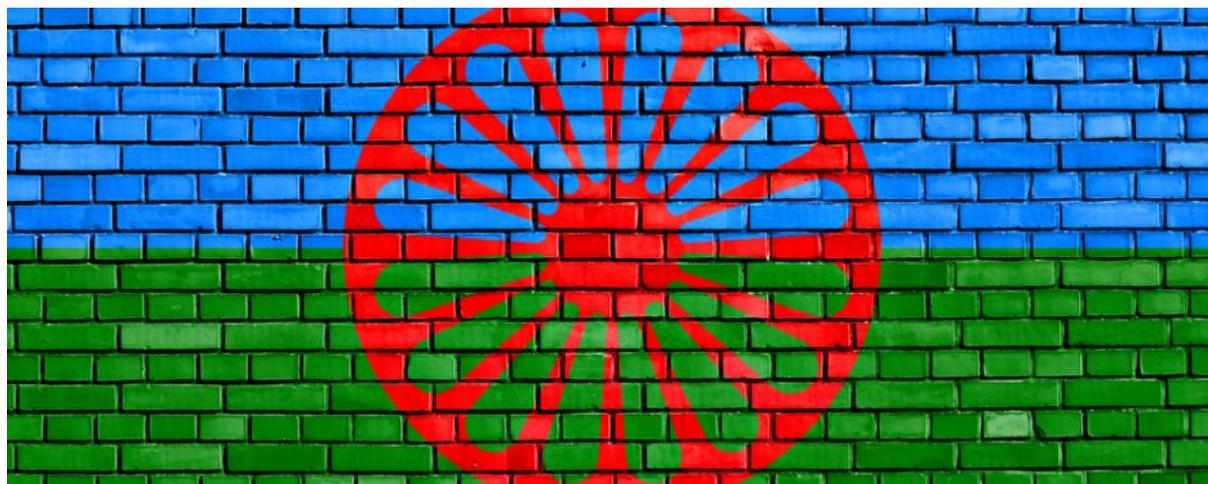


National Roma and Sinti equality, inclusion and participation strategy (2021-2030)

**Implementation of the Recommendation of the Council of the European
Union of 12 March (2021/C 93/01)**



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Notes on terminology and methodology

The title of this strategic document refers specifically to that indicated by the *EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01* of the European Commission. The decision was made to include an explicit reference to the Roma and Sinti communities without, however, precluding the possibility of extending the activities envisaged to the Caminanti community (also included in the title of the previous 2012-2020 Strategy). Within this framework, a specific project will be pursued by the Office for the Promotion of Equal Treatment and the Removal of Discrimination based on Racial or Ethnic Origin (UNAR), as National Contact Point, in order to liaise directly with associations representing the Caminanti community and with national and local institutions impacted by their presence. Throughout the document, the term "Roma" is used generally to indicate a wide spectrum of different populations of *Romani* origin, such as *Roma*, *Sinti*, *Kale*, *Romanichel* and *Boyash/Rudari*, in keeping with the EU Strategy and Recommendation¹.

Consultative and participatory process

To follow up on the process launched in all Member States with the publication of the “*Post 2020 EU Framework on Roma Equality and Inclusion Strategies*” the UNAR launched a consultation with stakeholders interested in contributing to the definition of the new post-2020 National Strategy. The **first phase of this consultative process** was aimed at civil society and presented during the plenary meeting of the National Roma and Sinti Platform held on 14 November 2019, attended by around 50 organisations which actively contributed to the discussion. Subsequently, at the request of the UNAR and using a shared format, over **30 associations sent written contributions** containing critical issues, good practices and proposals for the new Strategy, focusing specifically on local and regional contexts. During the first semester of 2020, the UNAR continued the consultative process by signing an agreement with the National Research Council (CNR) with the aim of analysing the 2012-2020 RSC Strategy and drafting an Evaluation Plan. Subsequently, the UNAR continued the stakeholder consultation process, implementing a series of initiatives aimed at analysing the documents related to the “*Post 2020 EU Framework on Roma Equality and Inclusion Strategies*”, after asking the Platform's NGOs to join the various working groups related to the horizontal and sectoral axes indicated by the EU. The substantial participation led to the formation of **six dedicated working groups**, which each appointed a delegate/*rapporteur*. Institutional representatives at central and local level (ISTAT, National Association of Italian Municipalities - ANCI, Conference of Regions and Autonomous Provinces, Ministry of Education, Ministry of the Interior, Ministry of Labour and Social Policies, Ministry of Health - National Institute for Promoting the Health of Migrant Populations and Combating Poverty-related Diseases - INMP, in conjunction with the representatives of the Regions and Municipalities affected by the presence of Action Plans on the 2012-2020 RSC Strategy) were involved in the consultative process. Overall, **12 thematic meetings were held**:

1. The UNAR organised two plenary meetings of the National Roma and Sinti Platform (held on 9 June 2020 and 10 July 2020) to establish the necessary framework for drafting the key points of the new Strategy;
2. A meeting of the National Roma and Sinti Platform (15 October 2020) and a meeting of the Roma and Sinti Community Forum (22 October 2020) on specific topics;
3. A meeting to provide information and training (23 November 2021), dedicated specifically to the guidelines, indicators and useful elements to encourage genuine participation of civil society and the Roma community in the drafting of the document and its subsequent implementation;
4. Three side events on specific topics, such as the collection of statistics (3 November 2020), remembrance and historical knowledge (1 February 2021) and the matter of Sinti family areas (22 November 2021);
5. Five meetings of the working groups dedicated to the sectoral axes, attended by the competent Administrations, delegates/*rapporteurs* of the National Roma and Sinti Platform and academic experts: “Meeting on the Housing Axis (27 April 2021); “Meeting on the Antigypsyism,

¹ The term, as used in the European context, also encompasses groups such as Ashkali, Egyptians, Yenish, Dom, Lom, Roma and Abdal, other populations including Travellers and populations designated by the administrative concept of 'Gens du voyage', without any intention of restricting or denying the specific characteristics of each group.

Education and Cultural Promotion Axis” (18 May 2021); “Meeting on the Governance, Local Level and Participation Axis” (21 June 2021); “Meeting on the Health Axis” (14 July 2021); “Meeting on the Labour and Anti-Poverty Axis” (11 November 2021).

In conclusion, it should be noted that the following reference documents were used in drafting this strategy:

- The previous National Roma, Sinti and Caminanti Inclusion Strategy 2012-2020;
- The EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01 (Recommendation).
- Communication no. 620/2020 “*Un’Unione della parità: quadro strategico dell’UE per l’uguaglianza, l’inclusione e la partecipazione dei Rom*” - Post 2020 EU Framework on Roma Equality and Inclusion Strategies (Framework).
- The 30 written contributions from the Roma and Sinti Platform associations.
- The minutes of the 12 thematic meetings held during the consultation process.
- The contributions and insights sent by the Authorities concerned.
- The "grey material" (specific literature, institutional reports, project outputs, NGO reports, etc.)

Document structure

The *National Roma and Sinti equality, inclusion and participation strategy (2021-2030)* consists of a series of interconnected sections. **Chapter one**, "A new framework", is dedicated to identifying the most critical issues that emerged in the previous strategic framework, defining the principles and national priorities of the new Strategy and presenting the current conditions of Italy's Roma and Sinti communities. **Chapter two** focuses on the new "*Governance and Participation*" processes outlined in the Strategy, paying particular attention to the role of the National Platform and the Community Forum. **Chapter three**, "*Thematic Areas*", describes the six main axes on which the new National Strategy is built (Antigypsyism, Education, Employment, Housing, Health, Cultural Promotion). The goals set out in the *EU Council Recommendation of 12 March 2021 on Roma and Sinti Equality, Inclusion and Participation - 2021/C 93/01*, an overview to highlight strengths and weaknesses, as well as measures related to the issues addressed, accompanied by relevant indicators, were presented in each axis. **Chapter four** is dedicated to transversal "*intervention processes*", such as *empowerment and participation*, on the *legal recognition* of minority status. Two specific sections were dedicated to **monitoring** and **evaluation** respectively, and to the central issue of **economic sustainability** and sources of funding for the Strategy. A *dynamic appendix* containing a **selection of the main national projects** that have been and are being implemented, as envisaged in the previous RSC Strategy for 2012-2020, and a **focus on process and result indicators** are annexed to this Strategy. These elements will be constantly updated by the National Contact Point, also through a web platform dedicated to the new National Strategy. The document also includes thematic focuses contained in **explanatory boxes** that present further details on specific topics - also with personal contributions from scholars and academics - good practices and regulatory elements.

1. A NEW FRAMEWORK

1.1 The 2012-2020 RSC Strategy. An analysis of context, critical issues and ongoing problems

As we know, Italy decided to comply with the European Commission's Communication No. 173/2011 “*A European Framework for National Roma Integration Strategies up to 2020*”² in 2012, drafting and implementing the first National Strategy for the Inclusion of Roma, Sinti and Caminanti (hereinafter

² Cf. Communication no. 173 of 4 April 2011, “*A European Framework for National Roma Integration Strategies up to 2020*”, approved by the Council during the session held on 23-24 June 2011, available at: <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:52011DC0173&from=EN>

the RSC Strategy 2012-2020) for 2012-2020, aligning with the rest of the member countries and the recommendations of other international human rights bodies. Two years later, the Council of the European Union adopted a recommendation on *effective measures for Roma integration in EU member states*³, providing further guidance to member states on how to strengthen the implementation of their national strategies. The composition of these two instruments outlined a framework aimed primarily at addressing the socio-economic exclusion of Roma and Sinti in the EU and enlargement countries, promoting equal access to education, employment, healthcare and housing, inviting Member States to design national Roma and Sinti integration strategies, appoint national Roma contact points and set specific national targets. The need for strong governmental coordination of interventions at national, regional and local levels led to the appointment of the UNAR⁴ as National Contact Point (hereinafter PCN) for the drafting and implementation of the RSC Strategy 2012-2020. So began the ten-year journey of the *National Roma, Sinti and Caminanti Inclusion Strategy 2012-2020*, inspired by the so-called approach based on human rights⁵ and the gender perspective⁶ focusing on the four main "axes", i.e.: work, home, health and housing, to be developed through strong inter-ministerial coordination and via regional tables and municipal inclusion plans. In the light of the path taken over the past ten years, the general goals⁷ envisaged by the previous RSC Strategy 2012-2020 can be summed up in the following five points:

1. removing the so-called "**Roma issue**" from **institutional consideration** as an **emergency**⁸, as this is politically and institutionally simplistic, subject to exploitation by the media and potentially subject to emotional or contingent approaches;
2. considering the opportunity to **schedule medium and long-term integration operations**, no longer accepting "exceptional measures";
3. making the inclusion of Roma and Sinti communities part of a cultural development process that affects the whole of society, contributing to the **dissemination** of Roma and Sinti culture and to the knowledge of their **history**, which has often been **painful** and marked by discrimination and violence;
4. giving the Strategy an **institutional and symbolic value**, investigating certain specific topics (e.g.: *Porrajmos*⁹) and including them in the institutional calendar and school curriculum.

