

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

> Justice and Consumers

in Croatia







#### **EUROPEAN COMMISSION**

Directorate-General for Justice and Consumers Directorate D — Equality and Non-Discrimination Unit D2 Non-Discrimination and Roma Coordination

European Commission B-1049 Brussels

#### **EUROPEAN COMMISSION**

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

Manuscript completed in January 2024

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PDF ISBN 978-92-68-29520-5 doi:10.2838/6941657 Catalogue number DS-01-25-138-EN-N
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#### How to cite this report:

Roma Civil Monitor (2025) *Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia.* Publications Office of the European Union, Luxembourg.

Luxembourg: Publications Office of the European Union, 2025

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The report was prepared as part of the initiative 'Preparatory Action - Roma Civil Monitoring - Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review' implemented by a consortium led by the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the Fundación Secretariado Gitano (FSG) and the European Roma Rights Centre (ERRC). The initiative was funded by the European Commission's Directorate-General Justice and Consumers (DG Just) under service contract no. JUST/2020/RPAA/PR/EQUA/0095.

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## **LIST OF ABBREVIATIONS**

AP 2021-2022 Action Plan for the NRSF implementation for 2021-2022 AP 2023-2025 Action Plan for the NRSF implementation for 2023-2025

EURSF EU Roma Strategic Framework HZZ Croatian Employment Office

KALI SARA The Roma Union in the Republic of Croatia, Kali Sara

MP Member of Parliament MUP Ministry of the Interior

MZOM Ministry of Education, Science and Youth

NRCP National Roma Contact Point (Government Office for Human and Minority Rights)

NRIS National Roma Inclusion Strategy 2013-2020

NRSF National Roma Strategic Gframework (official title "National Plan for the Inclusion of

Roma for the period 2021-2027")

OP Operational Programme for National Minorities 2024–2028

RCM Roma Civil Monitor

ROM HR Roma Youth Organization of Croatia

## **EXECUTIVE SUMMARY**

The implementation of Croatia's 'National Roma Strategic Framework' (NRSF) has led to visible progress in promoting Roma culture, improving living conditions, and enhancing participation. Awareness-raising initiatives, cultural memorials, and media projects have strengthened the recognition of Roma history, while associations like *Kali Sara* have received funding to support cultural and educational activities. Investments have also targeted better housing and data collection.

However, major challenges persist. Educational segregation remains widespread and is reportedly increasing, despite its inclusion in the NRSF Action Plans. Measures to address it have either been poorly implemented or are entirely absent. Similarly, while infrastructure in Roma settlements has improved, residential segregation continues. Community centres built in these areas offer some support but do not address the root causes of exclusion.

## Implementation of the NRSF

These mixed results are due to deeper structural and procedural shortcomings. While formal frameworks and coordination mechanisms are in place, they often fail to ensure consistency between planning and execution. Action Plans, particularly those associated with the 2023-2025 cycle, have expanded in scope but continued the trend of listing measures without delineating operational activities, leaving critical issues such as desegregation, social services, and targeted health interventions largely unaddressed. Even where Romafocused measures are included, implementation is frequently delayed, underfunded, or substituted with generalised programmes that do not reflect Roma-specific needs.

Roma participation remains limited in both planning and implementation. Despite guaranteed representation in drafting processes and monitoring bodies, actual engagement has declined, reflecting structural weaknesses in Roma civil society. The few Roma organisations that have been involved (primarily Kali Sara) lack broader sectoral representation, while most ministries retain the discretion to disregard proposals from the Working Group established to draft the 2023-2025 Action Plan. Monitoring structures, particularly the Committee for Monitoring the NRSF, are compromised by conflicting responsibilities, with oversight often overshadowed by internal disputes and a focus on fund distribution.

Data collection has improved, with baseline studies and detailed administrative reporting, but remains insufficient for evaluating the effectiveness of individual interventions. Most indicators track activities or beneficiary numbers rather than outcomes, making it difficult to assess impact. Employment data, for example, suggest positive trends, yet these are more likely attributable to broader labour market dynamics than to the success of Roma-targeted measures.

Coordination with mainstream national and EU-level policies exists in principle, but remains poorly operationalised. Roma concerns are rarely prioritised in mainstream reforms, and issues such as school zoning and housing segregation are largely addressed outside the NRSF framework, if at all. Despite alignment with EU objectives, Croatian authorities have yet to respond meaningfully to European guidance on ending residential segregation and its link to school segregation.

Mechanisms for civil dialogue, such as the National Roma Platform, have been inactive since 2017, further weakening participatory oversight. Earlier efforts to mobilise Roma youth and women have not been sustained, primarily due to institutional capacity constraints. Although the NRCP has acknowledged the importance of these platforms, it has deprioritised their reactivation in favour of larger, externally funded projects.

#### Review of country situation by area

**Fighting antigypsyism and discrimination:** Combating antigypsyism and discrimination remains one of the most pressing issues for Roma in Croatia. While the NRSF has implemented educational programmes, such as courses for criminal justice students focusing on Roma children as both victims and offenders, these measures have not been properly evaluated so far, and not only has their effect not been visible, but the sense of discrimination towards Roma has actually increased. This outcome was predicted in the comments by the Ombudsman's Office and the Center for Peace Studies during the creation of the NRSF. At the same time, reports from the Ombudsman's Office and the latest research by CMS, *Representation and Indicators of Attitudes Towards Foreigners and Minorities in Croatian Society: Threat, Encounter, Coexistence?* also highlight this issue. Discrimination in both the public and private sectors continues to affect Roma individuals, particularly

in education, housing, and employment. Furthermore, hate speech and negative stereotypes about Roma are widespread in the media and society. To address these challenges, more robust anti-discrimination measures are needed, alongside comprehensive public awareness campaigns to challenge and change harmful stereotypes about Roma communities

**Education:** The implementation of the NRSF in the area of education has faced significant challenges, particularly concerning the segregation of Roma students. Despite the measures in place, the system continues to segregate Roma children into separate classes. Although there have been some efforts to remedy this, such as activities aimed at integrating Roma students into mainstream education, the lack of implementation of these desegregation activities remains a critical issue. Additionally, specific activities defined under the NRSF, including targeted measures for Roma students, do not fully address the underlying problem of educational inequality. This leads to disparities in educational outcomes and limits opportunities for Roma youth. Thus, greater emphasis and investment in desegregation measures are needed. At the same time, the field of education has adopted a targeted approach toward the Roma community, with an annual investment of 2.9 million EUR, resulting in a noticeable increase in the number of Roma attending secondary schools and universities. Education stands out as a sector that consistently invests in the Roma community and yields ongoing, tangible outcomes. However, the persistent challenge of closing the gap in educational outcomes between Roma and the general population remains.

**Employment:** In the area of employment, the NRSF has implemented initiatives to promote Roma participation in the workforce, including through education and training programmes designed to enhance employability. However, Roma still face significant barriers to employment, including discrimination, lack of access to quality education, and limited job opportunities. Despite the implementation of measures to combat discrimination in the workplace, Roma remain underrepresented in the labour market, and a significant employment gap persists. To make meaningful progress, targeted policies addressing discrimination and providing Roma with equal access to employment opportunities are crucial. Furthermore, stronger support for Roma entrepreneurship and self-employment initiatives is needed to promote economic empowerment within these communities. The existing financial resources allocated by the Croatian Employment Service should be redirected from public works measures to targeted training and employment initiatives for Roma.

**Housing, essential services, and environmental justice:** The NRSF has allocated significant resources toward improving the living conditions of Roma communities; however, segregation is entirely overlooked, with no activities or measures addressing it in the Action Plans, despite its recognition as a significant issue in the NRSF. Activities such as funding the construction of community centres in segregated Roma settlements have made a positive impact in terms of providing cultural and social spaces for Roma individuals. However, the overall issue of housing inequality remains a significant barrier to Roma integration into mainstream society. While the construction of community centres, playgrounds, etc. provides some support, these efforts do not fully address the broader issue of segregated housing, which continues to hinder social mobility and the full participation of Roma families in Croatian society. Continued investments and targeted actions are necessary to address this deep-rooted issue and foster more integrated housing solutions for Roma communities.

#### Focus on key issues affecting Roma

**Education:** Education is widely recognised as a key area for Roma inclusion in Croatian society, yet segregation within the system remains a pressing issue. From preschool to subject-based teaching in primary schools, many Roma children are placed in predominantly or entirely Roma classes, which are often associated with a reduced curriculum and weaker educational outcomes. Although there is no official data confirming the poorer education quality in segregated settings, Roma civil society organisations consistently raise concerns based on observed disparities in learning outcomes. Despite this, the NRSF does not address the issue of education quality, focusing instead on combating segregation through targeted activities.

The education sector within the NRSF adopts a targeted Roma approach and includes more activities than any other area. The Ministry of Science, Education, and Youth allocates over 2 million EUR annually from the national budget to support Roma education. Affirmative measures span all educational levels, from preschool to adult education, and there has been a nominal increase in Roma children's participation in the system. However, dropout rates remain high, and overall outcomes still lag behind those of the majority population, with only 30% of Roma youth aged 15 to 18 currently enrolled in education.

**Housing and Residential Segregation:** While there have been significant efforts to improve Roma living conditions, including funding for the construction of community centres in segregated Roma settlements,

residential segregation remains a major issue. Roma communities continue to face inadequate housing, often being isolated in separate settlements that reinforce social exclusion and contribute to poor living conditions.

The current measures have not sufficiently addressed the root causes of residential segregation. While community centres provide social and cultural opportunities, they do not resolve the underlying housing inequality and segregation that Roma communities face.

The NRSF should prioritise initiatives aimed at improving housing conditions for Roma families, including integrated housing solutions that encourage inclusion and avoid further segregation. Investments in building mixed communities and ensuring equal access to housing opportunities are essential for achieving the long-term social integration of Roma populations.

### Use of EU funding instruments

European funding is acknowledged and welcomed in the Action Plans; however, the majority of activities that are actually implemented are financed by the Croatian government using national resources; those planned to be funded by EU funds are usually delayed.

The main reason is the NRCP's limited human capacity, which is essential for both preparing and implementing projects. This is particularly problematic given that the NRSF envisaged the NRCP playing a central role in the implementation of EU funds, including being designated as the beneficiary of many key projects. This has a notable impact on specific sectors such as healthcare and employment.

## **INTRODUCTION**

#### National Roma strategic framework

The Croatian government adopted the new National Roma Strategic Framework (NRSF), officially titled the 'National Plan for the Inclusion of Roma for the Period 2021-2027', in June 2021.¹ To date, two Action Plans have been developed under its framework: the first one for the period of 2021-2022 (AP 2021-2022),² and the second for 2023-2025 (AP 2023-2025)³; both of them were adopted following delays (in June 2021 and July 2023, respectively).

The NRSF is aligned with all policy areas defined in the 'EU Roma Strategic Framework' (EURSF), but the Action Plans do not comprehensively address every sector. While the AP 2021–2022 and AP 2023–2025 share several sectoral and horizontal objectives, the latter contains more activities and funding. Both plans combine mainstream and targeted Roma measures. The areas of health and employment rely mainly on mainstream interventions, while education includes the most targeted Roma activities. Employment uses a hybrid approach, with significant Roma funding but few Roma-specific measures. Some regular institutional actions, especially those associated with culture, are included as Roma measures, while social services remain indirectly addressed.

Other frameworks, including the 'Constitutional Act on the Rights of National Minorities' and the 'Operational Programme for National Minorities 2024-2028' (OP), also support Roma inclusion. The OP is financially stronger than both Action Plans. Some OP measures were integrated into AP 2023-2025 to avoid overlap, but are implemented under both.

The development of the NRSF and its Action Plans followed a participatory process, including public calls to academics, Roma, pro-Roma civil society, and other stakeholders. Despite being transparent and inclusive, Roma participation remained limited due to low capacity and interest within the Roma civil sector.

The Office for Human Rights and Rights of National Minorities, acting as Croatia's Roma Contact Point (NRCP), consolidates annual reports on NRSF implementation based on the submissions of other bodies involved in the implementation. The reports are approved by the NRSF Monitoring Committee (for details, see Section 1.1.3), submitted to Parliament, and adopted by the Government. Reports are public, though not easily accessible.

#### About this report

This report focuses on the implementation of the NRSF and is structured into several chapters. The first focuses on the development and progress concerning the document and its synergy with other policies and Roma participation. The second chapter provides an overview of implementation in areas where critical or significant challenges have been identified (see the 2022 RCM report on Croatia) and which the NRSF addresses: fighting antigypsyism and discrimination, education, employment and housing, essential services and environmental justice. The third chapter dives into an analysis of two crucial problems: segregation in education and housing. The fourth chapter analyses the implementation of EU funds in relation to the NRSF. The final chapter presents the recommendations of CSOs.

At the outset, it is important to clarify that the RCM initiative is not intended to involve the independent collection of quantitative data concerning the implementation of the NRSF. This responsibility lies solely with the government of the Member State, which, unlike civil society, has the necessary tools and authority to fulfil it. The aim of the RCM is to provide an independent, critical qualitative assessment of NRSF implementation, serving as a complementary perspective to official government reporting.

