

to the Commission Implementing Decision on the financing of the multi-country multiannual action plan in favour of the Western Balkans and Turkey for 2021-2022

Action Document for “EU support to fundamental rights of Roma in the Western Balkans and Turkey”

1. SYNOPSIS

1.1. Action Summary Table

Title	EU support to fundamental rights of Roma in the Western Balkans and Turkey Multi-country multiannual action plan in favour of the Western Balkans and Turkey for 2021-2022			
CRIS/OPSYS number	IPA III/2021/043-643/04			
Basic Act	Financed under the Instrument for Pre-accession Assistance (IPA III)			
Team Europe Initiative	No			
Zone benefiting from the action	Western Balkans (Republic of Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, Republic of North Macedonia, and Republic of Serbia) and Republic of Turkey			
Programming document	IPA III Programming Framework			
PRIORITY AREAS AND SECTOR INFORMATION				
Window and thematic priority	Window 1: Rule of law, fundamental rights and democracy Thematic priority 5: Fundamental rights			
Sustainable Development Goals (SDGs)	Main SDG : 1 - End poverty in all its forms everywhere Other significant SDG: 11 - Make cities inclusive, safe, resilient and sustainable			
DAC code(s)	15160 – Human rights - 30% 15150 – Democratic participation and civil society – 70%			
Main Delivery Channel	Donor country-based NGO) –22000 Other multilateral institution – Regional Cooperation Council (RCC) – 47000 Developing country-based NGO - Roma Active Albania (RAA) – 23000			
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women’s and girl’s empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

	Trade development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers @	Not targeted	Significant objective	Principal objective
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internal markers	Policy objectives	Not targeted	Significant objective	Principal objective
	Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUDGET INFORMATION				
Amounts concerned	Budget line: 15 02 01 01.01 Total estimated cost: EUR 7 000 000 Total amount of EU budget contribution: EUR 7 000 000 – year 2021			
MANAGEMENT AND IMPLEMENTATION				
Type of financing and method(s) of implementation	Project Modality Direct management through: Grants			
Relevant priorities and flagships from Economic and Investment Plan for the Western Balkans	Priorities: Human capital development - <i>Not in financial terms</i>			
Final date for concluding contribution / delegation agreements, procurement and grant contracts	At the latest by 31 December 2022			
Indicative operational implementation period	72 months following the adoption of the Financing Decision			

1.2. Summary of the Action

In the context of continued marginalisation and discrimination facing this group, the action will support implementation of fundamental rights of Roma¹ in the enlargement region²³. It will contribute to supporting implementation of inclusion policies; and enhancing access to basic socio-economic rights: civil documentation, education, employment, healthcare, housing and combatting antigypsism and discrimination of Roma. The action will also assist the progressive implementation in the enlargement region of the new “2020-2030 EU Roma strategic framework for equality, inclusion and participation”⁴; progress on fulfilment of Roma inclusion commitments taken under the negotiations chapter 23; and, as relevant, the 2019 Declaration of Western Balkans partners on Roma integration within the EU enlargement process (Poznan declaration)⁵.

The action consists of 3 components:

Component 1: Roma Integration phase III

It will implement the third phase of the Roma Integration action. It will continue to support implementation of governmental policies for Roma inclusion in the enlargement region, mirroring the efforts for Roma equality, inclusion and participation taking place within the EU; and, in the Western Balkans, particularly focusing on the [Poznan Declaration](#) objectives, the Economic and Investment Plan (EIP) for the Western Balkans⁶ as well as the green agenda, digital agenda, renovation wave and investment facilities. This will be done through policy advice, technical support and implementation of pilot initiatives with direct effects on the ground.

Component 2: EU Regional action for Roma Education and Employment: Increased education and employment opportunities for Roma students in Western Balkans and Turkey, phase II

It will support Roma children and youth in accessing better quality and long-term education, reducing drop outs, support the gender equality. It and will also contribute to increasing the potential and opportunities for employability of Roma the youth facilitating the transfer for education to employment. The action will actively cooperate with other relevant Roma inclusion projects, involve relevant local, national and international diverse stakeholders, (such as policymakers, project implementers and the beneficiary communities), and it will foster setting up Roma youth networks and regional knowledge transfer in the Western Balkans and Turkey.

Component 3: 5th EU Roma integration Award for Western Balkans and Turkey 2023

It is a continuation of what has become one of the most successful and visible communication tools on Roma inclusion both at local, national regional, and EU level. The Award contributes to improve positive visibility, self-perception and empowerment of Roma individuals and communities, as the awardees go back to their communities with prestige as interlocutors, strengthened in the conviction that their work matters and is appreciated.

2. RATIONALE

2.1. Context Analysis

The [EU Roma Strategic Framework for Equality, Inclusion and Participation](#) was issued by the European Commission on 7 October 2020. It provides for a comprehensive three-pillar approach, which complements the ongoing efforts towards the socio-economic inclusion of Roma while also fostering equality and promoting participation, in particular in the public service and public life. The new EU Roma Framework emphasises the situation and ambition for Roma in the EU enlargement region: *"The presence of Roma in Western Balkans is important and similar to EU Member*

¹ In line with the terminology of European institutions the umbrella term ‘Roma’ is used here to refer to a number of different groups (e.g. Roma, Sinti, Kale, Gypsies, Romanichels, Boyash, Ashkali, Egyptians, Yenish, Dom, Lom, Rom, Abdal...) without denying the specificities of these groups.

² According to the UNDP/World Banks study [“Breaking the Cycle of Roma Exclusion in the Western Balkans”](#), [Roma is the most discriminated minority in the Western Balkans. In Turkey, in a nationwide survey conducted in 2017, respondents who identify themselves as Roma have higher rate of perceived discrimination in their daily lives in access to jobs, housing and education.](#)

³ Roma people are not considered minorities under Turkish legislation. According to the Turkish legal system the word minorities encompasses only group of people defined and recognized as such on the basis of multilateral and bilateral instruments to which Turkey is a party.

⁴ COM(2020) 620, 7.10.2020: A Union of Equality: EU Roma strategic framework for equality, inclusion and participation.

⁵ Turkey is not a party to this Declaration.

⁶ COM(2020) 641, 6.10.2020.

States with a significant Roma population. There is a compelling case for addressing Roma equality, inclusion and participation in the EU and Western Balkans in the same way, including application of the same objectives for the period up to 2030. In July 2019, the Western Balkans prime ministers adopted a Declaration on Roma integration in the EU enlargement process (Poznan Declaration), committing themselves to the concrete improvement of the situation of Roma as regards education, employment, health, housing, civil registration and non-discrimination by the time of their accession. The EU will continue to support implementation of the Declaration and the work on data collection, Roma-responsive budgeting and the mapping of Roma housing. Progressive alignment with EU objectives and methodology will be part of the European perspective for all countries seeking to join the EU."

The abovementioned excerpt from the EU Roma Framework recognises and builds on the work by the Regional Cooperation Council (RCC) implemented Roma Integration action during its first and second phases.

The IPA III Programming framework indicates under Window 1, thematic priority 5, that decisive efforts are needed to protect minorities and, in line with the EU equal treatment *acquis*, fight discrimination, including against persons of the Roma community.

Education:

Most Roma children in the Western Balkans do not attend Early Childhood Education facilities, which leads to a shorter educational path and increased dropout rates from primary education, following also early school leaving. Incomplete primary education hinders completion of secondary education and far fewer students (close to 0%) move on to tertiary education. Low educational qualifications result in high unemployment rates among Roma youth and reduced ability to search for skilled jobs. Another major difficulty young Roma face in the region is the discriminatory attitude of employers and the rooted stereotypes against the Roma in the society when trying to access the formal labor market. Thus, Roma are forced into the precarious informal/grey economy with no access to employment based social and employment security system rights.

The action is in line with the EU priorities, namely to reduce the Roma/non-Roma gap in accessing and completing quality education, to reduce the gap between completion of education between Roma boys and girls, to improve the situation for Roma children and youth, to facilitate, from the point of view of education services and support, the transition from education to employment, and to promote durable systemic change and inclusion within education systems in the region. In addition the project objectives will support the implementation of the education and employment commitments taken by Western Balkans partners in the context of the Poznan Declaration .