³ Cf. Recommendation of the Council of the European Union of 9 December 2013, on "*Effective measures for Roma integration in the Member States*" (OJ C 378 of 24.12.2013), available at:

[https://eur-lex.europa.eu/legal-content/IT/ALL/?uri=CELEX:32013H1224\(01\)](https://eur-lex.europa.eu/legal-content/IT/ALL/?uri=CELEX:32013H1224(01))

⁴ The Office for the Promotion of Equal Treatment and the Elimination of Discrimination on the grounds of Racial and Ethnic Origin, abbreviated to UNAR, was set up to implement Directive 2000/43/EC on the principle of equal treatment between persons regardless of racial or ethnic origin. The Italian legislator clearly set out the functions to be performed by the Office, describing its responsibilities, powers and limits. For further details, see:

<https://www.unar.it/portale/web/guest/cos-e-unar>

⁵ Cf. RSC Strategy 2012-2020, page 21.

⁶ Cf. RSC Strategy 2012-2020, page 24.

⁷ Cf. RSC Strategy 2012-2020, page 25.

⁸ In 2008 and 2009, the Italian Government issued a series of ordinances declaring a state of emergency in relation to the settlements of "nomadic communities" in the regions of Campania, Lazio and Lombardy, which envisaged the appointment of the Prefects of the regional capitals concerned as extraordinary commissioners for the implementation of the operations envisaged. The actions undertaken included an extraordinary census of the Roma and Sinti population in 124 unauthorised and 43 authorised settlements in the cities of Milan, Rome and Naples, which led to the identification of 12,346 persons, 5,436 of whom were minors (44 percent). On 28 May 2009, the emergency measures were extended by the government until the end of 2010 with a decree entitled "*Declaration of a state of emergency in relation to the settlements of nomadic communities in the Campania, Lazio and Lombardy regions*". These events were reported by numerous human rights organisations and, in November 2011, a ruling by the State Council declared the proceedings illegitimate. For a complete examination of the ordinances and the Prime Ministerial Decrees related to the so-called "nomadic emergency", see the RSC Strategy 2012-2020, page 5 and pages 101-102.

⁹ The most commonly used term used at international level to refer to the extermination of Roma and Sinti is *Porrajmos*, a word that literally means "devourment" in *Romanés*. The term was proposed by Ian Hancock, a Roma professor at the University of Austin, Texas, to define the persecution and extermination of the Roma and Sinti people during Nazi-Fascism. Following the spread of this term, a broader debate is taking place in relation to the use of vernacular words in advertising. *Porrajmos* is not used in all variants of *Romanés* as, in some of them, it takes on the meaning of "rape" and is considered to be excessively vulgar. Several Sinti and Roma now question the fact that a word with a derogatory connotation is also used in institutional documents at national and international level. Other *Romanés* terms used in the communities in reference to the genocide suffered include: *Samudaripen* (general massacre) *Baro Merape*, (great extermination), or *Sintegre Laidi* (suffering of the Sinti), *KaliTraš* (black terror). For information see Eva Rizzin (editor), *Attraversare Auschwitz. Storie di Rom e Sinti: identità, memorie, antiziganismo*, Gangemi 2020, available online at:

<http://cdn.gangemeditore.com/import/materialiVari/AttraversareAuschwitz.pdf>. See also www.romsintimemory.it and www.porrajmos.it, which feature stories and materials useful for an approach to the subject.

5. dealing with the issue on an **inter-ministerial and inter-institutional basis**, starting with the four critical indicators (education, employment, housing and health) suggested by the European Commission's communication.

The implementation and achievement of the general goals mentioned above have been the subject of constant interest on the part of the European institutions and other international bodies, as well as civil society. Over the years, there have been thematic visits, reports and analyses of various kinds (academic, civil society, European bodies) on the assessment and monitoring of the goals attained¹⁰. With respect to the first point highlighted, concerning the emergency framework on which the entire strategy was based, progress and advancement in Roma and Sinti policies have been noted in several areas. In the Report of the European Commission against Racism and Intolerance (ECRI) of the Council of Europe published in 2016¹¹ as part of the fifth monitoring cycle on Italy, firstly, legislative measures bringing important improvements in legislation against racism and racial discrimination, including the ratification of *Protocol No. 12 to the European Convention on Human Rights and the Additional Protocol to the Convention on Cybercrime*, were welcomed. The report also positively highlighted the fact that an increasing number of incidents inciting hatred had resulted in legal proceedings. Secondly, the Report assigned importance to the Italian initiative of launching, for the first time, a study entrusted to the National Institute of Statistics (ISTAT) and the National Association of Italian Municipalities (ANCI) on the housing conditions of the Roma and Sinti communities. The ECRI report, however, also highlighted important critical issues. First of all, the worrying geographical disparity with regard to the level of inclusion achieved by the Roma and Sinti population on the national territory, as well as significant delays in the implementation of the RSC Strategy 2012-2020 and the continuation, parallel to housing transition and inclusion projects, of the practice of forced evictions from settlements, which - according to the Council of Europe Commission - took place in some cases without the necessary procedural guarantees.

Among the reports on the Italian situation compiled at international level, it is important to mention the *“Civil society monitoring report on implementation of the national Roma integration strategies in Italy”*, drafted in 2018 by several non-governmental organisations and promoted by the European Commission within the framework of the pilot project on activities to monitor the implementation of the RSC Strategy 2012-2020 by civil society, which will also be discussed later in the chapter on the conditions of the Roma and Sinti communities with reference to the data. The document highlights the positive role played over the years by the previous strategy, marking an important break with the past in terms of abandoning the concept of nomadism in favour of a broader approach to promoting Roma and Sinti inclusion. Specifically, the results of the consultations and analysis of administrative materials produced by the local authorities revealed **a change in symbolic terms and language** (the shift from the use of the expression "nomads" to the ethnonyms Roma and Sinti, with a tendency to distinguish the different needs and characteristics of people, avoiding simplifications and ethnicisation).

In the number of results attained in part or in full, especially with reference to the first and second points mentioned in the preamble to this introduction, attention should be drawn to the effective termination of the emergency practice of building new mono-ethnic settlements as the only answer to more general issues of housing and inclusion. The significant allocation of economic resources from European programming, thanks to the inclusion of a specific goal in the national operational programmes, a result on which the UNAR has focused its attention and operational efforts on several occasions, has led to the substantial overcoming of short-lived interventions in favour of medium and long-term projects. The launch of projects aimed specifically at defining a clearer informative picture of the needs and difficulties of the Roma and Sinti population in Italy, in collaboration with ISTAT and ANCI, should be considered in this sense.

¹⁰ These include: Roma Civil Monitor, CERD, ECRI, European Commission Report, Report 21 July, Report on Rights. See: 1) <https://www.rapportodiritti.it/rom-e-sinti> 2) Roma Civil Monitor (2018) <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-italy-2017-eprint-it.pdf>

¹¹ The complete Report is available at:

https://www.coe.int/it/web/portal/news-2016/-/asset_publisher/StEVosr24HJ2/content/anti-racism-commission-issues-new-reports-on-azerbaijan-cyprus-italy-lithuania-and-the-former-yugoslav-republic-of-macedonia-?desktop=true+

The **two-year period 2017-2018** witnessed **progress** in terms of the **involvement and active participation of civil society**, in particular the Roma and Sinti communities, in the consultative and decision-making processes envisaged by the RSC Strategy 2012-2020, with the **foundation of the National Roma, Sinti and Caminanti Platform and the Forum of Roma and Sinti Communities**¹² and the direct involvement of community representatives in institutional tables, international meetings and in the Monitoring Committees¹³ envisaged by the National Operational Programmes. An institutional and national impulse was created through the funding of projects aimed at addressing the historical "memory" of the genocide and persecution suffered by the Roma and Sinti populations during the Nazi-fascist period, also in Italy. The process launched by UNAR, in collaboration with civil society and other national institutions, represented the beginning of a broader and more complex process of rediscovery and awareness which - in the light of the new strategic framework - will need to be revisited later.

As identified in the European Parliament's 2018 *Report on the Implementation of National Roma Integration Strategies*, a significant proportion of Roma and Sinti people in Europe still live in situations of marginalisation and discrimination. According to the Commission *"the effectiveness of progress towards Roma integration goals is considered limited overall, with significant differences between sectors and countries. According to the analysis, education is the area where most progress has been made (improvements in countering school drop-outs, early childhood education and compulsory schooling, but worsening segregation). Roma perception of their health has improved, but health coverage continues to be limited. No improvement has been observed in access to employment and the percentage of young members of the Roma community not in employment, education or training (NEET) has actually risen. The housing situation continues to be difficult. Some progress has been observed with regard to the overall aim of combating poverty. Antigypsyism and hate crimes are still a major concern, despite some signs of reduction in the discrimination experienced by members of the Roma community in accessing services in certain areas"*¹⁴.

Discrimination, social exclusion and the segregation that affect the lives of Roma and Sinti people living in contexts at risk of exclusion and marginalisation have been mutually reinforced and exacerbated by the conditions generated by the recent COVID-19 pandemic which, as the EU Council Recommendation of 12 March 2021 clearly highlights (2021/C 93/01) *"highlighted the extreme exposure of the Roma communities excluded and marginalised to short-term adverse health effects and medium-term socio-economic consequences. Roma children living in marginalised communities are among those hardest hit by the pandemic. Too many Roma children living in households without an IT facility or electricity did not have access to any form of remote learning. The crisis has also highlighted the urgent need for a more effective political response at European level"*. Given their previous situation of limited access to quality education and their difficulty in entering the labour market, some particularly vulnerable Roma and Sinti groups were more exposed to unemployment and job insecurity, limited access to quality health care and precarious living and health conditions during the pandemic.