<sup>&</sup>lt;sup>1</sup> Available at: <a href="https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/National%20Plan%20for%20Roma%20Inclusion%202021-2027.pdf">https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/National%20Plan%20for%20Roma%20Inclusion%202021-2027.pdf</a>

<sup>&</sup>lt;sup>2</sup> Available at: https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Akcijski%20plan%20za%20provedbu%20NPUR-a%20za%202021.%20i%202022...pdf

 $<sup>^3</sup>$  Available at:  $\frac{\text{https://ljudskaprava.gov.hr/UserDocsImages/NPUR\%202021-2027/AP\%20NPUR\%202023-2025.pdf\%09}{\text{https://ljudskaprava.gov.hr/UserDocsImages/NPUR\%202021-2027/AP\%20NPUR\%202023-2025.pdf\%09}$ 

While quantitative data are useful (particularly for illustrating the scale of individual measures in Chapter 2), this report primarily relies on publicly available government figures. At the time of writing, the most recent data available were from 2023. This limitation should be kept in mind when interpreting quantitative references. However, the report's qualitative assessment, based on interviews and other data collection methods (see below), is not constrained by this and reflects the situation as of the cut-off date of January 2024.

Methods used for the development of this report include documentary analysis, institutional input, civil society perspectives, and the lived experiences of Roma to offer a balanced and comprehensive account of NRSF implementation. This gives voice to Roma actors beyond dominant institutional structures, ensuring the analysis reflects a broader spectrum of concerns and realities.

A mixed-methods approach guided the process, combining desk research, stakeholder interviews, targeted field consultations, and verification through observation and anonymous testing. Desk research focused on key policy documents, the NRSF, AP 2021–2022, and AP 2023–2025, supported by NRCP's implementation reports for 2022 and 2023 and the 2023 Ombudswoman's Annual Report. The authors' deep community engagement through ROM HR and other grassroots efforts added contextual insight and critical interpretation.

Given the political influence of the Roma Member of Parliament (MP) on the composition of the NRSF Monitoring Commission, where all Roma members are connected to the state-funded Roma umbrella organisation Kali Sara,<sup>4</sup> this report aimed to include underrepresented civil society voices. Prior RCM reports flagged the dominance of Kali Sara in formal processes; this report rebalances this by capturing broader civil society input.

Eighteen interviews (detailed in the Reference section) were conducted with institutional and civil society actors. Institutional interviews were conducted with the NRCP, the Ministry of Science, Education, and Youth (MZOM), and the Croatian Employment Service (HZZ), who shared valuable non-public insights. Some planned interviews did not materialise due to institutional disengagement—reflecting a lack of ownership of Action Plan implementation. Local government representatives from Zagreb and Međimurje also contributed.

Civil society input came from nine Roma CSOs, two national and others from Brodsko-Posavska, Osiječko-Baranjska, Međimurska, Primorsko-Goranska, and Zagreb. Interviewees included two county-level Roma National Minority Council presidents and Kali Sara representatives. A roundtable with participants from Kali Sara, MZOM, NRCP, the Ombudswoman's Office, Međimurje County, and a university expert helped validate findings and deepen understanding of educational inequalities.

Additionally, the team held targeted discussions with 34 Roma community members, including youth, women, and local activists from four regions (City of Zagreb, Međimurje County, Primorsko-Goranska County and Osiječko-baranjska County). These exchanges, balanced by age, gender, and education, provided insight into daily experiences and exposed gaps between official documentation and lived reality—particularly around discrimination and school segregation.

Additional information came from participation in four relevant public events: two NRCP-led meetings on NRSF implementation, the Ombudswoman's anti-discrimination event, and a conference by the Centre for Peace Studies (details provided in the Reference section). These gatherings offered further input from institutional actors and CSOs.

Field visits to schools in Međimurje and Zagreb included meetings with teachers, students, and faculty at the Teacher Education Faculty in Čakovec. These confirmed persistent segregation, despite national desegregation commitments. Two anonymous interviews with professionals in child protection institutions added sensitive but essential input.

Verification measures included two anonymous tests: one on Roma quotas at a private Edward Bernays University and another on the allocation of housing materials under the "Improving Living Conditions" Activity led by the Central State Office for Reconstruction and Housing (see Section 2.4.1). An online consultation regarding the segregation of Roma pupils in the educational system and potential international litigation in this

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<sup>&</sup>lt;sup>4</sup> As argued in this and the previous RCM report, Kali Sara can be considered a government-organised non-governmental organisation (GONGO), as it receives substantial public funding (EUR 2 million annually) without competitive procedures and operates under the influence of the Roma MP. At the same time, all Roma members of the NRSF Monitoring Committee, whose role it is to independently oversee the government's fulfilment of its NRSF commitments, are affiliated with Kali Sara.

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matter, conducted in collaboration with the European Roma Rights Centre (ERRC), provided regional and policy context to the findings on desegregation.

Interview requests to the Roma MP and the Ministry of Physical Planning, Construction, and State Assets were unsuccessful. Although the Ministry of the Interior initially agreed to participate, the scheduling failed. However, the Ministry's presentation at a separate event was included in the analysis. The Roma National Minority Councils of Zagreb and Međimurje declined formal interviews, but input was obtained from individual members, including Zagreb's Council president.

Report preparation was shared among Siniša-Senad Musić, coordinator of the RCM report, Marina Horvat, an independent expert, and Elizabet Takač from the coalition member partner, Roma Resource Center. Ms Takač led interviews in Osiječko-Baranjska County; Mr Musić and Ms Horvat handled the remainder. Mr Musić conducted data analysis and testing, while Ms Horvat focused on community engagement and school consultations. The final draft was reviewed by external experts Aleksa Đokić (NRCP) and Josipa Lulić, whose feedback improved the report's clarity and rigour.

The report's coordinator, Mr Siniša-Senad Musić, also contributed to the development of the NRSF and AP 2021–2022 as a member of the drafting working group.

## 1. IMPLEMENTATION OF THE NRSF

## 1.1. Key developments and effectiveness of implementation

The implementation of the NRSF shows a mixed record of progress and persistent shortcomings. While the adoption of AP 2023-2025 signals continuity and expanded activities compared to AP 2021-2022, critical gaps remain in areas such as housing, healthcare, and social services. Some issues, like housing segregation, are acknowledged in the NRSF but omitted from the Action Plans, while others suffer from a disconnect between objectives and activities. For instance, although AP 2023-2025 includes a measure on educational desegregation, no related activities have been implemented. Structural issues persist, including the lack of targeted approaches in key sectors like employment and health, and the misalignment between measures and planned actions. Despite increased funding, concerns over under-implementation and weak operational planning remain. The Monitoring Committee's dual role—implementation oversight and fund management—further complicates the strategic focus.

Systemic challenges also hinder effectiveness. Gaps in disaggregated data limit the evaluation, despite the availability of baseline data and tracking tools. Improvements are noted in cultural participation and some educational outcomes, though concerns remain about segregation and quality. Rising anti-Roma discrimination<sup>5</sup> highlights the need for stronger measures. While institutional monitoring frameworks are in place, translating plans into tangible improvements requires better coordination, accountability, and focus on delivery and impact.

#### 1.1.1. Changes in the NRSF

The NRSF consists of a long-term strategic document—the 'National Plan for the Inclusion of Roma 2021-2027', which provides a detailed overview across both horizontal and vertical policy sectors, and short-term implementation instruments in the form of Action Plans. The strategic document is to remain unchanged until 2027, while the Action Plans operationalise it over shorter periods. Importantly, the Action Plans are to be formally adopted by the national Parliament. The NRSF is aligned with all policy areas of the EU Roma Strategic Framework, but the scope and quality of implementation depend largely on the content and delivery of the action plans.

Both the NRSF and its APs are coordinated by the NRCP, which also initiates the Working Group formation process. In October 2022, the NRCP launched a public call for CSOs and academics for nominations to the Working Group drafting AP 2023-2025.<sup>6</sup> Due to the weak response, a second call followed.<sup>7</sup> However, for Roma CSO representatives, as many as 20 seats were allocated, but only two Roma representatives applied, both from Kali Sara,<sup>8</sup> indicating a further decline in participation since the previous cycle, when four applications were submitted (two from Kali Sara, two from ROM HR). This recurring issue is largely attributed to the lack of capacity within Roma civil society to effectively engage in such processes.<sup>9</sup>

This decline is not due to exclusion by the NRCP, but rather reflects enduring structural weaknesses within Roma civil society. Roma with a higher level of education rarely engage in civil society activities or choose not to apply. Those active in the sector often lack formal qualifications or the confidence to contribute meaningfully. As a result, consultation remains largely symbolic, with limited Roma representation in practice.

During the AP 2023-2025 drafting process, one Roma woman (Lea Oršoš) from Kali Sara attended all three Working Group meetings; the second Roma member (Stanko Borić) participated only once. No substitute members were nominated. The Working Group included representatives from ten ministries, two central state

 $<sup>^{5}</sup>$  Assessment based on interviews, a roundtable discussion organised by CMS, and reports from the Ombudsperson.

<sup>&</sup>lt;sup>6</sup> Public call available at: <a href="https://ljudskaprava.gov.hr/javni-poziv-rok-prijave-19-listopada-2022-godine/1098">https://ljudskaprava.gov.hr/javni-poziv-rok-prijave-19-listopada-2022-godine/1098</a>

 $<sup>^{7} \ \</sup>text{Public call available at:} \ \underline{\text{https://ljudskaprava.gov.hr/drugi-javni-poziv-rok-prijave-do-8-studenog-2022-qodine/1110}$ 

<sup>&</sup>lt;sup>8</sup> ROM HR did not apply, as no representative from ROM HR was included in the Committee for Monitoring the Implementation of NRSF. The decision not to apply was intended as a form of protest. Later, ROM HR requested to join and contribute its expertise, but the NRCP rejected the request.

<sup>&</sup>lt;sup>9</sup> Detailed information can be found in the RCM report 2022, available at: <a href="https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf">https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf</a>

offices, four Ombudsperson's offices, the Council for National Minorities, the Government Office for NGOs, two civil society organisations (Médecins du Monde and Centre for Peace Studies), and the NRCP (as Chair, Deputy Chair, Secretary, and Deputy Secretary). The NRCP Director, a member of the Roma minority, chaired the process. <sup>10</sup>

The drafting process moved faster than in previous cycles, as AP 2023-2025 built on the previous plan. Many activities were carried over with minimal change. However, decisions on which activities to include ultimately rest with the implementing institutions. Ministries are not bound by Working Group proposals; thus, the inclusion of certain issues often depends more on institutional advocacy or political will than on consensus within the Working Group. For instance, the Ministry of Science and Education consistently introduces new measures in each AP cycle, while other sectors contribute little or nothing.

As outlined already, the second AP 2023-2025 expanded the number of activities and budget but failed to adequately address key groups (women, youth, and LGBTQ+ Roma) and sectors (such as the omission of measures on residential segregation).

None of the Action Plans has included dedicated areas such as social services, child protection, or social welfare. Data collection in these areas is also insufficient, as institutions in these sectors do not gather disaggregated data specific to Roma communities. Despite this, some activities related to these areas are embedded within horizontal goals, which have a significant impact on these sectors. Overlap between activities is a recurrent issue, with some initiatives impacting multiple goals simultaneously. Horizontal goals frequently intersect with housing and social services, while overlaps are also evident in adult education and lifelong learning, which span both education and employment objectives. Employment, as a hybrid area, includes a budget allocated to Roma; however, the measures are not specifically tailored to Roma but are instead general active labour market measures applicable to all citizens of Croatia.

#### 1.1.2. Progress in implementation

The AP 2023–2025 was developed using the same framework as its predecessor. One of its objectives was to involve a broader range of stakeholders in the implementation process. Some newly designated stakeholders, as defined in the Action Plan, were reluctant to take ownership of their responsibilities. In some cases, such as with the Ministry of Health, they did not develop specific measures but delegated the task to the NRCP. On the other hand, certain stakeholders, such as the Ministry of the Interior, simply included their regular activities as part of the Action Plan.

Certain measures from the AP 2021-2022 have been carried over to the AP 2023–2025 plan despite the absence of associated activities in both periods. This raises concerns about their inclusion, as measures without corresponding activities or concrete implementation strategies lack utility. The persistence of measures that merely describe intended outcomes without any actionable steps undermines the strategic intent of the action plan and calls into question the efficacy of the planning process.

Overall, the NRSF implementation has diverged significantly from the plans and commitments. While the Action Plans outline numerous activities, many have not been executed as intended. In key areas such as combating antigypsyism, desegregation, and Roma employment, delays and non-implementation are frequent. For instance, in 2023, no activities were implemented to fight discrimination despite a rise in hate crimes and segregation. In education, although new activities were introduced, core measures such as reducing segregation and ensuring access to preschool remained dormant—transport subsidies went unused, and key analyses were not conducted. In employment, over 90% of funds were spent on public works not foreseen in the Action Plan, while targeted activities for Roma youth and women were absent. In housing, the implemented measures addressed symptoms rather than structural segregation and lacked transparency. Delays are often linked to insufficient funding, lack of institutional follow-through, and a failure to operationalise affirmative measures.

#### 1.1.3. Effectiveness of monitoring

The Committee for Monitoring the Implementation of the NRSF plays a central role in overseeing the strategy's execution. The Committee operates through working groups, whose meetings are convened frequently. Since

<sup>&</sup>lt;sup>10</sup> Decision on working group members available at: https://ljudskaprava.gov.hr/UserDocsImages//NPUR%202021-2027//IMG 0001.pdf

the adoption of the NRSF, 24 committee sessions have been held, up to the time of drafting this report. However, the focus of these meetings extends beyond monitoring implementation, as they are often driven by pressure from Roma stakeholders. This is partly due to the Committee's dual responsibility: not only does it oversee the implementation of the NRSF, but it also decides on the allocation of financial resources from its designated budget. Furthermore, the criteria for distributing these funds are determined by the Committee members themselves.