2.2. Problem analysis by areas of support

Since the Roma Integration component is focusing on extending the EU efforts on Roma equality, inclusion and participation to the region, it addresses similar priorities intervention areas as in the EU Member States. The following areas of support by the different components of the action are addressed:

Component 1 - Roma Integration phase III

AREA OF SUPPORT #1: Equality and mainstreaming

Equality and equal opportunities is a key area of intervention envisaged by the EU Roma Strategic Framework. Dismantling **antigypsyism** is at the core of this work, throughout all spheres of life in the EU enlargement region, including media. Relevant institutions rarely tackle this issue and legislation does not recognise it as a specific form of racism or discrimination. The Poznan Declaration calls for strengthening the government structures to protect against discrimination and establishing a dedicated department for non-discrimination against Roma in the existing equality bodies to provide for an institutional framework to deal with this challenge. Based on the limited data available, 36% of Roma in the Western Balkans reported that they have experienced discrimination in the last 12 months.⁷ Turkey is not included in the 2017 Regional Roma Survey conducted by the UNDP/WB Breaking the Cycle of Roma Exclusion in the Western Balkans. Therefore, no data resulting from this survey throughout the document refers to Turkey. However, according to studies on life conditions of Roma population in Turkey conducted - and the reports of workshops carried out by governmental institutions under the initiative called as "Roma Opening" declared by Turkish Government in 2009, Roma people are disadvantaged in several aspects and are particularly vulnerable to social exclusion and poverty. As in the other regions of the world, a large percentage of Roma in Turkey are afflicted by a number of inter-related issues like low rate of enrolment and attendance to primary schools, educational failure, low

⁷ The data are from the 2017 Regional Roma Survey conducted by the UNDP/WB Breaking the Cycle of Roma Exclusion in the Western Balkans

rate of transition to secondary education, housing problems, poor health situation, unemployment and prejudice and stereotypes which are creating a vicious circle of social exclusion and extreme poverty.

The Roma inclusion mainstreaming focuses on the major reform packages linked to the policy areas/targets of the EU Roma Framework, the Poznan Declaration and the main EU reform and investment packages, including the EIP, the green agenda and the digital agenda. Socio-economic policies must recognise specifically the challenges facing Roma and ensure that Roma benefit from such policies in order to reduce the existing gaps between Roma and non-Roma. In the region, although the strategies for Roma inclusion usually incorporate mainstream measures, such measures rarely recognise Roma as a vulnerable group in a specific situation and with specific needs. The programmes for active employment measures are a positive exception in some of the IPA beneficiaries, as they target Roma specifically as one of the priority groups. The Roma Integration action will work with IPA beneficiaries to ensure the relevant policies in the region recognise and support Roma interests and needs.

AREA OF SUPPORT #2: **Socio-economic area**

The Roma Integration action focuses in particular on employment and housing, as areas with slowest progress in the past two decades, as well as civil registration. In **housing**, the priority across the region is security of tenure/ownership and subsequently possible renovation. Many of the Roma dwellings are informal, and often on land which they do not own or cannot prove that they own. The 2017 Regional Roma Survey reports that 88.77% of Roma claim ownership of their dwellings, but often they lack legal paperwork. It is estimated that only about 20-30% of the dwellings are legal. The housing mapping exercise that the RCC Roma integration action is currently implementing should provide a better understanding of this problem.

In **employment**, the 2017 Regional Roma Survey indicators show a devastating situation with only 16.5% employment rate among Roma men and 7.33% for Roma women. The Not in Education, Employment, or Training (NEET) rate among Roma is as high as 78.5%. The rate of Roma in undeclared work in the region is 61%. For years, the governments are implementing the same active employment measures. These are not yielding significant results, as the situation stagnates, and the gap is increasing. The situation is also worrisome because of the current pandemic crisis, which significantly affects the opportunities for economic activities of Roma. The unemployment rate has a tendency to decrease, but without increasing the employment rate among Roma. Furthermore, Roma are underrepresented in the public sector.

In **civil registration**, as the United Nations High Commissioner for Refugees (UNHCR) reports, most of the cases of statelessness or at risk of statelessness in the region are Roma. The estimated number of unresolved cases is around 4500. According to the 2017 Regional Roma Survey, 97.5% of Roma have birth certificates and 90.5% of Roma have ID cards. The positive aspect is that most of the economies have made some efforts to reduce this number. In the second phase of the action, the governments worked on formulating roadmaps towards ending statelessness among Roma in the Western Balkans as part of their pledge to the UN Global Action Plan to end statelessness by 2024.

Besides the National Roma Contact Points (NRCs), the coordination bodies and the civil society, the stakeholders here include the relevant institutions for the areas, such as municipalities, ministries dealing with housing legalisation, employment services and ministries dealing with employment, and civil registration authorities. The third phase of the project will have activities directly dealing with the Roma communities on the ground.

AREA OF SUPPORT #3: **Institutional capacities**

Institutional capacities to implement Roma equality, inclusion and participation policies should include: 1) existence of official policy documents – strategies and action plans; 2) existence of institutional structures dealing with the policy – NRCs and coordination bodies (with participation of Roma and sufficient administrative capacities and institutional power); 3) regular social dialogue on this policy (national platforms, similar to those in EU Member States); 4) proper monitoring and reporting mechanism; and 5) existence of sufficient budget.

Policy documents on Roma integration exist in all the IPA beneficiaries and are currently being updated to reflect the new EU Roma Strategic Framework requirements. The third phase of the Roma Integration action should continue to support policy formulation and analysis as needed, particularly in terms of mid-assessment. Governments have designated NRCs, with different levels of capacities and mandate. The NRCs, including their teams if such exist and Roma public servants, need capacity building in order to effectively govern the policy cycle and mainstream Roma issues in general policies. The national platforms supported by the Roma Integration action are mostly the only opportunity for central level social dialogue on Roma.

With the 2013 Council Recommendation on Roma inclusion, the EU Member States committed to report on their Roma inclusion strategies. The Roma Integration action was given the task to assist with the regular reporting by the IPA beneficiaries to the European Commission. Overall, the reports scarcely included any statistical data or include outdated statistical data. In the second phase of the Roma Integration action, an initiative was launched for the

statistics offices to regularly conduct specific Roma surveys based on the methodology of the EU-funded Regional Roma Surveys, the FRA Roma Survey, the Poznan Declaration targets and the specific local contexts. This should help the monitoring, evaluation and learning efforts in the region. The 2020 EU Roma Strategic Framework puts an even higher emphasis on monitoring, reporting and evaluations than before.

In most of the region, governments are not properly planning the budget for integration of Roma⁸. Often, the budgets foreseen in strategies and action plans and the actual budgets allocated to their implementation do not correspond. Very often there are no reports on the spent budget, and as a rule the executed budget is lower than the planned. In the Western Balkans, governments endorsed the regional Guidelines for Roma Responsive Budgeting for budgeting Roma inclusion, as well as mainstream policies, including EU funding, but their implementation is very modest. The Roma Integration action phase III should focus on providing assistance towards the de facto implementation of these regionally adopted guidelines. A good best case example is the case of Albania that has included Roma responsive guidelines in the official Guideline No. 10 of 28/02/2020 on the "Preparation of the Medium-Term Budgeting 2021-2023" for local self-government units.

Component 2 - EU Regional Action for Roma Education and Employment

AREA OF SUPPORT #1: Early Childhood Education and Care

The challenges faced by Roma children in accessing quality early childhood education include a lack of preschool facilities, low level of attendance, low level of parental support, inability to cover preschool fees and other costs, as well as low quality of education. The schooling situation of Romani children has worsened with the the COVID-19 pandemic as schools have switched to distance education requiring technical equipment and infrastructure not available for most vulnerable Roma children.

Main stakeholders in this area include civil organisations, preschool institutions, Ministries, municipalities, parents and children. The action will be implemented in synergy with the mainstream and Roma inclusion preschool policies and other international programmes in the field of education for Roma (including Roma strategies and action plans and the Poznan Roma Declaration education objectives).

