, school segregation, or access to employment comes from research projects driven by Roma or pro-Roma NGOs. Although these studies are rigorous, they do not replace the responsibility of administrations to collect official and up-to-date information.
- Specific surveys: Initiatives such as the ‘National Health Survey for the Roma’ or education studies exist, but their frequency is not guaranteed, and most do not provide a detailed territorial breakdown. Moreover, they do not always encompass the full diversity of the Roma (migrants, LGBT+ groups, etc.).

- Lack of coordination with the National Institute of Statistics (INE): Although the Operational Plan 2023-2026 contemplates the possibility of incorporating Roma self-identification in future surveys and censuses, this is still in the design phase and will not be implemented until 2026 at the earliest. This step could significantly improve the quality of statistical information, but it requires a political and technical consensus that has not yet been reached.

In conclusion, the scarcity of reliable and comparable data hinders the evaluation of the true impact of the strategy and the design of evidence-based policies. Despite the intentions expressed in the Operational Plan, data collection remains a weak point that undermines the possibility of conducting precise and effective monitoring.

## 1.2. NRSF's synergy with domestic and EU actions

The NRSF does not operate in a vacuum; rather, it is integrated into a broader framework of policies and programmes at both the state and European levels. In documents from the European Commission (e.g., the 'EU Communication on the new Strategic Framework for the Roma 2020-2030') and in the plans of the Spanish Government ('Recovery, Transformation and Resilience Plan', 'Sustainable Development Strategy',<sup>14</sup> social inclusion strategies, regional plans, etc.), emphasis is placed on the need for coordination and coherence among different instruments, specifically mentioning the NRSF, albeit without establishing adequate mechanisms.

### 1.2.1. Complementary policies

At the national level, the NRSF is related to various strategies and plans that share partial or cross-cutting objectives:

- Recovery, Transformation and Resilience Plan (PRTR): Although focused on economic reactivation following the pandemic and on the ecological and digital transition, this plan includes action lines related to social cohesion and reducing the digital divide. Some Autonomous Communities have used these funds to finance inclusion projects that directly benefit the Roma, in line with the NRSF.
- Inclusion and poverty reduction strategies: There are state frameworks (e.g., the 'National Strategy for the Prevention and Fight against Poverty') and regional plans that address social inequality, residential exclusion, and precarious employment. The NRSF complements these instruments by focusing on the specificities of the Roma, promoting a vision that more closely aligns with the reality of anti-Roma discrimination and structural inequality.
- Sectoral plans in housing, education, employment, and health: The NRSF seeks to enhance coordination with the relevant ministries (housing, education, labour, health) and their regional counterparts. For instance, in housing, the strategy is complemented by the state housing plan, and in education, by support programmes and scholarships managed by the regions. However, the effectiveness of this complementarity depends on each territory's willingness to incorporate Roma priorities into their operational plans.

In this way, the NRSF introduces a cultural perspective as well as considerations of structural discrimination and Roma participation into policies that affect the general population. Numerous interviewees (e.g., Tatiana Font and Lola Ruiz) note that while this complementarity is formally recognised, it does not always translate into concrete plans with guaranteed funding, often depending on the political will of each department.

### 1.2.2. Alignment with EU actions

The NRSF is framed within the EU Strategic Framework for Equality, Inclusion and Participation of the Roma (2020-2030) and the Council Recommendation of 12 March 2021 on the equality, inclusion, and participation of the Roma. These European documents outline objectives aimed at combating discrimination, ensuring access to education, improving employability, and reducing poverty, among other key issues. The Spanish strategy reflects these objectives in several ways:

- Anti-Roma discrimination as a central axis: In line with the EU, Spain has reinforced the legal recognition of anti-Roma discrimination (through the reform of the Penal Code) and foresees measures

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<sup>14</sup> See in: <https://www.dsca.gob.es/sites/default/files/derechos-sociales/eds-cast-acce.pdf>



for awareness raising and training. The European Commission has positively assessed this step, although it insists on the need for impact indicators.

- **European structural and investment funds:** The European Social Fund Plus (ESF+) and the European Regional Development Fund (ERDF) include provisions for the inclusion of vulnerable groups, including the Roma. The 2023 progress report highlights that Spain has mobilised part of these funds in programmes for education, employment, and housing directed at the Roma. However, the European Commission has repeatedly reminded us that the enabling conditionality on anti-discrimination requires the effective implementation of the NRSF—an area that still shows shortcomings in some regions.
- **Synergies with the European Pillar of Social Rights:** The NRSF reinforces the principle of equal opportunities and access to the labour market (Principles 1 and 3 of the Pillar), as well as the right to education and housing. Formally, the NRSF aligns with the European commitment to reducing poverty and social exclusion by 2030, although the lack of robust monitoring mechanisms limits comparison with other Member States.

Overall, while alignment with European commitments is high at the regulatory and declared objectives level, the European Commission has noted in its evaluations that significant gaps persist in practical implementation. It has urged stronger coordination among administrations to translate formal alignment into tangible results that meet the NRSF objectives

### 1.2.3. Addressing concerns of previous assessments

The NRSF and its first Operational Plan have incorporated some of the recommendations formulated by the European Commission and other bodies in previous evaluations; however, the response is not entirely satisfactory. Although improvements have been made in supervision, inter-administrative coordination and integrating anti-Roma discrimination as a central axis, concrete progress varies considerably by region and depends on factors such as political continuity, budget allocation, and the genuine involvement of administrations.

Specifically, in previous evaluation cycles (including the first RCM cycle, the final evaluation report<sup>15</sup> of the ‘National Roma Integration Strategy in Spain 2012–2020’ (NRIS) or the Commission reports on the NRIS), several concerns were identified:

- **Lack of supervision mechanisms:** The European Commission, the Council of Europe (ECRI), and various NGOs warned about the lack of a solid accountability system. The NRSF introduces an Operational Plan with indicators and foresees periodic progress reports. Nonetheless, interviewees (Ismael Cortés, Beatriz Carrillo) agree that independent monitoring mechanisms are not being implemented, and the parliamentary subcommittee that promoted the pact against anti-Roma discrimination has been discontinued, leaving the effectiveness of monitoring in doubt.
- **Insufficient inter-administrative coordination:** It was noted that decentralised competencies and limited cooperation with local entities had hindered the implementation of measures. In response, the current NRSF envisions a greater role for the National Roma Council and the establishment of technical committees. However, in practice, coordination remains uneven and depends on the willingness of each autonomous community, as reported by Fernando Macías and Tatiana Font in their interviews.
- **Lack of specific data and diagnostics:** Previous evaluations stressed the need for reliable, disaggregated statistics to measure the impact of policies. Although the NRSF includes commitments to improve data collection (e.g., collaboration with the INE and a question on Roma self-identification), there remains a heavy reliance on studies conducted by civil society. Nevertheless, unlike the previous strategy, more attention has been paid to creating indicators and collaborating with the EU Fundamental Rights Agency (FRA), representing some progress in line with European recommendations.

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<sup>15</sup> See in: [https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe\\_final\\_strategia\\_Nacional\\_12-20\\_04.10.21.pdf](https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe_final_strategia_Nacional_12-20_04.10.21.pdf)

- Transversal integration of anti-Roma discrimination: Several previous evaluations criticised that anti-Roma discrimination was addressed only partially and almost entirely delegated to social services. In the new framework, anti-Roma discrimination has been elevated to a transversal category, and the reform of the Penal Code is a significant milestone. However, as noted by the Council of Europe in its reports on racism and xenophobia (ECRI Report on Spain – fifth monitoring cycle),<sup>16</sup> resources and training within administrations are still lacking to tackle structural discrimination.

### 1.3. Roma participation in implementation and monitoring

#### 1.3.1. Involvement of Roma CSOs in implementation

Roma CSOs have played a fundamental role in some phases of the NRSF implementation, both in the provision of services and in representing the Roma in decision-making spaces. However, their involvement is marked by a dual reality: on one hand, their presence is indispensable for executing projects in areas such as education, employment, and housing; on the other, their work compensates for many institutional shortcomings in the implementation of public policies.

The NRSF Operational Plan 2023-2026 explicitly recognises the role of Roma and pro-Roma CSOs in developing strategic actions, but it does not establish a formal mechanism to guarantee their participation in all phases of the process. A significant number of programmes targeting the Roma continue to rely on civil society initiatives, evidencing an outsourcing of responsibilities by public administrations.

Moreover, Roma CSOs report difficulties in accessing public funding, both in terms of bureaucratic hurdles and the stability of funds. The financing model still largely depends on annual grants and challenges in accessing European funds, which limit these organisations' capacity to develop long-term strategies.

The National Roma Council is one of the main instruments for institutional participation. However, its impact on the effective implementation of policies remains limited. Despite its advisory role, it does not have binding authority in decision-making, and its operation has been questioned due to a lack of resources and accountability mechanisms.

#### 1.3.2. Roma in public institutions implementing the NRSF

One of the major challenges in implementing the NRSF is the limited presence of Roma individuals in administrative and decision-making structures. The lack of institutional representation creates a gap between the policies that are designed and the actual needs of the Roma.

At the state level, there is no official data on the number of Roma working in public administration, whether in technical or political roles. However, NRSF monitoring reports and expert interviews agree that the presence of Roma in ministries, Autonomous Communities, and municipalities is very limited.

In some municipalities and Autonomous Communities, there are positive examples of including Roma professionals in social intervention programmes, especially in the fields of education and employment. However, these cases rely more on local political will than on a coherent state strategy.

Another relevant aspect is the role of Roma civil society in the design of public policies. Although the National Roma Council and other platforms facilitate dialogue with institutions, Roma participation in public administration remains contingent on CSO representation, lacking a structural presence within the bodies that manage the NRSF.

In this regard, the absence of quotas or affirmative action measures for hiring Roma in public administration limits the opportunities for genuine participation in the implementation of strategies.

#### 1.3.3. Roma participation in monitoring and evaluation

Monitoring and evaluating the NRSF continue to be areas with limited Roma participation, both in defining indicators and interpreting data. One recurring issue is the reliance on studies conducted by Roma or pro-Roma

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<sup>16</sup> See in: <https://rm.coe.int/interim-follow-up-conclusions-on-spain-5th-monitoring-cycle/1680a17dc5>

NGOs, which, although offering a qualitative and rigorous perspective, do not replace the responsibility of public administrations for collecting and analysing official data.

The 2023 progress report from the Ministry of Social Rights acknowledges that there is a lack of independent evaluation tools that incorporate the perspective of the Roma. This means that, although some CSOs participate in the NRSF monitoring, there are no formal mechanisms to ensure the effective evaluation of the Roma community.

In terms of direct participation, the National Roma Council has specific working groups for monitoring the NRSF, but its recommendations are not binding. Furthermore, the Council lacks the technical capacity and sufficient resources to develop its own evaluations, which limits its actual impact on supervising implemented policies.

On the other hand, decentralised administration implies that monitoring the NRSF largely depends on each autonomous community's willingness. In some regions, such as Andalusia or Catalonia, there are examples of collaboration between governments and Roma organisations, whereas in other Autonomies, civil society participation in monitoring is minimal.

## 2. REVIEW BY THEMATIC AREA

### 2.1. Fighting antigypsyism and discrimination

In the RCM 2022 report, we referred to the objectives defined by the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030 (NRSF) in the field of combating antigypsyism and discrimination: “The two specific objectives are significant and relate to some of the most pressing issues associated with antigypsyism. On one hand, these include the need to prevent and reduce antigypsyism in all its forms, including intersectional and multiple discrimination, hate crimes against Roma, and hate speech. On the other hand, they refer to the possibility for victims of antigypsyism to exercise their rights, ensuring that they receive assistance and specialised support. No concrete measures are established regarding the two specific objectives of the NRSF; only general actions are outlined to be promoted by various authorities, together with the planned non-discrimination legislation. The Roma National Contact Point (NRCP) indicates that the operational plans will include specific measures along with a budget allocated for their implementation.”

The NRSF Operational Plan 2023-2026 sets out nine measures for the first objective and six for the second, detailing in each measure the actions to be carried out over the four years of the Plan. However, we do not see any indication of the budget associated with these measures or actions. Instead, the responsible bodies for the development of each measure are identified, which serves as an element that facilitates monitoring of both the Plan’s compliance and the NRSF itself.

#### 2.1.1. Effectiveness of the NRSF in addressing the problems

Due to the inability to monitor the various measures proposed in the NRSF through the two Progress Reports published to date—since these essentially only report as results the amounts from public grant calls linked to the NRSF on a competitive basis—we proceed to analyse some of the actions included in the NRSF Operational Plan 2023-2026 for which our team has accessed information on their implementation and/or development, either through document analysis or from interviews conducted for this report.

With regard to Actions linked to the Objective “Reduce discrimination against Roma and antigypsyism, including stigmatisation, intersectional and multiple discrimination, hate crimes, and hate speech against Roma”, we highlight the forthcoming publication by the ‘Council for the Elimination of Racial and Ethnic Discrimination’ (CEDRE) of the Ministry of Equality titled *The Impact of Racism in Spain 2025* (the new title for what was previously known as *Perception of Racial or Ethnic Discrimination by Its Potential Victims*). This key report forms the basis for almost all the indicators associated with this strategic line of the NRSF, and its preparation involved an advisory group of experts, including prominent Roma activists and professionals. In this regard, it would be important that tenders launched by public administrations for such studies prioritise the contracting of organisations and companies from Roma and/or civil society representing the racialised population, as the latter possess the necessary experience and field knowledge that the consultancies winning these contracts do not. These consultancies also lack professionals recruited from among racialised members of society in the area of the analysis of data from surveys of racialised populations—an area where improvement is needed so that these studies empower the communities being studied.

Special attention must be paid to the approval of the ‘Strategic Framework for Citizenship and Inclusion, against Racism and Xenophobia 2023-2027’,<sup>17</sup> a document promoted by the Spanish Observatory on Racism and Xenophobia (OBERAXE), an agency under the Ministry of Inclusion, Social Security and Migrations (MISSM). This document is the fulfilment of the commitment to approve a ‘National Strategic Plan for Reception and against Racism in 2022’, as referenced in the NRSF Operational Plan 2023-2026. It includes a chapter dedicated to the Roma in its diagnosis section, as well as various measures and references in its proposed Actions. Undoubtedly, the collaboration of the Ministry of Equality in preparing this important document is evident—it explicitly refers to the Roma and integrates them throughout its development—but it is surprising that no participatory process was established with organisations working on the effects of racism, as none of the Roma organisations appear to have been convened, contrary to European institutions’ recommendations.

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<sup>17</sup> See in:

[https://www.inclusion.gob.es/oberaxe/ficheros/documentos/MarcoEstrategicoCiudadaniaInclusionContraRacismoXenofobia\\_REV.pdf](https://www.inclusion.gob.es/oberaxe/ficheros/documentos/MarcoEstrategicoCiudadaniaInclusionContraRacismoXenofobia_REV.pdf)

Regarding the approval and development of the Law against Racism, Racial Discrimination, and Other Related Forms of Intolerance, although we are aware that it is on the Spanish Government's agenda, no public steps have been taken for the text—drafted through a participatory process in the previous legislature—to be discussed in the Council of Ministers or Parliament. This is undoubtedly a first-order commitment that must be closely monitored in the coming years.

On the other hand, now consensus has been reached (in 2023)—including with the participation of organisations from the National Roma Council—it is expected that a question will be introduced in an INE survey (ECEPOV) in 2026 to allow the structured inclusion of data on ethnic origin in official statistics.

In terms of the continuity of actions that were already being carried out prior to the approval of the NRSF, campaigns against racism by the Ministry of Equality continue, the Ministry of the Interior collects data on hate crimes against Roma, and training initiatives at the National Institute of Public Administration (INAP) are still being promoted, albeit with the modest participation of highly qualified Roma professionals.

Finally, the Comprehensive Law for Equal Treatment and Non-Discrimination (Law 15/2022) has still not implemented measures as decisive as the establishment of the Independent Authority and the sanctioning regime. Beatriz Carrillo de los Reyes, Director General for Equal Treatment and Non-Discrimination and against Racism at the Ministry of Equality, informed us in an interview for this report that intensive work has been underway in recent months to establish the Independent Authority and that the results will be made public shortly. This delay renders such an important law seriously problematic in terms of applicability, generating a sense of frustration among a large part of the Roma and racialised population that had high expectations for its approval three years ago. We will be attentive to the announced imminent establishment of the Independent Authority, hoping that it receives sufficient budgetary allocation to fulfil its functions as mandated by the law.

In relation to the Objective “to increase the capacity of victims of discrimination and antigypsyism in exercising their rights by guaranteeing their access to specialised assistance, guidance, and support”, we highlight the maintenance and strengthening of the state-level ‘Victim Assistance and Guidance Service For Discrimination Based on Racial or Ethnic Origin’ provided by CEDRE. This important service, coordinated by FSG, has significantly increased its budget allocation, which has resulted in a greater number of centres where victims of racism can receive guidance and support; however, unfortunately, this has not yet led to the involvement of the other Roma entities that are part of the National Roma Council in that service, as explicitly mentioned in the Operational Plan 2023–2026. In addition, after FSG's departure from the National Roma Council, the service was disconnected from the Council.

On the other hand, we have observed the approval of the ‘Strategy for the Eradication of Violence against Children and Adolescents’,<sup>18</sup> but despite the Operational Plan indicating that this strategy should include Roma children, unfortunately, the document does not mention Roma children even once, nor does it establish any specific measure for Roma children. It is unlikely that a political document will include any group if it does not mention them or relegates them to the miscellaneous category for vulnerable children. Once again, this strategy violates European guidelines, which indicate that public policies should combine general (mainstream) measures with specific (targeted) ones to achieve greater efficiency and impact.

Finally, we cannot end this section without mentioning existing positive experiences at the regional level in terms of monitoring compliance with their respective strategies, which contrast with the limited usefulness of the aforementioned NRSF Progress Reports. We refer to the system of which we became aware in the interview carried out for the drafting of this report with Txema Ezkerra Fernández, Director General for Diversity, Coexistence and Intergenerational Solidarity of the Government of the Basque Country, in which we were able to observe how compliance with each of the measures is reviewed on an annual basis based on the data provided by the different government departments. The final result is discussed in the Basque Council of the Romany Population. This level of rigour and transparency is what is required for political commitments of great value, such as the strategies, which also aim to tackle situations of structural discrimination that have been in place for tens or hundreds of years. This Basque experience should not be an exception, nor the praxis of a single government. It must be said that in order to achieve this rigour, they mobilise the material and personal

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<sup>18</sup> See in:

<https://observatoriodelainfancia.mdsocialesa2030.gob.es/productos/pdf/EstrategiaErradicacionViolenciaContraInfanciaACCESIBILIDAD.pdf>

resources necessary to obtain all the information they need. The result is that they do not have a single action in their strategy that is not associated with data to evaluate, unlike the NRSF, unfortunately.

