



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

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and Consumers*



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LIST OF ABBREVIATIONS

CoE	Council of Europe
DIHR	Danish Institute for Human Rights (<i>Dansk institut for menneskerettigheder</i>)
ECRI	European Commission against Racism and Intolerance
EURSF	EU Roma Strategic Framework
MII	Ministry of Immigration and Integration
NRCP	National Roma Contact Point
NRSF	National Roma Strategic Framework
RCM	Roma Civil Monitor

EXECUTIVE SUMMARY

Implementation of the NRSF

Denmark's NRSF shows no real implementation, with no targets, action plans, or Roma participation. Authorities rely on universalist rhetoric of equal access, rejecting group-specific policies. This approach replaces concrete measures with abstract values, leaving Roma excluded. Various actors, including the EU and the civil society criticise Denmark's strategy as vague, non-specific, and unambitious.

Authorities reject targeted measures, relying on universal welfare instead. However, this reliance on mainstream policies ignores Roma-specific barriers, structural discrimination, and EU requirements for participation, accountability, and data.

Denmark's NRSF shows only formal alignment with domestic and EU frameworks, lacking targeted initiatives, institutional coordination, or monitoring tools.

It excludes Roma from implementation and monitoring. No Roma were consulted during drafting, involved in institutions, or supported through CSO capacity-building.

Focus on key issues affecting Roma

Antigypsyism in Denmark persists through public hostility, media stereotypes, and political rhetoric portraying Roma as criminal or disorderly. Roma often conceal their identity to avoid stigma. The NRSF fails to address antigypsyism, relying only on general anti-discrimination laws, with no goals, funding, or monitoring. Outside the NRSF, responses remain minimal and symbolic.

The problem of antigypsyism is closely linked to the country's persistent failure to effectively include a part of intra-EU migrants identified by the public, media and politicians as Roma. As consequence, they remain politically invisible and structurally marginalised, and the NRSF ignores their presence and offers no targeted measures to address their exclusion from housing, employment, healthcare, or education.

INTRODUCTION

The Roma population in Denmark can broadly be divided into two groups: domestic Roma and mobile EU citizens from other Member States of Roma origin.¹ No official statistics exist, as Danish authorities do not register ethnic data.² Estimates suggest between 1,500 and 10,000 domestic Roma,³ mainly comprising migrant workers from the former Yugoslavia who settled in the 1970s and their descendants, along with refugees from the Balkan wars of the 1990s and their families.

There are likewise no official figures on intra-EU mobile citizens of Roma origin in Denmark. Most appear to come from Romania, with smaller numbers from Bulgaria and Hungary. Their situation is not addressed in the Danish NRSF; their problems are neither acknowledged nor discussed, and no policies target their needs. Consequently, their circumstances remain unchanged. Many face homelessness due to a lack of resources for housing, exclusion from the labour market, and reliance on informal work such as recycling bottles, collecting scrap metal, or selling street magazines.

Roma with Danish citizenship or permanent residency are formally entitled to equal access to education, healthcare, social housing, labour market assistance, and social benefits. However, many mobile Roma from other EU states cannot access these rights in practice, as they are unable to obtain the national registration (CPR) number required for social assistance and housing.⁴

National Roma strategic framework

Denmark adopted its National Roma Strategic Framework (NRSF)⁵ on 25 October 2021, following the Council Recommendation on Roma Equality, Inclusion and Participation. The NRSF formally mirrors the EU Roma Strategic Framework (EURSF), with horizontal objectives on equality, inclusion, and participation, and sectoral goals on education, employment, healthcare, housing, and services. Compared with the earlier National Roma Integration Strategy (NRIS) of 2011, the 2021 NRSF is more elaborated and explicitly references mainstream approaches in the fields of social inclusion, non-discrimination, integration, and participation.