As we will see in detail in the following paragraph, in October 2021, the European Commission, with communication no. 620, outlined a new Framework committing the Member States to define a new National Intervention Strategy for a ten-year period (2021-2030), with the declared aim of overcoming - with a further and perhaps final strategic process - the obstacles that have prevented the full inclusion of Roma and Sinti communities in Europe. It seems appropriate, after illustrating some of the results achieved and before going on to describe the new European Framework and the commitments that Italy has undertaken with this strategic document, to highlight some of the macro-critical issues that emerged over the ten-year course of the RSC Strategy 2012-2020:

¹² See chapter 2 of this strategic document.

¹³ The EU Regulation governing European Structural and Investment Funds stipulates that Operational Programmes shall be subject to regular audits by a specially established body called the Monitoring Committee. The Committee meets regularly to assess the implementation of the Programme and progress towards its goals. Its functions also include examining and approving certain documents prepared by the Management Authority which have a strategic value for the implementation of the Programme.

¹⁴ *Communication of the Commission to the European Parliament and the Council, Report on the assessment of the EU Framework for National Roma Integration Strategies up to 2020* of 4 December 2018, COM(2018) 785 final, available at: <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:52018DC0785&from=IT>

1. The persistence of a difficult socio-economic framework, which mainly affects a more marginalised part of the Roma and Sinti community (aggravated by the COVID-19 pandemic).
2. The persistent discrimination¹⁵ suffered by members of the Roma and Sinti communities. An almost always unfavourable context in terms of perception, public debate and political orientation.
3. The governance system envisaged by the RSC Strategy 2012-2020 proved complex and hard to implement. As a non-binding policy instrument, the RSC Strategy 2012-2020 encouraged policy coordination, consultation and monitoring of targeted policies for Roma and Sinti inclusion, but left it to the discretion of regional and local governments to decide how to translate recommendations into administrative capacity and tangible political action.
4. The difficulties expressed particularly by local authorities in designing operations and in the effective use of resources earmarked for Roma and Sinti inclusion and the non-synchronic nature of the actions implemented, from an integrated perspective.
5. The unresolved issue of the lack of legal recognition of the minority status of the Roma and Sinti community.

¹⁵ See chapter 3.1 of this strategic document.

1.2 The new EU commitment, principles and national priorities

The commitment of European institutions in recent years has given great impetus to launching and strengthening social inclusion policies to overcome the marginalised and precarious socio-economic and housing conditions in which the Roma and Sinti communities find themselves at EU level. Following an important resolution of the European Parliament in 2008, which called on the European Commission to develop a framework strategy for Roma inclusion and a European Action Plan, two EU instruments have enabled Member States to take steps towards this goal: Communication No. 173/2011 "A European Framework for National Roma Integration Strategies up to 2020" and the first EU Council Recommendation on the social inclusion of Roma of December 2013. In Italy, Communication No. 173/2011 represented a first strong legitimisation of inclusive policies, and supported the development of the first Italian Strategy for the inclusion of Roma, Sinti and Caminanti communities 2012-2020. Despite the absence of a binding legal framework, the European approach has guaranteed and supported the Italian effort over the last decade, ensuring an inter-institutional and multi-level governance of integration processes and for the development of interventions in the four key areas: employment, education, access to housing and health.

The European Commission's 2021-2030 Ten-Year Plan in support of Roma and Sinti communities is a further and more mature driver for the inclusion processes initiated by the Member States, and a reference point for the relaunch of actions to be promoted at national level. The Plan consists of Communication no. 620/2020 "*A Union of Equality: An EU strategic framework for Roma equality, inclusion and participation*" and the Council Recommendation (COM(2020) 621 - 7.10.2020), which establish a list of measures to be adopted by the Member States in order to attain the goals of Roma and Sinti inclusion in the EU. If we look at the areas of inclusion in detail, we see that the European Plan focuses on seven key sectors: equality, inclusion, participation, education, employment, health and housing. For each of these key sectors, the European Commission has developed goals, recommendations and indicators that suggest priorities for action and tools for monitoring progress.

As we shall see in more detail below, the **fight against antigypsyism** is central to the new European commitment. Not only does it focus on the need to recognise antigypsyism and the roles, responsibilities and ways of intervening to counter it, it also provides space for its historical dimension and, in particular, the extermination of the Roma and Sinti communities during the Second World War, along with the need to conduct activities to raise awareness of Roma and Sinti history and promote reconciliation. Extensive space is devoted to the urgency of building positive narratives that can promote role models to combat prejudice, stereotypes and every risk of misinformation against Roma and Sinti people in key areas such as education, the media, arts, culture and history. According to the European documents, every effort should be made to fight discrimination and incitement to hatred, manifestations of antigypsyism and crimes, harassment and violence motivated by prejudice against Roma and Sinti people. In particular, all forms of systemic/institutional/structural discrimination experienced by the Roma and Sinti should be deconstructed and removed, fighting discrimination in employment (and access to employment), housing segregation, bullying and harassment in education, discrimination in access to quality health care, and spatial and housing segregation. Awareness-raising plays an important role in overcoming discrimination, both in terms of information and training of staff and public and private operators.

Fighting **multi-generational poverty** is the second pillar of intervention, which is developed through child protection measures; resources for early childhood education and care (e.g.: scholarships, tutoring, after-school care), nutrition, personal development and work with families. Participation in early childhood education and care is also accompanied by the protection of women, children and young people through strategies to fight crimes such as trafficking in human beings, including all forms of exploitation (sexual exploitation, labour exploitation, forced begging and the use of criminal activities aimed at forced marriages and sexual exploitation). Particular attention is paid to people with disabilities and children deprived of parental care, preventing institutionalisation and supporting vulnerable families.

The third pillar of the proposed interventions is the **promotion of Roma and Sinti participation**. This aspect, developed in particular in Italy through the National Roma and Sinti Platform and the Community Forum, is further legitimised by EU documents, to ensure minimum aspects and levels of participation in the design, implementation and monitoring of inclusion policies and in the scheduling of funds, as well as to increase their participation in national and local administrative interventions in the areas of equality and social inclusion and to encourage mutual trust. Working methods, forms of consultation and participation need to be developed in order to create opportunities for the emancipation of Roma and Sinti communities at local level and to promote effective cooperation and co-responsibility in the implementation of inclusion actions, the mobilisation of communities and their direct participation in local development actions affecting them. The Commission also calls for Roma and Sinti communities to be represented in all their diversity (nationals of the Member State where they live and non-nationals, marginalised and integrated, women, children and young people) in local policy-making processes, not only through consultation but also through the direct involvement of Roma and Sinti professionals as facilitators to promote cooperation, mutual recognition and legitimacy.

This common EU framework also sets minimum essential commitments, which this Strategy aims to exceed, but which provide basic parameters for action, such as at least: in of education, the halving of the gap in attendance of nursery schools, the reduction by at least one third of the gap in completing secondary school education; the halving of the number of Roma children who attend segregated primary schools. In terms of health, at least a halving of the gap in life expectancy at birth. In terms of employment, at least: a halving of the gap in access to employment; a halving of the gender gap in access to employment; a halving of the gap in the NEET rate. In terms of housing, a reduction by at least one-third in the number of Roma people without normal housing; the halving of the proportion of residents in overcrowded homes; the assurance that at least 95% of Roma have access to clean water.

The European institutions have also activated a **substantial framework of EU funding to support these significant goals**, with parameters to ensure that the use of EU funds for Roma and Sinti people generates a tangible impact for the improvement of their conditions. The EU Cohesion Policy 2021-2027¹⁶ will provide important support for strengthening the socio-economic conditions of Roma and Sinti individuals, as part of an overall effort towards economic, social and territorial cohesion. Reducing unemployment, increasing participation in training opportunities and reducing poverty and the risks of social exclusion are part of the new European Pillar of Social Rights and its Action Plan, which includes three ambitious overall goals to be met by 2030: to have at least 78% of the population aged between 20 and 64 in employment; to have at least 60% of all adults participating in training activities every year; to reduce the number of people at risk of poverty and social exclusion by at least 15 million. Among the European financial instruments, the European Social Fund ESF+ represents the main instrument of the European Pillar of Social Rights, together with the ERDF and the Next Generation EU package. To implement the recommendations of the European Pillar of Social Rights Action Plan, 25% of the ESF+ budget will be allocated to poverty reduction measures and at least 12.5% to reduce the NEET rate.