### 2.1.2. Addressing the problems beyond the NRSF

The inclusion of the fight against antigypsyism and discrimination within the strategic axis of equality was one of the main novelties of the NRSF, originating from the EURSF, and became one of its strengths—generating many expectations among Roma and pro-Roma civil society.

However, before the midpoint of the NRSF's term, structural inconsistencies and weaknesses become evident that go beyond the strategic frameworks and hinder the overall development of the strategy, particularly in those strategic areas that are not confined to the classic social inclusion items (education, employment, health, and housing), such as the fight against antigypsyism and discrimination.

Beatriz Carrillo de los Reyes, Director General for Equal Treatment and Non-Discrimination and against Racism at the Ministry of Equality and a Roma feminist activist, elaborated in an interview for this report on the structural difficulty arising from the near absence of public policies implemented by public administrations in the NRSF. She emphasised that “almost all existing resources are being outsourced to private entities (organisations from the third social sector) for the implementation of NRSF actions through various public grant calls, and as a consequence, the different institutional levels do not feel compelled to design and implement public policies that address the pressing needs diagnosed among the Roma.” This outsourcing, which the published Progress Reports show is carried out very unevenly among the various organisations, in turn, makes it very difficult to measure the impact, reach, and transformative capacity of the funds allocated to subsidised projects. Undoubtedly, it should be the governments at all levels that drive strong, evaluable, and transformative public policies—and this is not occurring. This fact, which is particularly relevant to the overall NRSF, is accentuated in this chapter because it is very difficult for a social organisation to impact a phenomenon such as antigypsyism, which European institutions acknowledge is structural and, therefore, largely institutional.

An expert social activist and advocate for combating antigypsyism warned us in an interview for this report:

Where are the public policies implemented by public administrations? The public grants (ESF+ or IRPF) or services arising from tenders conducted by social organisations—many of which perform excellently and do great work—should not replace the main role that public policies and other government initiatives should play. Their role should be complementary at most. Unfortunately, this is exactly what is happening. Public administrations are withdrawing from the scene and ceding that primary (or sole, in this case) role to Roma and pro-Roma social organisations in the development of the NRSF. That is not how it should be [...] Although the issue of antigypsyism has now been put on the public policy agenda with interesting legal changes, greater public funding for programmes to combat antigypsyism and greater awareness of this problem among prosecutors, judges, police officers, and other agents is still necessary. Access to the defence of rights is complicated, and public awareness must be improved.

Going further along the same lines, we would like to highlight the initiative in the field of the fight against antigypsyism, which Txema Ezkerra Fernández, Director General for Diversity, Coexistence and Intergenerational Solidarity of the Department of Welfare, Youth and Demographic Challenge of the Government of the Basque Country, explained to us in the interview we conducted with him for the preparation of this report. This is an initiative that has made it possible for Basque institutions to sign an institutional declaration of recognition and coexistence with the Roma People and against antigypsyism. This document has been discussed, agreed, and approved within the Basque Council of the Romany Population and was presented publicly on the day of the Basque Romany Population on 16 November 2024. We consider very positive the intention of the established process to involve all the Basque institutions (regional, provincial, and local governments), not only in approving this declaration, but also in implementing concrete policies against antigypsyism and in favour of the rights of the Romany People in their respective territories.

Furthermore, Beatriz Carrillo also pointed out the difficulty of coordination and territorial cohesion in a decentralised state such as Spain, noting that although action lines may be promoted at the national level in any field, if it is the Autonomous Communities that have competence in that area, they are under no obligation to follow the guidelines or orientations from the state administration. While the national government claims that the existing coordination mechanisms are effective, this mostly concerns reporting from regions to the centre. However, the actual NRSF implementation is primarily contingent on autonomous regions' will and resources to align with the National Strategy. This structural feature of the Spanish governance model



continues to hinder effective coordination and territorial cohesion, particularly in cross-cutting commitments such as the NRSF.

Finally, regarding the structural factor of antigypsyism, we note a significant lack of governmental impetus in this area at the time of designing and drafting the NRSF. In the approved text, one could conclude that the phenomenon of antigypsyism was not deeply addressed in all its dimensions, as the flagship of this strategic line was articulated as a victim assistance service—which we consider positive and essential—but no internal review process was established within public administrations to detect where antigypsyism is embedded in regulations, laws, rules, and practices. This seems to assume that by addressing the fight against antigypsyism, only the victims of aggression are to be helped, overlooking that often it is the public administrations themselves and some of their agencies that perpetrate discrimination against Roma due to their ethnic identity.

In short, there is a need for greater political impetus, more transformative and evaluable public policies, a better and more democratic distribution of public grants, and a thorough review of institutional actions to detect and counteract antigypsyism wherever it operates.

## 2.2. Education

The education strategic line is one of the most noteworthy and is positioned along the inclusion axis of the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021–2030 (NRSF). This line includes the following specific Objectives:

- Increase enrolment and participation of the Roma population in early childhood education (<6 years), especially in the first cycle from 0 to 3 years.
- Reduce school segregation at all educational levels and in all its forms.
- Eradicate illiteracy and enhance the training and education of Roma adults.
- Reduce discrimination against the Roma population in the educational field.
- Increase the academic success of Roma students of both genders in compulsory education.
- Boost the number of Roma students of both genders in post-compulsory education.
- Narrow the digital gap among Roma students.

The 2023–2026 Operational Plan of the NRSF establishes a total of 19 measures, each linked to the specific Objectives defined. Each measure, in turn, includes a series of actions to be carried out over the 4-year duration of the Plan. Yet, as in other strategic lines, we see no trace of the budget allocated to these measures or actions; only the responsible organisations for each measure are indicated.

### 2.2.1. Effectiveness of the NRSF in addressing the problems

In an interview with Juan Carlos Pérez Medina,<sup>19</sup> Technical Advisor at the Subdirectorate General for Territorial Cooperation and Educational Innovation (SGCTIE) of the Ministry of Education and Vocational Training (MEFP), he explained the main challenges in the field of education and how the NRSF is addressing them. The main challenges he mentioned were:

- A high concentration of Roma students (segregation).
- An educational gap affecting Roma students, particularly evident in the low rate of secondary education completion with certification, with this phenomenon being more pronounced among Roma girls.
- A high rate of grade repetition among Roma students.
- Elevated levels of early school leaving among Roma students.
- The scarce presence of Roma students in higher education.
- Low enrolment in the first cycle of early childhood education.

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<sup>19</sup> Juan Carlos Pérez Medina attended this interview as a technical advisor, not being able to count on the presence of any political leader of the department, given that at the time of the interview, the Deputy Directorate General was vacant due to the transfer of the previous deputy director to another government department in September 2024. Therefore, we must note that the interviewee's statements present an exclusively technical perspective on the topics discussed during the interview.

Juan Carlos Pérez Medina valued the NRSF as a positive instrument since it provides a theoretical and procedural intervention framework that is useful. He noted, "The NRSF has placed an emphasis on the fight against antigypsyism, gender perspective, and participation, guiding our interventions. This is a differential approach compared to the previous strategic framework, which focused exclusively on social inclusion and socioeconomic factors. The current approach is more holistic, and that in itself is a very important advance". This consideration is, in our view, an important feature of NRSF and represents a step forward compared to NRIS, giving the document much greater depth and capacity for transformation.

Conversely, based on our decades of experience in this field, both one of the social experts who was interviewed, and Beatriz Carrillo de los Reyes, Director General of Equal Treatment, Non-Discrimination and Against Racism at the Ministry of Equality, expressed concern about the evolution of the data obtained through the 'Exploratory Pilot Study on the School Segregation of Roma Students' (Fundación Secretariado Gitano (FSG), 2022).<sup>20</sup> This study reveals a stagnation in the situation of Roma students over the past decade, breaking the trend of improvement in areas such as absenteeism, academic failure, and enrolment in primary education since the beginning of democracy in Spain. For this reason, they believe that specific support programmes for Roma students should be created as part of public education policies in Spain. European-funded education programmes have been successful (ESF), but they need to be translated into national and regional public policies through specific programmes in the education system, funded by the state. European funds alone cannot solve the education problem.

The Study highlights the inequality that affects Roma students compared to other students, which constitutes a form of structural discrimination manifested in several ways:

- Educational gap and structural inequality: The report indicates that Roma students suffer a significant educational gap compared to other students, which constitutes a challenge to their full inclusion. This gap is reflected in high early school leaving rates (63.7% compared to 18.5% of the population as a whole) and a low level of participation in post-compulsory secondary education.
- Lack of role models and expectations: The lack of educated family role models and low expectations can perpetuate a cycle of social and educational exclusion.
- School segregation as a form of discrimination: The report defines school segregation as the "separation of students into different school settings based on some personal or social characteristic", which implies an unequal distribution of students and the concentration of students with similar characteristics in the same classrooms or schools. It is argued that school segregation violates the right to education and has negative consequences for equal opportunities, social cohesion, and coexistence.
- Differentiated impact on Roma women: The report highlights that Roma women face double discrimination based on gender and ethnicity, with worse educational outcomes than Roma men and higher rates of early school leaving due to family reasons.

These data highlight the need to adopt an anti-discrimination approach to address the educational inequalities affecting Roma students, taking into account the multiple dimensions of discrimination and the importance of ensuring equal opportunities and educational inclusion.

Regarding absenteeism, according to the Study, truancy is one of the main problems hindering the educational success of Roma students. The study notes that, although there have been improvements in the schooling of these students in recent decades, truancy in primary education remains a serious problem. This results in many Roma students not achieving the appropriate educational level for their age, which hinders their educational progress and increases the risk of early school leaving. The Study highlights the complexity of the situation in some schools and how the lack of resources directly impacts the care provided to students with the greatest difficulties, such as Roma students. Furthermore, it mentions the lack of motivation and expectations from an early age among many Roma students and their families, which contributes to absenteeism and school dropout. In this context, truancy becomes a key factor perpetuating the educational and social inequality of Roma students. The report emphasises the need to address this problem comprehensively, taking into account its

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<sup>20</sup> See in: [https://www.libreria.educacion.gob.es/libro/estudio-piloto-exploratorio-sobre-la-segregacion-escolar-del-alumnado-gitano\\_174012/](https://www.libreria.educacion.gob.es/libro/estudio-piloto-exploratorio-sobre-la-segregacion-escolar-del-alumnado-gitano_174012/)



multiple causes and the consequences it has on the educational development and future opportunities of these students.

Without a doubt, this fact should make us reflect on the causes of this stagnation and implement different courses of action if we want to achieve different results. In our opinion, in this precise aspect, it is crucial to apply an approach to combating antigypsyism and to completely reverse the policies that focus on Roma families in relation to absenteeism and academic failure. Victims of discrimination should never be the centre of analysis, much less if blame is being unfairly assigned. The barriers that prevent the Spanish education system, implemented by regional administrations, from effectively and sustainably including Roma students must be rigorously and thoroughly analysed, and once the causes are identified, action must be taken accordingly.

In addition to the violation of rights entailed by the school segregation suffered by a large proportion of Roma students, which we analyse later as one of the key areas of this report, we must mention that we have been emphasising for many years that we must include the history and culture of the Roma people in school curricula. The new education regulatory law in Spain, the Spanish Organic Law on Education (LOMLOE),<sup>20</sup> also states this, but in practice, Roma students do not see their ethnic origins recognised in the subjects they study, resulting in a very evident disaffection between these students and educational institutions. Many Roma students and their families view schools as something alien to them and often hostile. This is not a minor issue, but there is a continued refusal by public administrations to acknowledge the existence of a problem.

Furthermore, discriminatory professional practices persist that are neither reported nor addressed, but which Roma families insist exist. These practices unjustifiably diminish the academic pathways of Roma students, presumably considering them lost and curtailing their academic prospects and, therefore, their professional future. Given this, there are no initiatives to implement educational quality plans that would transform schools with Roma students into benchmark schools where non-Roma families also want their children to study.

Undoubtedly, another cause may be that successive economic crises have caused the most vulnerable population, including the Roma population, to seek solutions to their economic insecurity, being unable to wait for training processes, which we know are lengthy, to incorporate young people into self-employment and street vending positions that financially support their families. It seems evident that the education system has failed to sufficiently attract a proportion of the Roma student population into completing formal education and vocational training.

These and other elements must be put on the agenda, associated with rigorous studies and diagnoses. Plans should be developed to address these causes through multi-level institutional action, with an anti-discrimination approach and taking account of the essential role of Roma civil society, which must play a key role, establishing itself as the community's reference point for Roma students, their families, and educational centres.

Moreover, given the structure of the NRSF Progress Reports, it is not always possible to determine the degree of compliance with the Measures and Actions outlined in the 2023-2026 Operational Plan, as these documents mainly report the funding amounts of public grant calls linked to the NRSF. We need these reports to include data on the indicators established in the NRSF, especially on the actions and public policies that are implemented, because otherwise, it could be assumed that the NRSF is being implemented by Roma organisations, which are still private entities. Without this data, it is almost impossible to determine the level of compliance.

Nonetheless, Juan Carlos Pérez Medina highlighted some notable initiatives from the Ministry of Education and Vocational Training. "The approval of the Organic Law amending the Organic Law on Education (LOMLOE)<sup>21</sup> has been a very important advance since it acknowledges the need to educate about the history and culture of minorities, specifically that of the Roma", he explained. He also mentioned other significant measures: "The government has the authority to establish a minimum school curriculum, which Autonomous Communities can then complement within the scope of their competencies. In that regard, we have worked in line with LOMLOE's guidance on including the history and culture of the Roma in these curricula."

Based on this statement, we would like to point out the existing resistance at the regional level to the implementation of this Objective, which is preventing this from becoming a reality in practice. On the other

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<sup>21</sup> See in: <https://www.boe.es/buscar/doc.php?id=BOE-A-2020-17264>

hand, it is clear that there is a need for teacher training to implement the inclusion of the history and culture of the Romany population into curricula, as demonstrated by the publication of various educational materials by three Autonomous Communities (we should remember that Spain has seventeen Autonomous Communities with full competences in education) which address this need in their respective territories. This is the case of the Basque Country, with the material entitled *Te siklarel Romanipen*<sup>22</sup> (To learn Romanipen -Romany idiosyncrasy and knowledge), published by the Association of Romany Women of Euskadi with the financial support of the Basque Government for secondary school pupils and teachers. We also highlight the recent publication in Navarre of the guide *Didactic materials for working on the history and culture of the Romany population in infant and primary education classrooms*,<sup>23</sup> a publication promoted by the Gaz Kaló Federation of Romany Associations of Navarre and financed by the Navarrese Government, which is aimed at infant and primary education classrooms; and finally, the Government of the Valencian Community makes available to education professionals online material entitled 'Resources on the history and culture of the Roma People'<sup>24</sup>, which includes didactic units and different resources for infant, primary and secondary education.

Along the same lines, in August 2024, the document *The History and Culture of the Roma: A Brief Guide for its inclusion in the LOMLOE Curriculum Framework*<sup>25</sup> was published. This publication, proposed by the SGTIE in the context of the Education Working Group of the National Roma Council, aims to update the framework for studying Roma history and culture, adapting it to the new educational regulations and highlighting the opportunities that new curricula offer. Its Objectives include emphasising key elements for classroom treatment from a valorising perspective and education against antigypsyism, aligning its study with recent national and international inclusion frameworks, disseminating the Ministry of Education's didactic materials on Roma history and culture, and specifying how these contents can be integrated into the LOMLOE curriculum across various subjects. This document is didactic material that offers guidelines for integrating the history and culture of the Roma people into the Spanish educational curriculum, within the framework of the LOMLOE. We highlight the following contents:

- Relevance and justification: The document underlines the importance of including Roma history and culture in the curriculum as an act of historical justice, repairing a knowledge gap and representing a tool to combat racism and antigypsyism. Furthermore, it is aligned with the LOMLOE, which prescribes the inclusion of this content.
- Pedagogical and anthropological approach: It promotes an intercultural approach that values diversity, avoids stereotypes, and encourages the construction of inclusive identities. A dynamic and heterogeneous presentation of Roma culture is encouraged, avoiding essentialism and folklorisation.
- Curricular integration: The document details how Roma history and culture can be integrated into various areas and subjects of the curriculum of primary, compulsory secondary, and baccalaureate education.
- Competences: The teaching of Roma history and culture is linked to the development of key competences such as cultural awareness and expression, social and civic competences, and competence in cultural awareness and expression.
- Resources and training: References to teaching materials and training courses for teachers are provided, which are crucial for the effective implementation of these contents in the classroom.

Regarding the curriculum Integration of LOMLOE by subject, the document details the integration of Roma history and culture in various subjects, including:

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<sup>22</sup> See in:

[https://www.euskadi.eus/contenidos/documentacion/inn\\_doc\\_esc\\_inclusiva/es\\_def/adjuntos/diversidad/progra\\_didactica\\_historia\\_cultura\\_gitana\\_1\\_2\\_eso\\_c.pdf](https://www.euskadi.eus/contenidos/documentacion/inn_doc_esc_inclusiva/es_def/adjuntos/diversidad/progra_didactica_historia_cultura_gitana_1_2_eso_c.pdf)

<sup>23</sup> See in: <https://www.navarra.es/es/-/nota-prensa/educacion-presenta-materiales-educativos-y-un-libro-para-gue-el-alumnado-de-infantil-y-primaria-conozca-la-historia-y-la-cultura-del-pueblo-gitano>

<sup>24</sup> See in: <https://ceice.qva.es/va/web/inclusioeducativa/reico-poble-gitano>

<sup>25</sup> See in: [https://www.libreria.educacion.gob.es/libro/la-historia-y-cultura-del-pueblo-gitano-breve-guia-de-orientaciones-para-su-inclusion-en-el-marco-curricular-lomloe\\_184546/](https://www.libreria.educacion.gob.es/libro/la-historia-y-cultura-del-pueblo-gitano-breve-guia-de-orientaciones-para-su-inclusion-en-el-marco-curricular-lomloe_184546/)

- Primary Education: Knowledge of the Natural, Social, and Cultural Environment.
- Compulsory Secondary Education: Geography and History, Spanish Language and Literature, Education in Civic and Ethical Values, Music.
- Baccalaureate: Inclusion in subjects such as History, Literature, Art, and Social Sciences is promoted.