Nevertheless, the NRSF contains no Roma-targeted measures, sets no concrete goals, and establishes no monitoring mechanisms. It does not address antigypsyism as a specific form of racism, nor the discrimination and stigmatising rhetoric directed at some mobile EU citizens experiencing homelessness in Denmark who are frequently portrayed as Roma in public discourse. The absence of targeted measures leaves Danish authorities with no concrete responsibility to ensure that Roma are actually supported by mainstream policies in practice. Furthermore, Roma communities and representatives were not consulted during the drafting of the framework and remain excluded from its implementation and monitoring.

Danish authorities maintain that mainstream welfare and equality measures are sufficient to integrate Roma, arguing that Roma, like all legally resident individuals, have formal access to education, employment, healthcare, and housing. This universalist position is presented as a principle of fairness, suggesting that targeted interventions are unnecessary and even counterproductive. Yet this approach overlooks the structural disadvantages that Roma face, particularly racism, antigypsyist stereotypes, and discriminatory practices, which in practice prevent equal access to and benefit from mainstream measures. Without steps that actively

¹ The context is also elaborated in the RCM 2017-2020 reports on Denmark, available at: <https://www.romacivilmonitoring.eu/countries/denmark/>

² Danish legislation concerning personal data collection available at: <https://www.retsinformation.dk/forms/r0710.aspx?id=828>

³ DIHR report 2012:4; Committee on Legal Affairs 2002: Appendix 1; Danish website about Roma developed by Biljana Muncan and Johannes Laursen: http://romnet.dk/spg.html#_antal

⁴ For more details on the situation of intra-EU mobile citizens of Roma origin in Denmark, please, see: Roma Civil Monitor – Ravnbøl, Camilla Ida. (2020). *Civil society monitoring report on implementation of the national Roma integration strategy in Denmark: Identifying blind spots in Roma inclusion policy*. Publication Office of the European Union. Available at: <https://www.romacivilmonitoring.eu/pdf/rcm-civil-society-monitoring-report-3-denmark-2019-eprint-fin.pdf>

⁵ Available at: https://commission.europa.eu/document/download/b3b3ca08-d8dc-4db7-b76b-eb53ef576c12_en?filename=brurepprn02_brurep4xx05_1854_001.pdf

address these systemic barriers, the promise of universal access remains theoretical, ensuring equality only de jure, not de facto. The omission is particularly severe for intra-EU migrant Roma who, due to precarious socio-economic conditions, homelessness, and insecure employment, are especially vulnerable to exclusion.

By contrast, other EU Member States with comparable Roma populations, similar intra-EU migration patterns, and analogous challenges of exclusion have adopted more ambitious, Roma-targeted approaches. Such measures not only mitigate the effects of structural discrimination but also create pathways for Roma to benefit from mainstream policies on equal terms with the wider population.

About this report

While the previous 2022 Roma Civil Monitor (RCM) report on Denmark assessed the quality of the NRSF,⁶ the present follow-up report shifts focus to the quality of its implementation.

The main obstacle in conducting this assessment is the absence of reliable information about Roma in Denmark.⁷ Notably, the Danish Institute for Human Rights (DIHR), in its 2023 analysis of the national strategy,⁸ relied almost exclusively on findings from the earlier RCM reports⁹ as its only source of substantive information on Roma in Denmark.

In this context, the present report had to draw upon a very limited set of publicly available materials, including official documents and thematic reports.

An attempt was made to complement this desk research with interviews, but the possibilities proved very restricted. The author sought to interview Denmark's National Roma Contact Point (NRCP) at the Ministry of Immigration and Integration (MII). Initial outreach was met with refusal, criticising the wording of the author's email sent as the invitation to participate in the interview. Despite repeated follow-ups, the NRCP ultimately, has not granted the interview.

As Denmark does not have an active Roma civil society, and Roma-related issues remain largely outside the agenda of mainstream human rights organisations, it was not possible to include CSO representatives to the development of this report. Eventually, the only interview conducted for this report was with a journalist who openly identifies as Roma, whose testimony illustrates both the persistence of antigypsyism and the invisibility of Roma perspectives in public policy.