As highlighted in the 2022 RCM report on Croatia, <sup>13</sup> the selection of Roma minority representatives in the Committee has historically been influenced by political alignment, specifically by their support for the serving parliamentary representative of the Roma national minority. Between the two reporting periods, some Roma members of the Committee have since become political opponents of the current parliamentary representative. <sup>14</sup> This led to visible disputes within the Committee, though these disputes are more often tied to decisions about fund allocation rather than the monitoring of the NRSF's implementation.

While, in principle, the existence of the Committee is valuable, its primary purpose—ensuring the effective implementation of the NRSF—has been overshadowed by its role in financial management. The emphasis on allocating funds, often to the detriment of strategic oversight and monitoring, undermines the Committee's core mandate and limits its capacity to drive meaningful progress in Roma inclusion efforts.

Members of the Commission who were interviewed who represent service providers advocate for the separation of these two roles, with representatives of the Croatian Employment Office (HZZ) particularly emphasising the need for such a disentanglement.

#### 1.1.4. Data collection

Data collection on Roma in Croatia is notably detailed, with the most significant initiative being the baseline data collection<sup>15</sup> project that serves as a reference point for many outcome indicators in the current NRSF. Various institutions, including the MZOM, the HZZ and the social welfare system, provide Roma-specific data. Additionally, the Ministry of the Interior (MUP) facilitates the reporting process by supplying relevant information. Targeted Roma measures are tracked with precision, documenting who has utilised the measures, when they were implemented, and the financial expenditures involved.

For areas where data collection is currently lacking, the NRCP plans to conduct another baseline study upon the conclusion of the NRSF.<sup>16</sup> This research will not only serve as the final evaluation of the measures' effectiveness but will also act as a foundational dataset for the development of a new Roma strategy. However, a recurring challenge is the absence of data that precisely assesses the effectiveness of individual activities. Most metrics focus on nominal figures rather than measuring efficiency. For instance, while the HZZ does not implement targeted Roma employment measures, the number of employed Roma has increased. This rise is primarily attributed to the emigration of the general Croatian population, which has created labour shortages, rather

<sup>&</sup>lt;sup>11</sup> The reports from these sessions, available at the provided link, primarily focus on the allocation of funds, with significantly less attention given to reporting on the implementation of the NRSF. Reports on the number of sessions and minutes from the committee meetings are available at: <a href="https://pravamanjina.gov.hr/nacionalne-manjine/ostvarivanje-prava-romske-nacionalne-manjine/povjerenstvo-za-pracenje-provedbe-nacionalnog-plana-za-ukljucivanje-roma-za-razdoblje-od-2021-do-2027-godine/1031</a>

 $<sup>^{12}</sup>$  The criteria for applying for funding from the Committee for Monitoring the Implementation of the NRSF are available at:  $\frac{\text{https://pravamanjina.qov.hr/UserDocsImages//dokumenti//Kriteriji%20za%20utvr%C4%91ivanje%20financijske%20pomo %C4%87i%20od%2030.10.2023.pdf}$ 

<sup>&</sup>lt;sup>13</sup> Roma Civil Monitor. (2022). *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Croatia*. Publication Office of the European Union, available at: <a href="https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf">https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf</a>

<sup>&</sup>lt;sup>14</sup> The discussions and accusations were public, taking place on social media and television. The ultimate outcome was that one of the most prominent allies of the Member of Parliament from Međimurje County became his opponent in the Croatian parliamentary elections.

<sup>&</sup>lt;sup>15</sup> Kunac, S., Klasnić, K. & Lalić, S. (2012). *Inclusion of Roma in Croatian Society: A Baseline Data Study*, available at: https://www.cms.hr/wp-content/uploads/Uklju\_ivanje\_Roma\_u\_hrvatsko\_dru\_tvo\_istra\_ivanje\_baznih\_podataka.pdf

<sup>&</sup>lt;sup>16</sup> Information provided by RCT representatives, also reflected in their plans.

than the success of specific activities aimed at Roma employment.<sup>17</sup> Consequently, while the results may appear favourable, it remains challenging to confidently evaluate the effectiveness of these activities.

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

The NRSF is fully aligned with European policies, including the EURSF, and complements national policies in several areas. While the NRSF outlines specific policies implemented independently of the national framework, it also incorporates a range of targeted measures executed by state institutions and ministries. These measures, often described as affirmative actions or positive discrimination, focus exclusively on the Roma minority.

However, mainstream policies and their respective reforms, which may positively or negatively impact Roma communities, often fail to capture the attention of Roma civil society and Roma minority councils. Many such policies, such as those related to guaranteed minimum benefits, are only addressed after significant political intervention, often spearheaded by the Roma Member of Parliament. For instance, current legislative changes assigning new stakeholders to define school enrolment zones have attracted limited engagement from Roma organisations, with only ROM HR and Kali Sara actively addressing the issue, while broader discussions within the Roma community remain absent. These critical issues are typically addressed by non-Roma institutions, such as the Office of the Ombudsperson, rather than being prioritised within Roma advocacy frameworks.

The issue of segregation, previously highlighted in reports, continues to be a significant concern. While European policies advocate for housing desegregation, Croatia has shown little to no commitment to desegregation efforts. Instead, efforts are predominantly focused on improving living conditions and infrastructure within existing Roma settlements, including the provision of social and public services. While these measures are welcome as interim solutions, they appear to perpetuate rather than resolve segregation. Investments in Roma settlements, often mandated by funding mechanisms cited in action plans, further entrench this approach. Alarmingly, these measures are supported by Roma political leaders and are widely accepted within Roma communities, despite the lack of long-term strategies to promote desegregation.

#### 1.2.1. Complementary policies

Between 2022 and 2024, the proposed legislative changes concerning school enrolment zones, which designate the areas served by specific elementary schools, have the potential to exacerbate discrimination and intensify segregation in education.<sup>19</sup> However, an interview with a representative of Međimurje County highlighted the possibility of leveraging this legislation to counteract segregation, depending on its implementation.

A positive development during the prior period is that the enactment of the mandatory preschool education law has facilitated greater access to early education programmes for Roma children, a measure strongly advocated for by numerous Roma organisations.

Furthermore, several policies rooted in the Constitutional Act on the Rights of National Minorities implemented by Croatia directly impact the Roma minority.<sup>20</sup> The Council for National Minorities has increased funding for Roma civil society organisations through its calls for proposals. Roma political participation is ensured at all levels, from national to municipal, and prior to the current NRSF, the 'C model' curriculum'<sup>21</sup> for Roma was introduced as part of a comprehensive curricular reform. Amendments to the law on quaranteed minimum

<sup>&</sup>lt;sup>17</sup> More detailed information is available in: Roma Civil Monitor. (2022). *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Croatia*. Publication Office of the European Union, available at: <a href="https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf">https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf</a>

<sup>18</sup> Ibid

<sup>&</sup>lt;sup>19</sup> This information was obtained through an interview with representatives of KALI SARA and information is also available in the 2023 report of the Ombudsman, which is available at the link: https://www.ombudsman.hr/hr/download/izvjesce\_pucke\_pravobraniteljice\_za\_2023\_godinu/

<sup>&</sup>lt;sup>20</sup> The Constitutional Act on the Rights of National Minorities is available at: <a href="https://www.zakon.hr/z/295/Ustavni-zakon-o-pravima-nacionalnih-manjina%23qooqle\_vignette">https://www.zakon.hr/z/295/Ustavni-zakon-o-pravima-nacionalnih-manjina%23qooqle\_vignette</a>

<sup>&</sup>lt;sup>21</sup> There are various curricula in Croatia for minorities. The 'C Curriculum' refers to the provision of additional school classes such as the Roma language and Roma history. These classes are provided to students from the zero grade until the end of secondary education. The 'Model C' Curriculum is available at: <a href="https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=8420">https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=8420</a>

benefits were successfully enacted after years of implementation that had disproportionately negative effects on Roma communities.

Additionally, the 'Operational Programmes for National Minorities for the period 2024-2028' (Minorities OP) include substantial investments into the Roma community. The document is a negotiated policy framework between the government and representatives of national minorities (often via the Council for National Minorities), outlining concrete measures and funding commitments across various sectors, including education, culture, employment, and media, to support minority rights and inclusion. These are not part of the NRSF but function alongside it, with a binding character for state institutions. For Roma, the Minorities OP often includes specific cultural, educational or infrastructural actions agreed with Roma political representatives. According to the NRCP, its financial allocation is even more robust than that of the NRSF action plan, although certain activities are covered under both frameworks.

#### 1.2.2. Alignment with EU actions

The alignment of the NRSF has been thoroughly described in the previous 2022 RCM report on Croatia.<sup>23</sup> The NRSF is fully in line with all European actions, policies, and the EURSF. It aligns with all horizontal and sectoral objectives and addresses nearly all challenges.

However, the Action Plans do not cover all areas, as some measures are more focused on certain objectives within specific areas than others, and the Action Plans lack activities for some specific measures. Looking at the activities contained within the action plans, they do not fully correspond to the comprehensive situation presented in the foundational document, i.e., the NRSF.

#### 1.2.3. Impact of assessments

The previous RCM report<sup>24</sup> offered a set of targeted recommendations to improve the implementation of the NRSF. However, the majority of these have either not been addressed or remain absent from current planning. The lack of follow-up signals both a political and institutional reluctance to act on external assessments.

One of the central recommendations—resolving the tension between mainstream and targeted approaches—has not been tackled. No public debate has occurred, and implementing bodies remain under no obligation to introduce even a single Roma-targeted activity. In sectors such as employment and health, mainstream-only activities persist, with Roma-specific components largely absent.

The problem of residential segregation, repeatedly recognised as a core obstacle, also remains unaddressed. The NRSF acknowledges its existence, but neither of the adopted Action Plans includes concrete measures to overcome it. Similarly, the situation of Roma children in the social protection system—particularly those placed in foster care with non-Roma families or adopted by non-Roma parents—is still not reflected in the NRSF or its action plans.

Recommendations aimed at enhancing dialogue between Roma civil society and the NRCP have also not been realised. Systematic meetings under the National Roma Platform have ceased, and the platform itself has not been translated or activated as a consistent tool for engagement. In this context, the recommendation should be reformulated to focus on revitalising structured tools for civil dialogue and information-sharing.

A related concern raised in the previous report, the restrictive definition of the Roma target group, remains unresolved. The NRSF applies only to members of the Roma national minority with Croatian citizenship, excluding individuals with related identities such as Ashkali, Egyptian, or Bojas, as well as stateless persons. European institutions have yet to take a clear stance on whether such restrictive targeting complies with the intended scope of EU Roma policy frameworks.

 $<sup>^{\</sup>rm 22}$  Decision on the adoption of the Operational Programmes for National Minorities for the period 2024–2028, available at:

 $<sup>\</sup>frac{https://pravamanjina.gov.hr/UserDocsImages/dokumenti/Operativni%20programi%20nacionalnih%20manjina%20za%20razdoblje%202024.-%202028.pdf$ 

<sup>&</sup>lt;sup>23</sup> Roma Civil Monitor (2022). *Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Croatia*. Publication Office of the European Union, available at: https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf

<sup>&</sup>lt;sup>24</sup> Ibid.

Nonetheless, progress has occurred on several fronts. The new AP 2023-2025 features a broader range of Roma-targeted activities across multiple sectors. While some areas, such as housing and healthcare, still lack specific actions, targeted measures are now integrated into several horizontal objectives.

Education is another area where implementation has advanced. The AP 2023-2025 includes two activities aimed at addressing school segregation—an issue previously omitted. Although results are pending, there is growing pressure on the Ministry of Science and Education (MZOM) to evaluate the quality of education in segregated Roma classrooms, including through comparative research with mainstream education settings.

Social protection has also seen some structural improvements. While the recommendation to redistribute social workers based on caseloads rather than geography remains unfulfilled, EU-funded projects are supporting the creation of community centres and mobile teams in Roma settlements to improve access to social services and reduce administrative barriers.

The mobile teams have been established in seven municipalities in Međimurje County as part of a pilot project implemented by UNICEF under the framework of the 'EU Child Guarantee' in Croatia. This includes interventions in three key areas: integrated child protection and family support services, early intervention services, and access to quality early childhood education and care. The purpose of the mobile teams is to visit Roma households to assess the environment in which children are growing up, identify risk factors for child development, understand the root causes of challenges, and support families in accessing healthcare and children's social rights.<sup>25</sup>

As part of the same project, four Centres for Children and Families were constructed in Roma settlements in Podturen, Škarje, Orehovica, and Nedelišće, while the existing centre in the Roma settlement of Pribislavec was refurbished. The construction was coordinated by UNICEF, in cooperation with 11 partner organisations and with the support of local authorities.<sup>26</sup>

Concerning institutional planning, ministries have increased their inclusion of Roma-targeted activities, although these remain uneven across sectors. The overall direction, however, shows a positive trend in aligning sectoral responsibilities with NRSF goals.

At the international level, the Council of Europe has explicitly stated that residential segregation should not be used to justify educational segregation. While it remains unclear how much pressure European institutions are placing on Croatia, such statements are significant and should be used to reinforce advocacy efforts.

Progress has also been limited at the local level. ROM HR has developed several local and regional action plans, including for Zagreb, Rijeka, Delnice, and Primorje-Gorski Kotar County. However, none have been officially adopted, largely due to local governments' reluctance to allocate funding.