In Conclusion, the document is a valuable tool for educators and curriculum designers, as it provides a solid theoretical basis and practical guidelines for the inclusion of Roma history and culture in the Spanish education system, within the framework of the LOMLOE.

Another ongoing initiative from the MEFP aligned with the NRSF is teacher training, promoted by the National Institute of Educational Technologies and Teacher Training (INTEF). As an agency under the MEFP, INTEF offers active teachers—whether in early childhood, primary, or secondary education, and in both public and state-subsidised schools—various online training or refresher courses each year. These courses benefit teachers not only in terms of professional development but also in accumulating the credits required for career progression and the consequent financial bonus. The course titled ‘Educational Attention to Roma Schoolchildren’,<sup>26</sup> taught by, among others, José Eugenio Abajo Alcalde and Fernando Macías Aranda since 2020, has been very successful, achieving a high level of satisfaction and retention among participants.

Finally, in terms of actions carried out or continued from 2023 to date (the period analysed in the NRSF Operational Plan), it is worth highlighting that, in order to offer support and provide guidance to students in vulnerable educational situations and to reduce early school leaving rates, Spain is investing in the expansion of the current guidance, progress, and educational enrichment programme (PROA+).<sup>27</sup> This programme, although not specifically aimed at Roma students, is being applied in many schools, many of them segregated, with a high concentration of Roma students. The approach of adapting to the reality of each educational centre makes this programme a real opportunity for many Roma families and their school-age children, who can see that an investment and a methodological adaptation is being made with the aim of achieving educational success for the students of that centre. In fact, one of the insistent demands of Roma civil society is that this programme be scaled up to match the enormous pre-existing need, requiring much greater investment that will have a transformative effect on schools with Roma students, a demand that is not always heard by the public administrations responsible for this area.

This investment is part of “Component 21: Modernization and Digitalization of the Educational System, including early childhood education for 0-3 years” within the Recovery, Transformation and Resilience Plan. It focuses on providing resources to schools that commit to adapting their educational project to meet students’ needs (through programme contracts or similar agreements between schools and educational administrations, reflecting the commitment to achieving specific objectives and the necessary actions and resources). The programme aims to create an open, stimulating learning environment that reinforces personalised teaching methodologies adapted to all students’ needs, thereby reducing academic failure and early school leaving. The programme is intended for schools facing significant educational challenges, including those in rural areas.

There are institutions with a significant proportion of students<sup>28</sup> in vulnerable educational situations, facing various personal and social obstacles that hinder the full benefit of classroom teaching and the overall school environment. In most cases, this coincides with schools located in socially disadvantaged areas and serves students from families with low socioeconomic and educational levels. To implement the investment for PROA+, territorial cooperation is established with the Educational Administrations of the Autonomous Communities within the framework of the Sectoral Education Conference, which, following authorisation by the Council of Ministers, approves the requirements, criteria for territorial distribution of funding, and monitoring of execution; subsequently, these are published in the Official State Bulletin (BOE). The Ministry executes the investment as the educational administration in Ceuta and Melilla. Finally, technical cooperation regarding the programme is

<sup>26</sup> See in: <https://formacion.intef.es/aulaenabierto/course/view.php?id=69>

<sup>27</sup> See in: <https://www.educacionfpydeportes.gob.es/mc/sqctie/cooperacion-territorial/programas-cooperacion/proa.html>

<sup>28</sup> According to Save the Children in its 2018 report *Mix with me*, the concentration of vulnerable students in Spain affects 46.8% of all schools. See in: <https://www.savethechildren.es/notasprensa/la-mitad-de-los-ninos-en-espana-estudia-en-escuelas-con-alta-concentracion-de-alumnado> This figure should be revised after the dire effects of the COVID-19 pandemic.

developed, and mechanisms for monitoring and verifying its execution are implemented. Total funding for the period 2021–2024 amounts to 360 million EUR, of which 320 million comes from the Recovery and Resilience Mechanism and 40 million from the General State Budgets. It is noteworthy that PROA+ includes a key activity entitled ‘An inclusive school for the successful trajectories of Roma students,’ which is undoubtedly a first-order instrument for supporting educational action in schools with Roma students.

### 2.2.2. Addressing the problems beyond the NRSF

Juan Carlos Pérez Medina pointed out a recurring difficulty in most of the areas under analysis. The NRSF is a political document of the Spanish government that guides the administrations responsible for competencies to act in a certain direction. However, it does not have the power to enforce those guidelines, and administrations may choose to follow the outlined directives or opt for alternative criteria. In the case of educational competencies, this is a determining factor, as the decision-making power resides with the regional governments. We again note here, as in other chapters of this report, the structural difficulty involving highly decentralised states, as is the case in Spain, where the national government cannot force regional governments to implement policies or strategies. It is therefore necessary to work with much more impetus and resources on consensus-building at the time of strategy design if the NRSF is to make significant progress towards its objectives.

However, coordination mechanisms are subject to the will of public institutions, which are often entangled in political tensions due to differing governing parties in each region. In practice, this results in insufficient coordination and poor data collection, which is a significant barrier to evaluating the effectiveness of the designed strategic lines and axes.

Moreover, several interviewees (an independent expert, Beatriz Carrillo, Patricia Caro, and Ismael Cortés) noted that the context has changed substantially since 2021. Determining factors such as digital poverty and inequality, the rise of hate crimes and hate speech, and the entrenchment of social and media racism—issues that were either non-existent or marginal at the time—now play a crucial role in educational outcomes. These elements have effectively undermined the NRSF’s capacity to act since its very early months.

## 2.3. Employment

The National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021–2030 (NRSF) established five specific objectives in the area of employment. One of the main critical issues affecting the Roma in this field is related to the employment rate, which is alarmingly low compared to that of the non-Roma population, according to the available data.<sup>29</sup>

With regard to the intermediate targets set by the NRSF, these have been as follows:

- Increase the employment rate from 29.9% to 35% (30% for women, 40% for men).
- Reduce the unemployment rate from 60.4% to 50% among women and from 47.4% to 37% among men.
- Decrease the proportion of temporary employment from 75.5% in men and 68.1% in women to 60% in both cases.
- Reduce employment discrimination from 48% (according to FSG, 2019) or 30.1% (according to CEDRE, 2020) to 20%.
- Increase the rate of job regularisation<sup>30</sup> from 51.5% to 60%.
- Reduce the percentage of Roma youth who neither study nor work from 57.6% to 50% for Roma girls and from 42.4% to 35% for Roma boys.
- Increase the activity rate among Roma women from 38.5% to 40%.

Unfortunately, no quantitative or qualitative data are available to determine whether these intermediate targets have been met or are in the process of being achieved, as no study has been conducted on the current situation, and the Progress Reports from the Ministry of Social Rights, Consumption, and Agenda 2030 do not

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<sup>29</sup> FSG (2019). *Estudio comparado sobre la situación de la población gitana en España con relación al empleo y la pobreza*. [Comparative study on the situation of the Roma population in Spain in relation to employment and poverty.]

<sup>30</sup> A significant percentage of Roma are regularly self-employed, which places them in a precarious employment situation. The objective is to increase the rate of salaried/paid employment among the Roma.

display these figures. The intermediate goals mentioned above, set by the NRSF, lack measurement tools for determining whether they are being met. This is one of the main problems when monitoring the NRSF. The Spanish government should include specific tracking and monitoring tools, such as the survey used in the case of health. The latest report on employment dates from 2019, and the data need to be updated to determine whether progress has been made.

According to the available sources—the 2021–2022 Progress Report and the 2023 Progress Report—it is not possible to certify that the most critical and significant problems have been addressed, since there are no statistical data available to analyse and assess the measures implemented in the field of employment

### 2.3.1. Effectiveness of the NRSF in addressing the problems

The effectiveness of the NRSF cannot be evaluated, as there are no statistical data that allow us to analyse progress toward the established intermediate targets.

The coalition behind this report requested an interview with a representative from the Secretariat of State for Work to obtain information on the measures implemented and their effectiveness from 2021 to the present; however, no response was received.

In this regard, the only sources we have accessed are the 2021–2022 and 2023 Progress Reports of the NRSF issued by the Ministry of Social Rights, Consumption and Agenda 2030. In both reports, the Ministry states that the strategic line with the highest budgetary weight for measures specifically aimed at the Roma at the state level has been employment, while at the regional level it has been education.

The total budget allocated to specific employment measures has been:

- Year 2021: 9.5 million EUR.
- Year 2022: 11.9 million EUR.
- Year 2023: 15.7 million EUR.

The strategic objective that receives the largest portion of this budget is increasing the employment rate of the Roma, followed by the objective of enhancing the empowerment, participation, and activation of Roma women in the labour market.

Taking 2023 as a case study—when the budget increased to 15.7 million EUR—it can be observed that the responsibility for increasing the employment rate of the Roma in Spain practically falls on one civil society organisation, the *Fundación Secretariado Gitano*. From this budget, 13.6 million is dedicated to the specific objective of increasing the employment rate of the Roma; 1.5 million to increasing the empowerment, participation, and activation of Roma women in the labour market; and the remaining 0.6 million to the other objectives.

The types of actions to which virtually the entire budget has been allocated are the following programmes and/or projects:

- FSG's 'Acceder' programme: 8.9 million EUR.
- FSG's 'Calí' programme: 1.3 million EUR.
- FSG's 'Acceder' and 'Promociona' programme in Castilla y León: 1.3 million EUR.
- FSG's pilot project 'Mercaemprende,' aimed at Roma youth in Asturias: 155,907 EUR.
- FSG's pilot project 'Itinerarios de Inclusión' for beneficiaries of the IMV in Gijón: 120,000 EUR.
- FSG's pilot project 'Puerta de empleo para la comunidad gitana extremeña': 433,884 EUR (of which 368,801 EUR come from European Funds).
- 'Laborando Caló' programme in Galicia by Cáritas Diocesana: 152,923 EUR.

Of the seven actions with the highest budget allocated to employment, six belong to a single organisation. These six programmes and/or projects by FSG account for nearly 77.8% of the total employment budget. This means that the Spanish Government—specifically the Ministry of Social Rights and Agenda 2030—is effectively shifting the responsibility for achieving these objectives to the FSG.

According to FSG's 2023 Annual Report,<sup>31</sup> its 'Acceder' programme achieved the following results:

- 4,102 people obtained employment.
- 6,041 people received training.
- 20,687 people were assisted.

The FSG, as operator of the above-mentioned initiatives, publishes reports on the results and impact of its programmes,<sup>32</sup> but the responsibility of major interventions in public interest and using public funding should also undergo independent monitoring and evaluation. This responsibility and accountability lie with the Spanish government and should not be shifted to FSG or other Roma CSOs.

The programmes implemented by Spanish civil society organisations should serve as complementary actions to those developed and implemented by the central government and the governments of the Autonomous Communities (CCAA). In this sense, the role of the CCAA is crucial for the implementation and effectiveness of the established measures, as competence in employment lies with these administrations. If the CCAA does not integrate the NRSF into their specific plans directed at the Roma or into their employment strategies, it is unlikely that the actions and measures will be effective.

In general terms, while an increase in the budget dedicated to the Roma in the field of employment can be observed from 2021 to 2023, it is not possible to analyse the effectiveness of the measures due to the lack of statistical data on the employment rate, unemployment rate, and other indicators.

### 2.3.2. Addressing the problems beyond the NRSF

The NRSF is aligned with other national-level strategies. In the area of employment, the actions should have been carried out jointly with the Spanish 'Active Employment Support Strategy 2021-2024',<sup>33</sup> yet no data on joint actions between the two strategies are accessible. The Roma, defined as a "vulnerable population," have been specified as the object of actions carried out by the Spanish 'Active Employment Support Strategy 2021-2024'.

Mainstreaming measures—or measures directed at vulnerable groups, including the Roma—are more difficult to monitor. According to the 2023 Progress Report on the NRSF from the Ministry of Social Rights and Agenda 2030, in 2023, there was a predominance of measures specifically targeted at the Roma. These measures accounted for 50.46% of the actions compared to 34.02% of social inclusion measures aimed at vulnerable groups.

According to the coordinator of the Employment Working Group of the National Roma Council, intense efforts have recently been made to ensure that the new Spanish Active Employment Support Strategy 2025-2028 includes the Roma as a specific actor. In this way, actions should be tailored to the particular needs of the Roma rather than merely treating them as beneficiaries of measures aimed at vulnerable groups. The Roma have specific needs that must be addressed to ensure that the implemented actions are more effective and have a greater impact on Roma men and women. According to the Employment Working Group coordinator, this has been a very important step toward achieving the targets established in the NRSF. Including Roma as a specific actor means recognising their unique characteristics in order to improve their social status within the

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<sup>31</sup> See in: [https://www.gitanos.org/informeannual/wp-content/uploads/2024/07/fsg\\_informe-anual-2023\\_web\\_040724.pdf](https://www.gitanos.org/informeannual/wp-content/uploads/2024/07/fsg_informe-anual-2023_web_040724.pdf)

<sup>32</sup> See in: Fundación Secretariado Gitano; Prepared by: Red2Red Consultores (2021). *Evaluation of the results and impact of the Acceder Programme 2000-2020*. Madrid. Fundación Secretariado Gitano. Available at: [https://www.gitanos.org/resources/research/evaluation\\_of\\_the\\_results\\_and\\_impact\\_of\\_the\\_acceder\\_programme\\_2000\\_2020/](https://www.gitanos.org/resources/research/evaluation_of_the_results_and_impact_of_the_acceder_programme_2000_2020/)

Fundación Secretariado Gitano (2023). *Evaluation of the results and impact of the Calí Programme, for the Equality of Roma Women*. Madrid. Fundación Secretariado Gitano. Available at: [https://www.gitanos.org/resources/research/evaluation\\_of\\_the\\_results\\_and\\_impact\\_of\\_the\\_cali\\_programme\\_for\\_the\\_equality\\_of\\_roma\\_women/](https://www.gitanos.org/resources/research/evaluation_of_the_results_and_impact_of_the_cali_programme_for_the_equality_of_roma_women/)

<sup>33</sup> See in: <https://expinterweb.mites.gob.es/participa/listado/download/b570e083-10d3-43e7-a0ab-6d5c5324fa17>



rest of society, as has been done in recent years by including gender and women as a specific category in all policies due to the latter's disadvantaged position in relation to men.

Concerning the European Social Fund Plus (ESF+) and according to the progress reports from the Spanish Government, the Roma are one of the priority groups because all measures for vulnerable groups will also be directed at the Roma. Unfortunately, these measures have not yet been implemented.

## 2.4. Healthcare

The National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030 (NRSF) adopts a comprehensive approach to health rather than focusing on specific problems. The strategy posits that health is more than the absence of disease; it is addressed through its social determinants, with the understanding that the health of Roma individuals will improve as their living conditions improve.

For this reason, the NRSF outlines only two health objectives: improving the overall health status and reducing social inequalities in health across the Roma population throughout the life course—placing special emphasis on Roma children and older people—and reducing discrimination in the healthcare field for the Roma.

### 2.4.1. Effectiveness of the NRSF in addressing the problems

According to Ana Gil Luciano, Head of the Health and Equity Area at the Directorate General for Public Health and Health Equity, who was interviewed for this report, the measures established in the NRSF for health are proving effective. However, she stresses that the health of the Roma will ultimately improve only when the overall environment in which they are born and grow—as well as the quality of work, housing, and other social determinants—improves. In other words, if all the measures across the different sectors of the NRSF are successful, then the living conditions of the Roma will improve, and consequently, so will their health.

Ms. Gil Luciano explained that health is approached from an integrated and inclusive perspective, with active participation from the Roma in establishing actions in this field. Work is also carried out in cooperation with the Autonomous Communities (CCAA), which are responsible for the area of health. In fact, according to progress reports from the Ministry of Social Rights and Agenda 2030, nearly 80% of the investment in specific health measures in 2023 comes from the CCAA.

Regarding monitoring, health is the only area within the NRSF that employs a survey to collect data; however, we cannot present these data as the survey is still under development. This will be the third National Health Survey for the Roma Population (the previous ones being conducted in 2006 and 2014, respectively). It was supposed to be carried out during the previous National Strategy (2012-2020), but was not. It was then planned for 2023 and now seems likely to be executed in 2025. This tool is very useful because it includes social determinants such as housing, employment, and education, providing a more comprehensive picture of the living conditions of the Roma.

There is a general perception that significant efforts are being made within the health sector to improve the health status of the Roma and reduce inequalities, as well as to combat antigypsyism through training courses for health professionals that focus on equity, Roma culture, and various forms of discrimination. However, these efforts will not be sufficient if improvements are not made across all areas affecting the living conditions of Roma individuals.

More objective data on the effectiveness of the NRSF in health will have to wait until the completion of the third National Health Survey for the Roma Population.

Ms. Gil Luciano also noted that progress is being made and that additional actions are desired, but that administrative resources are limited. This is why working from a participatory perspective with the Roma and promoting community-based health is essential for advancing the health of the Roma population.

### 2.4.2. Addressing the problems beyond the NRSF

Health is conditioned by social determinants; therefore, without addressing health from a broader, more equitable, and inclusive perspective, results will remain limited.

Ms. Gil Luciano also mentioned that if all public policies adopted a more equitable and inclusive approach, it might not be necessary to work so specifically with certain population groups. In her view, this is a pending task across all sectors.

The improvement of Roma health should also be pursued through mainstream public policies. The NRSF refers to the 'Spanish Strategy on Disability 2022-2030' (although it was not approved at the time of drafting) for ensuring access to and enjoyment of human rights for persons with disabilities, and to facilitate care and treatment for Roma individuals and other vulnerable groups with disabilities. Ultimately, however, this strategy does not include the Roma in a manner that specifically addresses their particular needs, but rather groups them within the broader category of vulnerable populations.

The Ministry of Health has many plans and strategies, yet none adequately address the specific needs of the Roma or consider antigypsyism as a barrier to achieving full health equity in Spain. Without incorporating these specific issues and a stronger push for the implementation of targeted measures, health equity will remain elusive both for the general population and for the Roma in particular.

In general terms, there is a lack of data on the Roma in the field of health, both in the NRSF progress reports and in other plans or reports.