⁶ Roma Civil Monitor – Ravnbøl, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark*. Brussels: Publications Office of the European Union, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-pdf>

⁷ For more detailed discussion of the lack of information on Roma, please, see: Roma Civil Monitor – Ravnbøl, Camilla Ida. *Civil society monitoring report on implementation of the national Roma integration strategy in Denmark: Identifying blind spots in Roma inclusion policy*. Brussels: Publications Office of the European Union, 2020. Available at: <https://www.romacivilmonitoring.eu/pdf/rcm-civil-society-monitoring-report-3-denmark-2019-eprint-fin.pdf>

⁸ Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse. [Denmark's Roma strategy does not meet European obligations: Analysis.]* Copenhagen: DIHR, August 2023. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%2C%20analyse%2C%20august%202023.pdf>

⁹ The previous RCM reports on Denmark are available at: <https://www.romacivilmonitoring.eu/countries/denmark/>

1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

The implementation of Denmark's NRSF is effectively non-existent, reflecting the exceptionally low level of ambition regarding Roma equality, inclusion, and participation.

Although Denmark has formally committed to ensuring equal treatment of Roma and combating discrimination, the NRSF remains non-specific, lacking measurable targets, participatory structures, and concrete implementation mechanisms.¹⁰

Roma communities have not been invited to participate in either the development or implementation of the NRSF.

Roma exclusion is rooted in Denmark's universalist approach, where Roma are regarded as equal to all other legally residing individuals in Denmark and therefore at least formally granted equal access to services such as education, healthcare, and employment. The Ministry of Immigration and Integration even comments in the Sixth Cycle of monitoring under the Framework Convention for the Protection of National Minorities:

*"Denmark does not have and does not consider it productive to have integration policies specifically aimed at specific ethnic groups, hence neither the Roma population."*¹¹

Hence, Danish authorities replace concrete action with abstract values. While Denmark claims to align with the EU Roma Strategic Framework (EURSF), it does so only through rhetorical adherence to general principles like equal treatment and universal access—avoiding the core elements of the EU recommendation, including targeted measures, measurable goals, and Roma participation. This has also been European Commission's assessment of the Danish NRSF:

*"Although the adopted national framework is titled as 'Strategy on Roma equality, inclusion and participation', it mostly refers to mainstream policies and initiatives concerning legal residents and persons of foreign background, lacking substantiation on specific information and measures about the Roma (...)"*¹²

Moreover, Denmark has not introduced a national Roma platform that would enable involvement or at least informing of Roma or other stakeholders, action plans, to operationalise the NRSF's objectives, or cross-ministerial coordination bodies to ensure institutional commitment or policy coherence.

1.2. NRSF's synergy with domestic and EU actions

The Danish NRSF is formally aligned with broader national equality and inclusion policies, but its operational synergy with both domestic and EU frameworks remains weak or even absent.

¹⁰ Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse.* [Denmark's Roma strategy does not meet European obligations: Analysis.] Copenhagen: DIHR, August 2023, pp. 1-2. Available at:

<https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%2C%20analyse%2C%20august%202023.pdf>

¹¹ Ministry of Immigration and Integration. Comments by the Government of Denmark on the Sixth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities. Copenhagen: Ministry of Immigration and Integration, 2024, p. 4.

¹² Quoted in: Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse.* [Denmark's Roma strategy does not meet European obligations: Analysis.] Copenhagen: DIHR, August 2023. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%2C%20analyse%2C%20august%202023.pdf>

The strategy refers to existing mainstream measures intended for the general population and fails to provide targeted initiatives that address the specific barriers faced by Roma communities.¹³ There is no institutional coordination mechanism that ensures consistent implementation across ministries or with local authorities.

Furthermore, the NRSF lacks an integrated approach that would align with key domestic policies such as anti-discrimination efforts, housing, healthcare, or employment strategies in ways that are sensitive to the unique vulnerabilities of Roma individuals. As a result, implementation appears disconnected from both domestic sectoral policies and EU strategic priorities.¹⁴

1.2.1. Complementary policies

Although Denmark has a robust general welfare and inclusion system, the NRSF does not establish links or complementarities between these existing policies and the needs of Roma.