Lastly, a recommendation to clarify the legal and operational status of Kali Sara has prompted some response. For the first time, its representative stated that the organisation is a regular civil association—not a governing body—and that its funding stems from a strategic partnership with the Croatian Government. Although no structural change has occurred, this marks a shift in discourse and opens space for future dialogue on the role and status of minority organisations in Croatia.

### 1.3. Roma participation in implementation

Roma participation in the implementation of the NRSF is evident through various mechanisms, albeit with significant limitations. The Committee for Monitoring the Implementation of the NRSF plays a central role, with Roma representatives actively involved in determining funding allocation criteria and selecting projects aligned with Roma needs. However, the committee's dual focus on fund distribution and strategic monitoring, combined with capacity constraints among Roma representatives, hampers its overall effectiveness. Furthermore, while working groups tasked with drafting action plans include guaranteed seats for Roma representatives, their engagement remains low due to limited interest within the Roma community, as highlighted in prior alternative reports.

<sup>&</sup>lt;sup>25</sup> For more information, see: <a href="https://maqazin.hrt.hr/price-iz-hrvatske/mobilni-strucni-timovi-pomazu-romskoj-djeci-u-medimurju-8737837">https://maqazin.hrt.hr/price-iz-hrvatske/mobilni-strucni-timovi-pomazu-romskoj-djeci-u-medimurju-8737837</a>

<sup>&</sup>lt;sup>26</sup> See: <a href="https://zupan.hr/vijesti/medimurska-zupanija-zavrsena-i-treca-faza-eu-pilot-projekta-usmjerena-na-osiguravanje-jednakih-uvjeta-za-svako-dijete/">https://zupan.hr/vijesti/medimurska-zupanija-zavrsena-i-treca-faza-eu-pilot-projekta-usmjerena-na-osiguravanje-jednakih-uvjeta-za-svako-dijete/</a>

Additionally, key Roma stakeholders, such as Kali Sara, benefit from state-guaranteed budgets through the Minorities OP and actively contribute to cultural initiatives, anti-discrimination efforts, and the improvement of living conditions. Roma representation extends to institutional roles, including the leadership of the NRCP and positions within advisory bodies such as the Council for National Minorities. Despite these contributions, Roma participation in public institutions and ministries responsible for implementing action plan activities remains minimal. The forthcoming evaluation of NRSF effectiveness, contingent on a participatory baseline study on Roma, offers a critical opportunity to enhance engagement and measure progress.

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

Roma are involved in the implementation of the NRSF. First and foremost, Kali Sara receives guaranteed funding from the national government (approximately 2 million EUR), and based on their own plan and programme, they determine the areas of implementation in which they will be involved. Their activities are clearly visible in areas such as cultural development, combating discrimination against Roma, advocacy and improving living conditions.

Additionally, the Council for National Minorities plays a significant role in the action plans, with a budget allocated specifically to Roma associations. These organisations are provided with financial resources to carry out various activities, which primarily focus on culture. It is also important to note that the Roma Member of Parliament, by virtue of his position, is a member of the Council for National Minorities, and in addition, other Roma individuals can apply for membership in the Council through a public call.

The Committee for Monitoring the Implementation of the NRSF has a budget allocated to both individuals and legal entities based on specific criteria. Several Roma organisations have applied and successfully implemented projects in line with the needs of the Roma community.<sup>27</sup> Roma individuals are also members of this committee and have a significant, if not decisive, influence on the creation of criteria and the selection of projects to be funded

The action plan is inclusive in the sense that it involves Roma organisations as partners in the implementation of certain activities. Both the AP 2021-2022 and AP 2023-2025 highlighted ROM HR and Kali Sara as partners, as other organisations lacked the capacity even to participate in the development of the action plan.

Concerning capacities, there are very few Roma with the necessary skills for project writing and implementation, including administrative and financial reporting. Additionally, Roma with higher education are not employed in civil society organisations. Even in Kali Sara, all projects are led by non-Roma or individuals who have declared themselves to be Roma but are not of Roma origin.

A larger number of Roma associations are implementing projects funded through national or local funds, such as public work measures or cultural projects financed by the Council for National Minorities. However, only about ten associations participate even in these smaller and simpler projects, and often, non-Roma are involved in their implementation.

Apart from Kali Sara, there are no Roma organisations acting as lead beneficiaries of EU projects. Even when they participate as partners, they are mostly in a situation where they have a Roma representative, but a non-Roma employee manages and leads the project.

## 1.3.2. Roma in public institutions implementing the NRSF

Despite the fact that the Director of the NRCP is Roma, and the Member of Parliament from the Roma national minority has positions in institutions (such as the Council for National Minorities and the Committee for Monitoring the Implementation of the National Strategy for the Inclusion of Roma) that oversee and implement activities aimed at the Roma community, Roma are not adequately represented in public institutions and ministries, or in the implementing bodies responsible for the activities outlined in the action plans.

However, considering the Committee for Monitoring the Implementation of the NRSF as a public body that allocates funds and sets criteria for applicants, their involvement in this area can be assumed.

<sup>&</sup>lt;sup>27</sup> Information regarding the approval of financial funds by the NRSF monitoring committee is publicly available on the NRCP website. For more details, please follow the link: <a href="https://pravamanjina.gov.hr/nacionalne-manjine/ostvarivanje-prava-romske-nacionalne-manjine/povjerenstvo-za-pracenje-provedbe-nacionalnog-plana-za-ukljucivanje-roma-za-razdoblje-od-2021-do-2027-qodine/1031</a>

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

The involvement of Roma in the NRSF monitoring is described in detail in Section 1.1.3 (Effectiveness of monitoring), above.

The evaluation of the NRSF will be conducted following a baseline study on Roma, which is essential for measuring the effectiveness of measures and activities prescribed in the action plans. The initial baseline study achieved high participation from the Roma community in various forms. If the next study follows a similar participatory approach, it will be considered a highly positive development. Additionally, discussions are ongoing among members of the working groups responsible for drafting action plans, where guaranteed seats are allocated for members of the Roma national minority. However, as outlined in the previous alternative report, there remains a low level of interest from the Roma community in participating in such processes.

#### 1.3.4. Contribution of the National Roma Platform to the NRSF implementation

The National Roma Platform (NRP) was last implemented by NRCP through the 'Living Equality' project in 2016 and 2017, funded by the European Commission (Grant Agreement JUST/2015/RDIS/AG/NRp2/8813). The main objectives of the project were to enhance the involvement of all relevant stakeholders in the implementation of the previous National Roma Inclusion Strategy (NRIS), to strengthen local and regional stakeholder accountability, including Roma participation and ownership, and to raise awareness about gaps and challenges in the NRIS implementation. Special focus was placed on empowering Roma youth and women and fostering cooperation between Roma and non-Roma youth and women. Additionally, a national stakeholder network was established to facilitate collaboration in NRIS monitoring.

The activities included national and regional discussions on achievements and future challenges in NRIS implementation, as well as identifying local gaps in key areas such as education, employment, health, and housing. Two two-day focus group discussions were held with Roma youth and women to address these issues. Also, two-day-long meetings for youth and women explored the relationships between Roma and non-Roma groups, aiming to identify practical, mutual activities for implementation. Additionally, two focus groups were held with Roma women in Sisak (21 September 2016) and Kuršanec (5 December 2016), with a total of 19 participants, to assess the needs of Roma women and children.

To facilitate knowledge exchange, representatives from Slovenia were invited to present their NRIS implementation achievements and challenges, while local integrated initiative representatives from Pecs (HU) participated in discussions in Beli Manastir. The DG JUST representative attended the kick-off conference, and the FRA representative attended both the kick-off and final conferences. The Council of Europe Youth Department representative, Mr. Denis Durmis, also participated in the Roma Youth and Women meeting, emphasising the importance of mainstreaming Roma youth in both NRIS and broader youth policies.

The NRCP did not implement the NRP subsequently due to capacity limitations, including the availability of human resources, as well as the demands of designing and managing larger strategic projects funded by IPA 2012 and ESF from 2017 onward. The relatively poor capacity of Roma organisations and the challenges of transitioning from political to geographical issues further complicated event organisation.

While NRCP appreciates the favourable conditions offered by DG JUST, such as 100% funding, the ambitious plans for ESF+ co-funded projects have made it unlikely that NRCP will have the capacity to apply for the NRP grants in the future.

NRCP is very pleased with the results achieved during the NRP implementation, particularly in raising awareness about gaps and challenges in NRIS implementation. The achievements, along with a follow-up project with UNICEF, significantly contributed to the development of the NRIS implementation Action Plan for 2018-2019 and laid the foundation for the NRSF. The activities aimed at empowering Roma youth and women were highly appreciated by the target groups, as it was the first time these groups had been involved in addressing their own perceptions of NRIS implementation. Although individual youth and women activists were included in NRIS processes, they had never been brought together as a group of Roma and non-Roma women or youth with shared interests. The involvement of the Council of Europe Youth Department and its Roma Youth Action Plan also provided these groups with a broader European perspective.

## 2. REVIEW BY THEMATIC AREA

## 2.1. Fighting antigypsyism and discrimination

Despite formal recognition of structural discrimination against Roma in the NRSF, antigypsyism remains deeply entrenched in Croatia. The Ombudswoman's 2023 report confirmed that Roma remain the group most discriminated against, with employment and access to social welfare being the most frequently cited areas. An increase in hate crimes and persistent educational and residential segregation further highlight the scale of the challenge. Local-level cases of systemic housing discrimination, combined with negative public attitudes illustrate the normalisation of exclusion.

The AP 2021-2022 introduced five activities in this area: four under the measure to reduce discrimination and hate crimes, and one under the measure to strengthen social cohesion. The limited scope of these activities, already criticised in the previous RCM report, led to their significant expansion in the AP 2023-2025, which now includes ten activities.

However, this increase reflects institutional acknowledgement of previous shortcomings rather than meaningful progress. Although the 2023-2025 cycle introduced new initiatives, the government had reported no activities as implemented at the time of writing this report. Key actions from the earlier plan were also not carried out, as EU funding was not secured. As a result, there has been no tangible improvement. In some areas, especially school segregation, the situation has further deteriorated.<sup>31</sup>

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

Under the measure intended to reduce the number of Roma experiencing discrimination and hate crimes, the activity "Strengthening and promoting community safety" was formally overachieved in quantitative terms. However, most of the five underlying projects followed a mainstream approach, with gender equality or violence prevention as their primary objectives. A Roma-specific focus was present only in interventions led by the Police Directorate, which focused on cooperation with Roma associations in the Međimurje County.

Additionally, the Ministry of the Interior has started collecting detailed data on criminal and misdemeanour offences involving Roma, categorised into three groups: offences committed by Roma against non-Roma, offences committed by Roma against Roma, and offenses committed by non-Roma against Roma.

Despite these efforts, there has been no evidence of any improvement in the frequency of reported offences against Roma.<sup>32</sup>

An activity on "Enhancing the implementation of international frameworks", overseen by the Office for Human Rights and Rights of National Minorities, was the only one continued into the new AP2023-2025. However, the framework for the monitoring and assessment of the effectiveness of this measure is problematic, as the related performance indicator concerns NRCP's participation in national and international meetings – which does not provide information about the effect on achieving the protection of Roma rights.

Similarly, the activity on "Coordinating national reports under international frameworks" produced three submissions in 2022, despite none having been initially planned. These included Croatia's Fourth Periodic Report under the International Covenant on Civil and Political Rights. However, these activities consist of the regular work of the public administration and do not constitute any added value to the NRSF.

https://www.ombudsman.hr/hr/download/izvjesce\_pucke\_pravobraniteljice\_za\_2023\_godinu/?wpdmdl=18399&refresh=67\_68af9395fc11734913939

<sup>&</sup>lt;sup>28</sup> Report available at:

<sup>&</sup>lt;sup>29</sup> Source: data from the Ombudswoman's Office and the MZOM.

<sup>&</sup>lt;sup>30</sup> Media article about this case, available at: <a href="https://dnevnik.hr/vijesti/hrvatska/mjestani-hlebina-natjerali-romsku-obitelj-da-se-iseli-ovo-ce-eskalirati-do-neslucenih-razmjera---799750.html">https://dnevnik.hr/vijesti/hrvatska/mjestani-hlebina-natjerali-romsku-obitelj-da-se-iseli-ovo-ce-eskalirati-do-neslucenih-razmjera---799750.html</a>

 $<sup>^{31}</sup>$  Additional data received from the MZOM shows that the number of Roma attending segregated education is higher than in the previous period.

<sup>&</sup>lt;sup>32</sup> Data from the Ministry of the Interior.

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

The Activity "Supporting and promoting Roma cultural heritage", one of the few with direct impact potential, was not implemented. The NRCP cited the weakened absorption capacity of Roma associations following the COVID-19 crisis. The activity was subsequently dropped from the AP 2023-2025, missing an opportunity to support Roma identity and visibility.

Under the second measure aimed at promoting social cohesion, the sole activity implemented was "JUPI I", focused on integration. While eight consultative meetings were held by the NRCP, no clear implementation roadmap or applicant guidance was produced. The activity was not retained in the new AP 2023-2025, further confirming that earlier concerns about over-generalisation and a lack of targeting were valid. Activities under this pillar largely mirrored routine institutional work and did not trigger structural change.

The authors of this report and several interviewees claim that one of the main shortcomings of the NRSF's effectiveness in combating discrimination is that it focuses on national-level activities, rather than the local level where most discrimination occurs.