## 2.5. Housing, essential services, and environmental justice

The 2023-2026 Operational Plan<sup>34</sup> of the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030 (NRSF), although it describes the issues affecting the Roma population, has not yet implemented the creation of a new housing map beyond the one developed in 2015.<sup>35</sup> The need for this is compounded by the likely worsening of the already fragile household economies of many Roma families caused by the health crisis.

Regarding the 'State Housing Plan 2022-2025',<sup>36</sup> it does not include specific measures for the Roma population beyond mentioning groups with special vulnerabilities. A key factor in developing any measure is the governance among public and private stakeholders; therefore, it is necessary to strengthen coordination meetings in all initiatives undertaken so that it truly becomes an integrated plan. For example, from 2021 to 2023, according to data from the 2023 NRSF Progress Report,<sup>37</sup> the meetings held by the working group of the National Roma Council have totalled only nine.

Furthermore, there is a need for greater access to concrete data, both at the regional and local levels, in order to identify all the initiatives. Data that, if sent to the necessary bodies by the corresponding organisations, would allow for a more comprehensive overview beyond the isolated data that have been painstakingly collected to date.

### 2.5.1. Effectiveness of the NRSF in addressing the problems

The challenges raised in the previous cycle have seen only very limited and insignificant progress. The number of initiatives increased from 25 in 2021 to 35 in 2023, yet little is known about them. In an interview for this report, an independent expert on combating antigypsyism stated that although the NRSF "has defined indicators, there is no real commitment to implement them effectively. There is no public budget specifically earmarked for implementing each indicator, and their monitoring so far has not been very effective. The indicators are well designed, but if they are not met, there appears to be no concrete consequences or accountability for the competent authorities, whether in each region or the Spanish state."

The NRSF diagnosis indicates that the situation appears to have improved compared to the previous period. However, it does not specify regarding which concrete measures, although the 2023 Progress Report (p. 34) clarifies that only 2.7% of housing is classified as shanties, caves, or similar. Regarding the lack of data following the COVID-19 health crisis, the NRSF itself points out that the crisis has exacerbated the housing situation for the Roma population.

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<sup>34</sup> See in: <https://www.dsca.gob.es/es/derechos-sociales/poblacion-gitana/estrategia-nacional/estrategia-igualdad-inclusion-participacion-pueblo-gitano-2021-2030>

<sup>35</sup> See in: <https://www.dsca.gob.es/es/derechos-sociales/poblacion-gitana/estudios-e-informes>

<sup>36</sup> See in: <https://www.boe.es/buscar/act.php?id=BOE-A-2022-802>

<sup>37</sup> See in: [http://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe\\_progresos\\_2023\\_VF.pdf](http://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe_progresos_2023_VF.pdf)



Housing is a primary social issue that affects the entire population, but it is particularly acute for Roma families for several reasons, including the lack of education or qualified training, the problem of household income, and the cycle of exclusion from which they come. The measures provided in the State Plans often do not even allow the option of accessing assistance because the requirements remain exclusionary to the specific situation of many Roma families.

One of the issues to be addressed is energy poverty. According to Kamira's 2023 Housing Report,<sup>38</sup> 47% of surveyed households report not having heating, and 21% lack access to WIFI and utilities. In terms of housing typology, 32% live in rental properties, while 38% own their homes. It should be clarified that, although not having internet access is not directly related to fuel poverty, it may be related to limited access to essential services. It should be recalled that during the period of confinement due to COVID-19, the lack of internet access at home was an obstacle for many families with Roma children, as they could not have equal access to virtual classrooms.

Regarding public funding for housing-related actions, according to the NRSF 2023 Progress Report, the funding volume provided by the State Administration has been zero EUR, while the Autonomous Communities have allocated 1.7 million EUR. Of these budgets, two programmes have been implemented by the Camargo City Council and the Centro Bellavista in Cantabria with 100,000 EUR each, and the 'Residential Inclusion Programme for the Roma in Galicia' received a contribution of 83,334 EUR. In an interview for this report, Roma activist and law graduate Pedro Vargas highlighted the critical problem in housing: "Housing is an area where the exclusion and social marginalization of the Roma are clearly manifested. In many communities, access to dignified housing and basic services remains insufficient. According to the documents, approximately 12% of Roma families live in substandard housing or in areas with high levels of residential segregation. These conditions include overcrowding, lack of access to essential services, and unsanitary conditions, which exacerbate the issues of social exclusion and hinder the integration of these individuals into their communities."

### 2.5.2. Addressing the problems beyond the NRSF

Despite the content included in the 'National Plan for Housing Access 2022-2025',<sup>39</sup> in practice, there remain barriers preventing the Roma population from exercising their right to housing. In relation to renting a property, 63% of Roma individuals have experienced discrimination during the housing search process, and 42% while residing in a property.<sup>40</sup> Another issue is the lack of verifiable income (following the 2008 crisis and the COVID-19 crisis),<sup>41</sup> since many families still rely on income from market sales, the receipt of the Minimum Vital Income (IMV),<sup>42</sup> and encounter other challenges that prevent them from accessing rental assistance.

This situation is similar when trying to purchase a first home, as the need for support from extended family limits the option of living in areas that have suffered population loss due to various reasons and are experiencing significant depopulation. Consequently, this option is hardly viable. For the same reason (the need for extended family support or familial burdens), temporary rentals or residential arrangements such as cohousing are also not viable options for Roma families.

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<sup>38</sup> Borràs-Batalla, M. y Macías-Aranda, F. (2023). Condiciones de habitabilidad de la población gitana en España. Informe Final. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas, available at: [https://federacionkamira.com/wp-content/uploads/2024/05/KAMIRA\\_condiciones\\_habitabilidad\\_DEF-1-1.pdf](https://federacionkamira.com/wp-content/uploads/2024/05/KAMIRA_condiciones_habitabilidad_DEF-1-1.pdf)

<sup>39</sup> The Government has approved the National Plan for access to Housing 2022-2025, which will pay special attention to the most disadvantaged sectors of the population | Ministry of Housing and Urban Agenda.

<sup>40</sup> Borràs-Batalla, M. y Macías-Aranda, F. (2023). Condiciones de habitabilidad de la población gitana en España. Informe Final. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas, available at: [https://federacionkamira.com/wp-content/uploads/2024/05/KAMIRA\\_condiciones\\_habitabilidad\\_DEF-1-1.pdf](https://federacionkamira.com/wp-content/uploads/2024/05/KAMIRA_condiciones_habitabilidad_DEF-1-1.pdf)

<sup>41</sup> See in: [http://www.sepg.pap.hacienda.gob.es/sitios/sepg/es-ES/Presupuestos/InformeEconomicoFinanciero/Documents/Informe\\_economico\\_financiero\\_2021.pdf](http://www.sepg.pap.hacienda.gob.es/sitios/sepg/es-ES/Presupuestos/InformeEconomicoFinanciero/Documents/Informe_economico_financiero_2021.pdf)

<sup>42</sup> See in: [https://www.gitanos.org/estudios/estudio\\_sobre\\_el\\_impacto\\_del\\_ingreso\\_minimo\\_vital\\_en\\_la\\_situacion\\_de\\_pobreza\\_de\\_la\\_poblacion\\_gitana\\_en\\_espana.html.es](https://www.gitanos.org/estudios/estudio_sobre_el_impacto_del_ingreso_minimo_vital_en_la_situacion_de_pobreza_de_la_poblacion_gitana_en_espana.html.es)

## 2.6. Social protection

The general perception is that the Roma population remains the most disadvantaged group, with previous reports indicating that 92% of the Roma population is still at risk of poverty and social exclusion. Although the NRSF (p. 46) proposed including a specific line of action facilitating public administrations to improve the socioeconomic situation of the Roma – starting from an exclusion risk rate of 85.9% (FSG, 2019), with an intermediate target of reducing this rate to 60% and a final goal of 40% – the data speak for themselves. One specific measure was to establish aids such as the Minimum Vital Income (IMV), which, despite becoming one of the main income sources for some families, leaves the Roma facing challenges regarding access, its low amount, or incompatibility with other income sources, thereby directly affecting the improvement of household economies.

### 2.6.1. Effectiveness of the NRSF in addressing the problems

Figures recorded by the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030 (NRSF) show that 85.9% of the Roma population is at risk of exclusion and 76.8% is in severe poverty. The previous RCM 2022 report indicated that, according to the Arope report, these figures were 92% and 65.6%, respectively. One of the measures proposed in the NRSF (p. 38) was to improve access to economic and social benefits. In an interview conducted with Beatriz Carrillo de los Reyes for this report, she stated: “Currently, the rising cost of living is exacerbating the situation, particularly affecting access to adequate nutrition, housing, and energy.”

Furthermore, according to the FSG executive report (2023),<sup>43</sup> 25% of Roma households rely on public aid for their income, compared to 7.4% among the rest of the population. Additionally, the report asserts that access to the IMV is subject to specific requirements—with only 28% of initially applying households meeting those criteria (while 29% would receive more than 999 EUR)—meaning that many households might receive no income. Overall, 39% of the Roma population does not receive the IMV and does not meet the established requirements.

Besides challenges related to documentation, information, and the need for prior appointments, there is an excessive waiting period for accessing IVM—averaging nine months—which is critical for households in vulnerable situations. With regard to whether such income reduces the poverty threshold, the report notes that it does so only in cases of extreme poverty (p. 35).

The 2023 Operational Plan of the NRSF (p. 4) calls for enhancing cross-sectoral integration and introducing guarantees so that universal policies and/or strategies incorporate positive actions based on equity for groups in vulnerable situations.

A comprehensive report should be produced that annually details the measures and budgets allocated at both the state and regional levels. Such a report would document specific programmes in each field—naming them, detailing budgets, execution periods, and the results achieved, among other pertinent data. As a working tool, this report could be comprehensively evaluated to determine how each variable influences outcomes, thereby ensuring that any new programme is implemented more effectively and efficiently. Independent, isolated measures, however, are merely anecdotal.

### 2.6.2. Addressing the problems beyond the NRSF

The amount allocated to measures specifically aimed at combating poverty, social exclusion, and the digital divide (2023 Progress Report, p. 15) by the General State Administration amounts to 5.6 million EUR, while the Autonomous Communities contribute 8.8 million EUR, totalling 14.4 million EUR. Regarding the number of Autonomous Communities with exclusion strategy plans, eight currently have them, four are in development, and the remaining seven lack measures. New initiatives represent 16.67% of actions, 65.53% of measures remain in effect, and 17.8% of actions have been finalised. Among these new measures, three programmes stand out for which there is still no information regarding beneficiaries (2023 Progress Report, p. 18). To assess the scope, effectiveness, and efficiency of all programmes initiated to date, it is necessary to know the number of specific plans each percentage refers to—or to have a state report listing each programme, detailing its

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<sup>43</sup> See in:

[https://www.gitanos.org/estudios/estudio\\_sobre\\_el\\_impacto\\_del\\_ingreso\\_minimo\\_vital\\_en\\_la\\_situacion\\_de\\_pobreza\\_de\\_la\\_poblacion\\_gitana\\_en\\_espana.html.es](https://www.gitanos.org/estudios/estudio_sobre_el_impacto_del_ingreso_minimo_vital_en_la_situacion_de_pobreza_de_la_poblacion_gitana_en_espana.html.es)

actions, ultimate beneficiaries, and achieved objectives, among other measures. Such a report would serve as an exemplary best practice tool.

## 2.7. Social services

One of the actions of the 2023-2026 Operational Plan (p. 39) is scheduled for 2026, when a diagnosis of the sociodemographic situation is expected. This diagnosis will guide the development of state-level programmes funded through 0.7% of income tax and corporate tax, according to the priorities established in the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2023 (NRSF). It is important to recall that the first strategy began in 2012, and many actions remain unimplemented.

### 2.7.1. Effectiveness of the NRSF in addressing the problems

The 2023-2026 Operational Plan of the NRSF sets out mechanisms for joint working and coordination among the various administrative levels—state, Autonomous Communities, and local entities—as well as with the Romacivil society. However, despite this framework, Roma communities continue to experience significant difficulties in accessing and benefiting from the essential public services to which they are entitled as full citizens. Experts consulted for this report confirm that public services in many instances are insufficient, overly paternalistic, or even discriminatory toward the Roma population. There is also a pronounced lack of cooperation between social services and other governmental departments, such as the National Public Employment Service (SEPE). In this regard, a study was carried out by the European Commission (EFTHEIA, Budapest Institute, and ICON Institute, June 2018)<sup>44</sup> commissioned by the Directorate-General for Employment, Social Affairs and Inclusion, to explore the drivers and barriers to effective and efficient reforms aimed at improving coordination between employment and social services.

The current coordination measures appear delayed. The experience from the first Roma Inclusion Strategy (NRIS, 2012-2020) shows that systemic governance and coordination challenges have persisted, repeating errors made in previous years. Although the NRSF calls for the involvement of all ministries—not just the Ministry of Social Rights, Consumption and Agenda 2030—real and effective inclusion remains hampered by fragmented governance. Each autonomous community's independent governance structure complicates the implementation of unified measures, as funding from European sources and specific state budget allocations earmarked for the Roma are channelled through local administrations with varying levels of commitment.

Moreover, the NRSF does not include a dedicated focus on social services. While it identifies issues related to poverty and social exclusion, the measures targeting the enhancement of social services are embedded within broader action lines and lack specific objectives. In practice, this means that initiatives to improve cooperation between social services and sectors such as public employment and education are not sufficiently detailed. Interviews with experts reveal that without a concrete focus on social services, the Roma continue to face barriers in accessing public services, further compounded by the adverse effects of the COVID-19 pandemic.

### 2.7.2. Addressing the problems beyond the NRSF

Beyond the framework of the NRSF, the overall situation in social services remains problematic. As noted by Pedro Vargas and other consulted experts, the lack of comprehensive coordination among the different administrative levels leads to a proliferation of local initiatives with limited impact rather than the implementation of structural policies of great impact. The disparity in approaches means that while some Autonomous Communities manage to initiate programmes, many others are left with fragmented actions.

Furthermore, expert interviews reveal a consensus on the need for an integrative, collaborative alliance operating at all levels between social services and the Roma, with leadership provided by the state administration. The COVID-19 crisis has only deepened these challenges, exposing deficiencies in service delivery and increasing the vulnerability of Roma households. Civil society actors argue that the current social service framework is not only insufficient in scope but also fails to address the issues of discrimination and paternalism. They point out that the NRSF's treatment of social services is limited to a general focus on poverty and social exclusion, without establishing clear, measurable objectives for service improvement.

In summary, while the NRSF makes some reference to social services within its broader strategy, its lack of specific, targeted actions leaves a critical gap. As a result, the Roma continue to struggle with inadequate, non-

<sup>44</sup> See in: <https://www.budapestinstitute.eu/KE-04-18-545-EN-N.pdf>

inclusive services, and the persistent failure of coordination among key stakeholders—an issue that must be urgently addressed if the transformative potential of the NRSF is to be fully realised.

## 2.8. Child protection

The UNICEF Child Protection Strategy 2012-2030<sup>45</sup> addresses the prevention of exploitation, abuse, neglect, harmful practices, and violence against children and adolescents. Fortunately, the Roma child and youth population does not appear to face these problems in a generalised manner. However, other indicators must not be overlooked, since, as the report itself explains, “Economic recovery is threatened by increasing geopolitical tensions and social discontent, the deterioration of trade relations, climate change, and the COVID-19 pandemic,” which affect these minors across generations.

On the other hand, the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030 (NRSF) started from a Roma child poverty rate of 89% (FSG, 2019). Regarding the 2023 Progress Report, no specific data on child protection have been provided—that is, it is not known what specific measures, if any, have been implemented during this period.

Having clarified these two points, we can conclude that there are no specific programmes aimed at child protection, nor any known initiatives that address the indicators established by organisations such as UNICEF. Therefore, it is not possible to assess the impact or implementation of the Child Guarantee beyond the programmes that are being carried out, which are exclusively in the field of education.

### 2.8.1. Effectiveness of the NRSF in addressing the problems

As previously noted, there are no specific measures that directly address this matter. According to the 2023 Progress Report (p. 6), at the regional level, the largest budgetary weight—amounting to 35.62%—has been allocated to education (which, we understand, is measured as a psychosocial factor of poverty and exclusion and, at the same time, as a vector of development). The report also states (p. 7) that 65.53% of the budget is allocated to continuation measures; it should be clarified that this figure refers to general measures and does not specify whether those measures include programmes specifically aimed at child protection. Specifically, in 2023, the General State Administration and the Autonomous Communities continued initiatives already initiated in previous years (Progress Report 2023, p. 7), where 16.67% of the initiatives were launched as new actions, 65.53% are ongoing, and 17.81% have been completed.

The only programme specifying the 0-16 age group is an education programme carried out in Extremadura. Another programme, framed under poverty and social exclusion and named ‘La Llave’ in the Region of Murcia (Progress Report, p. 18), includes children and adolescents but does not provide any data.

Regarding investment in poverty, social exclusion, and the digital divide, the investment stands at 29.8% (p. 13) but there is no information about what these programmes are, who the beneficiaries are, or which objectives have been achieved—other than citing (p. 14) that the former has been allocated for comprehensive social intervention aimed at increasing attention to, preventing the marginalisation of, and promoting the integration of the Roma.

### 2.8.2. Addressing the problems beyond the NRSF

According to the previous RCM report (p. 19), it was already clear that no specific measures had been implemented in this area; they had only been included under the generic umbrella of “poverty and social exclusion.” At that time, collaboration with the Directorate General for the Rights of Childhood and Adolescence was expected, but no specific measures targeting Roma children were developed. The 2023 Progress Report does not indicate whether these meetings have taken place or if any agreements have been reached. Consequently, without specific actions and clear, quantifiable indicators, it is impossible to measure progress in this area—and, in practical terms, no measurable progress has been achieved.

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<sup>45</sup> See in: <http://www.unicef.org/media/105001/file/Child-Protection-Strategy-Spanish-2021.pdf>

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

### 2.9.1. Effectiveness of the NRSF in addressing the problems

In the previous Roma Civil Monitor report, we already warned that, in terms of promoting Roma culture, the National Strategy for the Inclusion of the Roma People (NRSF) has remained largely at the level of good intentions, with few concrete indicators of effective implementation. In these two years of implementation, our initial concerns have proven accurate. Essential measures—such as incorporating the history and culture of the Roma into school educational materials, despite existing legal mandates—continue to fail to materialise in classrooms. This content still depends on the personal initiative of teachers, who often lack the specialised training or adequate knowledge to address them effectively. As a result, it is frequently up to Roma associations to assume the responsibility of presenting these topics, mainly regarding key dates such as April 8 or during regional commemorations of the Roma People.