The fact that the Danish Ministry of Immigration and Integration, as mentioned above, does not consider it productive to have integration policies for Roma or any other national minority¹⁵ means that Roma are expected to benefit from general inclusion frameworks on an equal footing with others. Yet in practice, this approach does not account for structural discrimination, or the specific social disadvantages faced by Roma.

The absence of policy tools such as ethnic impact assessments, community outreach, and affirmative action undermines the NRSF's ability to support Roma equitably. In other EU countries, strategic frameworks have increasingly recognised the need to complement mainstream services with targeted actions to overcome systemic barriers. Denmark's reliance on a "mainstream-only" logic fails to reflect this evolving policy thinking.

1.2.2. Alignment with EU actions

While the Danish NRSF formally refers to the EU Roma Strategic Framework 2020-2030 and the Council Recommendation of 2021, it falls short of aligning with their substantive requirements including, meaningful Roma participation, and institutional accountability mechanisms. These core principles are not operationalised in Denmark's strategy.

Another key point of divergence is the lack of disaggregated ethnic data. Denmark refrains from collecting such data on legal grounds, which significantly hampers the ability to assess Roma inclusion or monitor ethnic disparities — despite EU guidance explicitly encouraging data collection that respects data protection norms.¹⁶ This absence of evidence-based monitoring also inhibits the development of relevant performance indicators or corrective action.

In effect, Denmark's alignment with EU actions is largely declarative rather than structural or functional. The lack of targeted interventions, funding mechanisms, and monitoring tools limits the strategy's ability to translate EU priorities into national practice. The Danish Institute for Human Rights has similarly criticised the strategy as vague and non-committal, calling for stronger operational linkages with the EU framework and a

¹³ Roma Civil Monitor – Ravnbøl, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark*. Brussels: Publications Office of the European Union, 2022, p. 32. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-pdf>

¹⁴ Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse*. [Denmark's Roma strategy does not meet European obligations: Analysis.] Copenhagen: DIHR, August 2023, p. 27. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%20analyse%20august%202023.pdf>

¹⁵ Ministry of Immigration and Integration. *Comments by the Government of Denmark on the Sixth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities*. Copenhagen: Ministry of Immigration and Integration, 2024, p. 4.

¹⁶ Roma Civil Monitor – Ravnbøl, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark*. Brussels: Publications Office of the European Union, 2022. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-pdf>

revision of the NRSF to ensure it meets minimum obligations.¹⁷ Danish Institute for Human Rights (DIHR) has further highlighted that Finland, like Denmark, has a relatively small Roma population, estimated at 0.21 percent of the total population, corresponding to approximately 11,000 individuals. However, the relatively limited presence of Roma has not prevented Finland from setting national targets that either directly correspond to the EU objectives or aim to address other relevant challenges.¹⁸

1.3. Roma participation in implementation and monitoring

Roma have not been involved in the implementation or monitoring of the NRSF. As documented by the previous RCM report on Denmark, Roma representatives were not consulted during the drafting of the NRSF,¹⁹ and – despite recommendations from DIHR – no steps have been taken to include Roma in either phase. While there are currently no formally active Roma CSOs, individual Roma representatives could have been invited by public authorities to contribute to the process.

In 2024, the Council of Europe (CoE) raised explicit concerns about the very limited political and institutional participation of Roma in Denmark.²⁰ Since Roma are not recognised as a national minority, they remain excluded from minority rights frameworks and consultation mechanisms. The CoE's Advisory Committee on the Framework Convention for the Protection of National Minorities highlights that Denmark's "one-size-fits-all" approach provides no targeted support for Roma civil society and urges the authorities to revise the Roma Strategy in close cooperation with Roma representatives to create an environment where Roma feel safe to self-identify.²¹

In its response, the Ministry of Immigration and Integration stresses that the EURSF allows for differentiated approaches based on national circumstances. Denmark "does not have and does not consider it productive to have integration policies specifically aimed at specific ethnic groups, including the Roma population". Instead, Roma are said to have equal access to universal welfare services.

While this is presented as a principle of equal treatment, it effectively rejects targeted measures and structured cooperation with Roma representatives, undermining the EURSF's emphasis on co-ownership, targeted engagement, and capacity-building.