AREA OF SUPPORT #2: Primary Education and Desegregation

Primary school education is the key educational level as it is the longest educational period, but it is associated with high dropout rates for Roma. There is a need to channel Roma children into higher quality, non-segregated schools, or classes, in order to increase chances of school completion and the pursuit of secondary education. An important impact of the COVID-19 pandemic has been the lack of schooling at schools for those children who are/were enrolled by their parents.

Main stakeholders here include civil organisations, primary schools, municipalities, Ministries, parents and children. The action will be implemented in synergy with the mainstream and Roma inclusion policies and other international programmes in the field of education for Roma (including Roma strategies and action plans and the Poznan Roma Declaration education objectives).

AREA OF SUPPORT#3: Secondary Education

Despite schooling per se being free in the region, an important challenge faced by Roma students at secondary school level are lack of financial resources to cover related needs, which often cause that Roma students are involved in work to support their own needs and the needs of their family too. Also, the pupils face lack of support in preparation or the classes (lack of proper tutoring when it comes to remedial education). As a consequence, Roma students face low educational results and drop out too before graduation. An important impact of the COVID-19 pandemic has been the lack of schooling at secondary schools for those students who transferred to secondary education. Especially Roma students in remote and non-connected areas have suffered lack of virtually all type of secondary education and support, outreach and follow-up⁹. Lack of access to electricity, internet and basic TV or IT equipment has also been detrimental to their educational development. There is no information about VET (Vocational Education and Training) school outcomes, but since most educational institutions have been shut down due to the pandemic, it is estimated that most of these students have not been able to finalise their training, including the Roma VET students that have managed to pass the acceptance criteria. This is especially important constraints that will impact transfer to first employment for the foreseeable future.

⁸ The constitution of the Republic of Turkey does not allow a budgeting based on ethnicity

⁹ <https://ergonetwork.org/wp-content/uploads/2021/04/Ergo-covidstudy-final-web-double-v2.pdf>. The survey does not claim nor aimed to be representative. The aim of the survey is to provide an insight into real situations of numerous Roma individuals and families.

Main stakeholders include civil organisations, secondary schools, Ministries, municipalities, parents and students. The action will be implemented in synergy with the IPA beneficiaries mainstream and Roma inclusion policies and other international programmes in the field of education for Roma (including Roma strategies and action plans and the Poznan Roma Declaration education objectives).

AREA OF SUPPORT#4: Tertiary Education

There is still a huge gap between Roma and non-Roma in case of higher education. Low number of Roma students enroll to universities and even less manage to graduate successfully. Challenges are very similar to secondary school level such as the financial limitations and dropout rates that results in an insufficient number of students that could qualify for tertiary education. Some donors have focused on providing support to tertiary Roma students in particular. Main stakeholders include Roma Versitas Centers, civil organisations, Ministries, municipalities, universities, students.

The action will be in synergy with the mainstream and Roma inclusion policies, programs and other international programs in the field of education for Roma (including Roma strategies and action plans and the Poznan Roma Declaration education objectives).

AREA OF SUPPORT#3: Employability of Roma Graduates:

Main challenges faced by Roma graduates are the lack of soft skills such as communication, presentation skills, teamwork, as well as the discrimination they face at the labor market. It results in either underemployment, unemployment or informal employment for non-skilled workers or self-employment in markets and other traditional job venues. Still many youth decide to leave their place of origin to find working opportunities in Western Europe.

Main stakeholders include training and VET institutions, Roma versitas centers, universities, employment offices, graduates. The action will be implemented in synergy with the IPA beneficiaries' mainstream and Roma inclusion policies and other international programs in the field of education for Roma (including Roma strategies and action plans and the Poznan Roma Declaration education objectives).

Component 3 - EU Roma inclusion award

AREA OF SUPPORT#1: EU Roma inclusion award in Western Balkans and Turkey 2023

One of the main challenges facing Roma is the both hidden and the not-so-hidden consequences of antigypsyism; non-recognition of the contribution of Roma to society and bias by decision makers at all levels that make access to rights-based services, registration and normal life possibilities much more difficult than they should be. The EU Roma inclusion award in Western Balkans and Turkey has already proven to be one of the most successful and visible communication tools on Roma inclusion both at local, regional and EU level. The Award contributes to improved self-perception and motivation of Roma individuals and communities, as the awardees going back to their communities strengthened in the conviction that their work matters and is appreciated. Main stakeholders are Roma and non-Roma communities alike, municipalities.

The action will be in synergy with the mainstream and Roma inclusion and anti-discrimination policies and other international Roma inclusion programmes (including Roma strategies and action plans and the Poznan Roma Declaration anti-discrimination objectives).

2.3. Relevance and complementarity with strategies supported by key stakeholders

Component 1

The **Roma Integration III component** is directly addressing the problems analysed above, and thus the needs for effectively tackling discrimination against Roma, ensuring Roma challenges are mainstreamed in the relevant general policies, piloting innovative approaches and supporting the implementation of housing legalisation, employment and civil registration of Roma, while also building the institutional capacities for the Roma integration policy cycle management. The internal policies on Roma integration, relevant for the Roma Integration component, are the National Roma Strategic Frameworks (NRSFs) and the accompanying action plans. The action will provide technical and expert support and policy guidance to the governments to plan the NRSFs for the next period up to 2030, ensuring the documents are mirroring the EU Roma Strategic Framework and are reflecting the commitments from the Poznan Declaration. The action addresses policy formulation, institutional capacities, monitoring (particularly focusing on statistical data) and proper budgeting and monitoring of spending.

Component 2

The **education and youth employability** activities are aimed to supplement and support measures which can enhance the education of Roma, children in the region. At the same time, it aims to work with the policy makers to create new ones, where it is needed. The action mirrors the education and employment objectives of the EU Roma Strategic Framework and reflects the education and employment commitments of the Poznan Declaration.

Relevant IPA beneficiary strategic frameworks include:

Albania: The main strategic framework is the Action Plan for Integration of Roma and Egyptians in Albania (2016-20), which proposes a number of measures in the area of education such as increase the enrolment and completion rate of Roma and Egyptians in preschool and compulsory education, and number of Roma and Egyptians teachers. These measures are yet to be supported through the legal and institutional framework. Furthermore, implementation at local level has to be ensured. The strategy is being revised.

Bosnia and Herzegovina: Bosnia and Herzegovina adopted the Action Plan to address Roma issues in the fields of employment, housing and health care for 2017-2020 that is in the process of being revised to cover the period up to 2025. Adequate policies and programmes with allocated funds that would effectively address the issue of Roma and other vulnerable groups do not accompany strategically developed documents at the state level. There is a compulsory preschool education and primary education policy, although its implementation at canton level differs from canton to canton and in different parts of Bosnia and Herzegovina reflecting the unequal implementation of the measures, especially in case of Roma community.

Kosovo: The government strategy for Inclusion of Roma and Ashkali Communities which is under preparation for the period 2017– 2021, together with the Action Plan for its implementation, is the most important policy inclusion document. It envisages interventions aimed at increasing enrolment in preschool and pre-primary education by increasing the number of public kindergartens and inclusion through private institutions. Among others, the “National Development Strategy” proposes building 18 kindergartens for preschool children, especially in those municipalities in urgent need of but lacking public kindergartens. The strategy is being revised to cover the period up to 2030.

Montenegro: Education measures are defined through the Strategy for Social Inclusion of Roma and Egyptians in Montenegro. It is in the process of being revised to cover the period up to 2025. The Inclusive Education Strategy (2019–2025) sets out directions for the development of education for children with special education needs as well as the national policies on preschool education and secondary and higher education which define measures related to provision of scholarships for students including Roma and Egyptians.

North Macedonia: The Government adopted the new Education Strategy 2018–2025 in 2018 as the key document for improving the quality and conditions in education. The Strategy for Roma integration provides the framework for the development of mainstream policies within the education sector. Primary and secondary education in North Macedonia is compulsory, while in case of preschool education of Roma there is an affirmative measure in place for preselected localities. The Strategy for Roma 2014-2020 is being revised to cover the period up to 2030.