Importantly, the NRSF implementation has not contributed to tackling the most serious manifestations of antigypsyism and discrimination against Roma. Data from the Ombudswoman's Office and the MZOM reveal a trend towards the intensification of segregation in education and housing.<sup>33</sup> CSOs and activists interviewed for this report identified multiple cases when Roma were denied access to services (typically hospitality establishments) because of their ethnicity; such cases were recorded in the Međimurska, Primorsko-goranska, and Osiječko-Baranjskaa Counties and the City of Zagreb.

The most spectacular antigypsist incidents took place in August 2023, when an unknown perpetrator demolished the homes of seven Roma families with 17 children in Drnje Municipality using excavators.<sup>34</sup> The investigation began only after a criminal complaint was filed by the local Roma association president, but the perpetrator remains unidentified. Moreover, the local government refused to take over dwellings offered by the central government, which would have provided the victims with substitute accommodation.

On the national level, legislative reforms, more robust anti-Roma discrimination campaigns, the systematic provision of legal support to Roma victims of discrimination, and direct work with employers on combating discrimination would be meaningful. However, these types of activities are missing in the NRSF and related action plans.

#### 2.1.2. Addressing the problems beyond the NRSF

Several relevant activities continue outside the scope of the NRSF, driven by Croatia's broader legal obligations. The Ombudswoman's annual reports remain the most consistent national mechanism for monitoring the situation of Roma. These reports regularly analyse patterns of discrimination, track segregation in education,<sup>35</sup> and assess outcomes. Their inclusion of Roma as a distinct thematic area enhances visibility and provides a critical evidence base.

Parallel initiatives by non-Roma civil society organisations, such as the Institute for Peace and Conflict (IPC), the Centre for Peace Studies (CMS), the Human Rights House Zagreb, Status M, Restart, POKAZ, the Open Art Workshop, and many others, have also gained traction.<sup>36</sup> Many projects explicitly address anti-Roma attitudes, collect data on societal perceptions, provide free legal assistance to Roma victims of discrimination, and promote inclusion. While fragmented and lacking institutional support, these efforts complement the state's limited engagement.

 $<sup>^{33}</sup>$  Additional data received from MZOM show that the number of Roma attending segregated education has increased compared to previous periods.

<sup>&</sup>lt;sup>34</sup> This case was covered by the media, but it was also described in the Ombudsman's report for 2023, which is available at: https://www.ombudsman.hr/hr/download/izvjesce\_pucke\_pravobraniteljice\_za\_2023\_godinu/

 $<sup>^{35}</sup>$  This data was presented by representatives of the Ombudsman's Office during the roundtable organised by ROM HR.

 $<sup>^{36}</sup>$  The programmes and projects of all the listed organisations have a certain level of visibility, and members of ROM HR have directly participated in many of them.

Schools, in particular, have emerged as important sites of awareness-raising.<sup>37</sup> There is evidence of a growing number of high school students expressing solidarity with Roma peers and a willingness to speak out against discrimination. The commendable efforts of the Kali Sara Association also deserve recognition. Their programmes bring together Roma and non-Roma children in shared spaces in Zagreb, working to raise awareness of Roma-related issues.<sup>38</sup>

At the national level, the media also play a significant role in combating discrimination against Roma. They actively cover three key Roma-related commemorative dates: the World Day of the Romani Language, International Roma Day, and the Commemoration of Roma Victims during World War II. These dates are often marked by various Roma organisations and national minority councils, with the participation of local and regional leaders as well as high-ranking officials in the Croatian government.

#### 2.2. Education

Equal and effective access to quality education remains a central yet unresolved challenge for Roma in Croatia. Despite this area being prioritised at all governance levels and absorbing the majority of NRSF funding, structural inequalities persist. A high level of early school leaving, widespread educational segregation, the overrepresentation of Roma in special programmes, and low preschool participation continue to hinder progress. Roma civil society and independent institutions have repeatedly raised concerns about the long-term implications of these systemic failures on inclusion and equality.

The AP 2021-2022 Action Plan outlined five measures across 23 activities; this number has increased slightly to 25 in the 2023-2025 cycle. A notable addition is the development of an analysis and action plan to reduce segregation in primary schools. Another change involved separating earlier combined activities into two: one focused on promoting preschool education, the other on preventing dropouts from secondary education.

In the 2023-2025 AP, the MZOM introduced a new activity, "Co-financing of dedicated transportation from home to kindergarten/school for children and students belonging to the Roma national minority living in isolated, segregated settlements", aimed at reducing segregation. Although funding for the activity has been secured, implementation has not yet begun at the time of writing this report, as this also depends on the willingness of Roma parents, who have so far not made use of it. In fact, the initiative to finance transportation for Roma children to more distant educational institutions in order to avoid segregation was rejected by the Roma community in the 'Josip Rimac' settlement in Slavonski Brod.

The Ministry of Science and Education (MZOM) allocates around 2.9 million EUR annually for educational inclusion under the NRSF, although Croatia's broader Operational Programme (OP) offers more significant resources.

Despite considerable institutional effort, key issues such as growing segregation, early school leaving,<sup>39</sup> special school placement<sup>40</sup> and attendance in adult education<sup>41</sup> remain unresolved.

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

Reducing the share of Roma children attending compulsory preschool and primary education in groups where the majority or all children are Roma.

 $<sup>^{37}</sup>$  Based on the RCM team's direct experiences during activities in schools, as well as testimonies from both Roma and non-Roma interviewees.

<sup>38</sup> The information collected during the interviews is also visible on their social media pages.

<sup>&</sup>lt;sup>39</sup> According to the Ombudsperson's Office. See also: Kunac, S., Klasnić, K. & Lalić, S. (2012). *Inclusion of Roma in Croatian Society: A Baseline Data Study*, available at: <a href="https://www.cms.hr/wp-content/uploads/Uklju">https://www.cms.hr/wp-content/uploads/Uklju</a> ivanje Roma u hrvatsko dru tvo istra ivanje baznih podataka.pdf

<sup>&</sup>lt;sup>40</sup> Ombudswomen Report, 2023. Available at: https://www.ombudsman.hr/hr/download/izvjesce\_pucke\_pravobraniteljice\_za\_2023\_godinu/?wpdmdl=18399&refresh=67 68af9395fc11734913939

<sup>&</sup>lt;sup>41</sup> Roma Civil Monitor, "Civil society monitoring report on the quality of the national strategic framework for Roma equality, inclusion, and participation in Croatia", 2022. Available at: <a href="https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf">https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C3-Croatia-CATALOGUE.pdf</a>

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

The principal activity intended to address educational segregation is the co-financing of transport for Roma children from segregated settlements to integrated kindergartens or schools. While conceptually promising, this measure was not utilised in 2022-2024; no new requests were submitted. According to interviewees,<sup>42</sup> the low uptake reflects parental concerns about potential discrimination in mainstream schools<sup>43</sup> and a limited understanding of the benefits of desegregation. Implementation depends on outreach and trust-building, but no actor has been designated responsible for these preparatory steps.

A second activity, co-financing parental contributions for Roma children in integrated preschool settings, has also had limited impact. Though continued in the current Action Plan, this intervention has suffered from low visibility and uptake. Many Roma parents do not actively seek kindergarten placement, often underestimating the importance of early education.<sup>44</sup> Limited kindergarten capacities and enrolment policies favouring employed parents further complicate access. While co-financing is extended to private kindergartens, the effect remains marginal without broader awareness campaigns.

In 2023, a new activity was introduced: drafting an analysis and plan to reduce the share of Roma children in segregated primary classes. Despite multiple stakeholder meetings, no such analysis had been conducted by mid-2024.

Measures for promoting early childhood education remain critical. Preschool programmes for Roma are fully funded by MZOM, while preparatory programmes are universally free. Though the NRCP is tasked with promotional efforts, only 23% of Roma children aged three to six were enrolled in preschool in 2023. The target for 2025 is 30%. 45 Despite rising participation, the pace of progress remains slow and is uneven across counties.

## Reducing the gap in the completion of secondary education between Roma youth and youth from the general population.

Dropout rates among Roma remain extremely high: nine out of ten early school leavers are Roma. Only 30% of Roma youth aged 15-18 remain in education. The NRSF tackles this through scholarships, Roma assistants, dormitory support, and extended school programmes. Roma stakeholders acknowledge the relevance of these interventions and report a steady increase in secondary school enrolment since 2013.<sup>46</sup> However, this trend reflects demographic growth rather than a rise in completion rates.

Roma assistants play a key role, yet their employment is not systematised<sup>47</sup> and varies significantly across schools. Without a formal job profile or unified training, their contribution remains inconsistent. MZOM currently lacks the authority to formalise these positions, hindering their scaling up.

#### Increasing the participation of Roma youth in higher education

Croatia provides relatively generous scholarships for Roma students in secondary and higher education. Students who repeat a year continue to receive financial support, and further incentives are available upon graduation. While these measures ease financial burdens, some Roma students intentionally prolong their studies to maintain housing and stipends—an issue arising from the high cost of living in university centres. Although housing access is not systemically guaranteed, MZOM has resolved all student accommodation requests it has received in a timely manner. Still, no structural reform exists to institutionalise these rights.

#### Increasing the participation of adult Roma in vocational training and upskilling programmes.

Adult education for Roma relies mainly on mainstream opportunities. MZOM supports primary education and vocational training programmes, while promotional activities are managed by the Vocational Education Agency.

 $<sup>^{42}</sup>$  During the two separate conversations with two members of the Roma national minority from the city of Slavonski Brod.

<sup>&</sup>lt;sup>43</sup> Data collected from the interview with representatives of Kali Sara.

<sup>&</sup>lt;sup>44</sup> Conducted by the Faculty of Humanities and Social Sciences in Zagreb, led by Professor Vedrana Vrkaš Spajić, along with the personal experiences of Roma associations and our observations.

<sup>&</sup>lt;sup>45</sup> Action Plan for the Implementation of the National Plan for Roma Inclusion, for the period of 2021–2027. Available at: <a href="https://ljudskaprava.gov.hr/UserDocsImages/NPUR%202021-2027/AP%20NPUR%202023-2025.pdf">https://ljudskaprava.gov.hr/UserDocsImages/NPUR%202021-2027/AP%20NPUR%202023-2025.pdf</a>

<sup>&</sup>lt;sup>46</sup> Ministry of Science of Education, non-published data. (e-MATICA), 2022-2023.

 $<sup>^{</sup>m 47}$  Based on the personal experiences of members of the RCM coalition.

These measures are active, yet uptake remains low due to limited awareness and motivational barriers. Stronger promotion and community-based mobilisation are needed to increase participation.

Despite incremental improvements, key structural challenges remain unaddressed. The overrepresentation of Roma in special education has not been targeted by any measure. Nearly half of all Roma children are in special programmes—five times the rate among non-Roma peers. Additionally, although segregation is acknowledged, the quality of education in segregated classrooms has yet to be assessed. Reports from the Ombudsperson and Roma organisations suggest these settings often deliver inferior education.

A systemic response is required. First, the Ministry should conduct a quality audit of Roma-majority classes. Second, the causes and criteria of special school placement must be scrutinised. Third, scholarships should be strategically used to channel Roma students into priority professions, such as education, where a shortage of Roma teachers impedes implementation of Model C curricula. This curriculum, while developed, remains unaddressed in Action Plans due to the lack of qualified Roma staff.

#### 2.2.2. Addressing problems beyond the NRSF

Outside the NRSF framework, several initiatives complement national efforts. The City of Zagreb offers merit-based scholarships for Roma students, though eligibility rules prevent combining this support with MZOM stipends. Međimurje County provides one-off grants to Roma students for study-related expenses. Additionally, private institutions, such as Edward Bernays College, offer tuition waivers to Roma students recommended by Kali Sara.

Civil society also plays an active role. Roma and pro-Roma NGOs deliver mentoring programmes, often funded by EU programmes, private foundations, or international donors. These initiatives fill critical gaps left by the NRSF and frequently focus on outreach, personalised support, and parental engagement.

A potentially regressive policy development is under discussion: a legislative change would transfer full authority for school catchment areas to local governments, removing safeguards against segregation. However, local stakeholders in Međimurje have pointed out that this could also be used proactively to split Roma settlements across multiple schools and thereby reduce their concentration.

### 2.3. Employment

Despite longstanding structural barriers, the area of Roma employment remains dominated by mainstream interventions with minimal tailoring to community-specific challenges. The persistent employment gap between Roma and the majority population, compounded by gender disparities, discrimination, <sup>48</sup> high NEET (Not in Education, Employment or Training) rates and limited access to upskilling opportunities underscore the need for targeted, well-funded strategies. However, both AP 2021-2022 and AP 2023-2025 reflect limited ambition and scope. Most Roma-targeted interventions are subsumed under general employment measures managed by the Croatian Employment Service (HZZ), while essential programmes, such as public works, which absorb the largest share of funds, are not even referenced in the NRSF.

While the NRSF defines three employment-related goals: (1) reducing the overall employment gap, (2) addressing gender inequalities, and (3) improving the situation of Roma NEET youth, the last two remain largely unaddressed. No activities have ever been planned under the gender-focused measure. Only one activity was envisaged for NEET youth, and it has never been implemented.

The measures in place concerning the first goal overwhelmingly mirror HZZ's mainstream offerings, with limited adaptation to the specific needs, motivations, or structural vulnerabilities of Roma jobseekers.

Roma-specific measures planned in the AP 2021-2022 and expected to be implemented by the NRCP have never materialised and were not carried over to the AP 2023-2025. Similarly, an activity under the responsibility of the Ministry of Defence/Armed Forces of Croatia was not carried over into the current Action plan.