Moreover, it is concerning that the Culture Working Group of the National Roma Council has not met for over a year and a half (from March 2023 until November 2024). This prolonged absence of meetings clearly demonstrates a lack of political will in the implementation of the NRSF. We confirmed this situation through interviews with one of the group's members, who expressed deep concern over the absence of regular discussions and the resulting delays in addressing critical cultural issues. In their last meeting, held on November 8, 2024, the Culture Working Group agreed to demand from the Ministry of Culture and the Ministry of Social Rights, Consumption and Agenda 2030 more equitable access to cultural grants for Roma entities. This equitable access is crucial to ensure a fair distribution of resources that genuinely reflects the needs and realities of Roma. It is equally necessary to strengthen the connection of the *Instituto de Cultura Gitana* with the Council.

Therefore, it is urgent to address the problem at its foundations. In addition to creating and promoting curricular content on Roma history and culture, it is vital to offer specific training to teachers and to incorporate these topics into the syllabi of the competitive examinations for new teachers. Only then can we guarantee an education that, at every level, adequately reflects Roma history and culture.

### 2.9.2. Addressing the problems beyond the NRSF

The year 2025 marks the 600th anniversary of the Roma People's arrival on the Iberian Peninsula, representing a unique opportunity to raise awareness in Spanish society about the historical and cultural legacy. Although the Government of Spain declared 2025 as the Year of the Roma People, and regional and local governments have expressed a willingness to collaborate and allocate resources to commemorate this event, we feel that the dissemination of this celebration has been insufficient. Cultural institutions—such as museums, theatres, and media—have yet to incorporate specific proposals or programming on Roma history and culture, likely due to a widespread lack of awareness about these issues.

To date, commemoration efforts have been limited mainly to Roma associations and groups, failing to achieve the societal relevance they deserve. If this trend continues, a crucial opportunity to build bridges with broader society will be lost regarding promoting a deeper understanding of Roma history and culture and its fundamental contribution to the construction of Spanish identity.

In this sense, it is essential that initiatives like the 'European Itineraries of Roma Culture',<sup>46</sup> which aim to preserve and promote Roma heritage, receive sustained support and continuity from various institutions. Furthermore, there is an urgent need to revive the Romani language.<sup>47</sup> Establishing a comprehensive plan by 2030 for its recovery and teaching in Spain is crucial not only for preserving linguistic heritage but also for strengthening cultural identity among younger generations.

The cultural component of the 2023-2026 Operational Plan, if effectively implemented, can serve as a driving force in these areas by facilitating coordinated actions among public institutions, cultural centres, and Roma

<sup>46</sup> See in: <https://romheritage.eu/>

<sup>47</sup> In Spain, the Romani language has suffered profound losses due to centuries of assimilation policies, repression, and the lack of institutional recognition. While some words have survived in everyday use among older generations, especially in Andalusia and Extremadura, the language is no longer transmitted intergenerationally. Its revival requires urgent investment in education and culture.

organisations. However, to ensure that such initiatives have a lasting impact, it is necessary to build stronger partnerships, increase investment, and set clear, measurable targets for the promotion of Roma culture and language.

### 3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

#### 3.1. Continuity of the State Pact against Antigypsyism

On 20 May 2021, the Congress of Deputies unanimously approved the creation of a subcommittee to study a State Pact against Antigypsyism and for the Inclusion of the Roma.<sup>48</sup> The objective of this subcommittee was to analyse the public policies implemented under the National Strategy for the Inclusion of the Roma in Spain 2012-2020 (NRIS), address the various dimensions of antigypsyism as a specific form of racism, and propose the preparation of a report containing the results of the previous strategy along with a diagnosis, proposals, and conclusions.

The report produced by the subcommittee was approved by the full Congress of Deputies on 30 March 2023.<sup>49</sup> This report contains 58 horizontal measures grouped into three areas: combating and preventing antigypsyism, eradicating poverty and social exclusion, and promoting participation through empowerment and confidence. In addition, the report includes 62 sectoral measures in the areas of housing, health, employment, and ensuring non-segregated access to housing and essential services. Besides these horizontal and sectoral measures, the report contains 17 specific measures aimed at eradicating gendered antigypsyism, 12 measures related to studies, research, surveys, and reports, 7 measures regarding financing, 1 measure for monitoring the Pact, and another addressing its competency framework – a total of 158 measures.<sup>50</sup>

To date, there is no State Pact against Antigypsyism in Spain despite the considerable effort made during the previous legislature with the creation of the subcommittee and the subsequent approval of its report by the legislative branch. The approved report is essentially a programmatic document. The next step following the approval of the subcommittee's report would have been its formalisation – that is, after the report is approved by the Congress of Deputies, it should be formalised through an action plan associated with public funding and the creation of a monitoring body to ensure its implementation, as indicated in Measure 157 of the report. This final step of formalisation has still not been undertaken by the executive, namely the Government of Spain.

According to Mr. Ismael Cortés in his interview for this report, one of the proponents of the creation of the subcommittee to study the State Pact against Antigypsyism pointed out that one of the reasons the formalisation of the Pact has not yet occurred is the absence of the Deputies who initially championed the Pact in the current Spanish legislature, as well as the lack of other Roma representatives in Congress. Consequently, the pressure that the legislative branch could exert on the executive is completely absent in this new legislative period. In this situation, the only force that can advocate for the formalisation of the State Pact against Antigypsyism is the National Roma Council (CEPG).

Currently, the main problem is that the significant effort made during the previous legislature – with the initial approval of the creation of a subcommittee to study a State Pact against Antigypsyism, as well as the subsequent approval by the full Congress of Deputies of its report – has not materialised in the formalisation of the State Pact, and consequently, in the creation of a Permanent Commission for Monitoring and Evaluation of the State Pact against Antigypsyism.

The Government of Spain is not fulfilling what was approved by the previous legislature's Congress of Deputies and has not shown any willingness to formalise this State Pact against Antigypsyism. All the work and sacrifice remain, for now, in the form of a programmatic document comprising 158 measures, with no mechanism in place for monitoring their implementation and without any public budget allocation to carry them out.

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<sup>48</sup> See in: [https://www.congreso.es/es/web/guest/busqueda-de-iniciativas?p\\_p\\_id=iniciativas&p\\_p\\_lifecycle=0&p\\_p\\_state=normal&p\\_p\\_mode=view&iniciativas\\_mode=mostrarDetalle&iniciativas\\_legislatura=XIV&iniciativas\\_id=158/000021](https://www.congreso.es/es/web/guest/busqueda-de-iniciativas?p_p_id=iniciativas&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&iniciativas_mode=mostrarDetalle&iniciativas_legislatura=XIV&iniciativas_id=158/000021)

<sup>49</sup> See in: [https://www.congreso.es/es/notas-de-prensa?p\\_p\\_id=notasprensa&p\\_p\\_lifecycle=0&p\\_p\\_state=normal&p\\_p\\_mode=view&notasprensa\\_mvcPath=detalle&notasprensa\\_notaid=44751](https://www.congreso.es/es/notas-de-prensa?p_p_id=notasprensa&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&notasprensa_mvcPath=detalle&notasprensa_notaid=44751)

<sup>50</sup> See in: [https://www.congreso.es/public\\_oficiales/L14/CONG/BOCG/D/BOCG-14-D-587.PDF](https://www.congreso.es/public_oficiales/L14/CONG/BOCG/D/BOCG-14-D-587.PDF)



### 3.1.1. Effectiveness of the NRSF in addressing the problem

The report produced by the subcommittee to study the State Pact against Antigypsyism is fully interconnected with the National Strategy for Equality, Inclusion and Participation of the Roma 2021-2030 (NRSF). Many of the measures contained in the report complement and expand the actions established by the National Strategy.

Regarding the horizontal measures—especially those aimed at combating and preventing antigypsyism—the subcommittee’s report goes further in its ambition, specifying the creation of a High Commissioner for the Real and Effective Equality of the Roma as an organ within the General National Administration and within the framework of the NRSF. It also calls for the establishment of an Observatory against Antigypsyism under the umbrella of OBERAXE (the Spanish Observatory on Racism and Xenophobia). The same applies to the other horizontal measures, which are structured and designed in line with the NRSF. Thus, the subcommittee’s report is very much in step with the NRSF, albeit with greater ambition and scope.

The problem, however, lies in the non-formalisation of the State Pact against Antigypsyism. This lack of formalisation leaves all these complementary measures of the NRSF in limbo. Formalising the State Pact against Antigypsyism would require the Autonomous Communities—which have competence in implementing the National Strategy—to assume responsibility for complying with the Pact. Public budget allocation must correspond with the obligation to implement and enforce these measures.

In this context, while the effectiveness of the NRSF is crucial for the implementation of some of the measures outlined in the subcommittee’s report, the lack of coordination and communication at the interministerial level—as well as among the various levels of the Spanish administration (state, regional, and local)—and the absence of a specific budget for all the measures greatly limit the overall effectiveness of the NRSF.

Therefore, it is not possible to conduct a full analysis because the fundamental problem remains the lack of formalisation of the State Pact against Antigypsyism; this lack of formalisation of the State Pact remains a key barrier that prevents full implementation of the NRSF’s measures. Formalisation would provide binding commitments, dedicated funding, and improved coordination across all levels of government, thereby significantly enhancing the NRSF’s overall impact.

### 3.1.2. Synergy with other actions

The subcommittee’s report on the study of a State Pact against Antigypsyism contains both horizontal and sectoral measures, and its objective is not only to combat antigypsyism but also to promote the inclusion of the Roma. This means that the measures included in the report are in synergy with other programmes, policies, and actions.

In this context, the subcommittee’s report supports Additional Provision No. 13 of Law 20/2022, of 19 October 2022, on Democratic Memory, which calls for the establishment of a Working Commission on Memory and Reconciliation with the Roma in Spain. This Memory Commission was established in December 2024.

Regarding the sectoral measures—those related to education, housing, health, and employment—these must be aligned with the corresponding plans or strategies in these areas. For example, one of the measures included in the subcommittee’s report calls for the development of an urgent educational plan addressing the vulnerability of Roma students’ right to education due to antigypsyism. This plan should be developed under the competence of the Ministry of Education and Vocational Training. In this regard, the various state ministries, as well as the departments of the regional governments, must incorporate these measures into their operational plans or annual strategies. Unfortunately, nothing has been done so far.

The full realisation of the 158 measures established in the subcommittee’s report is achievable only with the participation of the executive branches at all levels and the active involvement of the Roma.

### 3.1.3. Roma participation

The participation of the Roma in measures that directly affect their community should be a guaranteed right. Currently, Roma participation is only possible through the National Roma Council, which is an interministerial, consultative, and advisory body attached to the Ministry of Social Rights and Agenda 2030. Roma participation in other consultative bodies is not guaranteed.

The subcommittee’s report, approved by the full Congress of Deputies, includes 10 specific measures aimed at promoting the participation of the Roma through empowerment and confidence. This is why the formalisation of the State Pact against Antigypsyism is of great importance for ensuring the implementation of the measures



established in the report and, consequently, for increasing the participation of Roma men and women in policies directed at the Roma.

In general terms, the previous legislature expended considerable effort and sacrifice to bring forward the subcommittee's report on a State Pact against Antigypsyism. The Congress of Deputies has given the green light for this to materialise. At this moment, it is only a matter of the Government of Spain having the will to materialise and formalise the State Pact against Antigypsyism so that its measures can be executed and implemented. The absence of Roma representatives in the Congress of Deputies who could pressure the executive has contributed to the delay by the Government of Spain in launching this formalisation.

## 3.2. Critical analysis of the efficiency of the National Roma Council (CEPG)

### 3.2.1. Effectiveness of the NRSF in addressing the problem

The National Roma Council (CEPG) was established in 2005 as the primary channel for participation, cooperation, and dialogue between the Roma associative movement and the Spanish Government. However, its effectiveness has been questioned due to a lack of representativeness, insufficient funding, and inadequate management. The evaluation of the previous NRSF revealed that while its objectives remain pertinent,<sup>51</sup> its implementation has been deficient—a situation that persists today despite some progress, as indicated by various interviews.

Furthermore, the COVID-19 pandemic, along with the crises in Ukraine and the inflationary crisis, has exacerbated existing inequalities, making effective representation of the Roma in governmental decision-making even more urgent. Yet, the CEPG's response to these crises has been limited, reinforcing the perception of its inefficiency. In a context where structural inequalities have intensified, the Council should have played a more significant role in engaging with the Government to mitigate the impacts of these crises on the Roma.

Although the NRSF envisions measures to strengthen the CEPG participation, their implementation remains partial. The Operational Plan 2023-2026 establishes mechanisms to reinforce the CEPG, but it does not define concrete steps to improve its internal functioning or coordination with regional platforms and councils.

Interviews confirm that, although the CEPG plays an advisory role, its advocacy efforts have not been sufficiently effective in influencing the implementation of measures under the NRSF. As Beatriz Carrillo stated, "the lack of implementation and monitoring mechanisms has left many measures on paper." Likewise, Ismael Cortés emphasised that "the National Roma Council should be the main coordinating body for the State Pact against Antigypsyism, but it has not assumed that role."

The main obstacles limiting the efficiency of the CEPG include:

- **Lack of diverse representation:** Many Roma organisations are excluded from the CEPG, which limits its legitimacy and influence. Although the Council has a formal representation framework, its actual composition does not reflect the plurality of Roma civil society organisations, leaving out some groups with innovative or critical perspectives on government management.
- **Insufficient resources:** Without adequate funding, the CEPG cannot execute effective political advocacy or monitor the implementation of measures. The absence of a dedicated, sustainable budget hinders the execution of studies, awareness campaigns, and policy follow-up.
- **Administrative and bureaucratic barriers:** Poor coordination with other bodies and councils reduces its impact on decision-making. Excessive dependence on the ministerial agenda and a lack of operational autonomy have relegated the CEPG to a merely consultative role with infrequent meetings.
- **Absence of a monitoring and accountability mechanism:** Although the NRSF emphasises civil society's role in monitoring, in practice, there is no formal procedure compelling administrations to report to Roma entities. The CEPG receives information sporadically, and without performance indicators or evaluations, its actual contribution to improving NRSF implementation cannot be precisely measured.

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<sup>51</sup> See in: [https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe\\_final\\_strategia\\_Nacional\\_12-20\\_04.10.21.pdf](https://www.dsca.gob.es/sites/default/files/derechos-sociales/poblacion-gitana/docs/Informe_final_strategia_Nacional_12-20_04.10.21.pdf)

- Need for decentralised coordinated participation: Interviews with Tatiana Font (Pla Integral de Catalunya) and Lola Ruiz indicate that, in practice, the NRSF is implemented through regional and local plans and actions. Although some Autonomous Communities have promoted regional Roma councils and created dialogue spaces for Roma CSOs, these initiatives are not uniform across the territory, leading to unequal capacity for Roma civil society organisations to participate in NRSF implementation.

To address these deficiencies, it is essential to:

- Reform the CEPG structure: Broaden its representativeness by including Roma organisations currently excluded, particularly those representing youth. Creating cross-sector working groups—especially on street vending and school segregation, as suggested by Carmen Santiago (Vice-president of the CEPG) in her interview—is also necessary.
- Ensure stable funding: Secure a dedicated and sustainable budget to enable the CEPG to develop effective initiatives. As Carmen Santiago notes, “it is necessary to create an independent technical office for the CEPG. This office should work to make the Council more visible, active, and efficient, fostering broader collaboration between the General State Administration and Roma civil society organisations.”
- Establish accountability and evaluation mechanisms: Implement periodic audits or monitoring reports to increase transparency and assess the impact of its actions.
- Strengthen coordination with regional platforms: Enhance cooperation with regional and municipal Roma councils to ensure a more coherent, decentralised, and effective approach across the country.
- Boost capacity building: Develop a training and support plan to strengthen the technical capacities of Roma organisations, enabling them to access more public calls and participate more effectively in decision-making (as highlighted in the FEIG 2024 Report<sup>52</sup>).

### 3.2.2. Synergy with other actions

General policies on inclusion and anti-discrimination should be integrated with the actions of the CEPG. However, so far, there have been no significant changes in the structure of the Council to better align it with the NRSF. The disconnect between general policies and specific actions targeted at the Roma remains a persistent issue. For example, there are no coordination mechanisms with the Sustainable Development Council—a body that serves as an advisory, collaborative, and participatory channel for achieving the Sustainable Development Goals of Agenda 2030.

The CEPG should play a more active role in implementing European initiatives, such as the ‘Action Plan of the European Pillar of Social Rights’, the Action Plan against Racism and Discrimination’, the ‘Gender Equality Strategy’, and the ‘New EU Strategic Framework on the Roma’. However, its impact in these forums remains marginal. The lack of active participation limits the Roma associative movement’s ability to influence both European and national political agendas. Similarly, it is imperative that the CEPG, alongside the rest of Roma civil society, assume a more active role in implementing Agenda 2030 and the Sustainable Development Strategy in Spain.

### 3.2.3. Roma participation

Although the NRSF 2030 recognises the role of Roma civil society organisations and the CEPG, interviews reveal a structural deficit in their effective inclusion. The CEPG remains the primary forum for dialogue and cooperation between the Roma civil society and the National Roma Contact Point, yet it is limited by inadequate resources, political influence, and capacity.

Several interviewees (Cortés, Carrillo, Ruiz) stress that the CEPG should play a more significant role in monitoring measures and coordinating with other bodies—not just in drafting proposals. They note that although the CEPG has created new working groups (for example, on equal treatment, and the European agenda), a lack of resources and capacity prevents it from leading or enforcing the implementation of Actions outlined in the National Strategy.

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<sup>52</sup> See in: [https://www.presenciagitana.org/2024\\_12\\_31\\_Informe\\_FEIG\\_2024.pdf](https://www.presenciagitana.org/2024_12_31_Informe_FEIG_2024.pdf)

Interviews also reveal that many Roma entities are relegated to secondary or advisory roles, while critical decisions—such as fund allocation and priority setting—are often made without genuine consultation.

Furthermore, the absence of Roma representatives in the teams of public institutions implementing the NRSF until 2024 reinforces the disconnect between the policies designed and the real needs of the Roma. The lack of Roma representation in decision-making positions reflects a structural problem of institutional exclusion. Although two Roma individuals have recently joined the National Roma Contact Point (NRCP), it is still too early to assess the impact of their performance.