Serbia: Almost all education related strategies in Serbia provide measures and a framework for the inclusion of minorities. The Strategy for Development of Education up until 2020 prescribes (a draft strategy for development of education until 2030 exists) a number of tasks for the development of education for minorities. They include instruction in the minority language, learning the minority language and other measures for all stages of the education process. The Strategy for Social Inclusion of Roma in the Republic of Serbia 2016-2025 is being revised to cover the period up to 2030.

Turkey: Measures for the education are defined through the Strategy Paper Roma People in Turkey. The Action Plans (2016–2018 and 2018-2021) include some actions for the development of education for children and parents at same time. Main objectives of the strategies focus on to preventing dropouts and creating awareness of education for the parents. Implementation of the action plans in the framework of the Strategy Paper is continuing in order to accomplish the objectives.

Component 3

The **Roma award** aims to supplement and support the positive measures which can enhance the socio-economic inclusion of Roma in the enlargement region. The component mirrors the anti-discrimination objectives of the EU Roma Strategic Framework and reflects anti-discrimination commitments of the Poznan Declaration. This being the fifth award, the action will seek to celebrate its 10-years of existence by inviting previous winners to attend the celebration and a number of dedicated activities, thus contributing to further networking and consolidation of Roma civil society actors and actions.

2.4. Relevance and complementarity with EU policy and EU and other donors’ assistance

The action corresponds to the thematic priorities of the IPA III Programming Framework and the Enlargement policy. The rule of law priority envisages integration of marginalised communities such as Roma and combating their discrimination. It also recognises Roma under social protection and inclusion and combating poverty. The Green Agenda for the Western Balkans¹⁰ does not directly mention Roma. However, the circular economy is relevant, particularly in terms of undeclared workers in waste management and recycling waste materials, but also potentially in

¹⁰ SWD(2020)223 final

de-pollution and sustainable food systems. The Digital Agenda should tackle the particular challenges of Roma such as combating online hate speech against Roma, ensuring means and access of Roma children to digital education and promoting digitalisation of businesses among Roma entrepreneurs. The digital divide/gap has been particularly evident during the pandemic of 2020 where Roma children could not benefit from televised and online education and adult Roma could not e.g. access cash transfers or other means of money due to a lack of access to bank accounts and online banking. The action will continue to contribute towards the IPA programming, including where relevant the planning of the EIP for the Western Balkans to ensure the needs of Roma are mainstreamed in relevant areas. The action is also contributing to the implementation of the European Commission anti-racism action plan 2020-2025 in the enlargement region as well as other EU equality policies, strategies and action plans.

In addition to the targets of the 2020 EU Roma strategic framework, the proposed action support the goals of the Poznan Declaration (2019), which set as its main targets in case of education as *“to Increase the enrolment and completion rate of Roma in primary education to 90 per cent and the enrolment and completion rate of Roma in secondary education to 50 per cent;”*, while in case of employment *Increase the employment rate of Roma in the public sector to the rate proportional of the participation of Roma in the overall population; Increase the employment rate among Roma to at least 25 per cent;”*

It is also in line with the European Commission Communication for *“A credible enlargement perspective for and enhanced EU engagement with the Western Balkans”*¹¹ which states that *“Addressing reforms in the area of rule of law, fundamental rights and good governance remains the most pressing issue for the Western Balkans. It is also the key benchmark against which the prospects of these countries will be judged by the EU”* and promotes the need for regional cooperation among the beneficiaries.

2.5. Lessons learned and links with previous financial assistance

Component 1 - Roma Integration III

The EU Roma Strategic Framework recognises the need for continuous efforts by the EU and the governments of enlargement region for Roma equality, inclusion and participation. The Roma Integration action, supported as a multi-county initiative with IPA funding, has proven to be an instrumental tool for technical and expert support and policy guidance to the governments in the region. It was also crucial for maintaining the Roma integration topic continuously on the agenda of the governments. The relevance and importance of the action has also been recognised by the governments in the region. Based on the Results Oriented Monitoring (ROM) report conducted for the phase II of the action, the action is relevant and well defined and is expected to continue and build on the achieved results.

Component 2 - Education and youth employability

The COVID-19 pandemic created unexpected difficulties in the implementation and redesign of activities. Under IPA II, the Regional Education Fund (REF) was supported and an internal evaluation was carried out. Based on the results of the internal mid-term evaluation, the following lessons learned will be incorporated:

- Provide opportunity and equipment for outdoor playing activities and outdoor learning, especially for Early Childhood Education (ECD) and primary education.
- Provide substantial material and financial support for families of the project beneficiaries (pandemic-related, but also school supplies etc.), including allocating more resources dedicated to mentorship and tutorship (to compensate for the lack of education services in vulnerable communities)
- Encourage and provide support for the beneficiaries transiting from one educational level to the other (targeted tutorships support, financial support etc.)
- Provide substantial support to students in their last years of either primary or secondary level of education (i.e. before graduation): These grades are critical for student transition and achievement of project planned outcomes.
- Increase in advocacy and employment activities, especially in beneficiaries that have taken over the programming of scholarships for Roma students, but where policy changes have not taken root to the extent that the path to employment is provided for graduate Roma students.
- Increase non-formal education aimed at improving students' employability potential and opportunities (i.e. skills training such as communication, C.V. writing, interview preparation, providing even for the financial means to attend additional classes and training opportunities etc.).
- Increase quality of education by preventing segregation and promoting inclusion/inclusive education and training of educators, inter-cultural communication, etc.
- Providing substantial technical assistance to implementing partner organisations.

¹¹ COM(2018) 65, 6.02.2018.

Component 3 - 5th Roma Inclusion Award

The EU Roma inclusion award in Western Balkans and Turkey has already proven to be one of the most successful and visible communication tools on Roma inclusion both at local and regional and EU level. In particular the latest award, organised by the CSO Roma Active Albania, was highly successful in attracting the attention of media, public authorities and other stakeholders, and proved to have lasting impact in terms of visibility and dialogue.

The Award is contributing to improved self-perception and motivation of Roma individuals that are often marginalised and left without hope, as the awardees going back to their communities strengthened in the conviction that their work matters and is appreciated.

3. DESCRIPTION OF THE ACTION

3.1. Planned results and intervention logic (describing causal links between impact, outcome(s) and output(s) and including assumptions)

Component 1

In the overall vision of increased equality, inclusion and participation of Roma in the enlargement region, and taking into account and adapting to specific IPA beneficiary contexts, the activities of the **Roma integration action phase III** will support the recognition of antigypsyism/anti-Roma racism and will work to ensure the existence of dedicated institutions that can monitor and combat discrimination against Roma, as stipulated in the Poznan Declaration. These activities will help reduce the discrimination against Roma (Outcome 1).

In the third phase of the action, a set of activities will focus on strengthening the institutional capacities of the governments with regards to their Roma equality, inclusion and participation policies which will help improve the situation of Roma in the areas of housing, employment and civil registration (Outcome 2).

In addition, the action will continue to provide support and capacity building to the NRCs, the coordination and equality bodies as well as promoting further participation of Roma as public servants, besides their participation in the coordination and monitoring processes as civil society. Moreover, the participating governments will also be supported in policy management (formulation, coordination, budgeting, implementation, monitoring and reporting, assessment and evaluation of the policies) so that they have better institutional capacities to tackle the challenges facing Roma (Outcome 3).

Thus the three outcomes of the action will contribute to enhance the focus to include not only the socio-economic integration (education, employment, housing, health, civil registration) but also effective inclusion and equality and meaningful participation of the Roma population in the enlargement region (Impact).

Component 2

The second phase of the **education and employability project** will seek to continue the activities of phase 1 while addressing the needs that has arisen due to the COVID-19 pandemic and support the implementation of the Poznan declaration objectives on education and employment. Activities will ensure an increased enrolment as well as school completion of Roma children and youth which will improve their educational attainment (Outcome 4) Activities will also target Roma graduates so that they have an increased possibility for transfer to first formal employment as well as for tertiary education completion followed by transfer to first formal employment, possibly in the public sector but with a view to enhance employment possibilities in the private sector that has the largest employment potential (Outcome 5). In addition, activities will support the introduction by the respective stakeholders and decision-making bodies (central/local authorities, individual schools or communities) of more inclusive local and central policies for the support of the Roma community which contribute to achieve a more inclusive education within the education system (Outcome 6).