<sup>&</sup>lt;sup>48</sup> According to the Ombudswoman's report

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

#### Reducing the gender employment gap

Despite being included in both Action Plans, no activities were foreseen or implemented under this measure. The systemic exclusion of Roma women from the labour market remains an unaddressed issue. Their underrepresentation is reflected in the data: as of December 2023, 53.5% of the 3,484 unemployed Roma registered with HZZ were women.<sup>49</sup> Without targeted interventions, such disparities are likely to persist or deepen.

#### Reducing the NEET gap

Though acknowledged as a priority, the measure targeting NEET youth consists of a single activity that has not been operationalised in either reporting period. The number of Roma aged 15–29 registered as unemployed is 987. According to NRSF baseline data, 63.3% of Roma youth are NEET, compared to only 14.2% in the general population. The absence of action undermines not only employability but also long-term social inclusion.

#### Reducing the employment gap between the Roma and the general population

Under this measure, several activities have been implemented, but with limited scale and impact:

- Career guidance and early school-leaving prevention: While part of standard HZZ practice, this activity has not been tailored to Roma youth and has not achieved its intended outcomes.
- Personal and professional development for unemployed Roma youth: Conceptually suitable for the NEET target group, this activity had minimal outreach and low participation.
- Upskilling and requalification: Participants receive full financial coverage for training (except in primary education), with options including adult education, on-the-job training, and hybrid models. Despite being a relevant intervention, participation remains low. In 2022, 44 Roma completed primary education programmes and 51 engaged in further training. In 2023, 50 completed primary education programmes and 21 participated in further education. The numbers then dropped despite evident demand, and the targets for 2023 were inexplicably reduced to only 26 participants. Field feedback indicates a misalignment between the offered training and Roma interests, with driving-related qualifications being most frequently requested.
- Subsidised employment: This is associated with relatively positive outcomes. HZZ supports
  employment through the co-financing of wages and internships, helping provide initial experience.
  Targets were met or exceeded.
- Self-employment support: While there is growing interest among Roma, uptake remains low due to insufficient information and guidance. The programme targeted ten beneficiaries annually, with nine grants awarded in 2022 and seven in 2023.

In 2022, two additional activities were included:

- Outreach to employers in Roma-concentrated areas: Meant to reduce discriminatory hiring practices, this activity was never implemented by the NRCP and was dropped from the 2023–2025 Action Plan.
- Promotion of military service: This broadly targeted informational activity lacked specific relevance for Roma and was rightfully excluded from the current Action Plan.

It is notable that these planned interventions represent less than 10% of the total budget reportedly allocated by HZZ for Roma-targeted employment.

While it provides short-term income, this intervention has no proven effect on employability and is widely seen as a social welfare mechanism<sup>50</sup> rather than a labour market integration tool. Its omission from the strategic framework further demonstrates the disconnection between practice and planning.

<sup>&</sup>lt;sup>49</sup> Data obtained from the Croatian Employment Service (HZZ) upon request. The data is not publicly available.

<sup>50</sup> Ibid.

HZZ continues to face criticism associated with the public works activity, including anonymous complaints of nepotism and corruption. Although internal checks found no irregularities in documentation, trust in the fairness of implementation remains low among Roma stakeholders.

#### 2.3.2. Addressing the problems beyond the NRSF

Outside the NRSF, few Roma-specific initiatives exist. HZZ operates with a dedicated Roma budget amounting to 1.7 million EUR in 2023 and 2.2 million EUR in 2024.<sup>51</sup> The overwhelming majority (over 90%) is spent on public works, a measure omitted from both Action Plans. The majority of employers utilising this measure are local self-government units, although public works are also available to associations and Councils of Roma National Minorities. Representatives of the HZZ acknowledged that councils were not initially intended to engage in such employment activities, as their members are elected in public elections and they are already compensated for their roles within the councils. However, HZZ representatives also cited political pressure as the reason for allowing Roma councils to use public works. The same pressure influenced the allocation of quotas (employees) for each county.

Interviewees (who requested to remain anonymous) revealed cases where public works were used for nepotism, enabling employers to hire relatives or extract a percentage of net wages from workers. Employers receive funding from the HZZ to cover the total wage cost of workers for six months. While workers receive their full wages, they are often required to return a portion of their salary to the employer. This involves a deal between the employer and employee, from which the employer uses unethical, but not illegal, means to obtain financial income. Some workers do not complete a standard 40-hour workweek but still receive wages. For workers, receiving a partial income is preferable to no income, especially if they do not work 40 hours per week, while employers justify this arrangement to employees as compensation for administrative costs, such as bookkeeping. In many cases, this arrangement will not be reported by employees as they accumulate money, but on the other hand, even when they report such behaviour, they cannot do anything, as the paper trail shows that everything is according to the regulations. Such practices undermine the intended goals of the measure and fail to enhance Roma employability. Many participants return to unemployment registers after completing their public works assignments, awaiting the next opportunity to requalify for the programme.

Employer discrimination is one of the systemic barriers to improving the employment of Roma (the other one is the low level of educational attainment<sup>52</sup>), but this problem remains largely omitted by the NRSF and in the design or implementation of employment policies. At the same time, civil society's involvement in this area is minimal. The only notable intervention comes from the Office of the Ombudswoman, which conducts mandatory anti-discrimination training for selected public institutions and state-owned companies. These sessions help raise awareness but are insufficient on their own to counter widespread structural exclusion.

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

Persistent structural inequalities continue to characterise Roma access to adequate, desegregated housing and essential services in Croatia. The most pressing problems—segregation, substandard housing conditions, lack of access to potable water, sanitation, and basic infrastructure—remain unresolved despite sustained investment. Moreover, the strategic direction of both the NRSF and broader operational programmes prioritises service delivery within Roma settlements, rather than structural change through desegregation. This entrenches spatial segregation and normalises discrimination, which is no longer perceived by the public or authorities as a rights violation.

The NRSF's AP 2021-2022 and AP 2023-2025 both maintain four identical measures in the housing domain. Yet only two of these have associated activities. Despite recognising overcrowding and a lack of access to drinking water as critical concerns, neither Action Plan outlines any concrete steps to address these issues. Where activities are defined—particularly under housing improvement and local infrastructure—they often function as social assistance, lacking a transformative or rights-based orientation.

<sup>51</sup> Ihid

<sup>52</sup> Ibid.

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

#### **Housing Deprivation**

Under the measure "Reducing the gap in housing deprivation between Roma and the general population", two activities were implemented.

The first concerns the improvement of living conditions and housing provision for Roma, implemented by the Central State Office for Reconstruction and Housing. Since 2022, this programme has been delivered through four models: distribution of appliances (Model 1), exterior joinery (Model 2), bathroom or sanitation equipment (Model 3), and floor renovation (Model 4). While these interventions provide tangible support, their implementation suffers from a lack of transparency and weak social targeting. Eligibility is not means-tested, meaning resources are not directed to those in the most precarious conditions. Furthermore, procurement and administrative delays complicate monitoring and annual planning. Reports indicate that this measure, while valued by many Roma, generates intra-community tension due to its perceived unfairness and poor communication. Moreover, available governmental reports indicate the low absorption of allocated funds (59% in 2022 and only 17% in 2023).

The other activity involves providing financial assistance to the Roma national minority, coordinated by the NRCP.

This activity includes various support forms, but its outcomes are unclear. It lacks connection to structural housing objectives and instead resembles a general social policy measure, which does not address the stated aim of reducing housing deprivation.

These interventions improve individual housing conditions but fail to tackle the systemic drivers of housing deprivation or segregation. Most importantly, they reinforce the status quo by targeting improvements within segregated Roma settlements without enabling mobility or access to non-segregated housing options.

#### **Environmental and Infrastructural Inequalities**

The measure "Reducing environmental and infrastructural inequalities in Roma communities compared to the majority population" includes one activity: infrastructure improvements in minority-inhabited areas, funded through the state budget and implemented by the Ministry of Regional Development. The Programme currently has a budget allocated until 2026, with a budget line prediction of around 800,000 EUR per year.

Local authorities are eligible to apply for funding to develop communal, environmental, and public infrastructure, including public buildings, streets, and waste services. The Roma community widely supports these improvements, and some settlements now have community centres, paved roads, lighting, and transport infrastructure.

However, such development has not addressed the underlying exclusion. Even in settlements with improved infrastructure, problems such as lack of security, poverty, and stigma persist. Crucially, investment is limited to Roma-majority areas, reinforcing segregation rather than integrating Roma into broader urban and rural communities. These measures enhance living standards locally but leave segregation untouched.

## 2.4.2. Addressing the problems beyond the NRSF

One key example of positive practice is the City of Zagreb's previous success in dismantling the Plinarsko naselje settlement and relocating residents to integrated housing. However, progress has stalled under the new city administration. Efforts to replicate desegregation in Struge have yielded few results. Elsewhere, no municipalities are currently implementing desegregation strategies, and national policy does not incentivise or require such action.

<sup>&</sup>lt;sup>53</sup> For more details, see: Musić, S. (2024). 'Croatia: Desegregation is the permanent solution.' In: Roma Civil Monitor. *Examples of successful housing desegregation as a precondition of Roma integration.* (edited by Marek Hojsík). Publication Office of the European Union. Available at: <a href="https://romacivilmonitoring.eu/wp-content/uploads/2024/07/RCM">https://romacivilmonitoring.eu/wp-content/uploads/2024/07/RCM</a> 2023 Thematic-report-desegregation FINAL-ISBN.pdf

## 3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

Residential and educational segregation are the key challenges for Roma inclusion, equity, and participation in Croatia, and they are deeply interconnected. They create a cycle that leads to early school dropouts and the start of families at an early age.

This is reflected in data showing that Roma women have their first child, on average, at 18 years of age, and only 30% of Roma children aged 15-18 remain in the education system. After starting families, many rely on social assistance and face limited access to employment and other services. Their lives are marked by poverty, and their children often continue this cycle, repeating the same patterns.

#### 3.1. Segregation in education

The segregation of Roma children within Croatia's education system has deep historical roots and remains a pervasive issue. While residential segregation is a significant contributing factor, it is not the sole driver of this systemic challenge. Despite legal acknowledgement,<sup>54</sup> legal framework and policy measures (introduced since 2003), the situation remains largely unchanged. The first action plan to include measures against desegregation or the reduction of Roma segregation is the AP 2021-2022.

According to official data from MZOM for the 2022/2023 academic year 19% (977 out of 5,216) of Roma children enrolled in primary school attended segregated classrooms, with the problem being most acute in Međimurje and Brodsko-Posavska counties. In the 2023/2024 academic year, 22.5% (1,178 out of 5,230) Roma children enrolled in primary schools attended segregated classrooms. These statistics demonstrate a growing trend towards ethnic segregation in education.

While segregation in pre-primary education is less widespread in non-compulsory pre-school education, it remains significant in compulsory pre-school programmes. In Croatia, there are currently 20 entirely Roma pre-school groups, 16 of which are located in Međimurje County.

Despite national policies and international recommendations<sup>55</sup> opposing segregation, local authorities continue to justify segregated educational environments based on the residential concentration of Roma communities. Local authorities often argue that segregated schooling is necessary to meet the needs of both Roma and non-Roma populations in particular areas.

The segregation of Roma children has a profound impact not only on their educational outcomes, but also on their ability to integrate into their social environment and generally succeed in wider society:

"Studies show that segregated environments often correlate with lower academic performance, poorer social integration, and limited opportunities for Roma students to develop the skills necessary to succeed in wider society." (Professor Vedrana Vrkaš Spajić, at the roundtable on education)

 $<sup>^{54}</sup>$  The European Court of Human Rights' ruling in *Oršoš and Others v. Croatia* in 2010

<sup>&</sup>lt;sup>55</sup> Council of Europe, Strategic Action Plan for Roma and Traveller Inclusion (2020-2025). Available at: <a href="https://edoc.coe.int/en/roma-and-travellers/8508-council-of-europe-strategic-action-plan-for-roma-and-traveller-inclusion-2020-2025.html">https://edoc.coe.int/en/roma-and-travellers/8508-council-of-europe-strategic-action-plan-for-roma-and-traveller-inclusion-2020-2025.html</a>;

Ombudsperson report 2023 Available at: <a href="https://www.ombudsman.hr/hr/diskriminacija-temeljem-rasnog-ili-etnickog-podrijetla-2023/">https://www.ombudsman.hr/hr/diskriminacija-temeljem-rasnog-ili-etnickog-podrijetla-2023/</a>

Fundamental Rights Agency, ROMA IN 10 EUROPEAN COUNTRIES — MAIN RESULTS, 2022. Available at: https://fra.europa.eu/sites/default/files/fra\_uploads/fra-2022-roma-survey-2021-main-results2\_en.pdf

In segregated schools and classrooms, Roma children face educational content that may not meet their needs or that is insufficiently differentiated to address their diverse backgrounds and challenges.<sup>56</sup> All these factors contribute to the perpetuation of the cycle of exclusion and marginalisation.<sup>57</sup>

Addressing the issue of Roma educational segregation is complex, involving not only local practices but also ingrained societal attitudes towards Roma communities. While national authorities are generally opposed to formal segregation, local implementation remains inconsistent and often based on irrelevant factors.

In addition, the proposed potential and other pilot initiatives are subject to scepticism or deliver mixed results.