### 3.3. School segregation of Roma students

School segregation affecting Roma students represents one of the most significant obstacles to achieving full citizenship for the Roma. Beyond our observations, based on firsthand knowledge of the situation, we interviewed various technicians and experts on the subject for this report.

According to the Kamira Federation's 2024 report,<sup>53</sup> over 90% of Roma students are enrolled in schools with high concentrations of Roma pupils, often exceeding 30% of the student body. This segregation is particularly acute in urban areas such as Madrid, Seville, and Valencia, where certain neighbourhoods with large Roma populations correspond to schools with predominantly Roma student bodies. The report highlights that this segregation is not solely due to residential patterns but is also influenced by administrative decisions and school policies that fail to promote diversity. For instance, the lack of effective measures to distribute students more evenly across schools contributes to the concentration of Roma students in specific institutions.

The consequences of such segregation are evident in educational outcomes. Data indicates that the dropout rate among Roma students remains alarmingly high, with a significant percentage leaving school before completing compulsory secondary education. According to Fundación Secretariado Gitano (2022), 62.8% of Roma youth between the ages of 16 and 24 do not complete compulsory secondary education (ESO), compared to just 4% of the general population. Additionally, 40% of Roma students drop out as soon as they turn 16, often due to grade repetition and educational delay. School segregation—based on both ethnic and economic grounds—not only violates their basic rights but also perpetuates longstanding social and educational inequalities. As expert José Eugenio Abajo explains, school segregation is a complex, multifaceted phenomenon that stems from historical spatial segregation and a legacy of antigypsyism, reinforced by current discriminatory practices within the education system.

Prejudices and negative stereotypes form the ideological underpinning of segregation. These biases, both conscious and unconscious, result in an underestimation of the academic potential of Roma students and their families. The idea that Roma children are less capable or face greater learning difficulties derives from longstanding antigypsyism, which stigmatises the Roma as 'ignorant', 'backward', or 'parasitic'. Such conceptualisations deeply influence how Roma students are treated in schools, leading to low expectations, limited opportunities, and practices that actively isolate them from mainstream education.

Historical discrimination has left enduring scars that persist despite legal reforms. While legal discrimination has been formally addressed, structural and urban segregation continue to shape the educational landscape. Ethnic segregation and antigypsyism are deeply embedded in history and continue to influence the opportunities available to Roma individuals.

An additional issue is the lack of teacher training in intercultural education and inclusive pedagogies. Many educators lack the necessary preparation to work in diverse environments, which perpetuates segregation and differential treatment of Roma students. Finally, many Roma families find themselves at a crossroads. Despite their aspirations to offer a better future for their children, socioeconomic conditions and social discrimination breed distrust in the educational system.

In summary, school segregation is not an isolated phenomenon but the result of an interplay between ideological prejudices, historical and social inequalities, inadequate teacher training, and segregative practices within the education system. All of these factors create an environment in which Roma students face greater

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<sup>53</sup> See in: Macías-Aranda, F., & Borràs-Batalla, M. (2024). *Estudio sobre discriminación y racismo estructural hacia el Pueblo Gitano en educación. Informe final*. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas. Available at: <https://federacionkamira.com/wp-content/uploads/2024/09/SegregacionEducativaPG.pdf>

difficulties in accessing inclusive and equitable education, thereby perpetuating social and educational inequalities.

### 3.3.1. Effectiveness of the NRSF in addressing the problem

The National Strategy for Equality, Inclusion and Participation of the Roma (NRSF) outlines measures to combat school segregation, yet its effectiveness in this area remains limited. At the heart of the issue is a set of prejudices that result in low academic expectations for Roma students. These manifest in three key levels:

- Segregation by schools: Roma children are often concentrated in specific schools, which reinforces their social isolation.
- Segregation within schools: Roma students are frequently assigned to separate classes or placed on less challenging academic tracks.
- Low teacher expectations: Remarks such as 'this is not for you' or 'it's not worth trying' further undermine Roma students' confidence and contribute to school abandonment.

A source from the Ministry of Social Rights (Lola Ruíz) has acknowledged that school segregation remains a significant challenge. To address this, the Ministry of Education has developed didactic materials and orientation guides designed to integrate Roma history and culture into school curricula. While this measure does not directly address segregation in terms of the physical distribution of students, it forms part of a broader theory of change aimed at transforming the school environment from within. By incorporating Roma history and culture into mainstream education, the initiative seeks to foster recognition, reduce prejudice, and combat the negative stereotypes that often justify or reinforce school segregation. The expectation is that by normalising Roma identity within the curriculum, both educators and non-Roma students will develop greater empathy and awareness, thereby creating more inclusive school cultures.

Additionally, Organic Law 3/2020 mandates non-discrimination and effective equality in both access and retention in the education system. Initiatives such as appointing well-being and protection coordinators in schools and support programmes like PROA have been implemented to help vulnerable students.

Despite these efforts, data on the true extent of school segregation are scarce, largely relying on studies mentioned above, conducted by organisations such as the Fundación Secretariado Gitano,<sup>54</sup> and Kamira.<sup>55</sup> A technician from the Ministry has explained that restrictions on collecting detailed ethnic data significantly limit the understanding of segregation levels, though a future anonymous survey is under consideration.

Expert Fernando Macías has emphasised that the greatest challenge for the Roma is the education system itself, which perpetuates both segregation and discrimination. In his view, the current NRSF strategy does not fully address the structural racism embedded in the system, opting instead for simplistic solutions such as dispersing Roma students among different schools without confronting the deeper issues and root causes.

For instance, in Andalusia, regional authorities promoted student redistribution as a corrective measure, encouraging Roma students to enrol in schools outside their neighbourhoods. However, without additional support measures (e.g., free transportation, intercultural mediation, or teacher training), families often find this option impractical or unsustainable. A similar case occurred in Madrid, where some municipalities attempted to avoid concentrations of Roma students by recommending their placement in 'mixed' schools. Yet, no structural policy was put in place to ensure equal treatment or improve academic outcomes, and Roma students continued to face low expectations and marginalisation once inside the new schools.

Similarly, expert José Eugenio Abajo, in his article "*But does segregation exist in our schools?*"<sup>56</sup> mentions that in many primary schools, Roma students are removed from regular classrooms to receive support, often starting in the early grades. This measure disguises a form of segregation and separation of students from

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<sup>54</sup> See in: <https://www.gitanos.org/actualidad/archivo/136556.html.es>

<sup>55</sup> Macías-Aranda, F., & Borràs-Batalla, M. (2024). *Estudio sobre discriminación y racismo estructural hacia el Pueblo Gitano en educación. Informe final*. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas. Available at: <https://federacionkamira.com/wp-content/uploads/2024/09/SegregacionEducativaPG.pdf>

<sup>56</sup> See in: <https://eldiariodelaeducacion.com/2024/07/22/ah-pero-existe-segregacion-en-nuestros-centros-educativos/>

very early levels. He also notes that, under the euphemism of 'curricular adaptation', a significant portion of Roma students are asked to perform simplified activities that differ from those of the rest of the class, thereby isolating them from the standard curriculum. The expert explains that, in recent years, many secondary schools have adopted the practice of creating compensatory education groups in the first and second years of compulsory secondary education, intended for students from ethnic or cultural minorities in disadvantaged situations. These practices contribute to the perpetuation of segregation and discrimination within the education system.

Also, recent studies have revealed a strong link between residential segregation and school segregation among Roma communities. Data from the Federation Kamira report<sup>57</sup> indicate that neighbourhoods with high concentrations of Roma residents tend to have schools with significantly lower resources, higher dropout rates, and poorer academic performance. For instance, the report shows that Roma students residing in segregated areas are twice as likely to attend under-resourced schools compared to those in more integrated settings. This spatial concentration not only reinforces educational inequalities but also perpetuates a cycle of social exclusion that is deeply rooted in historical discrimination and ongoing urban segregation policies.

Although the NRSF 2023-2026 Operational Plan<sup>58</sup> outlines a coordinated approach to address residential and school segregation among Roma communities, but clear, measurable results have not yet been achieved. The plan details targeted measures, such as increased resource allocation for schools in segregated areas, support programmes like PROA+,<sup>59</sup> and integrated local strategies that combine educational interventions with urban renewal efforts aimed at reducing concentrated poverty. Despite these promising strategies, the government has not yet shown tangible improvements in either the physical or educational environments. While the plan calls for stronger collaboration among the Ministry of Education, housing authorities, and the National Roma Council, the monitoring and evaluation mechanisms in place have not yet led to significant progress. This highlights the urgent need for more effective implementation and a reassessment of current measures.

### 3.3.2. Synergy with other actions

A holistic response to school segregation requires integrating the NRSF with broader national and European initiatives. The Operational Plan 2023-2026 and related European frameworks for Roma inclusion stress the importance of coordinated actions across the educational and social sectors.

For instance, the Ministry of Education has developed instructional materials and orientation guides to incorporate Roma culture and history into curricula, aligning with the NRSF's objectives. Programmes such as PROA and its expanded version, PROA+, financed with European funds, along with initiatives like Kumpania,<sup>60</sup> offer valuable support for vulnerable students. However, coordination among these initiatives is often fragmented. While some Autonomous Communities have successfully established regional Roma councils and created intercultural spaces, these efforts are not uniformly implemented across the country.

Interministerial collaboration is also crucial. Organic Law 3/2020 establishes the legal framework for ensuring non-discrimination and effective equality in education, yet without clear mechanisms linking national, regional, and local actions, the overall impact is diluted. Enhanced cooperation between the Ministry of Education, the Ministry of Equality, and regional bodies is needed to foster a more integrated approach that not only disperses Roma students but also addresses the structural roots of segregation.

Moreover, establishing dedicated monitoring and evaluation systems focused on Roma educational segregation—drawing on best practices from existing European reports such as the EC's *Evaluation Report on the National*

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<sup>57</sup> See in: Macías-Aranda, F., & Borràs-Batalla, M. (2024). *Estudio sobre discriminación y racismo estructural hacia el Pueblo Gitano en educación. Informe final*. Córdoba: KAMIRA, Federación de Asociaciones de Mujeres Gitanas. Available at: <https://federacionkamira.com/wp-content/uploads/2024/09/SegregacionEducativaPG.pdf>

<sup>58</sup> See in: [https://www.dsca.gob.es/sites/default/files/consumo\\_masinfo/PLAN\\_OPERATIVO\\_2023-2026.pdf](https://www.dsca.gob.es/sites/default/files/consumo_masinfo/PLAN_OPERATIVO_2023-2026.pdf)

<sup>59</sup> See in: <https://www.educacionfpydeportes.gob.es/mc/sqctie/cooperacion-territorial/programas-cooperacion/proa.html>

<sup>60</sup> See in: <https://inclusio.gva.es/es/web/igualdad-diversidad/kumpania>

*Roma Strategic Frameworks* (COM(2023) 871 final)<sup>61</sup>—would allow for better assessment of the effectiveness of integrated measures and facilitate adjustments as needed.

### 3.3.3. Roma participation

Effective Roma participation is essential for reducing school segregation and achieving a truly inclusive education system. Although the NRSF acknowledges the role of Roma civil society, actual participation remains minimal. Roma families and organisations are often relegated to advisory roles (such as National Roma Council) rather than being active partners in policy design and evaluation; however, they play a crucial role in documenting and raising awareness of school segregation, as illustrated by civil society initiatives such as Kamira's 2024 report *Segregación Educativa*, which provides detailed evidence on the persistence and patterns of educational discrimination.

Interviews with experts such as Fernando Macías and José Eugenio Abajo reveal that low teacher expectations and segregative practices are compounded by a lack of meaningful involvement of Roma voices in decision-making. The prohibition on collecting detailed ethnic data further obscures the true extent of segregation, limiting the input that Roma communities can have on shaping policies.

The Ministry of Education and the Ministry of Equality have initiated steps such as developing inclusive teaching materials, appointing well-being coordinators, and establishing support programmes. Yet, these measures have not been accompanied by sufficient Roma participation in advisory and decision-making bodies. Strengthening Roma participation would require not only increased representation in national and regional councils but also enhanced engagement at the local level, such as within school boards and community organisations. The active involvement of Roma stakeholders would ensure that policies are better tailored to their needs and help dismantle the systemic barriers that perpetuate segregation.

In summary, while existing initiatives provide a foundation for addressing school segregation, the full impact of these measures depends on achieving greater synergy among all levels of action and ensuring robust, empowered participation from Roma communities. Only through a coordinated, inclusive approach can the persistent challenges of segregation and structural discrimination in the education system be effectively overcome.

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<sup>61</sup>See in: [https://commission.europa.eu/publications/assessment-report-member-states-national-roma-strategic-frameworks-full-package\\_en](https://commission.europa.eu/publications/assessment-report-member-states-national-roma-strategic-frameworks-full-package_en)



## 4. USE OF EU FUNDING INSTRUMENTS

### 4.1. Conditions for EU funds implementation for Roma equality

EU Cohesion Funds—particularly the ESF+ (European Social Fund Plus) and, to a lesser extent, the ERDF (European Regional Development Fund)—play a fundamental role in financing social inclusion programmes in Spain. The enabling conditionality of the European Commission requires Member States to have a political framework that guarantees non-discrimination and equal treatment. In this context, the NRSF has been presented as one of the benchmarks for meeting these requirements.

Since 2000, Spain has deployed European Social Fund (ESF) resources as a model of good practice in supporting Roma inclusion. However, while the ESF's contributions have been valuable, it should not serve as the principal source of financing for national or regional Roma policies. Instead, the State and its Autonomous Communities should establish dedicated Roma programmes fully funded by the General State Budget and by regional budgets, administered by public authorities rather than solely by NGOs. The ESF was created to complement—and never to replace—core public policy measures.

To fully leverage this framework, it is essential that EU funds be directed toward implementing the specific conclusions outlined in the EU Agency for Fundamental Rights (FRA) Annual Report & Roma 2023. In particular, the report emphasises the need to provide Roma living in segregated settlements with access to decent, accessible, affordable, desegregated, and environmentally safe housing, while also supporting community-based housing services. Furthermore, it calls for ensuring quality education and expanded training opportunities for Roma children, with active involvement of Roma civil society in the design, implementation, and monitoring of these measures. These conclusions reinforce the need for a coherent policy framework that effectively integrates EU Cohesion Funds to address the multifaceted challenges faced by Roma.

However, as highlighted in interviews with experts such as Patricia Caro, and based on all available information and documentation, several challenges remain in applying these funds. Firstly, there is no dedicated budget line with a pre-assigned amount exclusively for the Roma community in public education or employment policies at the national level, which hinders sustained and strategic investment. The Spanish ESF Administrative Unit (UAFSE), part of the Ministry of Labour and Social Economy, has published a report<sup>62</sup> indicating that operations linked to the Specific Objective “Measures to improve access of marginalised groups, such as Roma, to education and employment, and to promote their social inclusion” amount to 61 million EUR.

UAFSE officials declined to be interviewed by the Spanish Roma Civil Monitor coalition, which prevented access to complementary and precise information regarding the implementation of the funds. Nevertheless, we positively acknowledge that, for the 2021–2027 programming period, the allocation of 61 million EUR reflects a significant financial commitment. This creates the potential to implement long-term actions that advance Roma inclusion.

In this regard, Measure 154 of the State Pact Against Antigypsyism (analysed in a previous chapter of this report) underscores the need to “increase transparency by publishing regular reports on European funding managed by the UAFSE allocated to the Roma, broken down by year, entity, and funded programmes or projects, as well as the corresponding independent impact reports.”

As a result, it remains unclear how these funds have been allocated in detail, what impact they have had, and what proportion has directly benefited the Roma population as opposed to other marginalised groups. Therefore, Roma-targeted actions must compete with those addressing the needs of other vulnerable groups, making it difficult to assess the real impact on Roma communities.

The NRSF's 2023 Progress Report (p. 31) does specify the funding coming from European Funds allocated to the Roma community, indicating that 16.3 million EUR of European funding was implemented in 2023: 89.5% came from the European Social Fund Plus (ESF+), with a contribution of 14.7 million EUR. On the other hand, only 11.5% came from the European Regional Development Fund (ERDF), with a total of 1.7 million EUR. This budget has been used for specific measures targeting Roma and represents 36.80% of the total budget

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<sup>62</sup> See in: [https://www.mites.gob.es/UAFSE/ficheros/FSE21\\_27/programas/inclusion/pro\\_inclusion.pdf](https://www.mites.gob.es/UAFSE/ficheros/FSE21_27/programas/inclusion/pro_inclusion.pdf)

allocated to specific measures. The Next Generation budget for the same period was 2.5 million EUR, also earmarked for specific measures for Roma.

In the period 2021-2022, the total budget from EU structural funds (ESF+ and ERDF) allocated to Roma was 26.67 million EUR. This budget has been used for specific measures targeting Roma and represents 33.63% of the total budget allocated to specific measures. The Next Generation budget for the same period was 4 million EUR, also earmarked for specific measures targeting Roma.

Regarding the distribution of these funds, there is no available disaggregated data detailing how these funds have been used in specific areas such as combatting antigypsyism, improving access to employment or education, housing, or healthcare, making it difficult to assess their actual impact on Roma inclusion. The only available national-level information refers to the continuation of initiatives managed by the Fundación Secretariado Gitano, such as *Acceder*, *Promociona*, *Calí* (social and labour inclusion pathways), *Acceder Joven*, *Aprender Trabajando*, and *Formatéate*.

The concentration of funding in a single organisation highlights the need to democratise access to European funds, including more flexible conditions to enable more Roma organisations to access ESF+ funds, as an independent expert has pointed out to us—similar to the model used in national calls financed through Personal Income Tax (IRPF). In addition to the funds distributed to organisations, public administrations should also make greater use of their institutional capacity, infrastructure, and resources to implement a higher volume of EU funding. As the main actors responsible for correcting social disparities and removing the barriers that hinder or prevent full participation in political, economic, cultural, and social life, it is imperative that administrations play a leading role in ensuring that funds contribute to inclusive policies.

Although the central government defines the National Strategy, the implementation of funds depends largely on the Autonomous Communities and municipalities. Furthermore, many local and regional governments do not even submit projects to benefit from these funds—either due to a lack of interest, insufficient knowledge, or the high bureaucratic demands. This situation creates territorial inequalities, with some Autonomous Communities successfully leveraging these resources while others see no European investment in inclusion and equality for the Roma. Even though the Autonomous Communities (regions) of Catalonia and Madrid are two of the three that receive the most European funds overall, they are unfortunately among those that make the least use of the ESF+ and the ERDF. This is because they have to provide higher co-funding, being more developed regions. This, unfortunately, means that Roma living in these regions, who represent a very large proportion, do not benefit from these instruments (direct or indirectly).