The three outcomes of the action mirror the educational and employment objectives of EU Roma Strategic Framework and will contribute to reduce the Roma/non-Roma gap in participation to and completion of quality education in the enlargement region (Impact).

Component 3

The activities of the fifth **Roma integration award** will focus on promoting positive stories and examples of Roma contributions to society as well as recognising the positive role models and actions that contribute to community cohesion and reconciliation. Providing high level attention to activities that contribute to Roma inclusion (Outcome 7), the action will contribute to address discrimination and racism towards Roma and further support the equality, inclusion and participation of Roma in the enlargement region (Impact).

3.2. Indicative type of activities

The action will indicatively include the following main activities:

Component 1

A range of activities will be implemented to produce the envisaged outputs and consequently achieve the outcomes and contribute to the envisaged impact of the action. These activities include:

- technical support, provision of expertise and guidance to the governments in the region to formulate adequate policies and legislation on Roma inclusion and general policies mainstreaming Roma issues
- direct support to the implementation of strategic measures from the policies on Roma inclusion, particularly in housing, employment and civil registration (and possibly in other priority areas if need be) by which innovative approaches and promising practices shall be promoted
- regular social dialogue on the issues of Roma equality, inclusion and participation, through annual Platforms, coordination meetings, policy formulation meetings
- formulation of monitoring mechanisms, focusing on collecting statistical data, by developing methodologies in line with the FRA proposed indicators and the Poznan targets and piloting Roma surveys
- maintaining and coordinating the reporting mechanism at regional level, providing expert support as needed
- capacity building of NRCPs, coordination bodies, Roma public servants and other relevant stakeholders through trainings, mentoring, studies and similar
- regional exchange and coordination through meetings (including Task Force meetings, high level meetings, thematic meetings, etc.)
- supporting the governments from the region in relating their Roma equality, inclusion and participation efforts with the EU efforts (by supporting participation at relevant EU fora, mirroring activities of EU and EU Member States, ensuring mainstreaming Roma issues in EU funding in the region)
- cooperating with media and producing media content combating negative narratives, hate speech, fake news and stereotypes and promoting positive examples of Roma and the benefits from Roma equality, inclusion and participation for the whole society.

Component 2

- **Technical Assistance (training, studies, study tours etc.)**
 - Regional trainings aimed to increase the quality of education and the activities of local implementation partner organisations.
 - Capacity building of implementing partner organisations in the field of financing, reporting, data collection.
 - Regional educational events and Experience sharing events with Education professionals in the region
- **Investments & Grant Making for Education Purposes (works and supplies)**
 - Sub granting activities – financial support to third parties - in the beneficiaries for 4 education levels (ECD, primary, secondary, tertiary, including contributing to employability)
 - Areas of support for the sub granting activities:
 - (1) Expanding access to quality Early Childhood Education/ECD services: supporting access to early childhood education, including material support; training activities for educators; parenting programs; small scale infrastructural investment if needed; creating Toy Libraries; create opportunities for outdoor learning and teaching where is possible/needed; provide support for the transition from one educational level to the other etc.
 - (2) Expanding access to quality primary school education: mentoring and tutoring support; Training for educators and mentors/tutors; desegregation activities; creating Toy Libraries; provision of financial incentive for the families of the pupils enrolled in primary education; create opportunities for outdoor learning and teaching where is possible/needed provide; support for the transition from one educational level to the other etc.
 - (3) Increasing performance and employability of Roma secondary school students: Implementation of scholarship and mentorship scheme; support to secondary school students' employability potential (classes, trainings etc.); customised support during the final years (i.e. graduation year in preparation of the Matura/Baccalaureate exam) in education of the beneficiaries (tutoring, mentorship, remedial education etc.)
 - (4) Increasing access and participation of Roma students in tertiary education and support transition to labor market through employability: University scholarship and mentorship scheme; soft skill development, support provided for students' employability potential (classes, trainings etc.)
 - Opportunities for best-practice exchanges among sub granting entities (sharing experiences in education services provisions, interaction with beneficiaries, stakeholders etc.
- **Policy Dialogue**

- Policy round tables and advocacy activities in all the participating IPA beneficiaries
- Policy analysis reports
- Events aimed to promote the results and the activities in the region
- **Performance Monitoring and Reporting**
 - Maintain database and internal monitoring system
 - Monitoring visits and actions
 - Midterm and final evaluation

At the same time, following the completion of the 2020-2021 academic year of the project, some other lessons learnt may arise, which, in consultation with the project stakeholders, might be added to the activities when full proposal will be prepared. However, the main framework highlighted in the points above will remain unchanged.

Component 3

This activity will enable the fifth edition of the EU Roma Integration Award in the Western Balkans and Turkey. The Award ceremony will in principle be held during the Roma week that is co-organised by the European Parliament and the European Commission, when winners will come to Brussels to receive the awards and meet stakeholders.

Activities will include organisation of the award competition; Organisation of the Jury and selection of the winners; Organisation of the Award ceremony in Brussels; Study trip to the EU; Organisation of policy roundtables; and communication activities.

3.3. Risks and assumptions

Risks Component 1	Risk level (H/M/L)	Mitigating measures
The key assumption is that the governments continue to be committed and to work on Roma equality, inclusion and participation, as part of their EU integration processes and the implementation of the Poznan Declaration. The related risk is that governments lose their political will to work on Roma issues, which is a low level risk. But another related risk is that governments are preoccupied by other priorities, such was the crisis caused by the COVID-19 pandemic, which is still a high level risk.	L/H	Losing political will and interest on Roma issues can be mitigated by strong advocacy by the action team as well as the allies, particularly the donors and other international/intergovernmental organisations. Crisis or other situations shifting the focus of the governments from Roma (and other) issues is already being addressed with the second phase of the action and is taken into account in the design of the third phase. Furthermore, the experience showed that the action team is capable to adjust the methods and approaches of the action to the situation without compromising the objectives.
The governments in the enlargement region continue to view Roma inclusion as a regional issues and have interest in cooperating and exchanging information. The risk is to reduce this interest.	L	Continued interest to be ensured through regular contact, negotiation on involvement in activities and flexibility of the action.
The action envisages influencing relevant mainstream policies, including those relevant at regional level, in order to ensure Roma issues are tackled and Roma are explicitly targeted. The risk, that proved relevant in the past in some areas and by some institutions, is the lack of communication and influence and resistance by certain institutions to respond to the needs of Roma (ex. Ministries of finance closeness for Roma responsive budgeting). In the phase III crucial institutions besides the sector ministries dealing with education, employment, housing, health and civil registration, are the Ministries of finance, Ministries of EU integration, the Equality bodies and the statistical agencies.	M	Mitigation of this risk depends on the reasons. Most often the resistance is because of lack of capacities, resources, knowledge, personnel that would address the Roma issues. In such cases the action has the means to provide technical and expert support.
Relevant legislation, such as the legislation regarding housing legalisation, employment /	M	The action is generally opportunistic in terms of seizing the possibilities that already exist in the

undeclared work, civil registration and similar, needs to be conducive for the implementation of the objectives of the action.		society in terms of legislation, processes, initiatives, developments, etc. When there are legislative barriers, the action may employ its planned activities to mitigate the risk, for example by providing expert support in proposing legislative changes, capacity building of the NRCP to advocate for changes, etc.
Risks Component 2	Risk level (H/M/L)	Mitigating measures
Continuation of pandemic or appearance of other crisis situations	M	Preparation of contingency plan Allow for more material support (even in an ad-hoc manner) to be directed for the support of the communities, families of the beneficiaries etc.
Limited attention on Roma issues due to restarting of the economies after the pandemic	H	Preparation of the local, central policy makers for the start of the next phase – kick off meeting. Increased visibility of the project
Risks Component 3	Risk level (H/M/L)	Mitigating measures
Continuation of pandemic or appearance of other crisis situations	M	Preparation of contingency plan for the award ceremony and linked activities
Reduced interest by local and central authorities in Roma inclusion activities and reduced willingness by civil society to nominate public actors	L	Preparation of contingency plan for the award focus and linked activities
Assumptions (to be reflected in the Logical Framework Matrix above) – grouped by outputs and outcomes		
It is assumed that the beneficiaries will stay committed to Roma equality, inclusion and participation due to the link with accession to the EU		

3.4. Mainstreaming

How does this Action contribute to Gender Equality and Women's and Girls' Empowerment (in line with the EU gender equality strategy 2020-2025)?