The commitment in favour of the inclusion of the Roma and Sinti communities should also be included in the framework of international and regional legal instruments on human rights, in particular conventional instruments and regional, national and EU legislation and jurisprudence. At regional level, the Council of Europe, the OSCE and the European Union itself have developed various legal instruments and initiatives on the protection and recognition of minorities in recent decades. In particular, it should be stressed that numerous Conventions, Protocols, Strategies, Resolutions,

¹⁶ The legislative package relating to cohesion policies 2021-2027 is articulated on the basis of the following sources of law: [Regulation \(EU\) 2021/1060](#), containing the common provisions applicable to the funds European Regional Development Fund (ERDF), the Cohesion Fund (of which Italy is not a beneficiary under the existing rules), the European Social Fund Plus (ESF+), the Just Transition Fund (JTF), the European Maritime, Fisheries and Aquaculture Fund (EMFAF) and the common financial rules applicable to these Funds and the Asylum, Migration and Integration Fund (AMIF), the Internal Security Fund (ISF) and the BVMI; [Regulation \(EU\) 2021/1058](#) relating to the European Regional Development Fund (ERDF) and the Cohesion Fund; [Regulation \(EU\) 2021/1057](#), establishing the European Social Fund Plus (ESF+); [Regulation \(EU\) 2021/1059](#), containing specific provisions for the "European Territorial Cooperation" goal (Interreg) supported by the European Regional Development Fund and external financing instruments; [Regulation \(EU\) 2021/1056](#), establishing the Just Transition Fund (JTF). See also the dynamic appendix entitled "Sources of national and EU funding" at the end of this strategy document

Recommendations, Judgments and Initiatives aimed at the recognition, protection and social and socio-economic inclusion of the Roma and Sinti communities have been adopted. In this sense, reference should be made to the European Convention for the Protection of Human Rights and Fundamental Freedoms; the European Social Charter; the European Charter for Regional or Minority Languages; the European Convention on the Exercise of Children's Rights; the Council of Europe's Framework Agreement for the Protection of National Minorities, as well as the Decisions and Action Plans for the improvement of the situation of Roma and Sinti communities, promoted by the OSCE-ODIHR. At EU level, particular mention should go to the Charter of Fundamental Rights of Nice¹⁷, especially articles 1, 8, 19, 20, 21, 22, 24, 25, 34, 35 and 45; the Treaty on European Union, articles 2 and 3 of which enshrine the fundamental rights and principles of the European Union, while article 6 deals with fundamental rights in the Union; as well as articles 9, 10 and 19 of the Treaty on the Functioning of the European Union, which specifically recognises the EU's legislative power to fight all forms of discrimination. Article 21 of the Charter of Fundamental Rights of the European Union states: "*Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited*". In implementing the aforementioned provisions, the European Institutions have consistently adopted a series of measures aimed at fighting racism, xenophobia and intolerance, as well as strengthening social cohesion and, in particular, the protection of minorities, including Roma and Sinti communities in the European Union, the synergy of which will be discussed in the following chapter.

In this regulatory context, the Council of the European Union, with Directive 2000/43/EC, has envisaged the establishment of a body for the implementation of equal treatment in each member state. As we know, Italy has implemented this with the issue of Legislative Decree no. 215 dated July 9, 2003, which established, at the Department for Equal Opportunities of the Presidency of the Council of Ministers, the Office for the promotion of equal treatment and the removal of discrimination based on race or ethnic origin, known as the UNAR (Ufficio Nazionale Antidiscriminazioni Razziali - National Anti-Racial Discrimination Office), with the role of acting as guarantor and monitoring equal treatment and the effectiveness of the instruments implemented to prevent discrimination based on race or ethnic origin. The principle of equal treatment applies to all people in every area, both public and private, of social life such as employment, social protection, including social security and healthcare, education, access to goods and services available to the public. For this reason, the fight against antigypsyism and the promotion of positive actions for the inclusion of Roma and Sinti communities have been a relevant aspect of the UNAR's activity since its establishment. In 2012, the UNAR was appointed National Contact Point for the implementation of the Strategy of Roma, Sinti and Caminanti Inclusion 2012-2020 and played a role in coordinating and implementing projects and initiatives aimed at promoting inclusive and non-discriminatory policies in the areas of employment, housing, health and education, from a gender perspective. The implementation of the principle of equal treatment has, in this sense, a universalistic character of protection of fundamental rights and addresses the Roma and Sinti as being at greater risk of discrimination, not as an ethnic minority. In the Italian legal system, in fact, the general concept of minority in Italy is linked to linguistic singularity and is founded in article 6 of the Constitution: "The Republic protects linguistic minorities with appropriate legislation". Law no. 482 of December 15, 1999 on "*Laws for the protection of linguistic-historical minorities*" recognises and protects twelve linguistic minorities: Albanian, Catalan, Germanic, Greek, Slovenian, Croatian, French, Franco-Provençal, Friulian, Ladin, Occitan and Sardinian (taking into account linguistic-historical criteria but especially the criterion of territoriality, in other words localisation in a given territory). In the interpretation of article 6, the principle of "territoriality" has prevailed, excluding the Roma minority from the law, as they are a "scattered minority", meaning that they do not have a recognisable territorial concentration.

The implementation of social inclusion policies for Roma and Sinti communities falls within the jurisdiction of the local authorities, and some regions have passed regional laws on the matter, for which reference should be made to the RSC Strategy 2012-2020¹⁸. Following the publication of the RSC Strategy 2012-2020, the Emilia Romagna Region issued Regional Law no. 11/2015 "Standards for the

¹⁷ Enforced in 2010 - on the basis of the Lisbon Treaty - it is equivalent to the other EU Treaties.

¹⁸ Cf. National Strategy RSC 2012-2020, pages 103-104.

social inclusion of Roma and Sinti", which reiterated the need to remove all obstacles to integration and access to goods and rights, services, opportunities on the four fronts of housing, school and training, work and health, promoting paths of autonomy and emancipation. The Calabria Region is also noteworthy for Regional Law no. 41 of 25 November 2019, on the "Integration and promotion of the Romani minority" and the amendment to Regional Law no. 19 of 19 April 1995. This regional law promotes the establishment of a participatory territorial Observatory of Roma and Sinti communities, as well as public initiatives to disseminate knowledge of the minority and to commemorate the victims of extermination, recognising *Porrajmos* Day and the International Day of the *Romani* population.

1.3 Synergy with other National Strategies

The European Union has legal instruments and a general policy that can enable the construction of a true "*Union of equality*". The **principle of equal treatment and non-discrimination** is a fundamental element of the European legal system. The prohibition of discrimination is clearly expressed in Article 21 of the **Charter of Fundamental Rights in the Treaty on the Functioning of the European Union** (TFEU)¹⁹, which states that the Union shall aim in all its activities to fight discrimination on the basis of different factors by taking appropriate action (Articles 10 and 19). The commitment of the European Union has been strengthened over the years and has taken the form of the adoption of measures, resolutions, recommendations and policy documents for the introduction of protection for people at risk of discrimination and the promotion of specific actions. At the same time, the role of the jurisprudence of the European Courts of Justice, the action of the Council of Europe and the United Nations has been important²⁰.

European Union policy strategies have long adopted an **intersectional approach**²¹, in view of the fact that discrimination is often multidimensional and only an intersectional approach can pave the way for sustainable and respectful changes in society. In this context, the important work on the elaboration and implementation of the Roma and Sinti Strategy 2021-2030, should be read in conjunction with other recently adopted instruments of reference and stimulus for Member States. On 18 September 2020, the European Union adopted the **Action Plan against Racism**²² (A Union of Equality: the EU Action Plan against Racism 2020-2025), which represents an important opportunity to relaunch the discussion on anti-discrimination issues, both at EU and domestic level. The Action Plan defines the main political priorities, while presenting a political-strategic framework for the identification of instruments and measures of operational and financial support. Specifically, the Plan works in four main directions: strengthening existing European legislation on the subject, increasing dialogue with minorities and equality bodies, demanding greater collaboration from Member States, and monitoring diversity within the institutions themselves. At the same time, however, the European Commission encourages member states to "*develop and adopt national action plans against racism and individual action plans*". These plans should be adopted by 2022, in compliance with the Commission's guidelines.

The European Union's commitment to anti-discrimination has also recently been strengthened with the adoption of the **EU Strategy for LGBTIQ Equality 2020-2025**, adopted on 12 November 2020²³. The

¹⁹ Charter of Fundamental Rights and in the Treaty on the Functioning of the European Union (TFUE) (2016/C 202/02). See: <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:12016P/TXT&from=ES>

²⁰ This refers to the international framework established by the United Nations 2030 Agenda and the Concluding Observations/Recommendations addressed to Italy on the subject of non-discrimination/social inclusion within the United Nations (Universal Periodic Review process; country visits by special *Rapporteurs*; state of implementation of Treaties that Italy has ratified such as CRC, CERD, CEDAW, CRPD, ICESCR, ICCPR).

²¹ The European Institute for Gender Equality defines "intersectionality" as an "analytical tool to study, understand, and respond to the ways in which sex and gender intersect with other personal characteristics/identities and the ways in which these intersections contribute to specific experiences of discrimination." This definition applies equally to all forms of discrimination.

²² *A Union of Equality: the EU Action Plan against Racism 2020-2025*, COM(2020) 565 final. See: <https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX%3A52020DC0565>

²³ *A Union of Equality: the strategy for equality of LGBTIQ people 2020-2025*. See: https://ec.europa.eu/info/sites/default/files/lgbtiq_factsheet_2020-2025_it.pdf

Strategy is based on the vision of a Europe in which people, while respecting differences, are equal and free to live their lives to the full, regardless of their sexual orientation, gender identity/expression or sexual characteristics. It is an important document on the basis of which Member States are invited to adopt national strategic action plans, taking existing good practices into consideration. The Strategy defines a series of key objectives: to fight discrimination against LGBTIQ people; to ensure the safety of LGBTIQ people; to build inclusive societies for LGBTIQ people; to lead the fight for equality of LGBTIQ people in the world to be achieved through a mainstream approach, incorporating the fight against LGBTIQ discrimination in all EU policies.

Within the scope of the above-mentioned processes, in the coming months, Italy will be promoting the "National Plan against racism, xenophobia and intolerance" and the "National LGBTI Strategy". With a view to complementarity and optimisation, the fact that the UNAR institutionally represents the national focal point for each of the three strategies (Roma and Sinti Strategy, National Plan against racism, xenophobia and intolerance and National LGBTI Strategy) will avoid operational and conceptual overlaps, ensuring the real effectiveness of the principles of equal treatment and non-discrimination and ensuring the necessary synergies in the use of funds guaranteed by European planning, also with reference to other national strategic plans in force²⁴.

1.4 The condition of the Roma and Sinti in Italy and the subject of data collection

In Italy, the limited availability of scientifically reliable socio-demographic and economic statistical information on the Roma and Sinti population is clearly one of the main causes that contribute to making it difficult to accurately identify the problems affecting the living conditions of this heterogeneous group of people²⁵. In turn, the lack of a precise quantification of the presences and of the main characteristics that help draw a picture of the complex situation of the Roma and Sinti population, negatively affects the possibility of developing effective and targeted public policies and of making the best use of available resources to finance paths of social inclusion and/or cultural promotion. Moreover, without the help of official statistical data, it is hard to set goals, to determine instruments capable of pursuing them, and to assess the impact of the public interventions implemented.