1.3.1. Involvement of Roma CSOs in implementation

Denmark has made no efforts to create or support Roma-led organisations that could act as partners in implementation. The absence of targeted capacity-building measures—such as funding schemes, training programmes, or organisational support—has meant that there are currently no active Roma CSOs capable of engaging with public authorities on an institutional level. Ravnøhl highlights that Roma involvement in Denmark occurs only ad hoc and relies on individual initiatives, making participation dependent on personal networks rather than on systemic, sustainable collaboration.

As confirmed by Wøhlert, a journalist with Roma background, he has never heard of any Roma representatives being contacted regarding the NRSF's implementation. This reflects both a lack of outreach by authorities and the absence of a mechanism to identify and engage potential Roma partners. Without investment in building

¹⁷ Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse.* [Denmark's Roma strategy does not meet European obligations: Analysis.] Copenhagen: DIHR, August 2023. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%2C%20analyse%2C%20august%202023.pdf>

¹⁸ Ibid, p. 12.

¹⁹ Roma Civil Monitor – Ravnøhl, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark.* Brussels: Publications Office of the European Union, 2022, p. 9-10. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-.pdf>

²⁰ Council of Europe. *Sixth Opinion on Denmark, Advisory Committee on the Framework Convention for the Protection of National Minorities.* Strasbourg: Council of Europe, 2024, paras. 78–82. Available at: <https://rm.coe.int/6th-op-denmark-summary-dk/1680b05cf1>

²¹ Ibid, para. 82, Article 6.

organisational capacity, Roma voices remain excluded from recognised implementation roles at both national and local levels.

1.3.2. Roma in public institutions implementing the NRSF

Roma are also excluded from the institutions responsible for implementing the NRSF, with no known cases of Roma employed in relevant ministries, agencies, or local authorities. The lack of targeted recruitment or diversity measures further limits the chances of Roma perspectives shaping NRSF policies and practices.

1.3.3. Roma participation in monitoring and evaluation

The lack of Roma involvement also extends to the monitoring and evaluation of the NRSF. There are no formal mechanisms enabling Roma representatives to participate in data collection, indicator review, or the assessment of progress.

Furthermore, Denmark's policy of not collecting ethnically disaggregated data is used by the Ministry of Immigration and Integration (MII) to argue that it is therefore impossible to evaluate the NRSF's specific impact on Roma.²² This situation has been criticised also by the CoE.²³

By contrast, the Danish Institute for Human Rights (DIHR) highlights that Finland has developed monitoring approaches in cooperation with Roma representatives, using voluntary surveys and qualitative studies to gather data on education, employment, and housing.²⁴ These methods allow for targeted policy evaluation without violating privacy, and they illustrate that alternative, rights-compliant approaches to data collection are possible, yet absent in the Danish context.

²² Ministry of Immigration and Integration. *Comments by the Government of Denmark on the Sixth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities*. Copenhagen: Ministry of Immigration and Integration, 2024.

²³ Council of Europe. *Sixth Opinion on Denmark, Advisory Committee on the Framework Convention for the Protection of National Minorities*. Strasbourg: Council of Europe, 2024. Available at: <https://rm.coe.int/6th-op-denmark-summary-dk/1680b05cf1>

²⁴ Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse. [Denmark's Roma strategy does not meet European obligations: Analysis.]* Copenhagen: DIHR, August 2023. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%2C%20analyse%2C%20august%202023.pdf>

2. FOCUS ON KEY ISSUES AFFECTING ROMA

2.1. Fighting antigypsyism and discrimination

Discrimination, antigypsyist rhetoric, and political hostility toward Roma remain persistent challenges in Denmark. Roma civil society representatives consistently report that stigmatization and prejudice deter participation in public life and reinforce social exclusion.²⁵ Public discourse continues to feature openly negative portrayals of Roma, widely disseminated on platforms such as Reddit and Facebook, as well as in local newspapers.²⁶

The term *Roma* is frequently used in a pejorative context and is often replaced with the derogatory term *sigøjner* ("gypsy").²⁷ Roma are regularly portrayed as a homogenous group associated with criminality, homelessness, and begging, leading to collective stigmatisation. Political and media actors commonly refer to homeless encampments as "Roma camps" and individuals who beg as "Roma beggars," regardless of their actual or self-declared ethnicity.²⁸ Such language reinforces the image of Roma as inherently problematic and fuels exclusion.