Component 1 is promoting the inclusion of Roma women as a mainstream principle in all of its activities, including policy advice, monitoring (statistics disaggregated by sex), participation of women, etc.

Component 2 will provide for education opportunities for Roma women and Roma girls, thus making a contribution to the long-term gender empowerment.

Component 3 is promoting the inclusion of Roma women as a mainstream principle in all of its activities and the award criteria, including participation of women, etc.

How does this Action address Environment and Climate change?

Component 1 targets the Green Agenda for the Western Balkans, for example by transforming undeclared work of waste collectors and promotion of environmental justice for Roma, as well as through investment in public infrastructure.

Component 2 will help achieve well educated citizens who are able to participate in society through gainful (formal) employment are better able to understand and contribute to addressing environmental and climate issues.

Component 3 will seek to reduce the environmental impact of its activities through focus on its carbon footprint.

How does this Action address the Rights Based Approach?

Component 1 particularly focuses on effective equality – non-discrimination, which is in the core of the right based approach when vulnerable groups, particularly Roma are concerned. While the action is mainly referring to EU legislation, it also uses other international principles and human/minority rights standards to address certain issues (for example UNHCR in civil registration). But one of the main elements for success is its focus on using internal legislation (or lack of implementation and enforcement thereof) as leverage towards the authorities, including through supporting advocacy for structural reforms of relevant policies and legislation (incl. e.g. guidance notes etc.).

Component 2 will invest in education services for Roma children and youth in the region and it will contribute to desegregation in education where relevant. Also, through the activities, the action will contribute to the building of the resilience of project beneficiaries.

Component 3 focusses on equality in formal, quality employment.

How does this Action promote the systematic engagement with Civil Society?

Component 1 closely cooperates with the civil society coalitions supported by its donors – the EU and the Open Society Foundations and always ensures that these coalitions are involved in local and regional dialogue.

Component 2 will involve non-governmental organisations (as receivers of sub-grants), it will invest in their capacity and it will empower them to furthermore apply the methodologies and tools used in the activities.

Component 3 is implemented by an NGO and relies on nominations by civil society actors and individuals.

Others (such as Resilience and Conflict Sensitivity, Roma, people with disabilities and other vulnerable groups)

All 3 components focus on Roma equality, inclusion and participation.

3.5. Conditions for implementation

Component 1

The conditions for implementation of this action have been met.

Components 2 and 3

There are no specific legal or policy conditions required for the implementation of the actions.

3.6. Logical Framework for PROJECT MODALITY (3 levels of results / indicators / Baselines / Targets / Source of Data / Assumptions - no activities)

Results	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Baselines (year) At IPA beneficiary level	Targets (year) At IPA beneficiary level	Sources of data (1 per indicator)	Assumptions
Impact	<p><i>To ensure progress in implementation of the 2020-2030 EU Roma strategic framework and the Poznan commitments</i></p> <p><i>To increase the equality, inclusion and participation of the Roma population in the enlargement region</i></p> <p><i>To reduce the Roma/non-Roma gap in participation to and completion of quality education, to improve Roma transition between education and employment, and to promote durable systemic change and de-segregation within education systems in the enlargement region.</i></p>	<p><i>State of play in the area of Roma equality, inclusion and participation (qualitative assessment within Commission reports)</i></p> <p><i>Progress related to the outcome of the 2017 Roma inclusions survey on the state of play in all the priority areas (education, employment, health housing, civil documentation). Gap between Roma and non-Roma in participation to and completion of quality education reduced. Progress should concern improvement of situation, gender balance and gap between Roma and non-Roma citizens living in the vicinity</i></p>	<p>(2020)</p> <p>The 2021 Commission Communication on EU Enlargement Policy¹² notes that Roma continue to be disadvantaged compared to their non-Roma neighbours, and vulnerable Roma were disproportionately affected by the COVID-19 crisis and the related restriction measures.</p> <p>Results of the 2017 WB Roma inclusion survey.</p>	<p>(2026)</p> <p>Progress is noted on all the issues of concern regarding Roma integration</p> <p>Increased number of students, children, parents experiencing better access to education</p>	<p>Poznan declaration implementation assessment; Commission reports</p> <p>Results data new survey on Roma inclusion</p> <p>Final evaluation</p>	<i>Not applicable</i>

¹²

COM(2021) 644 final, 19.10.2021.

Outcome 1	<i>Related to Component 1 Discrimination against Roma and its effects effectively addressed in the enlargement region</i>	<i>Share of Roma that have experienced discrimination in the last 12 months.</i>	(2011) 36%	(2026) maximum 25%	Roma surveys in the region	The governments in the region are committed to address inequality of Roma.
Outcome 2	<i>Related to Component 1 Situation of Roma improved in the areas of housing, employment and civil registration in the enlargement region.</i>	<i>Dwelling ownership rate Employment rate Unresolved cases of civil registration</i>	(2017) 88.77% (not legal, but claimed ownership; estimated 20-30%) 16.5% 4500 cases	(2026) At least 50% At least 25% 0 cases	Roma surveys in the region Survey to be conducted by Turkey under their Action Plan	The governments in the region are committed to achieve the Poznan Declaration targets.
Outcome 3	<i>Related to Component 1 Increased institutional capacities of the governments of the enlargement region to tackle the challenges facing Roma.</i>	<i>- Number of Governments reporting on Roma policies (including statistics and budget)</i>	(2021) 7 (all report, but without proper and statistics and budget)	(2026) 7 (all report with statistics and budget)	Governments' reports	The governments are committed to regional cooperation on Roma issues.
Outcome 4	<i>Related to Component 2 Educational outcomes (including preventing school drop-out) improved at all educational level with a special focus on reducing the wide gap between male and female education levels.</i>	<i>- Access of Roma children of both genders to quality pre-school and primary education improved - Secondary school retention and completion of Roma students of both genders improved. - Gap in completion of tertiary education between Roma students and non-Roma students reduced.</i>	N/a TBC	Roma children test scores/skills increased after participation in ECD services The parents consider a greater importance to have an active role in the children's education. Among children	Where relevant official data from schools, municipalities, ministries Community assessment tool, baseline, midline and end line project data	Interest, engagement and active participation of local and central authorities, schools, school teachers and parents in the project activities.

				participating to school after school programs, early school leaving is 20% lower.		
Outcome 5	<i>Related to Component 2 Transition of Roma students between education and employment improved with a special focus on reducing the wide gap between male and female education levels.</i>	<i>- Employability of Roma students of both genders increased.</i>	N/a TBC	Employment rate is increased for beneficiaries of the project	Official data form schools, municipalities, ministries Community assessment tool, baseline, midline and end line project data	Interest, engagement and active participation of local and central authorities, schools, school teachers and parents in the project activities.
Outcome 6	<i>Related to Component 2 Durable, systematic policies for inclusive education achieved within education system</i>	<i>- Inclusive educational measures in the targeted areas put in place by respective stakeholders and decision-making bodies (central/local authorities, individual schools or communities).</i>	N/a	More inclusive local and central policies	Ministerial data and project data.	Openness of Roma and non-Roma communities to change their attitude. Engagement of relevant authorities to implement decisions and plans and provide the necessary budget for them.
Outcome 7	<i>Related to Component 3 High level attention drawn to activities that contribute to Roma inclusion.</i>					
Output 1 related to outcome 1	<i>Related to Component 1 Antigypsyism recognised and addressed</i>	<i>- Number of economies where antigypsyism is recognised by law.</i>	(2021) 0	(2026) At least 4	Project reports.	Governments are