#### *Social Inclusion Call in the Region of Murcia (Autonomous Community)*

In 2023, an autonomous community (Region of Murcia) launched a call for grants financed by the ESF+ for social inclusion projects.<sup>63</sup> Although the National Roma Strategy 2021-2030 and the 2023-2026 Operational Plan mention the need for actions directed at the Roma community, the call did not include any specific budgetary allocation for this group. The Roma people were only mentioned under Specific Objective J, together with other vulnerable groups potentially eligible for the grant, without any prioritisation or dedicated budget line.

Roma associations that attempted to participate encountered significant difficulties in accessing the funds, as there was no clear framework prioritising their needs. Meanwhile, larger NGOs with greater administrative capacity were able to benefit from the financing.

This case illustrates that, despite the existence of national and European strategies, the lack of political will at some administrative levels prevents funds from truly reaching the Roma community. In fact, according to the latest information in the NRSF Progress Report (p. 32) (as of 30 March 2024), only Castilla-La Mancha reports having selected an operation in line with Specific Objective J, for an amount of 1.4 million EUR, while there is no information on the other Autonomous Communities.

<sup>63</sup> See in: [https://murciasocial.carm.es/-/orden-de-20-de-febrero-de-2023-de-la-consejeria-de-politica-social-familias-e-igualdad-por-la-que-se-aprueban-las-bases-reguladoras-para-la-concesio-1?utm\\_source=chatgpt.com#6](https://murciasocial.carm.es/-/orden-de-20-de-febrero-de-2023-de-la-consejeria-de-politica-social-familias-e-igualdad-por-la-que-se-aprueban-las-bases-reguladoras-para-la-concesio-1?utm_source=chatgpt.com#6) :



## 4.2. Roma civil society in EU funds implementation

The participation of Roma civil society in the management and execution of EU funds remains very limited and faces multiple challenges. Although the EU promotes the principle of 'partnership' and the empowerment of the Roma community in policy implementation, the reality in Spain is that Roma organisations have very restricted access to these funds.

One of the main issues is the lack of democratisation in accessing the funds. As noted by Ismael Cortés and Beatriz Carrillo in interviews, large national NGOs tend to be the primary beneficiaries, while smaller Roma entities are relegated to roles as collaborators or subcontractors, with no real leadership capacity in project management.

Additionally, economic and bureaucratic barriers prevent many Roma associations from competing for funding, as managing EU funds requires prior financial stability, detailed expense justification, and specialised personnel. According to the 2023 Progress Report (p. 32), there is no stable training programme or technical assistance for Roma entities to overcome these barriers, which perpetuates their exclusion.

The 2023 Progress Report also acknowledges that bureaucracy and co-financing requirements hinder the participation of resource-limited organisations, resulting in many calls where Roma organisations participate as 'collaborators' or 'subcontractors' to larger non-Roma entities leading the project. This translates into a lack of leadership and real decision-making power over the design, methodology, or evaluation of actions, as documented in the FEIG 2024 Report.<sup>64</sup>

In terms of consultation in planning, Roma organisations participate in some dialogue or consultation groups, yet they do not have a decisive role in policy design or in defining financing priorities. Another significant problem is the lack of monitoring and follow-up on the impact of EU-funded projects.

In conclusion, the use of EU financing instruments in Spain does not guarantee equitable access for the Roma community. The absence of specific budget allocations exclusively for Roma, dependence on large NGOs and administrations, bureaucratic complexity, and the lack of effective local strategies hinder the effective transfer of European funds to those who need them most.

To improve the situation, it is necessary to:

- Establish specific, exclusive, and well-funded budget lines for the Roma community within the ESF+ and ERDF within each relevant policy area. This approach would avoid competition with other vulnerable groups and ensure that Roma needs are addressed systematically across sectors.
- Simplify procedures and include more flexible conditions so that Roma entities can access funds directly, without intermediaries.
- Incentivise regional and local governments to submit inclusion projects aimed at the Roma community.
- Strengthen the capacity of Roma organisations in managing EU funds.
- Guarantee greater participation of Roma civil society in the design and evaluation of EU-funded programmes.

If these measures are not applied, the gap between European inclusion policies and their actual implementation in Spain will continue to perpetuate inequalities and hinder equitable access to resources for the Roma community.

### *Employment Training Project*

In 2022, an ESF+ funded employment training programme included an action line aimed at the Roma community. However, a large non-Roma NGO managed the project and subcontracted Roma mediators without consulting local associations during the design phase.

<sup>64</sup> See in: [https://www.presenciagitana.org/2024\\_12\\_31%20Informe%20FEIG%202024.pdf](https://www.presenciagitana.org/2024_12_31%20Informe%20FEIG%202024.pdf)

Local Roma entities could not influence the selection criteria or the methodology. The FEIG 2024 Report indicates that, although the final execution was positive in terms of job insertion, there were no disaggregated indicators to assess the specific impact on Roma beneficiaries. Moreover, participants did not receive structured feedback on their experience or outcomes.

Although the project achieved certain employability objectives, the exclusion of Roma organisations from meaningful participation limited its long-term impact. No mechanisms were put in place to strengthen the institutional capacity of Roma civil society or to ensure the sustainability of results within the community.

## CONCLUSIONS AND RECOMMENDATIONS

The NRSF's key strengths include its comprehensive framework, clear legal mandate, and strong alignment with EU strategic objectives. It sets specific targets across critical sectors—education, employment, healthcare, housing, social protection, the fight against antigypsyism, etc.—providing a robust policy foundation. However, its implementation is constrained by fragmented coordination among regional administrations, inadequate data collection, and insufficient funding mechanisms. Additionally, the underutilisation of European funds further limits the strategy's impact. Finally, the limited participation of Roma and civil society in decision-making processes significantly hinders the ability to monitor progress and achieve measurable outcomes. This gap between the NRSF's ambitious objectives and the tangible outcomes on the ground highlights the need for structural adjustments to ensure more effective execution of the National Strategy.

Below is a set of recommendations aligned with the specific conclusions drawn in each thematic area, with references to the relevant sections.

### *Recommendations to national authorities*

1. Designate without further delay the Independent Authority for Equal Treatment and Non-Discrimination (Autoridad Independiente para la Igualdad de Trato y la No Discriminación), as mandated by Law 15/2022, endowing it with sufficient human, technical and financial resources to: monitor and investigate cases of antigypsyism and all forms of discrimination; publish regular, disaggregated reports on hate crimes, hate speech and systemic bias; conduct proactive outreach and awareness-raising campaigns in collaboration with Roma communities.
2. Develop an urgent policy plan for quality education for Roma pupils and establish education as the primary strategy for the social advancement of the Roma people (see Section 2.2 on Education).
3. Enhance interministerial and interregional coordination to ensure the consistent and effective implementation of the NRSF (see Section 1.1 on implementation challenges and the need for coordination).
4. Allocate dedicated and sustainable budget lines to support the full execution of key measures, including specific and exclusive budget lines for the Roma community within both ESF+ and ERDF programmes. In particular, the use of ERDF funds should be significantly increased to tackle the issue of segregated Roma settlements, supporting access to desegregated, adequate, affordable, and environmentally safe housing (see Section 2.5 on Housing).
5. Strengthen systems for disaggregated data collection to enable accurate monitoring and timely policy adjustments (see Section 1.1.4 on data collection).
6. Increase Roma representation in decision-making bodies and public institutions to foster more inclusive policy development (see Section 1.3.2).
7. Establish clear accountability and evaluation mechanisms to rigorously assess progress and address implementation gaps (see Section 1.1.3).
8. Strengthen participation bodies: Create new participation organs within regional governments and reinforce existing ones. In the context of the National Roma Council, establish an independent technical office to enhance its visibility, activity, and efficiency—leveraging ESF+ as a complementary funding source (see Section 3.2).
9. Improve multilevel coordination: Facilitate dialogue and greater coordination among local, regional, and national governments, ensuring alignment with the NRSF. Establish a clear framework for collaboration between the CEPG and regional councils, including regular joint meetings and digital platforms for information exchange, with specific representation for women, youth, and local communities (see Section 3.2).
10. Promote multi-year plans: Prioritise the funding of multi-year measures to ensure the stability and continuity of actions aimed at Roma communities (see Section 1.1).

11. Formalise the State Pact against Antigypsyism by the Spanish Government through an action plan financed with public funds, as is the case with the State Pact against Gender Violence (see Section 3.1).

#### ***Recommendations to European institutions***

12. Provide targeted financial support and technical assistance to Member States for developing and executing comprehensive Roma inclusion strategies.
13. Strengthen EU-level monitoring and evaluation frameworks to ensure national strategies align with EU objectives.
14. Facilitate the exchange of best practices and lessons learned among member states to promote effective interventions against antigypsyism.
15. Develop and disseminate EU-wide guidelines on ethnic data collection to improve the quality and comparability of monitoring efforts (see Section 1.1.4).

#### ***Recommendations to civil society***

16. Enhance collaboration among Roma civil society organisations to consolidate advocacy efforts and present a unified voice in policy discussions.
17. Invest in capacity-building initiatives to empower Roma organisations in accessing public funding and participating effectively in policy formulation.
18. Engage actively in national and regional forums to provide continuous feedback, ensuring that Roma communities' lived experiences inform policy adjustments (see Section 1.3.3).

#### ***Recommendations to other stakeholders***

19. Foster partnerships among educational institutions, local governments, and the private sector to design and implement inclusive programmes that address segregation.
20. Support initiatives aimed at dismantling structural barriers in the education system, including comprehensive teacher training in intercultural education (see Section 2.2).
21. Promote community-based monitoring and participatory evaluation processes to ensure that policies effectively meet the needs of Roma communities (see Section 1.3.3).

## REFERENCES

### List of interviews

The following is a list of interviews conducted as part of this report. These interviews were carried out through various methods (in person, video call, or email) and include both individual and group sessions.

- Caro Maya, Patricia. Roma activist and former Member of the European Parliament. Video call, 28 October 2024.
- Carrillo de los Reyes, Beatriz. Director General of Equal Treatment and Non-Discrimination and Against Racism, Government of Spain. Video call, 8 February 2025.
- Cortés Gómez, Ismael. Roma academic and expert on the State Pact against Antigypsyism. Video call, 24 October 2024.
- Ezquerro Fernández, Txema. Director of Diversity, Coexistence and Intergenerational Solidarity, Government of the Basque Country. Video call, 12 March 2025.
- Font Miguel, Tatiana. Head of the Integral Plan for the Roma in Catalonia, Generalitat de Catalunya. Video call, 10 February 2025.
- García Martín, José Luis. Deputy Mayor, Area of Preferential Attention and Social Rights, Seville City Council. In person, 26 February 2025.
- Gil Luciano, Ana. Head of the Area of Promotion of Health and Equity, Ministry of Health. Video call, 20 November 2024.
- Macías Aranda, Fernando. Director General of Equal Treatment and Non-Discrimination, Generalitat de Catalunya. Video call, 8 January 2025.
- Martín Ramírez, Manuel. Roma activist and president of the Advisory Council of Presencia Gitana. In person, 17 December 2024.
- Pérez Medina, Juan Carlos. Representative, Ministry of Education. Video call, 25 November 2024.
- Ruíz Bautista, María Dolores and Olivares, Carmen. Representatives, Ministry of Social Rights, Consumption and Agenda 2030; National Roma Contact Point (Key Authority). Video call, 17 October 2024.
- An expert combating antigypsyism and an independent social activist. Video call, 26 November 2024.
- Vargas Heredia, Pedro. Expert on CEPG. Email, 14 January 2025.
- Vargas Porras, Francisco. Councillor, Sant Adrià City Council (Barcelona). In person, 13 February 2025.
- Vázquez Saavedra, Antonio. Roma activist. In person, 25 February 2025.

Additionally, consultation sessions were held with entities from the National Roma Council and Plataforma Khetane in November 2024, and a validation session took place in January 2025. These sessions provided invaluable feedback from experts and civil society organisations, which was subsequently integrated into the final version of the report.

### Key policy documents and reports

The following is a list of major policy documents and reports that have informed the analysis presented in this report:

- *National Roma Strategic Framework in Spain 2021-2030 (NRSF)*. Spanish Government, Ministry of Social Rights, Consumption and Agenda 2030, 2021.
- *Operational Plan 2023-2026 of the National Strategy for Equality, Inclusion and Participation of the Roma in Spain 2021-2030*. Spanish Government, Ministry of Social Rights, Consumption and Agenda 2030, 2023.
- *Progress Report 2021-2022 on the National Strategy for Equality, Inclusion and Participation of the Roma in Spain*. Spanish Government, Ministry of Social Rights, Consumption and Agenda 2030, 2023.
- *Progress Report 2023 on the National Strategy for Equality, Inclusion and Participation of the Roma in Spain*. Spanish Government, Ministry of Social Rights, Consumption and Agenda 2030, 2024.
- *Segregación Educativa Report*. Federación Kamira, 2024.

- *FEIG Report 2024*. Foro Estratégico Interautonómico Gitano (FEIG), several NGOs, 2024.
- *FSG Annual Report 2023*. Fundación Secretariado Gitano (FSG), 2023.
- *European Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030 (EURSF)*. European Commission, Directorate-General for Justice and Consumers, 2020.
- *State Housing Plan 2022-2025*. Spanish Government, Ministry of Housing, 2022.
- *Organic Law 3/2020 on the Modification of the Organic Law on Education (LOMLOE)*.
- *Law 15/2022 on Equal Treatment and Non-Discrimination*.
- Additional relevant reports and documents:
  - Reports from the National Institute of Statistics (INE) on ethnic data collection.
  - Publications from the Council for the Elimination of Racial or Ethnic Discrimination (CEDRE).
  - Publications from the European Union Agency for Fundamental Rights (Roma Survey 2021, Fundamental Rights Report 2023).
  - Recent academic articles and policy evaluations on Roma inclusion and antigypsyism.

Specific references relevant to one or two sections are provided as footnotes in the relevant chapters.

## ANNEXE: LIST OF PROBLEMS AND CONDITIONS

### *Fighting antigypsyism and discrimination*

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Antigypsyism is not recognised as a specific problem in national political frameworks	critical problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	Legislative developments in recent years have not yet overcome the applicability barrier. It is still very difficult to legally prove antigypsyism as a basis for hate crime and hate speech.
Prejudice against Roma	critical problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	The forthcoming establishment of the Independent Authority for Equal Treatment and Non-Discrimination should play a decisive role by imposing sanctions on media outlets and social media profiles that continue to support these prejudices with impunity, thereby distorting the right to freedom of expression in a manner that undermines fundamental freedoms and democracy.
Hate crimes against Roma	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement	It is essential to establish the sanctioning regime under the Equal Treatment and Non-Discrimination Act of 2022 so that these crimes—rooted in a profoundly anti-Roma collective ideology—can be identified and effectively prosecuted.
Hate speech towards and against Roma (online and offline)	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement	The authoritarian drift of major social media platforms is extremely concerning, as it appears we are regressing by decades in this crucial area. The tepid commitments these platforms have made toward eliminating cyberhate are being undermined by the dynamics emerging from the new US administration. European legislation must be less lenient, and platforms should be compelled to comply with such laws.
Limited effectiveness of	critical problem	mentioned but not analysed	present but insufficient	adequate but with room for	The NRSF Operational Plan 2023–2026 includes anti-discrimination measures, but their effectiveness



protection against discrimination		sufficiently		improvement	remains limited due to inconsistent enforcement and a lack of accountability mechanisms. While legal frameworks are in place, significant gaps in implementation persist, leaving many Roma individuals vulnerable to continued discrimination in education, employment, housing, and access to services.  Moreover, insufficient data collection on discrimination cases makes it difficult to assess the true extent of the issue. There is also a lack of focus in combating discrimination and addressing under-reporting.
Segregation in education, housing, or public services	critical problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement	The state refuses to acknowledge that school and residential segregation were produced by public administration through its housing and education policies. Although the strategy mentions segregation in response to pressure from Roma organisations, it does not even consider eliminating it in the long term.
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	Spain faces a serious housing problem, as the private sector has been allowed to do as it pleases. Consequently, continuous evictions occur due to the erratic policies of various governments and the insatiable speculation of a sector that turns a basic right into a business.
Stateless individuals lack identity documents	significant problem	Irrelevant	absent	absent	Migration issues across the EU are even more acute when the migrants are Roma. There are no efficient public policies with an inclusive approach; instead, punitive measures with a clear racist and anti-Roma bias prevail.
Misconduct and discriminatory behaviour by the police (lack of oversight)	critical problem	understood with limitations	present but insufficient	some targets but not relevant	The behaviour of law enforcement agencies in Spain remains a significant concern, as anti-racist protocols are not implemented and oversight mechanisms for these agencies are both insufficient and inadequate.

## Education

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Lack of available and accessible preschool and early childhood education (EAPI) services for the Roma population	Critical problem	identified and analysed sufficiently	Adequate, but with room for improvement	relevant targets well defined	The Operational Plan 2023-2026 includes targeted measures to expand and improve access to early childhood education services for the Roma. Initiatives such as increased enrolment initiatives and new service provision are expected to enhance accessibility over time. However, while relevant objectives are well defined, comprehensive monitoring data remain limited, with ongoing efforts to gather reliable, disaggregated data from regional administrations.
Lower quality of preschool education and EAPI services for the Roma population	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	Specific measures to improve quality include curriculum enhancements, specialised teacher training, and quality assurance protocols. These measures are anticipated to raise standards and provide a more supportive learning environment. Preliminary pilot projects and regional feedback indicate modest improvements, though systematic data collection is still in progress to confirm their overall effectiveness.
High rate of school leaving before completing primary education	Critical problem	identified and analysed sufficiently	Adequate, but with room for improvement	Relevant objectives well defined	Interventions to reduce early school leaving include academic support programmes, tutoring, and early identification of at-risk students. These measures included in the Operational Plan are expected to improve primary completion rates. Although defined targets are in place, the availability of meaningful data is limited, and more robust evaluation tools need to be developed to evaluate progress.
Premature dropout from secondary education	Critical problem	identified and analysed sufficiently	Adequate, but with room for improvement	Relevant objectives well defined	The strategy adopts mentorship programmes, tailored academic support, and alternative educational pathways to reduce dropout rates at the secondary level. While early implementation shows promise in some regions, the overall effectiveness is difficult to assess due to insufficient standardised data; ongoing surveys and monitoring initiatives are planned to strengthen data collection.