Roma are still framed in public discourse as a group that disrupts order and contributes to urban decline. For example, in a local newspaper article about "Basar under Buen" in the Nordvest district of Copenhagen, a resident described how Roma-linked activities made her consider relocating. She associated Roma with *svineri* ("filth"), disorder, and illegal behaviour, stating she had to chase Roma individuals out of her backyard while they searched through waste containers.²⁹ Statements referring to Roma as a "Roma plague" or a "Roma occupation" continue to appear in political debates.³⁰

This is closely connected to the lack of effective integration policy concerning a part of intra-EU migrant Roma who face persistent exclusion. Many experience homelessness, precarious work, and reliance on informal street economies, exposing them to intensified policing and restrictive measures. Public discourse often portrays them collectively as a "problem group," fuelling stigma and hostility. Yet the Danish NRSF fails to acknowledge their presence or outline steps to ensure access to housing, employment, healthcare, or education. Instead, they are

²⁵ Roma Civil Monitor – Ravnø, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark*. Brussels: Publications Office of the European Union, 2022, p. 32. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-.pdf>

²⁶ For example, see: https://www.reddit.com/r/Aarhus/comments/1inpshx/vil_folk_i_aarhus_ikke_godt_stoppe_med_at_give/ or: <https://www.facebook.com/berlingske/posts/tv-2-har-fat-i-et-af-tidens-staende-dilemmaer-med-en-dokumentar-der-viser-to-kun-1136055105215516/>

²⁷ Ekstra Bladet. "De kriminelle familier." [*The criminal families.*] 12 October 2024, available at: <https://ekstrabladet.dk/nyheder/lederen/de-kriminelle-familier/10400250>

²⁸ Roma Civil Monitor – Ravnø, Camilla Ida. *Civil society monitoring report on implementation of the national Roma integration strategy in Denmark: Identifying blind spots in Roma inclusion policy*. Brussels: Publications Office of the European Union, 2020. Available at: <https://www.romacivilmonitoring.eu/pdf/rcm-civil-society-monitoring-report-3-denmark-2019-eprint-fin.pdf>

²⁹ kbenhavnliv.dk. "Spillereglerne blev ændret på forhadet plads, men Katrine vil stadig flytte: 'i er til grin'." [*The rules of the game were changed at the despised square, but Katrine still wants to move: 'We are a laughingstock.'*] 15 January 2025. Available at: <https://kbenhavnliv.dk/byliv/spillereglerne-blev-aendret-paa-forhadet-plads-men-katrine-vil-stadig-flytte-vi-er-til-grin>

³⁰ See: Roma Civil Monitor – Ravnø, Camilla Ida. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Denmark*. Brussels: Publications Office of the European Union, 2022, p. 32. Available at: <https://romacivilmonitoring.eu/wp-content/uploads/2023/08/RCM2-2022-C4-Denmark-CATALOGUE.DOCX-.pdf>

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formally covered by universal welfare provisions that remain inaccessible in practice due to legal, administrative, and social barriers.

Previous RCM reports on Denmark have repeatedly underlined these shortcomings.³¹ With no dedicated measures, outreach, or support mechanisms, this population remains politically invisible and structurally marginalised, forced to navigate systemic discrimination without institutional backing or pathways to genuine inclusion.

Journalist Kenneth Wøhlert, who is of Roma background, notes in an interview conducted for this report that Roma are consistently associated with criminality in Danish discourse, often in ways that would be publicly unacceptable for other ethnic groups. He stresses that if the word Roma were replaced with Jews, it would be a scandal. Like many others, Wøhlert concealed his Roma identity until the age of 30 and only disclosed it to his children during their teenage years. His experience reflects a broader pattern among Danish Roma of hiding ethnic identity to avoid stigma. He describes how public discourse reinforces the perception of Roma as “second-class citizens,” discouraging active participation in civic life, an effect amplified by both political and media rhetoric.