	<i>through legislation and institutions.</i>	<i>- Number of economies with specific institutions dealing with antigypsyism.</i>	0	At least 4		committed to implement the Poznan declaration. Equality bodies are willing to cooperate.
Output 2 related to outcome 1	<i>Related to Component 1 Mainstreamed policies in socio-economic spheres and regionally high-priority issues address the specific challenges of Roma.</i>	<i>- Number of mainstream policies addressing Roma issues.</i>	(2020) 12 mainstream policies	(2026) 28 new mainstream policies address Roma issues	Project reports.	Democratic processes allow for influencing the mainstream policies.
Output 1 related to outcome 2	<i>Related to Component 1 Housing legalisation processes initiated and dwellings of Roma are legalised through pilot initiatives.</i>	<i>- Number of legalised dwellings</i>	(2021) 100 (expected to be completed by the end of phase II of the project)	(2026) 1000	Project reports.	Legislative possibilities for housing legalisation continue to exist in the region.
Output 2 related to outcome 2	<i>Related to Component 1 Employment of Roma encouraged by piloted promising practices.</i>	<i>- Number of Roma employed</i>	(2021) 0	(2026) 400	Project reports.	
Output 3 related to outcome 2	<i>Related to Component 1 Civil registration resolved for all Roma in need through a partnership with the government.</i>	<i>- Number of Roma directly benefiting from the project in civil registration</i>	(2021) 0	(2026) 50% of the number stated above	Project reports.	Governments are implementing the commitments undertaken within UNHCR and are willing to contribute with 50% in the initiative to eradicate statelessness.
Output 1 related to outcome 3	<i>Related to Component 1 Policies and institutional arrangements</i>	<i>- Number of designated NRCs - Number of institutional bodies</i>	(2021) 7	(2026) 7	Project reports.	Governments maintain

	<i>dealing with Roma issues exist in the region.</i>	<ul style="list-style-type: none"> - Number of Roma participating in the bodies - Number of economies with official policies for Roma 	7 10 (estimated) 7	7 20 7		their willingness to cooperate on the project.
Output 2 related to outcome 3	<i>Related to Component 1 Relevant monitoring and reporting mechanisms established.</i>	<i>- Number of economies conducting regular Roma survey</i>	(2021) 0	(2026) 6	Project reports. Roma survey reports.	The governments are willing to implement the Poznan declaration. Beneficiary statistics are able to conduct Roma survey.
Output 3 related to outcome 3	<i>Related to Component 1 Budget for Roma planning and reporting improved .</i>	<ul style="list-style-type: none"> - Data on the planned and spent public budget exist - Amount (in EUR) spent annually on Roma issues 	(2020) EUR 53 525 873	(2026) EUR 7 80 000 000	Project reports. Governments budget reports and law. Governments reports on Roma policies.	Ministries of finance in the region are more willing to cooperate.
Output 1 related to outcome 4	<i>Related to Component 2 Increased number of Roma children aged 0-6 benefitting from quality ECD services and increased number of parents who consider of greater importance to have an active role in the children's education</i>	<ul style="list-style-type: none"> - Number of children participating in ECD services - Number of parents participating in parental clubs and community-based activities 	TBC	(2026) 1000 children aged 0 to 6 years old 1000 parents in the project countries	Official data, where relevant, from schools, municipalities, ministries Community assessment tool, baseline, midline and end line project data	Interest, engagement and active participation of local and central authorities, schools, school teachers and parents in the project activities.
Output 2 related to outcome 4	<i>Related to Component 2 Increased primary age children benefitting from inclusive, quality education in the target countries.</i>	<ul style="list-style-type: none"> - Number of children transiting to inclusive primary school after preschool education - Number of children benefitting from 	TBC	(2026) 1000 primary age children	Official data where relevant from schools, municipalities,	Interest, engagement and active participation

		<p><i>school after school support or other form of educational support services</i></p> <ul style="list-style-type: none"> - Share of Roma girls of primary school age benefiting from school after school support or other form of educational support services 			<p>ministries</p> <p>Community assessment tool</p>	<p>of local and central authorities, schools, school teachers and parents in the project activities.</p>
Output 3 related to outcome 4	<p><i>Related to Component 2</i></p> <p><i>Increased school performance and graduation of Roma secondary school students</i></p>	<ul style="list-style-type: none"> - Number of secondary school students benefiting from educational support services - Number of Roma secondary school students graduating successfully - Share of Roma girls of secondary school age graduating successfully 	TBC	<p>(2026)</p> <p>300 Roma students in secondary school per year</p>	<p>Official data where relevant from schools, municipalities, ministries</p> <p>Community assessment tool</p>	<p>Interest, engagement and active participation of local and central authorities, schools, school teachers and parents in the project activities.</p>
Output 4 related to outcome 4	<p><i>Related to Component 2</i></p> <p><i>Increased access and participation of Roma students in tertiary education</i></p>	<ul style="list-style-type: none"> - Number of Roma students benefiting from educational support services - Number of Roma students graduating successfully - Share of Roma girls in tertiary education graduating successfully 	TBC	<p>(2026)</p> <p>200 Roma students in tertiary education per year</p>	<p>Official data where relevant from schools, municipalities, ministries</p> <p>Community assessment tool</p>	<p>Interest, engagement and active participation of universities, and parents in the project activities</p>
Output 1 related to outcome 5	<p><i>Related to Component 2</i></p> <p><i>Increased employability skills and capacities of Roma students to successfully transition to labor market</i></p>	<ul style="list-style-type: none"> - Number of Roma students and secondary school students benefiting from soft skills development and other trainings - Share of Roma girls (either involved in secondary education or tertiary education) benefiting from soft skills development and other trainings - Number of employability opportunities 	TBC	<p>(2026)</p> <p>500 Roma students per year (both girls and boys)</p>	<p>Project data</p> <p>Community assessment tool</p>	<p>Interest of Roma graduates to get employed after graduation</p>

		<i>to which Roma students and secondary school students are exposed to (employability workshops, internships, thematic training sessions, foreign languages tutoring etc.)</i>				
Output 2 related to outcome 5	<i>Related to Component 2 Increased number of partnerships created with companies, organisations, teaching entities for the support of employability of Roma students</i>	<i>- Number of partnerships created - Number of internship programs or placement programs established</i>	TBC	TBC	Project data	Openness companies and international organizations to increase the employability of Roma
Output 1 related to outcome 6	<i>Related to Component 2 Increased number of inclusive educational measures in the targeted areas put in place by respective stakeholders and decision-making bodies (central/local authorities, individual schools or communities).</i>	<i>- Number of programs, measures introduced for the support of the Roma community</i>	TBC	TBC	Ministerial data, where relevant, and project data	Openness of Roma and non-Roma communities to change their attitude. Engagement of relevant authorities to implement decisions and plans and provide the necessary budget for them
Output 1 related to Outcome 7	<i>Related to Component 3 The fifth Edition of the EU Roma Integration Award implemented</i>	14 prizes awarded Number of post-award activities for the winners of all five issues Study trip to Brussels for the award ceremony as well as networking with EU Member States actors active in the field (local and/or central authorities and equality bodies)				

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing agreement

In order to implement this action, it is not foreseen to conclude financing agreements with the IPA III beneficiaries.

4.2. Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures¹³.

4.2.1. Direct Management (Grants)

Grants: (direct management)

1. Component I- Roma Integration phase III

a) Purpose of the grant

The grant will contribute to achieve outcomes 1, 2 and 3 and the related outputs.

b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, the grant may be awarded without a call for proposals to the Regional Cooperation Council (RCC). Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified based on Article 195 (f) of the Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, i.e. "for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals".

In terms technical capacity, RCC is the only regional organisation covering Western Balkans and Turkey, which has a long experience and capacity to coordinate, in a comprehensive way, all priorities related to Roma inclusion. The close relation of the RCC with the governments and their know-how have already highly contributed to creating a solid regional roma inclusion policy. Furthermore, the RCC Roma team plays a central support role in the implementation of the Poznan declaration commitments by Western Balkans and contributes to the preparatory work of the EU-Western Balkans Summits. In this context, they developed unique expertise concerning:

- The substance of the new 2021 Strategies and Action Plans on Roma inclusion to be adopted very soon and aiming to align the enlargement policy with the EU 2020-2030 new Roma strategic framework
- Legalisation methodology for illegal Roma settlements
- How to set up a solid statistical data collection to allow strong monitoring

The RCC also plays a central regional coordination role on the development of the green and digital agendas that were identified in the July 2021 Berlin Summit as new priorities for Roma inclusions.