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

Education in NRFS is framed under the theme of "effective and equal access to quality and inclusive education for Roma." And this is precisely what Roma children lack when they attend segregated educational settings. The Ministry of Education and Science (MZOM) is actively working to contribute to improving the educational outcomes of the Roma community. Consequently, for the first time in the Action Plan 2021–2022, under the measure "Reducing the share of Roma children attending compulsory preschool and primary education in groups where the majority or all children are Roma", a meaningful and direct activity was introduced, entitled "Co-financing targeted transport from home to kindergarten/school for children and pupils belonging to the Roma national minority living in isolated, segregated settlements".

This activity is expected to have a significant impact on reducing segregation. However, despite being included in the Action Plan for 2021-2022, this activity has not been implemented because of a lack of demand for it. No Roma settlement, nor any local authority, has requested its implementation.

Based on the collected information, we conclude the following: although the activity is not yet utilised, it should remain a part of the plan, as it is evident that it is not sufficient to simply introduce an activity and allocate funds. There must also be consideration of the obstacles and challenges involved in implementing such an activity. Some of the key barriers preventing the utilisation of this activity are:

- Local authorities are reluctant to take advantage of the activity due to concerns about negative reactions from the majority population.
- Roma civil society has been too weak to effectively prepare the Roma community for such an activity.
- The Roma community has been segregated for so long, both residentially and educationally, that it does not recognise the problems and consequences of segregated education.
- Due to fear of discrimination, both children and their parents are reluctant to let their children be transported to other schools.

Potential challenges that could arise include the preparation of teachers, the majority community children, and the Roma children. In the next implementation period, activities should be developed to address and overcome these targeted challenges and barriers.

The Ombudswoman's 2023 Report identified segregation as the primary barrier to Roma children's access to quality education and recommended that MZOM prepare an analysis of this issue.<sup>58</sup> Furthermore, the NRSF emphasises the elimination of educational segregation.

In this regard, the Action Plan 2023-2025 expanded the measure "Reducing the share of Roma children attending compulsory preschool and primary education in groups where the majority or all children are Roma" by introducing the activity "Drafting an analysis and plan to reduce the share of Roma children attending primary education in groups where the majority or all children are Roma". This activity could form the

https://www.ombudsman.hr/hr/download/izvjesce\_pucke\_pravobraniteljice\_za\_2023\_godinu/?wpdmdl=18399&refresh=67\_68af9395fc11734913939

<sup>&</sup>lt;sup>56</sup> Interview with Vedrana Vrkaš Spajić, author of research that was also presented at the round table, but has not yet been published.

<sup>&</sup>lt;sup>57</sup> Interview with Vedrana Vrkaš Spajić, author of research that was also presented at the round table, but has not yet been published.

<sup>58</sup> Available at:

foundation of well-designed initiatives that could make a significant contribution to achieving the stated objective.

However, this activity should not remain merely a paper exercise, but the analysis should identify necessary activities and ensure that these activities will be implemented. It is also necessary to monitor the implementation of these activities.

#### 3.1.2. Synergy with other actions

In our opinion, synergy with other actions does not exist in a positive sense. Actions associated with other sectors, in most cases, actually promote segregation.

Investments in Roma settlements often lead to the opening of various preschool programmes within the settlements, which further exacerbates segregation.

Compulsory preschool education has long been advocated for, and after the state introduced one year of compulsory pre-primary education before starting primary school, referred to as the 'Preschool Program', the number of Roma children enrolled in such programmes increased significantly. However, their segregation became even more evident as many preschool programmes were established near Roma settlements attended exclusively by Roma children.

A newly proposed law would leave the designation of the school enrolment area solely to the founders of schools. There is a significant risk that this will increase or solidify segregation, even though such a change could theoretically have positive effects. We believe that it will likely lead to developments that lead in a negative direction.

#### 3.1.3. Roma participation

Given that many Roma have lived for an extended period in segregated settlements and have themselves attended segregated education, this phenomenon is not entirely foreign to them. Many parents lack awareness about the negative effects of segregated education and do not consider the problem of their children attending segregated schools. Often, their desire is simply for more Roma and non-Roma children to attend school together, but these wishes remain just that—desires, with no concrete action behind them.

On the other hand, Roma civil society is underdeveloped and often led by Roma leaders who are politically active. A significant challenge is that the areas with the greatest segregation, such as Međimurje County, have the fewest active organisations. These organisations' capacities are limited and primarily implement projects rather than participating in the design of activities, strategies and policy development.

Last but not least, there are no effective platforms or mechanisms designed for Roma participation in the fight against educational segregation. At the moment, there is only a roundtable that addresses the issue, while its impact is not in line with the scope of the problem. There is a movie under production about the matter of educational segregation that will be broadcast on national television. However, among the movie producers and those involved, there is only one Roma person participating.

#### 3.2. Residential and spatial segregation

According to the 2021 Census, approximately 18,000 Roma live in Croatia, while unofficial estimates suggest there may be around 25,000. Given that Međimurje County alone has 12 Roma settlements, with an average estimated population of 1,000 residents per settlement, and considering that nearly every county with a significant Roma population has at least one Roma settlement—some even more—it is evident that the majority of Roma in Croatia live in segregated Roma settlements.

Segregated Roma settlements in Croatia vary significantly in size, ranging from small settlements with 40–50 residents to larger ones with up to 2,000 residents. These settlements also differ in living conditions, with some lacking electricity, water, paved roads, or potable water, while others are relatively well-organised or have improved areas.

Many Roma settlements either already have or are in the process of constructing cultural and community centres or playgrounds. Additionally, as sectoral reports show, investments in infrastructure have been made, and some settlements have been legalised. Despite years of discussions, there has been no development of a desegregation plan.

Residential segregation significantly affects the overall integration of Roma into Croatian society. The authors of this report consider the issue problematic since spatial segregation physically isolates Roma, contributes to educational segregation, and people living in these settlements face discrimination and prejudice, including overpolicing. These issues are recognised problems within the Roma community. Interestingly, many Roma students studying in larger cities have stated they would not, or did not, return to live in Roma settlements. Similarly, older respondents frequently expressed that life in such settlements is challenging due to the lack of services and constant noise, and many regretted not leaving when they were younger.

However, as noted in earlier sections, examples of discrimination against Roma who relocate to non-Roma neighbourhoods also demonstrate the challenges of desegregation. Nonetheless, this is not always the case, as many Roma who achieve financial stability move out of settlements. Specifically, wealthier Roma leaders tend to leave these settlements, though there are exceptions to this trend.

While desegregation is the ultimate goal, current policies and actions by Roma and non-Roma politicians and decision-makers seem focused on improving living conditions within settlements, inadvertently reinforcing segregation. This approach disproportionately affects the most vulnerable populations – the poorest individuals who have no choice but to remain in settlements, their children who endure segregated education and often fail to complete secondary education, and those who face multiple forms of discrimination.

Roma residents often welcome investments in settlements, which is understandable as they seek a quality of life suitable for the 21st century. However, politicians and policymakers exploit this to secure support for their agendas. The number of Roma living in settlements continues to grow, and children are raised in environments that lack motivation and are filled with examples of early school dropout and early family formation. This perpetuates stereotypes about Roma.

The result is an increase in discrimination against Roma, perpetuating the cycle of poverty, segregation, and marginalisation in which they are trapped.

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

While the NRSF section "Effective and Equal Access of Roma to Appropriate, Desegregated Housing and Basic Services" explicitly mentions "desegregated housing" in its title, since the very beginning of the Roma inclusion initiative, action plans have not included a single activity or effort aimed at opening pathways for people to move out of segregated Roma settlements.

NRSF does not address housing desegregation at all, making it one of the crucial unresolved issues.

#### 3.2.2. Synergy with other actions

Unfortunately, desegregation processes lack synergy with other activities, as other actions are primarily focused on improving living conditions in Roma settlements.

Nevertheless, cities that implement social housing policies also include Roma among their beneficiaries. However, the most developed social housing programmes are located in large cities, whereas Roma settlements are often found in more rural areas and smaller municipalities.

The City of Zagreb has a social housing policy, and many Roma are beneficiaries of social housing or municipal housing.

#### 3.2.3. Roma participation

Spatial segregation in Roma settlements is a significant issue, and addressing it requires the involvement of Roma political representatives. A change in attitude regarding residential segregation can only come from the parliamentary representative of the Roma national minority and/or Kali Sara. Thus far, politicians have favoured investing in Roma settlements, as such funds are more readily available, and the impact is quicker and more visible to the entire Roma community. For example, if one manages to integrate two families into mainstream housing, the visibility is limited to those two families. In contrast, constructing a community cultural centre benefits the entire settlement, with an impact felt on a daily basis.

## 4. Use of EU funding instruments

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

In certain cases, activities not implemented in 2022 depended on EU funds that were not provided. However, the following activities within the Action Plan were financed using EU funds in 2022:

1. "Provision of School Meals"

The Implementing Authority was the Ministry of Labour, Pension System, Family, and Social Policy, partnering with local and regional self-government units. The action was funded from the Fund for European Aid to the Most Deprived (FEAD) in the amount of 484,759.23 HRK (approx. 64,380 EUR).

- "Strengthening Horizontal and Vertical Coordination and Monitoring Capacities for Implementing the National Roma Inclusion Plan". The Implementing Authority was the Government Office for Human Rights and Rights of National Minorities (NRCP). A meeting was organised in Zagreb, partially funded by the European Social Fund (ESF) in the amount of 2,227.85 HRK (approx. 296 EUR), for travel and logistical costs.
- 3. "Promotion of Early Childhood Education and Prevention of Secondary School Dropout".

The implementing authority was the Government Office for Human Rights and Rights of National Minorities (NRCP). This was a national campaign conducted to increase enrolment of Roma children in preschool education programmes and prevent school dropout at the secondary level. The campaign, which began in 2020, included activities such as a media campaign on the NRCP Facebook page that ran until January 2022.

Funded by the European Social Fund (ESF) in the amount of 302,561.68 HRK (approx. 40,187.61 EUR).

The total EU-funded expenditure in 2022, according to the most recent figure available at the time of writing this report, amounted to approximately. 104,867.16 EUR.

The AP 2023-2025 also anticipates European funding. However, the report for 2023 indicates that no money from European funds was utilised for implementing the activities outlined in the AP 2023-2025.

In addition to the above, some institutions implement EU projects intended for all citizens and do not track how many Roma may have benefited from these activities.

According to information collected from representatives of the National Roma Contact Point (NRCP), programming responsibilities lie with the competent authorities, which often lack a specific focus on Roma. While some projects may indirectly impact Roma communities—for instance, regional communal infrastructure development initiatives may include Roma settlements even if they are not explicitly targeted—there are notable examples of exclusion. One such case is the allocation of funding to large urban areas, which does not necessarily encompass interventions in Roma settlements. A specific example is the city of Čakovec and the Roma settlement of Kuršanec, which is administratively part of Čakovec but was not included in any planned investments.

Due to such circumstances, the NRCP intervenes and develops projects directly targeting Roma, in which the NRCP is designated as the lead beneficiary. Although the NRCP's official mandate focuses on data collection, it engages in programming activities to ensure Roma prioritisation, which technically falls outside its core responsibilities. Consequently, the NRCP appears as the lead institution for numerous activities under the Action Plans for the implementation of the National Roma Inclusion Plan, including areas not formally under its remit—such as employment, health, and other sectors—where funding is expected to be secured from the European Social Fund (ESF). However, even in these cases, the NRCP's role can be disregarded during the decision-making process, as the final authority over programming rests with the respective competent bodies.

On the other hand, the NRCP does not intervene in projects funded through the European Regional Development Fund (ERDF), primarily due to the technical and structural nature of these investments and the NRCP's limited capacity in terms of specialised knowledge. Despite NRCP's efforts to steer ESF-funded projects towards Roma inclusion, progress remains slow, largely due to insufficient institutional capacity and a limited number of staff capable of managing such complex processes. Notably, previous Roma Civil Monitor (RCM) reports

recommended strengthening the NRCP by increasing staffing levels. However, since April 2025, the NRCP has operated with even fewer staff than before, despite currently open public calls for recruitment.

Relevant examples of promising practices include projects such as 'Child Guarantee', 'Zaželi' (an employment support programme), and community centres in Međimurje County, which are either directly targeted at Roma or include significant Roma populations as beneficiaries. The outcomes of these projects are in line with the objectives of the National Roma Strategic Framework (NRSF).

## 4.2. Roma civil society in EU funds implementation

Roma civil society lacks the capacity to implement EU projects, particularly as a lead beneficiary. Among all surveyed Roma associations, only Kali Sara has acted as the lead beneficiary of projects funded through EU funds. Projects implemented by institutions and ministries under the NRSF framework target Roma; however, Roma are unable to participate in project design or decision-making regarding which projects to apply for. In the implementation of such projects, Roma are treated as subjects or a target group.

For example, in the campaign described in the section above under Measure 3, Roma were portrayed as actors in videos and photos.

Regarding the formal monitoring structures for EU funds, there are no Roma organisations participating in these mechanisms. There is no interest or willingness from the respective authorities to include Roma organisations in those processes.

There is a mechanism at the NRCP called the 'Commission for Monitoring Implementation of NRSF'. There is a public call through which Roma individuals can apply, and the Government appoints the respective individuals. Within the Commission, thematic meetings are organised where Roma members can also attend. These meetings would provide an opportunity for members to address questions/comments related to the monitoring of the usage of EU funds. However, according to the experience of the authors of this report, the limited capacities of Roma members do not allow them to meaningfully follow up or intervene on the matter of monitoring.