2.1.1. Effectiveness of the NRSF in addressing the problems

The Danish NRSF does not recognise antigypsyism as a structural or political problem. This omission persists despite ample evidence of antigypsyist rhetoric in public and political discourse.

As mentioned above, the NRSF relies solely on general anti-discrimination legislation. It omits Roma-specific measures, sets no concrete goals, allocates no targeted funding, and lacks indicators to monitor progress. It also fails to address key issues such as hate speech, ethnic profiling, or systemic exclusion.³²

This generalised and minimal approach fails to account for the specific barriers that Roma face and does not offer an adequate response to their exclusion. As a result, the NRSF is ineffective in addressing antigypsyism and does not meet the obligations laid out in the EURSF.

2.1.2. Addressing the problems beyond the NRSF

Outside the NRSF, Denmark’s institutional response to antigypsyism remains fragmented, minimal, and largely symbolic. Despite consistent recommendations from DIHR, ECRI, and the CoE’s Advisory Committee on the Framework Convention for the Protection of National Minorities, Roma are not recognised as a national minority. No institutional mechanisms exist to ensure their inclusion in policy development or decision-making processes.

In its 2024 opinion, the CoE’s Committee strongly criticised the Danish government for the total absence of targeted measures—such as efforts to combat antigypsyism, support Roma youth, or promote Roma cultural heritage as signs of institutional neglect. It also expressed concern over the disproportionate enforcement of anti-camping laws against Roma experiencing homelessness and Denmark’s failure to address poverty among migrant Roma.³³

A concrete example of political denial comes from a 2023 parliamentary exchange. Member of Parliament Rosa Lund (*Enhedslisten*), a member of the Immigration and Integration Committee, asked Minister Kaare Dybvad Bek how the government intended to ensure Roma participation in policy and uphold Denmark’s human

³¹ The previous RCM reports on Denmark are available at: <https://www.romacivilmonitoring.eu/countries/denmark/>

³² Danish Institute for Human Rights. *Danmarks romastrategi lever ikke op til europæiske forpligtelser: Analyse.* [Denmark’s Roma strategy does not meet European obligations: Analysis.] Copenhagen: DIHR, August 2023, p. 27. Available at: <https://menneskeret.dk/files/media/document/Danmarks%20romastrategi%20lever%20ikke%20op%20til%20europæiske%20forpligtelser%20C%20analyse%20C%20august%202023.pdf>

³³ Council of Europe. *Sixth Opinion on Denmark, Advisory Committee on the Framework Convention for the Protection of National Minorities.* Strasbourg: Council of Europe, 2024. Available at: <https://rm.coe.int/6th-op-denmark-summary-dk/1680b05cf1>

rights commitments. The Minister replied that Denmark's universal welfare model rendered targeted Roma inclusion unnecessary and stated there was no significant Roma population to justify specific action.³⁴

The NRSF does not recognise the relevance of addressing political antigypsyist rhetoric, despite the fact that in 2017, Trine Bramsen of the Social Democrats publicly asserted that Roma engaged in begging were likely under the control of "criminal ringleaders," describing them as "modern slaves" and urging the public to stop giving them money. Although framed as concern for victims, her repeated use of the term "Roma beggars" equated ethnicity with criminality and reinforced the stereotype of Roma as inherently linked to illegal activity. Bramsen also called for restrictions on Roma mobility at the EU level, portraying their presence in Denmark as a public threat. This narrative criminalises Roma as a group, obscures individual rights, and legitimises exclusionary policy. Her remarks are part of a broader pattern in Danish political discourse that shifts attention from structural inequality to punitive control.

Notably, Minister Kaare Dybvad Bek and Trine Bramsen are both from the Social Democrats and therefore represent the same party, one that has both equated Roma presence with criminal behaviour and, simultaneously, denied the need for Roma-specific policies. This underscores how antigypsyist rhetoric and policy denial are not isolated incidents but rather reflect a broader reluctance within the party to engage constructively with antigypsyism as a structural issue.