As far as Italy is concerned, most of the information available to date on the living conditions and socio-demographic characteristics of Roma and Sinti communities originates from scientific surveys conducted by universities and research institutions, or from information held by local authorities and third sector organisations that pursue projects aimed specifically at this group of people. The data collected through ad hoc surveys and the information in the possession of Third Sector organisations and bodies, while often presenting a high degree of detail, are mostly unable to provide a complete and generalisable picture of the living conditions of Roma and Sinti communities in Italy, mainly due to the fact that the data refers to specific territorial aggregates, which rarely go beyond a regional level (the data usually refers to individual cities or settlements) and to the fact that it is collected using different methodologies and definitions which do not allow comparison.

²⁴ National Strategy on Gender Equality 2021-2025; the National Strategic Plan on Male Violence against Women 2021-2023; Action Plan on Business and Human Rights; Report of the Working Group on Online Hate established by the Ministry of Technological Innovation together with the Ministry of Justice and the Presidency of the Council; Extraordinary Commission of the Senate to combat phenomena of intolerance, racism, anti-Semitism and incitement of hatred and violence.

²⁵ Only the Emilia Romagna Region, since 1996, has systematically produced data on the Roma and Sinti population present in settlements in the regional territory, through a survey carried out every three years since 2018. The data collected refers mainly to two areas: one dedicated to the people present and to some of their socio-anagraphical characteristics; the other dedicated to the settlements, whether public or private. The data collected by the municipalities is limited to detecting the presence of people in camps and micro-areas, but does not collect data on people living in traditional houses or data referring to those who are present in spontaneous and temporary settlements. For further details, see:

<https://sociale.regione.emilia-romagna.it/esclusione-sociale-e-poverta/il-monitoraggio-dei-rom-e-sinti-presenti-in-emilia-romagna>.

As far as the **education sector** is concerned, in the analysis of levels of school enrolment and attendance (success will be discussed later in the chapter dedicated to this specific axis) we must make an initial distinction regarding the area of reference. As we will see in more detail later - and this is one of the merits of analytical clarity attributable to the RSC Strategy 2012-2020 - the Roma and Sinti population residing in settlements does not represent all those who identify as members of this minority in our country. The survey conducted by ANCI and Fondazione Cittalia at the behest of the UNAR in 2013/2014, mentioned on several occasions, has substantially reduced the terms of what has been called the "camp system" analysing and identifying the number of Roma and Sinti people living in settlements in municipalities with over 15 thousand inhabitants, as about 30,000 units²⁶. As we know, the level of access by the Roma and Sinti to public education in our country in the first decade of the 21st century was provided exclusively by the reports of the Ministry of Education, which, at least from academic year 2008/2009 until academic year 2014/2015, regularly published data on the number of Roma and Sinti children enrolled in Italian schools of all levels. The analysis of this annual report, drawn up for several years with the collaboration of the ISMU, has always provided useful suggestions and food for thought, for an in-depth examination of "schooling". First of all, the choice of method of identification: the data collected by the Ministry of Education has always concerned Roma and Sinti children "recognised" as such by the educational institution. Over and above the indications relating to the appropriateness and correctness of the procedure of hetero-identification of individuals belonging to a minority, which determined the suspension of this survey from academic year 2016/2017, a second important element is represented by the universe of reference: in short, taking academic year 2014/2015 as an example, 12,437 Roma and Sinti students were registered in schools of all levels in Italy²⁷. The problem with this data is immediately evident if we compare the figures with a general reference universe: the total number of Roma and Sinti people living in our country, estimated by the Council of Europe at between 120,000 and 150,000²⁸. In short, the operation carried out for years consisted in applying a system of identification which, besides presenting ethical doubts, detected a presence of "enrollees" which - in the best case scenario - referred exclusively to those who could be easily identified as belonging to the minority, by virtue of the fact that they lived in a camp. The end result of this operation has not been neutral: for years, in various contexts - from academia to political decision-making - the thinking has been in factual terms, and therefore in terms of "data" referable to schooling, taking into consideration only a minimal part of enrolment data, but considering it indicative and representative of the general and national context. In this context, many ordinary and successful experiences undoubtedly "escaped". Some of these have brought, and continue to bring, many young Roma and Sinti silently into the classrooms of universities, masters or PhD programmes.

As regards access to **social and healthcare services** by Roma and Sinti groups and, more generally, their right to health, in the Health Action Plan²⁹ envisaged by the RSC Strategy 2012-2020 the lack of national data and information of an epidemiological nature has already been thoroughly highlighted. On this specific point, the Plan stressed that *"epidemiological surveys conducted in small communities do not allow comparisons or generalisations, while the data collected by health services is not conclusive as it concerns only the population that had access to services (services that, as we know, are used little and incorrectly by Roma and Sinti populations). Having to outline a profile of healthcare requirements that can guide the implementation of healthcare interventions, even with all the limitations mentioned above, one must however refer to the various surveys conducted in the so-called "nomadic camps" from 1985 to the present day, from which it is possible to identify some significant and recurrent health-related issues"*³⁰. This critical issue - linked to the absence of a nationwide epidemiological

²⁶ Data on the presence within the settlements has been the subject of further investigation by ISTAT and sector associations. On this point, see chapter 3.4 of this strategy document.

²⁷ Cf. MIUR, ISMU, *Pupils with non-Italian citizenship. Multicultural schools in local contexts. National report A.Y.2014/2015*, Quaderni ISMU n. 1/2016, Milan.

²⁸ Cf. National Strategy RSC 2012-2030, page 4.

²⁹ See chapter 3.5 of this strategic document.

³⁰ In short, here is the list of issues reported in the Health Plan: (1) Life expectancy is lower than that of host populations and infant mortality is higher. (2) Reproductive health is characterised by early marriages, (2) low demand for contraception and (3) higher frequency of abortions, (4) poor monitoring during pregnancy. Compared to non-Roma populations, there is evidence of (5) lower birth weight, (6) higher number of premature births, (7) significantly increased smoking during pregnancy, (8) decreased use of dietary supplements. (9) Exclusive breastfeeding tends to end when the child is about 2-3 months old. (10) There is a higher prevalence of congenital diseases in children than in the general population, and a high percentage of diseases proven to be causally linked to poor housing conditions, poor nutrition and poverty in general. The

survey - is the specific subject of a project currently underway with the Sacred Heart University of Rome, which will be reported in the dynamic appendix of this document.

By far - if possible - more fragmented is the statistical picture with regard to **access to employment by Roma and Sinti individuals**, for which one of the few specific references is provided by the research entitled *EU Inclusive - National Report on Social and Labour Inclusion of the Roma in Italy*³¹, which shows that the employment rate of Roma and Sinti individuals in Italy in 2012 was 34.7%, highlighting substantial differences between the employment rate of Roma and Sinti individuals living in traditional housing (46%) and that of those residing in camps (24%).

In addition to that presented so far with reference to the issue of education and health, more generally speaking, the absence of data and information relating to the presence and living conditions of Roma and Sinti individuals has already been perceived by the previous RSC Strategy 2012-2020 as a problem of fundamental importance. To address this deficit in a structured way, the **RSC National Statistical Information Working Group**, coordinated by the Italian Institute of Statistics (Istat), was set up in June 2017. The Central Administrations (Ministries) implicated, ANCI (National Association of Italian Municipalities) and delegates of the National Roma, Sinti, Caminanti Platform participate in the activities. The *RSC National Statistical Information Working Group* has operated so far with the aim of meeting the following goals:

1. To define a conceptual framework for the identification of indicators aimed at detecting and monitoring the inclusion of Roma and Sinti populations with respect to the four axes of the RSC Strategy 2012-2020 (education, housing, work, health);
2. To provide the agencies and bodies involved with guidelines for collecting and processing data regarding the Roma and Sinti populations;
3. To contribute to the computerisation of data sources and the harmonisation of existing data;
4. To build an Integrated Information System on Roma and Sinti populations fed by the members of the group, which will lead to the exchange of good practices applied to the subject.

The acquisition of a complete statistical picture of the various aspects of daily life and the need to continue the efforts made so far, through the continuation of the Statistical Working Group and the projects related to it, are highlighted in the following paragraph.

1.4.1 The main interventions developed at national level to bridge the information gap

Following the adoption of the first RSC Strategy 2012-2020, three major research activities were carried out in order to fill the information gap on the Roma and Sinti populations mentioned above. Their results were published between 2017 and 2021.

The volume entitled *Sources of Data on the Roma, Sinti and Caminanti Population. A pilot survey in four Italian municipalities* was published in 2017³². The publication presents the results of the survey conducted on data sources regarding the Roma and Sinti population in four Italian municipalities (Naples, Bari, Lamezia Terme and Catania). It is a research conducted by ISTAT with the UNAR and Anci. The critical information issues that emerged from the survey - arising from a lack of uniformity,

latter are responsible for two out of three hospital admissions: respiratory diseases, intestinal infections (11), malnutrition and impetigo. Compared to non-Roma children, there is a higher percentage of dental problems (12), less vaccination, and a higher percentage of cases of domestic accidents, including poisoning and burns. Children's diets are characterised by inadequate consumption of fruits, vegetables, milk and dairy products, cereals, pasta, rice, eggs, meat and fish, and an excessive consumption of sweets. In adults, a high consumption of animal fats, beer and alcohol is noted (13). In addition to a high prevalence of metabolic diseases (hypertension, dyslipidemia, diabetes, gout, etc.), infectious diseases are reported to be attributed to living conditions and discomfort such as tuberculosis, scabies, viral and fungal infections; lastly, venereal diseases are beginning to be reported more frequently than in the past. (14). Smoking is also widespread among young people (15).

³¹ Project co-funded by the European Social Fund through the Sectorial Operational Programme for the Development of Human Resources 2007-2013, carried out by Fondazione Casa della carità "Angelo Abriani", available at: http://www.cestim.it/argomenti/03rom-sinti/2012-Casa-Carita-Rapporto_nazionale_sull_inclusione_lavorativa_e_sociale_dei_Rom_in_Italia.pdf

³² Link to survey: <https://www.istat.it/it/archivio/196456>

organisation and computerisation of the data sources available - highlighted the need to improve the collection of information in order to produce monitoring indicators required at European level.