The third phase of the Roma Integration action follows up the second phase and builds on the assessment and requests provided by the participating governments and civil society. The RCC implementing the Roma Integration has incorporated the action within its existing structure, in particular making available its administrative and managerial capacities, as well as by promoting the issue of integration of Roma throughout its existing strategy and policy programs. The third phase of the RCC Roma Integration action is closely linked to mainstreaming Roma integration within the Digital Agenda and Green Agenda for the Western Balkans. Given RCCs mandate over these agendas, it remains the most suitable structure to ensure appropriate coordination and complementarity. In addition, the topic of Roma Integration has already been well placed within the current process of developing the South East Europe (SEE) 2030

¹³ www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

Strategy, as well as within the starting phase of operationalisation of the Digital Agenda and Green Agenda.

2. Component 2 - EU Regional Action for Roma Education and Employability phase II

a) Purpose of the grant:

The grant will contribute to achieve outcomes 4, 5 and 6 and its related outputs.

b) Justification of a direct grant :

Under the responsibility of the Commission's authorising officer responsible, the grant may be awarded without a call for proposals to a non for profit legal entity, an international organisation or an NGO selected using the following criteria: financial and operational capacity, proven experience in implementing similar regional actions and ability to mobilise partners in the Western Balkans. Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified based on Article 195 (f) for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals.

The technical capacity searched for will include:

- a specific mission and focus on closing the gap in educational outcomes between Roma and non-Roma;
- demonstrated experience in promoting good practice for Roma inclusion in education;
- a demonstrated ability to cover the whole enlargement region in the area of focus;
- strong working partnerships with educational institutions, municipalities and ministries, Romani NGOs, domestic and international organisations and institutions engaged in Roma education;
- transnational implementation experience and solid previous records in financial support to third parties;
- solid mechanisms in place for financial and program monitoring and evaluation of project partners and grantees.

3. Component 3 – Implementation of the 5th Roma Inclusion Award in the Western Balkans and Turkey, with Roma Active Albania

a) Purpose of the grant

The grant will contribute to achieve outcome 7 and the related outputs.

b) Justification of a direct grant :

Under the responsibility of the Commission's authorising officer responsible, the grant may be awarded without a call for proposals to the Roma Active Albania (RAA). Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified based on Article 195 (f) of the Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, i.e. "for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals".

The 5th award follows up on the 3rd and the 4th award. RAA has the experience and in particular has demonstrated a deep knowledge about the Roma communities in the region and ability to cooperate and coordinate with Roma network partners about the dissemination of the process and selection of nominated winners and runners-ups, as well as capacity to liaise with the local settlement level, ensuring meaningful and representative nominations, as well as to efficiently organise such an award scheme (as exemplified for example by 2018 and 2019 successful Roma friendly mayor awards as well as the 2019 and 2021 EU Roma Integration Awards). The Roma civil society network that RRA has managed (the NGO has implemented two IPA funded network grants (2014 and 2020) provides it with a special position to reach the wide range of stakeholders targeted by the 5th award, i.e. public authorities, Roma citizens and Roma and non-Roma CSOs, and is able to cover all the enlargement region at local and central level. The effective nominations of candidates at local level will require an implementing body that understands the context and sensitivities, and that has regional overview of the theme of the award.

4.3. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions:

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

4.4. Indicative budget

	EU contribution (amount in EUR) 2021	Indicative third party contribution, in currency identified 2021
Grants – total envelope under section 4.2.1	7 000 000	N/A
Outcome 1, 2 and 3 and related outputs (Roma Integration)		
Direct management (Grants) – cf section 4.2.1	2 700 000	N/A
Outcome 4, 5 and 6 and related outputs (Roma education)		
Direct management (Grants) – cf section 4.2.1	4 000 000	N/A
Outcome 7 and related outputs (Roma Award)		
Direct management (Grants) – cf section 4.2.1	300 000	N/A
Totals	7 000 000	N/A

4.5. Organisational set-up and responsibilities

The main institutional stakeholder involved in the management and implementation process of the action is DG NEAR, Unit D.5 as the contracting authority. Unit D.5 will manage all contracting foreseen. However as a regular practice, Unit D.5 will exchange information and coordinate with the relevant EU Delegations/EU Office in order to strengthen synergies among the different EU funded actions.

Other institutional stakeholders that will be involved at beneficiary level include the implementing organisations, National Roma Contact points, CSOs.

5. PERFORMANCE/RESULTS MONITORING AND REPORTING

5.1. Internal monitoring

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of the implementing partner's responsibilities. DG NEAR D5 will ensure regular exchanges with the implementing partners, also based on inputs from EUDs. In addition, the action might be subject to external monitoring in line with the European Commission rules and procedures.

5.2. Roles & responsibilities for data collection, analysis & reporting

Performance and Results-based Financing (text to be finalised):

The implementing partners will continuously capture, record and track key statistical information on the implementation of activities. Particular emphasis will be placed on systematic collection of data required to track progress on indicators identified in the logical framework. The monitoring methods and sources will include the following as relevant: action records showing details about events held and actions taken; website and social media analysis showing viewership, reach, and engagement of target audiences; visibility and impact of social media campaigns; number of mainstream media stories published using material provided through the action; and feedback from participants through questionnaires designed for the action.

5.3. Evaluation

Having regard to the importance of the action, a mid-term or final evaluation may be carried out for this action or its components via independent consultants hired by the implementing partners. It may be carried out for accountability and learning purposes at various levels (including for policy revision).

In addition, the Commission may, during implementation, decide to undertake such an evaluation for duly justified reasons either on its own decision or on the initiative of the partner. The financing of the evaluation shall be covered by another measure constituting a financing Decision.

In case an evaluation shall be carried out, the evaluation reports shall be shared with the partner beneficiary and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner beneficiary, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

Moreover, the on-going and continuous monitoring, evaluation and assessment of quality assurance will also form a central function of evaluation through the action reporting intervals as per contractual obligations. In this way, quality assurance is embedded in the action from the outset and throughout its operation.

6. AUDIT

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

The financing of the audit shall be covered by another measure constituting a financing Decision.

7. COMMUNICATION AND VISIBILITY

Visibility of EU funding and communication about objectives and impact of actions are a legal obligation for all actions funded by the EU, as set out in the EU communication and visibility requirements in force.

In particular, the recipients of EU funding shall acknowledge the origin of the EU funding and ensure its proper visibility by:

- providing a statement highlighting the support received from the EU in a visible manner on all documents and communication material relating to the implementation of the funds, including on an official website and social media accounts, where these exist; and
- promoting the actions and their results by providing coherent, effective and proportionate targeted information to multiple audiences, including the media.

Visibility and communication measures shall be implemented, as relevant, by the public administrations (for instance, concerning the reforms linked to EU budget support), entrusted entities, contractors and grant beneficiaries. Appropriate contractual obligations shall be included, respectively, in financing agreements, delegation agreements, and procurement and grant contracts.

The measures shall be based on a specific Communication and Visibility Plan, established and implemented in line with the EU communication and visibility requirements in force. The plan shall include, inter alia, a communication narrative and master messages for the action, customised for the various target audiences (stakeholders, civil society, general public, etc.)

Visibility and communication measures specific to this action shall be complementary to the broader communication activities implemented directly by the European Commission services and/or the EU Delegations and Offices. The European Commission and the EU Delegations and Offices should be fully informed of the planning and implementation of the specific visibility and communication activities, notably with respect to the communication narrative and master messages. It is the responsibility of the implementing partner(s) to keep the EU Delegations/Office and the European Commission fully informed of the planning and implementation of the specific visibility and communication activities.

Communication on this action should also take into consideration the risks from misinformation and disinformation, and the ways of countering these in order to avoid undermining the Union's efforts and image in the Western Balkans and Turkey.

8. SUSTAINABILITY

The action is expected to be sustainable beyond its implementation period as it will focus on increasing on the one hand institutional capacities of IPA III beneficiaries and various stakeholders to pursue the policy objectives targeted by the activities; and on the other to ensure larger share of Roma pursuing education, which is expected to have an impact on life long revenue, and other socio-economic indicators.