While prominent Social Democratic politicians have contributed to antigypsyist narratives, the Ministry of Immigration and Integration under Minister Kaare Dybvad Bek has echoed these views through its rejection of targeted Roma policies. This reinforces exclusion and prevents the development of rights-based strategies.

³⁴ Ministry of Immigration and Integration. *Endeligt svar på spørgsmål nr. 361 (alm. del) stillet af Rosa Lund (EL) vedrørende dansk romastrategi. [inal reply to question no. 361 (general section) submitted by Rosa Lund (EL) concerning the Danish Roma strategy.]* 14. september 2023. Available at: <https://www.ft.dk/samling/2022/almdele/uu/spm/361/svar/1953244/index.htm>

Ministry of Immigration and Integration. *Endeligt svar på spørgsmål nr. 362 (alm. del) stillet af Rosa Lund (EL) vedrørende inddragelse af romaerne. [Final reply to question no. 362 (general section) submitted by Rosa Lund (EL) concerning the involvement of the Roma.]* 14. september 2023. Available at: <https://www.ft.dk/samling/2022/almdele/uu/spm/362/svar/1953245/index.htm>

CONCLUSIONS AND RECOMMENDATIONS

Denmark's NRSF remains largely symbolic, with no clear actions, targets, or monitoring arrangements. While it follows the formal structure of the Eursf, it does not move beyond references to existing mainstream welfare policies. Authorities insist that these are sufficient to ensure equality, yet this stance disregards persistent antigypsyism, discrimination, and barriers that Roma encounter in practice.

Roma remain excluded from both the drafting and implementation of the NRSF, and no structures exist to support their participation. The absence of Roma civil society, combined with a lack of capacity-building initiatives, leaves Roma perspectives invisible in policymaking. Denmark's refusal to collect ethnic data further prevents proper monitoring of inequalities.

Recommendations to national authorities

1. Revise the NRSF to include Roma-targeted objectives, concrete actions to make the mainstream measures, services and opportunities better accessible for Roma.
2. Set up measurable targets and indicators allowing for monitoring and implementation of the NRSF.
3. Recognise antigypsyism as a structural form of racism in national policy and develop measures to combat hate speech, discriminatory practices, and stereotypes. Allocate budget for these actions.
4. Establish participatory mechanisms by involving Roma representatives in consultations, monitoring, and decision-making, and invest in building the capacity of Roma civil society.
5. This will require encouraging Roma to participate; focusing on building trust and empowerment of Roma youth from intra-EU mobile population can be productive.
6. Improve data collection through rights-compliant methods (e.g. voluntary surveys, qualitative studies) to enable evidence-based monitoring of Roma inclusion.
7. Develop targeted support for intra-EU migrant Roma, particularly in housing, healthcare, employment, and education, ensuring they can access mainstream services in practice.

Recommendations to European institutions

8. Support and encourage further exchange of good practices between Member States with similar Roma population and types of challenges experienced.
9. Monitor how mobile EU citizens are affected by the implementation of Danish legislation in cases concerning rough sleeping and begging.

Recommendations to the civil society

10. For Roma representatives: contact the Roma Contact Point at the Ministry for Immigration and Integration to ensure that Roma representatives are consulted and included in mainstream activities for equality, inclusion and participation.
11. For broader civil society in Denmark: invite Roma representatives to participate in mainstream measures concerning the inclusion of ethnic minorities. Plan and coordinate Roma-targeted initiatives together with Roma communities.
12. Monitor whether and how Danish authorities and private actors discriminate against mobile EU citizens of Roma origin, particularly in cases concerning rough sleeping (camping) and at private camping grounds.

Recommendations to other stakeholders

13. For scholars: Conduct studies together with Roma communities and Roma researchers on the situation of Roma inclusion in Denmark.

14. For private foundations: invite Roma to apply for funds to establish Roma civil society organisations so they can obtain the support that is necessary in the start-up process. Prepare funding calls that involve Roma inclusion so that new initiatives can be supported.

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