Also in **2017**, the research mentioned in the preamble on education entitled *Roma, Sinti and Caminanti camps in Italy*³³, carried out by Fondazione Cittalia as part of a collaborative relationship between ANCI and UNAR, was published. The aim of the study, referred to in the previous paragraphs, was to identify the number and conditions of authorised and spontaneous camps in the municipalities, with populations of over 15,000, noting in particular their location, morphological characteristics, types of accommodation and the profile of the resident population. The unit of analysis is both large and small family-based camps, more or less temporarily located in micro-areas, on public or private land. The main aim of the survey was to provide local, regional and national authorities and policy makers with a support tool for the design of policies aimed at definitively abolishing these camps. The survey revealed the presence of 516 camps scattered throughout Italy (48.2% of which were informal and unrecognised camps, 15.6% were spontaneous but recognised camps and 36.2% were equipped camps). In total, they were home to an estimated 30,000 people. A specific discussion of the survey results will be presented in the chapter on housing.

A more recent publication (**2021**) is *Housing in Transition. Survey on housing transition projects for the Roma, Sinti and Caminanti populations*³⁴. The work presents the results of a background survey conducted by ISTAT as part of an agreement with the UNAR to create a database to monitor some aspects implemented by the RSC Strategy 2012-2020, with the overall aim of building an information framework on the inclusion/exclusion, social hardship and housing conditions of these populations. The survey - still ongoing - involved all Italian municipalities with at least 15 thousand inhabitants and gathered information on housing transition projects (in progress or already completed), implemented since 2012. As a corollary to the background survey, information on the presence of camps in the area was also gathered. The published work represents the conclusion of the first phase of a survey that includes two further cognitive steps. The second step, currently in progress, gathers information on members of the Roma and Sinti population who have moved from camps to other forms of housing (such as social housing or housing found on the private market). Its main goal is to provide a picture of the main socio-demographic variables, current living conditions and access to services (education, work, health, housing). The third and final step involves gathering information from Roma and Sinti people who still live in camps in the same areas where transitional housing projects have been implemented, making it possible to compare those who were interviewed in the previous phase with those who continue to live in camps. The ultimate goal of this three-phase research process is to provide indicators that measure the inclusion gap between the Roma and Sinti population living in camps and those living in permanent housing, in order to better guide the planning of policy interventions to be put in place in the near future.

In addition to these three surveys, **an important source of data** on the conditions of inclusion/exclusion of Roma and Sinti communities and their forms of participation is represented by the three Reports prepared by civil organisations within the framework of the *Roma Civil Monitor pilot project, "Capacity-building of the Roma civil society and the reinforcement of its participation in the monitoring of national Roma inclusion"*³⁵, promoted by the European Commission, DG Justice and Consumers. The work was coordinated by the Center for Policy Studies at the Central European University (CEU CPS), in partnership with the European Roma Grassroots Organisations network (ERGO Network), the European Roma Rights Center (ERRC), the Fundación Secretariado Gitano (FSG) and the Roma Education Fund (REF) and implemented with the collaboration of approximately 90 NGOs and experts from 27 Member States. For Italy, the research activities were developed by a partnership between the following NGOs: Casa della Carità "A. Abriani", Consorzio Nova Onlus, Fondazione Romaní, Associazione 21 Luglio, Associazione Sinti di Prato and Arci Solidarietà Onlus. The first Report was dedicated to the analysis of the implementation of the RSC Strategy 2012-2020. The second analysed working conditions, housing, access to schooling and the impact of health protection policies on the Roma, Sinti and Camino population. The third focused on regional laws aimed at the Roma and Sinti

³³ Link to survey: http://www.cittalia.it/images/Gli_insedimenti_Rom_Sinti_e_Caminanti_in_iItalia_.pdf

³⁴ Link to survey: <https://www.istat.it/it/archivio/254436>

³⁵ The three reports are available at this link: <https://cps.ceu.edu/roma-civil-monitor-reports>

population, the lack of reliable data, and counter-narratives about the Roma and Sinti communities. The third report also presented a case study on community and mass media, dedicated to the condition of the Sinti in the city of Prato.

Lastly, a further significant source of data on the living conditions of Roma and Sinti groups in Italy can be found in the Research Reports prepared as part of the project, promoted by the UNAR, called P.A.L. (Piani di Azione Locali - Local Action Plans): *encouraging the participation of the Roma and Sinti in social, political, economic and civic Pilot actions for the creation of tables and networks of stakeholders involved in various ways with Roma, Sinti and Caminanti communities*³⁶. The project, which is part of Action 9.5.4 of Axis 3 - National Operational Program (NOP) "Inclusion" 2014-2020, was developed between January 2019 and November 2021 in eight metropolitan cities: Milan, Genoa, Rome, Cagliari, Naples, Bari, Messina and Catania. The main aim of the project was to develop eight Local Action Plans aimed at promoting social inclusion and participation of Roma, Sinti and Caminanti groups, while working on the dissemination of an effective methodology of participatory planning. (). The project activities were implemented by a temporary association made up of Consorzio Nova Onlus, Associazione 21 Luglio, Fondazione Romanì Italia, Casa della Carità "A. Abriani".

Insight box no. 1

The highlights identified during the survey activities of the "P.A.L. Project"

The surveys conducted in the eight cities during the implementation of the P.A.L. project activities revealed that, among the cities involved, **Rome had the highest number of Roma and Sinti inhabitants**, as well as the highest number of camps, both formal and informal. With reference to the numerical consistency, the Italian capital was estimated³⁷ as having about 6,000 Roma and Sinti, living in 16 formal camps (about 4,000 people), 300 informal camps (about 1,300 people), occupied buildings (about 650 people) and apartments (in this case it was not possible to estimate the number). More than half of the Roma people in the capital's settlements are originally from the former Yugoslavia.

Milan was the second city in terms of number of estimated inhabitants and number of camps. About 3,400 Roma and Sinti were identified in the metropolitan area of the city of Milan, living in seven formal camps (about 700 people, most with Italian citizenship) and in about 130 informal camps (inhabited by almost 2,700 people, mostly from Romania). Also in the case of Milan, it was not possible to estimate the number of people living in apartments.

In the city of Naples, between 1,100 and 1,400 Roma people were estimated, mostly Romanian or originating from the former Yugoslavia. Four formal camps (with about 700 people) and two informal camps (about 800 people) were detected. In the case of Naples, it was possible to estimate the number of Roma living in apartments to be at least 50.

In the other cities, the estimated number of Roma and Sinti was less than 300 units. In **Cagliari**, there were an estimated 270, of Bosnian origin, mostly (196) living in apartments following a specific operation to abolish the camp that had been set up in the city. Catania had approximately 250 Roma, mostly from Romania, living in informal camps. In **Bari**, the presence of Roma inhabitants was estimated at about 250 (mostly from Romania), living in two camps, one formal and the other informal, as well as in illegally occupied buildings. In **Genoa** there were about 130 Italian Sinti within a formal camp, about a hundred Romanian and ex-Yugoslavian Roma in informal camps and an unquantified number of Roma living in houses. The situation in the city of **Messina** is very particular,

³⁶ The complete project materials can be found at: <https://pianiazionelocale-rsc.com/>

³⁷ All the data shown in this box is taken from the Survey Reports carried out during the project activities, aimed at providing a first snapshot of the different territorial situations in relation to the general characteristics of the Roma and Sinti population living in the cities. The data is updated to July 2019. See: <https://pianiazionelocale-rsc.com/documenti/>

with a small Roma community of about ninety people housed in public housing as a result of a project called "Home is Work", launched in 2011 by the municipal administration.

In all the cities involved in the project activities, prior to the launch of the PAL activities, interventions aimed at the inclusion and participation of Roma communities had been tested, with varying results. Overall, 32 initiatives were counted in the eight cities (80% still active at the time of the announcement of PAL project activities). 34% of the initiatives involved interventions aimed at supporting school attendance, 21% housing interventions³⁸, 18% interventions for social and labour inclusion, and 6% interventions aimed at facilitating access to healthcare services. Although to varying degrees and intensities, recurring and, in part, overlapping problems regarding the quality of life in the camps, access to work, schooling and the use of social and health services were found in all the cities. With reference to housing, almost all of the settlements were located in isolated areas without services, often in dangerous areas, close to highways or in unhealthy places. The health and hygiene conditions were critical and the housing structures were cramped and overcrowded. With working conditions being generally unstable, unemployment was very high, especially among women and young people. The jobs found were mostly informal and occasional activities incapable of guaranteeing a continuous and sufficient income to meet family needs. Equally difficult is the relationship with school, characterised by occasional and irregular attendance; generally speaking, educational qualifications are not higher than those required by compulsory education, and there are high rates of drop-out and early abandonment of schooling, especially for teenage girls. It also emerged that the use of the services of the local welfare system was complicated both by the location of the camps, often lacking public transport connections, and by the various forms of barriers to access resulting from the lack of information and knowledge about the workings of the local social and health service system. In addition to these problems, there were also the difficulties of access to the National Health System for those who lacked registration and/or residence permits, and those arising from forms of discrimination, sometimes experienced by citizens identified as Roma.

Further information and data to help expand the socio-statistical information framework on Roma and Sinti populations will come from research activities currently underway in five Italian regions (Lazio, Emilia Romagna, Puglia, Sardinia and Calabria) as part of a project promoted by the UNAR called "*P.A.R. Piani di Azione Regionali (Regional Action Plans) - System of pilot interventions for the creation of local tables and networks of stakeholders involved in different capacities with the RSC communities, in order to encourage the participation of Roma people in social, political, economic and civic life*", which is part of the NOP Inclusion 2014 – 2020.

1.4.2 Italy and possible research paths to follow for data collection

Despite the important steps forward made thanks to the completion of the above-mentioned surveys, to date, the lack of reliable and scientifically based information, systematically collected on the living conditions of the Roma and Sinti population, continues to represent a critical issue in terms of knowledge of the phenomenon and on the more fully operational level of the development of effective interventions aimed at removing the causes that determine forms of social exclusion and disadvantages for a significant proportion of this population in Italy. It should be noted that the absence of specific surveys on the Roma, Sinti and Caminanti population is not specific to Italy, but is shared by most European countries.³⁹ Both at European level and in individual countries, there are only estimates of the number of Roma people present. The absence or the lack of data is due largely to the complexity of the

³⁸ It should be noted that, in several cases, the Administrations also included interventions for the management and maintenance of housing structures present within the formal camps in this category.