Secondary education/vocational training disconnected from labour market needs	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	Measures include the realignment of vocational training curricula with labour market demands and partnerships with industry and business stakeholders. These actions are intended to improve job placement outcomes for Roma graduates. Early assessments suggest that these initiatives have potential, but their full reach remains uncertain as comprehensive data and impact evaluations are still being gathered.
Shift of Roma students towards special education	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	Initiatives aimed at preventing placement in special education classes involve inclusive assessment protocols and targeted teacher training. Expected improvements include reduced segregation and better academic placement. However, data on the extent and effectiveness of these measures are fragmented, with further systematic evaluations needed.
Educational segregation of Roma students	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	The NRSF includes measures to promote the integration of Roma students into mainstream classrooms, such as revised school assignment policies and inclusive education guidelines. While these measures are designed to reduce segregation, their implementation has been uneven across regions.
Increased selectivity in the educational system, leading to the concentration of Roma or other disadvantaged students in lower-quality schools	Critical problem	Mentioned, but not sufficiently analysed	Present but insufficient	Some objectives defined, but not relevant	To address selectivity, policies aim to diversify school enrolment and allocate resources more equitably. Though objectives are outlined and some pilot programmes are in place, regional disparities persist. Initial localised studies indicate modest improvements, but comprehensive, systematic data collection is still underway.
Limited access to second-chance education, adult education, and	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	The Operational Plan promotes the expansion of adult education and second-chance learning opportunities through targeted programmes and partnerships with regions and NGOs. While promising initiatives have been launched in some Autonomous Communities,

lifelong learning					their overall reach is unclear due to the absence of centralised monitoring data.
Limited access and support for online and distance learning when educational institutions closed, as occurred during the coronavirus pandemic	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	The Operational Plan emphasises the need to enhance digital infrastructure and remote learning support through improved online platforms and teacher training in digital methodologies. While several regions have initiated such programmes using EU funds, early data on reach and effectiveness remain preliminary. Ongoing assessments and updated digital literacy surveys are expected to provide more comprehensive insights.
Low level of digital skills and competencies, and few opportunities for their development among students	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	Specific initiatives have been adopted to improve digital literacy by integrating targeted digital training programmes into the school curriculum. In this regard, CODI funds—financial resources provided by the Ministry of Youth and Childhood to promote digital inclusion and the modernisation of digital infrastructures—have been utilised to support teacher training in digital methodologies and to implement programmes designed to enhance Roma students' digital competencies. Although early feedback is promising, comprehensive evaluation data remains limited, preventing a full assessment of the effective deployment of CODI funds in improving digital skills among Roma.
Low level of digital skills and competencies, and few opportunities for their development among adults	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	Measures to improve adult digital competencies involve incorporating digital training into broader lifelong learning programmes. Early initiatives show a positive trend in skills development; however, similar to student data, robust monitoring and systematic evaluation mechanisms are still in the early stages, making it difficult to fully assess overall progress.
Lack of available and accessible preschool and early childhood education (EAPI)	Critical problem	Understood with limitations	Present but insufficient	Adequate, but with room for improvement	The Operational Plan 2023-2026 includes targeted measures to expand and improve access to early childhood education services for the Roma. Initiatives such as increased enrolment initiatives and new service provision are expected to enhance

services for the Roma population					accessibility over time. However, while relevant objectives are well defined, comprehensive monitoring data remain limited, with ongoing efforts to gather reliable, disaggregated data from regional administrations.
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### Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Limited access to or low effectiveness of public employment services	Critical problem	Understood, but not well analysed	Absent	Absent	<p>No data exists on this issue.</p> <p>The SEPE (State Public Employment Service) directly manages the TándEM programme, which is inspired by workshop schools and employment workshops with the objective of training unqualified young people and providing them with work experience. This programme is part of the specific investment for Youth Employment under the Recovery, Transformation and Resilience Plan – funded by the EU's NextGenerationEU. Spain is set to receive approximately 140 billion EUR.</p> <p>TándEM is promoted by the state public sector in collaboration with the third sector. In this regard, FSG has been the beneficiary entity for reaching out to Roma youth.</p> <p>There is no data on other initiatives by the State Public Employment Service or on measures taken in relation to the NRSF that are specifically directed at the Roma.</p>
Youth not in employment, education, or training (NiNi/NEET)	Critical problem	identified and analysed sufficiently	Adequate but with room for improvement	Some targets but not relevant	<p>The TándEM project mentioned above, implemented by FSG for unemployed Roma youth, is financed by the Recovery, Transformation and Resilience Plan – NextGenerationEU. This project benefited 175 young people in 2023 and 50 in 2022. The 'Acceder Joven' initiative has also contributed to this effort. Additionally, the 'Mercaemprende' project—a programme designed to support self-employment—is</p>

					<p>relevant. According to FSG's 2023 activity report, this project has helped establish 101 self-employment initiatives. Within this project, there is an initiative targeting Roma youth engaged in street vending—especially in Asturias—which has benefited 44 Roma youth.</p> <p>Regarding the scope and effectiveness of these measures, only around 225 Roma youth have benefited, and no data are available on overall effectiveness. It is important to note that these are pilot projects with defined start and end dates. They are not stable, permanent public measures but rather temporary projects implemented by organisations, which limits both their effectiveness and reach.</p>
Limited access to (re)training, lifelong learning, and skills development	Critical problem	identified and analysed sufficiently	Present but insufficient	Some targets but not relevant	No data exist to analyse the scope and effectiveness of the NRSF in addressing this issue.
Discrimination in the labour market by employers	Critical problem	identified and analysed sufficiently	Present but insufficient	Some targets but not relevant	<p>Law 15/2022, of 12 July – the Comprehensive Law for Equal Treatment and Non-Discrimination – aims to guarantee and promote the right to equal treatment and non-discrimination, and to respect the equal dignity of individuals, as stipulated in Articles 9.2, 10, and 14 of the Spanish Constitution. The effectiveness of this legal framework requires an adequate system of control, monitoring, and enforcement to prevent discriminatory practices in the labor market and to adopt appropriate sanctioning measures in cases of noncompliance. To this end, the State Office for the Fight against Discrimination was created through Order TES/867/2023, of 22 July, within the State Labour and Social Security Inspection body. Currently, no data have been collected by this Office, which was established in 2023, nor by the Ministry of Equality, CEDRE, or OBERAXE.</p> <p>The Directorate General for Equal Treatment and Non-Discrimination is working on establishing a</p>

					central agency to record all cases of discrimination as part of a National Plan against Racism. It is not possible to provide information on the effectiveness and measures established in the NRSF for this issue, but we believe that mainstreaming measures may help address the problem.
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### Healthcare

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Exclusion from public health insurance coverage (including stateless persons, third-country nationals, or those moving within the EU)	Significant problem	Mentioned, but not sufficiently analysed	Present but insufficient	Some targets defined, but not relevant	The NRSF does not address this problem. However, the situation varies by region. Regardless, there are no data available to analyse this problem in depth, and the progress reports do not mention it.

### Housing, essential services, and environmental justice

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Lack of access to drinking water, sanitation, access to electricity, or public transport	Significant problem	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Some targets but not relevant	The measures to be implemented must be included in the housing programmes. The problems are not limited to slum housing or access to rental housing; plans should include dedicated budgets for these measures, and each programme should incorporate the necessary indicators for subsequent evaluation.
Housing in informal or illegal settlements/	Significant problem	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Adequate but with room for improvement	Resettlement and accompaniment plans are currently being implemented. To assess their effectiveness, it is important to bear in mind that in some cases, these are lengthy processes that require individualised



neighbourhoods					<p>attention.</p> <p>It remains crucial for local authorities and the Autonomous Regions to stay involved in achieving total eradication.</p>
Concentration and residential segregation of the Roma population	Significant problem	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Adequate but with room for improvement	<p>The NRSF Operational Plan 2023–2026 targets residential segregation by promoting access to dignified housing and addressing overcrowding and discriminatory practices. However, while these initiatives aim to reduce the concentration of Roma communities in substandard areas, their overall impact is limited by regional disparities, insufficient budget allocations, and gaps in consistent data collection.</p> <p>It also appears that these measures are taking time to be implemented, and the difficulties may also stem from the socio-economic challenges faced by the families themselves.</p> <p>Efforts should therefore be made to improve or invigorate this sector. The rehabilitation of degraded or marginal areas would enhance their habitability and reduce the precarious conditions in which families live.</p>
Overcrowding (space/room available to families)	Critical problem	Mentioned but not analysed sufficiently	Adequate but with room for improvement	Adequate but with room for improvement	<p>There are no specific measures for the Roma population—only access to the resources provided by the State Housing Plan.</p> <p>On many occasions, the proposals or subsidies from the State Housing Plan do not reflect the reality of many Roma families, as they cannot even meet the eligibility requirements.</p>
Lack of an updated diagnosis of the housing map of the Roma population	Significant problem	Identified and analysed sufficiently	Adequate but with room for improvement	Adequate but with room for improvement	<p>A new housing mapping study is being prepared, but the data are currently unknown since it is planned for 2026.</p>
Restricted	Critical problem	Mentioned but	Adequate but	Adequate but with	<p>The only available aid is the social voucher ('Bono</p>

heating capacity (households are unable to heat all rooms/all hours when needed) or solid waste used for heating		not analysed sufficiently	with room for improvement	room for improvement	social'), which is offered to vulnerable people. Although the Ministry's website provides data on beneficiaries in the provinces and Autonomous Regions, these figures pertain to the general population.
Poor physical security of housing (ruined or slum housing)	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	Few city councils, such as Granada and A Coruña, allocate any resources to these measures, and they are also general calls for proposals. It is hoped that the new housing map will provide more concrete data.
Lacking or limited access to social housing	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	The increase in the stock of social housing is foreseen in the State Housing Plan 22-25. However, as housing is a major issue for the Spanish population, we believe that Roma families will continue to be at a great disadvantage compared to the rest of the population, including vulnerable families. This plan remains a forecast, and there is no specific data beyond the projections.
Discrimination and antigypsyism in the field of housing	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	This problem is a reality for Roma families, who are also required to demonstrate the discrimination they face when accessing rental housing. Moreover, state bodies, public officials, and administrations do not seem fully aware of the problem. The negative social image of the Roma has become so ingrained that such behaviours are normalised even by the authorities.
Lack of socially inclusive housing policies	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	There is a clear need for coordinated governance among the State, the Autonomous Regions, and local authorities. However, this coordination appears to be inadequate, as each administration tends to follow its own plans.

## Social protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
High at-risk-of-poverty rate and material and social deprivation	Critical problem	Identified and analysed sufficiently	Present but insufficient	Adequate but with room for improvement	<p>The data are chilling, and the measures are insufficient given the poor results of the first strategy.</p> <p>The 2008 crisis deeply affected the Roma population, causing a significant decline in purchasing power, and the recent health crisis has further impacted the already fragile economy of Roma families. The measures are inadequate because they rely mainly on access to social benefits as a solution.</p> <p>However, these measures are not enough when there are no comprehensive plans.</p>
Difficulties in accessing economic and social benefits	Significant problem	Understood with limitations	Present but insufficient	Adequate but with room for improvement	<p>The NRSF Operational Plan 2023–2026 has implemented measures aimed at improving access to economic and social benefits by enhancing outreach through integrated social services and establishing dedicated support networks for vulnerable Roma populations. While these initiatives have improved awareness and facilitated enrolment in some regions, their overall effectiveness is hindered by regional disparities. Also, bureaucracy remains a significant problem, and above all, the processing time is problematic. Long waiting times leave many particularly vulnerable families without essential resources.</p> <p>Additionally, inconsistent data collection across regions limits the ability to fully assess the reach and impact of these measures, underscoring the need for more uniform application to ensure that all eligible Roma benefit effectively.</p>
Limited effectiveness of the Minimum Vital Income benefit in reducing poverty	Significant problem	Understood with limitations	Present but insufficient	Adequate but with room for improvement	<p>The Minimum Vital Income benefit under the NRSF for 2023–2026 includes targeted outreach and integrated social services aimed at improving access for the most vulnerable groups, particularly Roma households with children and Roma women. While these measures have provided essential support,</p>

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in Spain

among marginalised groups, including Roma women and children.					<p>their effectiveness is mixed as they often fall short in addressing the multidimensional aspects of poverty due to regional disparities and cultural barriers.</p> <p>A report by FSG on the impact of the MVI on the Roma population shows that only 29% of Roma people who are entitled to receive the benefit actually obtain it. Despite meeting the requirements, they face processing barriers and longer waiting times compared to the general population.</p>
Low flexibility of income support programmes for addressing changing conditions of the household	Critical problem	Mentioned but not analysed sufficiently	Present but insufficient	Some targets but not relevant,	This problem does not appear to be adequately addressed by any administration, and the rigidity of the requirements continues to be exclusionary.
Lack of compatibility between support measures and the transition to employment or other training opportunities	Critical problem	Understood with limitations	Present but insufficient	Adequate but with room for improvement	There are no pathways linking socio-occupational inclusion plans with the receipt of benefits, and most benefits are mutually exclusive, making it impossible to reconcile them with the economic improvement of families.

*Social services*

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Limited capacity of social services to collaborate effectively with other agencies (e.g., the public employment service) to assist clients.	Critical problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	The NRSF Operational Plan 2023–2026 includes measures to enhance inter-agency coordination by establishing joint protocols and training programmes aimed at fostering collaboration between social services and entities such as the public employment service. However, despite these initiatives, the effectiveness of collaborative efforts remains limited due to structural constraints, fragmented administrative responsibilities, and inconsistent

					<p>implementation across regions.</p> <p>The Autonomous Communities (CCAA) are becoming increasingly aware of the need for Regional Roma Councils, which would allow for a closer and more direct approach to the realities of the Roma population. However, good intentions must be backed by concrete plans and effective coordination between institutions.</p>
Discrimination by social service providers	Critical problem	Understood with limitations	Present but insufficient	Adequate but with room for improvement	<p>The NRSF Operational Plan 2023–2026 introduces anti-discrimination training and guidelines for social service providers to address prejudicial practices, yet the measures have shown limited effectiveness.</p> <p>The measures to be adopted to address this widespread issue, resulting from the normalisation of antigypsyism, should include the pedagogical training of professionals in this field.</p>
Lack of adequacy of programmes to address indebtedness (providing counselling and financial support)	Significant problem	Mentioned but not analysed sufficiently	Present but insufficient	Adequate but with room for improvement	<p>Indebtedness to public or private administrations is a barrier to accessing social assistance, perpetuating the condition of exclusion. The NRSF Operational Plan 2023–2026 includes measures such as targeted financial counselling and support services intended to address this problem among vulnerable Roma households. However, these programmes have proven inadequate due to limited scope, inconsistent implementation, and insufficient resource allocation.</p>
Limited quality, capacity and comprehensiveness of help provided by social services	Critical problem	Understood with limitations	Adequate but with room for improvement	Adequate but with room for improvement	<p>The NRSF Operational Plan 2023–2026 has introduced new training protocols and resource enhancements to improve the quality, capacity, and comprehensiveness of social services. However, the overall level of assistance remains limited, as many service providers still struggle to meet the complex needs of vulnerable Roma communities. The measures have achieved only partial success due to insufficient resources and expertise, while gaps in data collection and inconsistent evaluations further restrict the ability to fully assess their effectiveness and reach. These challenges indicate a need for more robust investment in training and enhanced monitoring systems to ensure that social services can</p>

					deliver comprehensive support that truly addresses the needs of Roma.
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### Child protection

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Child protection is not taken into account in the NRSF.	Critical problem	Understood with limitations	Present but insufficient	Absent	<p>Child protection is not only about preventing child marriages, labour, or sexual exploitation but also about breaking the cycle of generational poverty.</p> <p>The NRSF Operational Plan 2023–2026 largely overlooks child protection, resulting in a significant gap in addressing the specific needs of Roma children. While the framework includes broader social inclusion policies, there are no dedicated measures to safeguard or promote the welfare of this particularly vulnerable group. Consequently, the reach and effectiveness of support services remain unassessed, leaving Roma children exposed to risks without tailored intervention.</p>
Large-scale and discriminatory placement of Roma children in early childhood care institutions	Significant problem	Mentioned but not analysed sufficiently	Absent	Absent	<p>The NRSF Operational Plan 2023–2026 does not explicitly address the large-scale and discriminatory placement of Romani children in early childhood care institutions, leaving a critical gap in child protection and family support policies. Currently, a social worker's report is sufficient for the administration to take custody of children. In most cases, the suspicions or accusations are unfounded, and the procedures to regain guardianship can be lengthy.</p>
Biased treatment of Roma youth by law enforcement and security forces	Critical problem	Understood with limitations	Present but insufficient	Some targets but not relevant	<p>As mentioned in previous paragraphs, the discriminatory treatment of the Roma is normalised in mainstream society. The NRSF Operational Plan 2023–2026 lacks specific measures to address the biased treatment of Roma youth by law enforcement and security forces, despite widespread reports of racial profiling and discriminatory practices. While broader anti-discrimination policies exist, they do not include targeted training to prevent and address such</p>

					abuses. Furthermore, the absence of reliable data collection on police interactions with Roma youth makes it difficult to assess the extent of the problem.
Inadequate child/adolescent participation	Significant problem	Understood with limitations	Present but insufficient	Adequate but with room for improvement	While broader inclusion strategies exist, there are no specific mechanisms to ensure meaningful youth engagement in social, educational, or community initiatives. The NRSF does not include such measures, and Roma organisations themselves have few programmes to promote the participation of minors and young people.

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

<b>Problems and conditions:</b>	<b>Significance:</b>	<b>Identified by strategy:</b>	<b>Measures to address:</b>	<b>Targets defined:</b>	<b>Details of NRSF implementation relevant to the problem:</b>
Romani history and culture are not included in school curricula and textbooks for both Roma and non-Roma students	significant problem	understood with limitations	present but insufficient	some targets but not relevant	Although the NRSF proposes specific measures for the implementation of Romani History and Culture in school curricula, these measures have been ineffective due to the poor penetration of the strategy into educational issues. This greatly limits the impact of a measure that can have a strong social impact and combat antigypsyism. There are indicators that show that the objectives are not being met and that they will probably not be met in the medium term.



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