## **CONCLUSIONS AND RECOMMENDATIONS**

The NRSF is in line with European frameworks and national policies, with substantial funding directed towards the Roma community, both through the NRSFF and other funding channels. However, critical issues such as educational and housing segregation are not sufficiently addressed. While there is visible investment in the Roma community, physical integration remains a challenge. The limited capacity of Roma civil society, often influenced by political factors, further complicates efforts. Despite this, the strategy benefits from solid baseline data, strong national investment, and a clear commitment to improving the situation of the Roma, though greater focus is needed on systemic inclusion and integration into society.

### Strengths:

- Comprehensive Framework: The NRSF and its related Action Plans provide a broad, wellstructured framework for Roma inclusion.
- 2. **Financial Investment**: Notable funding allocations show strong governmental commitment to addressing Roma issues, particularly through national budgets.
- 3. **Inclusive Policies**: The involvement of Roma representatives in consultations and project implementation strengthens the inclusivity of actions.
- 4. **Long-Term Goals**: The NRSF focuses on sustainable solutions in many areas, aiming for long-term impact rather than short-term fixes.

#### Weaknesses:

- 1. **Insufficient Roma Participation**: Roma civil society lacks the capacity to lead and implement EUfunded projects, limiting their participation in decision-making processes.
- 2. **Implementation Challenges**: While funding is allocated, the effectiveness of measures is hindered by bureaucratic inefficiencies, lack of targeted actions, and inconsistent follow-up.
- 3. **Lack of Targeted Outreach**: Some projects do not specifically target Roma communities, limiting the reach of the initiatives.
- 4. **Insufficient Focus on Residential and Educational Segregation and Neglect of the Health Sector:** There is a lack of targeted actions to address the deep-rooted residential and educational segregation affecting the Roma community. Additionally, health-related disparities and challenges within the Roma population are insufficiently addressed.
- Absence of a Focus on Multidimensionally Discriminated Groups: The inclusion efforts do not sufficiently target groups within the Roma population who face multiple layers of discrimination, such as women, children, and elderly individuals, which limits the overall effectiveness of the strategy.
- 6. **Underutilisation of EU Funds and Limited Involvement of Roma in Programming:** Despite the availability of EU funds, state authorities insufficiently utilise these resources for Roma inclusion. Moreover, Roma communities are not adequately involved in the planning and programming phases of EU-funded interventions, which weakens the relevance and sustainability of the measures.

#### Recommendations to national authorities

- Prioritise Addressing Segregation: Implement targeted measures to reduce the residential and educational segregation of Roma communities, ensuring equal access to quality education and housing.
- 2. **Enhance Health Sector Support**: Strengthen health initiatives aimed at Roma communities, addressing both physical and mental health disparities.
- 3. **Focus on Multidimensional Discrimination**: Develop strategies that address the needs of Roma groups experiencing multiple forms of discrimination, such as women, children, and the elderly.

- 4. **Empower Roma Civil Society**: Invest in building the capacity of Roma civil society organisations, enabling them to lead and implement programmes more effectively.
- 5. **Strengthen EU Fund Utilisation**: Maximise the use of EU funds by streamlining procedures and enhancing the effectiveness of funded projects to ensure they directly address the Roma community's needs
- 6. **Empower the Commission Regarding the Monitoring of the Implementation of NRSF:** The NRCP should separate the functions of the NRSF Monitoring Commission and strengthen the role of Roma stakeholders to ensure that the Commission focuses on its core function of monitoring the implementation of the NRSF.
- 7. **Empower the NRCP:** The government should allocate funds to the NRCP to strengthen its human resource capacity in order to effectively implement and utilise EU funds.
- 8. **Guarantee the Execution of Activities**: If a measure is included in the action plan, at least one activity should be financed with domestic funds to avoid situations where no activity under the measures is implemented due to the non-receipt of European funds, or their delay.

### **Recommendations to European institutions**

- 9. Enhance Support for Strengthening Roma Civil Society in Croatia: The EU should increase financial and technical support for Roma civil society organisations in Croatia. This will help them build their capacity to implement Roma-focused projects, engage in policy discussions, and ensure that their voices are effectively represented in national and local decision-making processes. In particular, empowering Roma organisations will improve the overall effectiveness of the National Roma Integration Strategy and Action Plans.
- 10. Facilitate Roma Participation in EU Funding and Policy Decision-Making: The EU should prioritise the involvement of Roma representatives in the management and allocation of EU funds for Roma inclusion. This would ensure that Roma communities' needs are directly addressed in funding schemes, with greater inclusion in the decision-making process for relevant EU initiatives. Furthermore, the EU should encourage national governments, including Croatia, to consult with Roma communities when designing programmes or policies that directly affect them.
- 11. European Institutions Should Open Channels of Communication and Utilise Existing Tools to Address Residential and Educational Segregation in Croatia: European institutions need to actively engage with Croatian authorities to address issues of residential segregation and segregation in education. This can be achieved by leveraging existing EU mechanisms, such as the European Semester and the EU funds for Roma inclusion, to ensure that Croatia implements targeted policies and measures to tackle these critical issues. Likewise, transnational learning could be promoted.

### **Recommendations for civil society**

- 12. **Enhance Collaboration with National and Local Authorities**: Roma civil society should strengthen its partnerships with national and local authorities to ensure that Roma communities are effectively integrated into policy-making processes. By collaborating with government institutions, Roma organisations can ensure that their needs and concerns are represented and addressed in the implementation of the National Roma Integration Strategy and related Action Plans.
- 13. **Capacity Building and Professional Development**: Roma organisations should invest in building their internal capacity through training programmes in areas such as project management, advocacy, and policy analysis. Strengthening organisational skills will help them better manage EU-funded projects and contribute more effectively to the national dialogue on Roma inclusion.
- 14. **Focus on Advocacy for Segregation Issues**: Roma civil society should increase its advocacy efforts to address critical issues such as residential and educational segregation. By raising awareness and pushing for reforms in these areas, Roma organisations can help create a more inclusive environment that ensures equal opportunities for all Roma, particularly in education and housing.
- 15. **Foster Inter-Community Cooperation**: Roma civil society should engage in dialogue and cooperation with other marginalised groups and civil society organisations. Building coalitions can

amplify the voice of Roma communities, address intersectional issues such as discrimination against Roma women or disabled Roma, and create more inclusive, multi-dimensional solutions.

#### Recommendations to other stakeholders

- 16. **Strengthen Private Sector Involvement in Roma Inclusion**: The private sector, including businesses and employers, should play a more active role in promoting Roma inclusion, particularly in employment. Companies should be encouraged to implement diversity policies, provide targeted job opportunities for Roma individuals, and offer support for Roma entrepreneurship. Public-private partnerships can help drive economic empowerment and reduce social exclusion.
- 17. **Engage Local Communities in Roma Integration**: Local authorities and communities should be more actively involved in the integration of Roma people by implementing inclusive policies at the local level. Community-driven approaches that involve Roma people in decision-making processes will foster a sense of ownership and promote sustainable social inclusion. Local governments should invest in Roma-friendly infrastructure and services, such as education and healthcare.
- 18. **Promote Education and Awareness Campaigns**: Educational institutions, media, and civil society should collaborate to raise awareness about Roma culture, rights, and integration challenges. Public campaigns can combat stereotypes, reduce discrimination, and foster greater understanding between Roma and non-Roma populations. Educational curricula should also include content on Roma history and culture to promote tolerance and social cohesion.

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### List of interviews

- Interviews with representatives of NRCP, two representatives, in person
- Interview with a representative of the Ministry of Science and Education (MZOS), one representative, in person
- Interviews with representatives of the Croatian Employment Service (HZZ), two representatives, in person
- Interview with a representative of the City of Zagreb, one representative, in person
- Interview with a representative of Međimurje County, one representative, in person
- Interviews with representatives of Kali Sara, two representatives, in person
- Interview with a representative of the Roma association Bolja Budućnost, two representatives, in person
- Interview with a representative of the Roma association Perspektiva, one representative, in person
- Interview with a representative of the ROM association, one representative, online
- Interview with a representative of the Roma association Romnja, two representatives, in person
- Interview with a representative of the Roma association of Međimurje, one representative, by phone
- Interview with a representative of the Ludari association, one representative, by phone
- Interview with a representative of the Roma Catholic Church (RKC) Darda, two representatives, in person
- Interview with a representative of the Romorčić association, one representative, by phone
- Interview with a representative of ERRC, one representative, online
- Two anonymous interviews with persons from childcare services, two representatives, in person
- Two anonymous interviews with individuals who have used public works, by phone
- Roundtable 'Quality School for All', focused discussion with representatives of NRCP, the Ombudsperson's Office, Kali Sara, MZOS, Međimurje County, and academics from the Faculty of Philosophy. The roundtable included 20 participants from Roma and pro-Roma associations, as well as Roma and pro-Roma activists.
- Roundtable and presentation of the research 'Representation and indicators of attitudes towards foreigners and minorities in Croatian society: threat, encounter, coexistence?', organised by CMS, focused discussion, and presentation of results related to the feeling of discrimination. Personal participation of the Ombudsman.
- Participation in the meeting and presentations on the experience of implementation, monitoring, and evaluation of national policies for Roma inclusion, thematic visit of the Expert Committee on Roma (ADI ROM) of the Council of Europe (Presentations: Ombudsperson's Office, NRCP, MZOM, Ministry of Internal Affairs, Croatian Institute of Public Health, presentation of preliminary findings by RCM, and presentation of Kali Sara).
- Short focused discussions with Roma activists, 34 participants, in person and by phone.

### **Key policy documents and reports**

Action Plan for the Implementation of the National Roma Inclusion Plan for the period 2021–2027, for the years 2021–2022, in Croatian, available at: <a href="https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Akcijski%20plan%20za%20provedbu%20NPUR-a%20za%202021.%20i%202022.pdf">https://pravamanjina.gov.hr/UserDocsImages/NPUR%202021-2027/Akcijski%20plan%20za%20provedbu%20NPUR-a%20za%202021.%20i%202022.pdf</a>

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# **ANNEXE: LIST OF PROBLEMS AND CONDITIONS**

# Fighting antigypsyism and discrimination

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Prejudice against Roma	critical problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	The new activities were adopted by AP for 2023-2025, but implementation is expected in 2025.
Hate speech towards and against Roma (online and offline)	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	The new activities were adopted by AP for 2023-2025, but implementation is expected in 2025.
Weak effectiveness of protection from discrimination	significant problems	mentioned but not analysed sufficiently	absent	adequate but with room for improvement	No activities
Segregation in education, housing, or the provision of public services	critical problems	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Segregation in education has been adopted as an activity, but not implemented yet; segregation in housing lacks activities.
Misconduct and discriminatory behaviour by police (under- policing/underpo licing)	significant problems	understood with limitations	present but insufficient	Some targets but not relevant	Within NRSF, we do not even have data on this

## Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Lower quality of preschool education and ECEC services for Roma	significant problems	irrelevant	absent	absent	Absent
Early leaving from secondary education	significant problems	identified and analysed sufficiently	appropriate	relevant targets well defined	Effective measures have been adopted, and outreach is 100% effective with some of the measures, with specific data available.
Misplacement of Roma pupils into special education	significant problems	identified and analysed sufficiently	present but insufficient	absent	Absent
Education segregation of Roma pupils	critical problems	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Measures have been adopted but not yet implemented; data regarding educational segregation is detailed and has been collected.

# Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Youth not in employment, education or training (NEET)	critical problems	identified and analysed sufficiently	appropriate	relevant targets well defined	This measure was not implemented. Data about NEET has been gathered.
Discrimination on the labour market by employers	critical problems	understood with limitations	present but insufficient	absent	The activities were not implemented,

# Housing, essential services, and environmental justice

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor physical security of housing (ruined or slum housing)	critical problems	identified and analysed sufficiently	present but insufficient	adequate but with room for improvement	Adopted activities, effective, detailed data about outreach
Lack of access to drinking water	significant problems	identified and analysed sufficiently	present but insufficient	adequate but with room for improvement	Related activities were not implemented
Lack of access to sanitation	significant problems	identified and analysed sufficiently	absent	absent	absent
Limited or absent public waste collection	significant problems	irrelevant	absent	absent	absent
Lacking or limited access to social housing	significant problem	understood with limitations	adequate but with room for improvement	absent	absent
Overcrowding (available space/room for families)	critical problem	identified and analysed sufficiently	adequate but with room for improvement	absent	absent
Housing in segregated settlements/ neighbourhoods	critical problem	identified and analysed sufficiently	absent	absent	absent
Housing in informal or illegal settlements/ neighbourhoods	critical problem	identified and analysed sufficiently	absent	absent	absent

# 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 problems	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined	Adopted measures (associated with other institutions) are effective and target Roma, including the collection of data regarding outreach and the number of Roma.
Income support programmes fail to guarantee an acceptable level of minimum income for every household	critical problems	understood with limitations	present but insufficient	adequate but with room for improvement,	Adopted measures (from other institutions) are effective and target Roma, including the collection of data regarding outreach and the number of Roma.
Risk of municipalities misusing income support to buy votes	significant problems,	relevant	absent	absent	absent

## Social services

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Limited quality, capacity and comprehensiven ess of help provided by social services	significant problems,	mentioned but not analysed sufficiently	absent	absent	absent

# Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Early marriage	significant	understood with limitations	absent	absent	absent

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

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Exclusion of Roma communities from national cultural narratives	significant problems,	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	We do not currently have specific activities directed at this problem.
Romani history and culture are not included in school curricula and textbooks for both Roma and non-Roma students	significant problems,	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	We do not currently have specific activities directed at this problem.

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