³⁹ EU countries that do not officially identify the Roma population are: Finland, France, Germany, Greece, Italy, Luxembourg, Norway, Netherlands, Portugal, Slovakia, Spain, Sweden, United Kingdom. EU countries that officially identify the Roma population by self-definition are: Austria, Bulgaria, Cyprus, Croatia, Estonia, Ireland, Latvia, Lithuania, Poland, Czech Republic, Romania, Slovenia, Hungary.

categorical definition of "who"⁴⁰ can be considered Roma or Sinti and, in part, to the spread of antigypsyism. The way in which the Roma and Sinti population is identified, together with the limits imposed by legislation on the protection of personal data, including some particular categories of data (formerly "sensitive data"), such as ethnicity, have led almost all countries that produce official data on the Roma and Sinti population to make use of the self-definition given by those concerned. While this choice makes it possible to overcome the issue of definitional complexity, it has not always proved adequate for the collection of reliable data due to the spread of antigypsyism and related phenomena. It should, in fact, be stressed that, where data is gathered on the ethnicity of Roma or Sinti people, it tends to underestimate, sometimes significantly, the actual number present. This is largely due to widespread prejudice that makes many people reluctant to disclose their membership of such a discriminated minority. According to the *No data – No progress* report⁴¹, in countries where the Roma presence is officially recorded, official figures underestimate the presence in a range between 55% and 99% compared to data collected by non-governmental associations.

While the issue of collecting data on ethnicity is still particularly complex, several international bodies have highlighted the need to collect this type of data in order to plan anti-discrimination policies. The European Commission against Racism and Intolerance (ECRI) of the Council of Europe was among the first international bodies to advocate the need to collect ethnic data in a consistent and comprehensive manner in order to assess the effectiveness of policies aimed at ethnic minority groups⁴². Remaining within the scope of the Council of Europe, the European Committee of Social Rights has requested national authorities to collect data on equal treatment in order to inform policy makers. The Committee has stated that where it is clear that a particular category of people is, or is likely to be, discriminated against, it is the duty of national authorities to collect data to assess the extent of the problem⁴³. The collection and analysis of ethnic data (with appropriate safeguards for privacy and against other forms of abuse) is essential to the formulation of rational policy⁴⁴. The UN Special Rapporteur on extreme poverty and human rights went further than this request, stating that the European Commission should initiate violation proceedings if a member state continues to misinterpret EU data protection provisions, such as not allowing the collection of data on ethnicity⁴⁵. From a legislative point of view, at European level, the European Union does not prohibit the collection of data on ethnic grounds, as long as data protection safeguards are implemented and the data subject gives their explicit consent to the processing of such personal data for one or more specific purposes. No Member State imposes an absolute ban on the collection of ethnic data as long as the collection of such data is carried out in compliance with the Data Protection Directive⁴⁶. Article 9 of the current European legislation on the protection of personal data (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) prohibits the processing of personal data revealing racial or ethnic origin, but states that this prohibition

⁴⁰ With reference to the matter of categorical complexity, as Leonardo Piasere reminded us back in 1995, in the introduction to the text *Comunità girovaghe, comunità Zingare* that of the Roma is a polythetic category, a category that lacks the necessary and sufficient traits to exclusively identify the members of these groups. On an epistemological level, Roma is a political, social and scientific categorical concept, which takes on different meanings depending on the contexts and the ways in which it is used. There seem to be no "thorough and exclusive" shared criteria for determining who can be considered Roma and who cannot, either in the context of studies on the subject or in the classification criteria used by public administrations, or in the public debate in which Roma and Sinti organisations take part.

⁴¹ The complete report is available at:

<https://www.opensocietyfoundations.org/uploads/165c9e47-6056-4abf-97fb-4fa2d67f695c/no-data-no-progress-20100628.pdf>

⁴² See, for example, Recommendation no. 4 of the ECRI's general policy on national surveys of the experience and perception of discrimination and racism from the perspective of potential victims, adopted on 6 March 1998.

⁴³ *European Roma Rights Centre v. Greece*, Report no. 15/2003, decision on the merits no. 27 of 8 December 2004.

⁴⁴ *European Roma Rights Centre v. Italy*, Report no. 27/2004, decision on the merits no. 23 of 7 December 2005.

⁴⁵ United Nations, End of Mission Statement on Romania, by Professor Philip Alston, Special Rapporteur of the United Nations Human Rights Council on extreme poverty and human rights, available at: <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=16737&LangID=E#sthash.42v5AeFT.dpuf>

⁴⁶ On this point, see also the Guidance note on the collection and use of equality data based on racial or ethnic origin, prepared by the Sub-Group on Equality data on behalf of the High Level Group on Non-Discrimination, Equality and Diversity established by the European Commission. The Guidance note reiterates the approach to the collection of statistical data based on respect for human rights of the OHCHR (UN Human Rights) and the importance of aspects such as the participation of affected communities, self-identification of respondents, data disaggregation, transparency and confidentiality of information. The document is available at:

https://ec.europa.eu/info/sites/default/files/guidance_note_on_the_collection_and_use_of_equality_data_based_on_racial_or_ethnic_origin_final.pdf

does not apply where the data subject has given their explicit consent to the processing of such personal data for one or more specific purposes and only under the following conditions:

1. If referring to all minorities, according to the principle of self-definition of individuals, which can only be carried out on a voluntary basis.
2. If people's right to privacy is respected.
3. If used only at aggregate level and with the aim of fighting inequality and supporting positive actions to counteract ethnic discrimination.

As already highlighted, the option of hetero-identification of the Roma population, i.e.: the attribution of ethnicity by third parties or based on the use of proxy variables, besides no longer being permitted by current European legislation, also poses many important methodological problems. Most recently, on 12 March 2021, the Recommendation (2021/C 93/01) of the Council of Europe on Roma Equality, Inclusion and Participation, while stressing that the collection of information on ethnic origin is a sensitive topic and that it is prohibited in some Member States, reaffirmed the importance of collecting this type of data as *a necessary base for the design of measures to effectively improve the situation of the Roma population, in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council (14) and the 2018 Guidelines for Improving the Collection and Use of Equality Data, published by the Subgroup on Equality Data under the High Level Group on Non-Discrimination, Equality and Diversity*. Therefore, if these prerequisites were met in Italy, there would be, in principle, no impediment to collecting data on a specific minority, including Roma and Sinti, even within the framework of "non-recognition" in which this minority is included⁴⁷. **At present**, if we were to pursue the path of collecting information on ethnic appearance, **three paths** would be possible.

The first path - barely feasible under the current legislation - is to officially collect disaggregated data on minority membership (including Roma and Sinti) during the *permanent census of population and housing* carried out by Istat. For this to happen, however, there would have to be a specific legislative intervention, as, to date, Istat does not collect this type of information during the census.

The second path, which is currently feasible, is to plan a series of dedicated exploratory and representative surveys at local level, which involving individuals who define themselves as Roma and Sinti and which, thanks to a random sample, are able to reach even those who, for the aforementioned reasons related to antigypsyism, seem more reluctant to make self-declarations. The road of explicit consent to the processing of personal data and self-identification (implementing appropriate tools that can contain the possible risks of distortion: building a relationship of trust with respondents, involvement of associations, use of specialised surveyor networks), albeit with the caveats mentioned above, defines a usable path. Given the sensitivity of the collection of this type of data, as required by the above-mentioned Recommendation of 12 March 2021 of the Council of Europe, **representatives of Roma and Sinti communities must be directly involved** in the design, planning and implementation of this type of research activity. After all, the framework of objectives should not look at that of enumeration, typical of census approaches, but at that of in-depth research into the characteristics and degree of inclusion of this community in the socio-economic fabric of the country, taking into account the conditions of social vulnerability and often extreme poverty in which part of the Roma and Sinti population finds itself.

However, the gap between the official surveys and those in the possession of the Roma and Sinti organisations in countries where ethnic data is collected is likely to expose this type of survey to a risk of calibrating policy choices (or measuring their impact) on data affected by bias. This raises the possibility of **a third path**, an alternative to data collection on the basis of ethnicity; **shifting the focus** of analysis from the **Roma and Sinti population to the territories and the ways in which initiatives for Roma and Sinti inclusion and participation are promoted**. This type of survey, alternating desk-research techniques with those of sampling and fieldwork, would provide information on how well the various territories (regions and/or municipalities) are equipped to promote processes of social inclusion and participation of the Roma and Sinti population. Information with respect to the processes of social

⁴⁷ Roma and Sinti, as we know, have not been included among the historical-linguistic minorities recognised by Law no. 482 of 1999. On this point, see chapter 4.2 of this strategic document.

inclusion and participation could be gathered on the basis of the definition of indicators to be elaborated starting from the goals envisaged in this National Strategy in relation to the six axes: antigypsyism, education, housing, work and training, health, cultural promotion and its governance system. The information collected using this method would give an account of the inclusive potential of the various territories⁴⁸, at different levels of aggregation (e.g.: "Town", "Municipality", "Province" and "Region"). The term inclusive potential means a significant set of objective factors (projects activated to ensure the implementation of the Strategy, public interventions carried out to ensure the implementation of the Strategy, organisation of cultural events, promotion of spaces for participation in public life, programmes to support access to employment, programmes to support quality schooling, programmes to fight antigypsyism ...) that can positively or negatively affect the start and development of processes of inclusion and participation of the Roma and Sinti people within each territorial context. Based on the information gathered, it would be possible to construct "territorial maps" that describe the inclusive potential expressed by the territories. These maps would indirectly also provide information on the varying degree of implementation of the National Strategy throughout the country. The data to build indices on the inclusive potential expressed by the various Italian territories should be collected by an independent research organisation, with the participation of scholars, academics, the Third Sector and representatives of the Roma and Sinti communities.

Insight box no. 2

Italy and the collection of data on an "ethnic" basis

Chapter XII of the 2020 Recommendations for the Censuses of Population and Housing (Unece), which focuses on Ethnic-Cultural Characteristics, provides useful guidance on the collection of statistical data related to ethnicity (*non-core topic*). In particular:

“Ethnicity, broadly defined, is based on a shared understanding of the history and territorial (regional, national) origin of an ethnic group or community, as well as particular cultural characteristics, such as language and/or religion and/or specific customs and lifestyles”⁴⁹.

In the framework of the UNECE Recommendations for the 2020 Census of Population and Housing, it is stressed that data on ethnicity is relevant for understanding the cultural diversity of the population, the position of ethnic groups in society, and for defining and monitoring the fight against discrimination. In this context, data on ethnicity provides a more accurate picture of the immigrant population's cultural heritage than data on the respondent's country of birth or that of their parents alone, which is not significant for second and third-generation immigrants.

Another aspect highlighted within the Recommendations, is that ethnicity is a multidimensional concept and needs to be considered as a process rather than a static concept. Accordingly, the ethnic

⁴⁸ The structures of local authorities, the departments that deal with Roma and Sinti people in the various municipalities, the social services, associations and NGOs that carry out cooperation projects in the various territories, are often aware of the situation of Roma and Sinti people in different contexts. Their living conditions, their health and hygiene conditions, their work problems and opportunities, their school attendance. This is an immense wealth of fragmentary data, collected spontaneously and using different methods, based more on direct experience than on correct statistical processing, referring to very specific situations and therefore not easily generalisable. This data could be used to build a more precise and widespread awareness: by collecting, processing and computerising this considerable amount of information coming "from below". It is necessary to activate these sources of knowledge through a national project, however, which envisages an investment aimed at guaranteeing the uniformity of research and data collection and processing methods; which feeds quantitative surveys and qualitative investigations aimed at the knowledge of the different aspects concerning the presence of Roma and Sinti people throughout the territory.

⁴⁹ Cf. *Recommendations for the 2020 Censuses of Population and Housing (Unece)*. Conference of European Statisticians, available at: https://unece.org/DAM/stats/publications/2015/ECECES41_EN.pdf

classification adopted within the scope of population census should be treated as dynamic and the categories identified within the classification should have shifting boundaries.

Official statistics

In Italy, the official statistics are not disaggregated by ethnic origin. Within official statistics, data on ethnic origin is not collected either in the Population Census or in other large-scale statistical surveys.

General Data Protection Regulation – GDPR 2016/679

Published in the European Official Journal on 4 May 2016, the GDPR came into force on 24 May 2016. However, its implementation took place from 25 May 2018. The European Data Protection Regulation identifies certain special categories of data (formerly "sensitive data") for which special processing is required. In particular, Article 9 of the GDPR, prohibits the processing of special categories of personal data:

Article 9

1. The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data intended to uniquely identify a natural person, data relating to health or sex life or sexual orientation of the person, is prohibited.

There are actually some exceptions to this prohibition: these particular categories of personal data may be processed with the explicit consent of the data subjects and for specific purposes, when their processing is necessary for reasons of substantial public interest, for statistical, scientific or historical research purposes (etc.). The exceptions envisaged by the GDPR under which this prohibition does not apply (Art.9) are the following:

- a) the data subject has given their explicit consent to the processing of such personal data for one or more specific purposes, except where EU or Member State law states that the data subject may not waive the prohibition referred to in paragraph 1;
- b) processing is necessary to fulfil the obligations and exercise the specific rights of the data controller or the data subject in the field of employment and social security law and social protection, insofar as it is authorised by EU or Member State law or by a collective agreement under Member State law, subject to appropriate guarantees for the fundamental rights and interests of the data subject;
- c) processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving their consent;
- d) the processing is carried out, within the scope of its legitimate activities and with appropriate guarantees, by a foundation, association or other non-profit organisation which pursues political, philosophical, religious or trade union aims, as long as the processing relates solely to members, former members or persons who have regular contact with the foundation, association or organisation on account of its aims, and that personal data is not disclosed externally without the consent of the data subject;
- e) the processing concerns personal data made manifestly public by the data subject;
- f) processing is necessary for the establishment, exercise or defence of legal claims or whenever judicial authorities exercise their judicial functions;
- g) processing is necessary for reasons of substantial public interest on the basis of EU or Member State law, which must be proportionate to the aim pursued, respect the essence of the right to data protection and envisage appropriate and specific measures to protect the fundamental rights and interests of the data subject;

h) processing is necessary for the purposes of preventive or occupational medicine, the assessment of the employee's ability to work, health or social diagnosis, care or treatment, or management of health or social care systems and services on the basis of EU or Member State law or pursuant to a contract with a healthcare professional, subject to the conditions and guarantees outlined in paragraph 3;

i) processing is necessary for reasons of public interest in the area of public health, such as protection against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and medical products and devices, on the basis of EU or Member State law envisaging appropriate and specific measures to protect the rights and freedoms of data subjects, particularly professional confidentiality;

j) processing is necessary for archiving in the public interest, scientific or historical research or for statistical purposes in compliance with article 89, paragraph 1, on the basis of EU or national law, which is proportionate to the purpose pursued, respects the essence of the right to data protection and envisages appropriate and specific measures to protect the fundamental rights and interests of the data subject.

3. The personal data referred to in paragraph 1 may be processed for the purposes referred to under point (h) of paragraph 2 if those data are processed by or under the responsibility of a professional bound by professional confidentiality pursuant to EU or Member State law or rules laid down by competent national bodies or by another body also bound by the obligation of confidentiality pursuant to EU or Member State law or rules laid down by competent national bodies.

4. Member States may maintain or introduce further conditions, including restrictions, with respect to the processing of genetic data, biometric data or data concerning health.

The Italian legislator has established that the supervisory authority (the Guarantor) may impose further guarantees if this specific type of data is processed.

2.GOVERNANCE AND PARTECIPATION

2.1 Analysis of context, critical issues and ongoing problems

As we know, the Office for the Promotion of Equal Treatment and the Removal of Discrimination based on Racial or Ethnic Origin (UNAR), was identified in 2011⁵⁰ as the National Contact Point (NCP) for the Strategy for Roma, Sinti and Caminanti Inclusion 2012-2020, in implementation of the commitment made in European Commission Communication no. 173/2011. The governance system developed within the previous RSC Strategy 2012-2020 envisaged the collaboration and combination of some institutional and non-institutional components, technically supported and, in some cases, coordinated, by the UNAR:

1. A top-level body, represented by an Interministerial Table, with tasks of policy and institutional coordination of the RSC Strategy 2012-2020 as a whole, coordinated at the time by the Minister for International Cooperation and Integration and, later, entrusted to the political structure with responsibility for integration.
2. A steering committee between the regions and local authorities, providing an interface and mutual cooperation.
3. A Forum of Roma and Sinti communities to interface, liaise and coordinate with the National Contact Point.
4. Four National Tables, set up on the basis of the four priority intervention axes and coordinated by the Ministry of reference.
5. Dedicated working groups, set up to investigate specific issues (e.g.: the matter of legal recognition or statistical data).
6. Regional and Municipal Tables with the aim of ensuring synergy and homogeneous implementation of the RSC Strategy 2012-2020 at territorial level.

The reference to the governance structure of the previous RSC Strategy 2012-2020 seems appropriate also in view of the problems that emerged in its implementation, as already outlined in general terms in the first chapter. In its ten-year course, the governance of the 2012-2020 RSC Strategy proceeded at different speeds, highlighting the efficiency of some of its components and the evident weaknesses of others. In particular, the implementation of individual regional or local strategies, in line with the national strategy, encountered numerous obstacles:

- 1) The **difficulties** encountered by the National Contact Point, in its condition of central office and European equality body, **in maintaining a constant and adequate capacity of coordination, monitoring and exchange** with institutional stakeholders, especially at local and territorial level. As pointed out in several contexts, from the academic sphere to the area of civil society⁵¹, at the end of the strategic path, only ten Italian Regions⁵² had adhered to the idea of implementing a Regional Strategy by setting up dedicated concertation tables which revealed their scarce effectiveness over time, both in terms of public policy definition and in terms of involvement of civil society stakeholders, especially due to the discontinuity of their operations.
- 2) The complexity and, at times, the specificity of the issues related to the RSC Strategy 2012-2020, combined with the lack of legal recognition of the Roma and Sinti minority, highlighted the **discontinuous nature of the commitment of the competent ministries in implementing measures and active policies** within an explicit but not exclusive approach towards Roma and Sinti groups.
- 3) The **difficulty in making the actions of local authorities consistent and binding** with the principles of the RSC Strategy 2012-2020. This is significant in two ways. On one hand, there

⁵⁰ The UNAR received formal designation by the Permanent Technical Committee of the CIACE on 18 November 2011, Cf. RSC Strategy 2012-2020 page 32.

⁵¹ Cf. Roma Civil Monitor, page 7.

⁵² In the Emilia Romagna region alone, a regional plan has been active and financed since 2015, and only in two regions (Emilia Romagna and Calabria) has a new regional law been approved in line with the RSC Strategy 2012-2020.

is the issue of institutional jurisdiction over certain specific areas: for example, access to the labour market and vocational training, which is a specific regional responsibility, or housing policies, made transversal by the need for management of the housing transition from camps by the municipalities in which they are located, and the harmonisation of regulations on access to social housing, which is again a regional responsibility. With respect to the general framework, the second profile refers to the phenomenon of **antigypsyism**, which finds - not by chance - extensive space for intervention in this strategic document in line with the European model: this particular form of discrimination - even in its expressions of an institutional nature⁵³ - had a constant negative influence on the effective implementation of the 2012-2020 RSC Strategy through the persistence, alongside projects perfectly in line with the strategic principles, of measures still considered as being of an emergency nature, easily subject to phenomena of political exploitation.

In the light of the problems mentioned above, the UNAR, as NCP, chose to promote, in the final phase of implementation of the RSC Strategy 2012-2020, projects in support of the empowerment of Roma and Sinti civil society (National Platform and Forum of Roma and Sinti communities), the creation and animation of Regional and Municipal Tables as tools for dialogue and active participation and the active fight against antigypsyism. The following proposals and governance guidelines are also part of this context.

2.2 From tables to networks for a new arrangement of active governance. Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01

Involving and supporting national contact points for the Roma people (articles 11-13)

Involvement of bodies for the promotion of equal treatment (articles 14-15)

Mobilising local and regional stakeholders (articles 16-20)

Cooperation with civil society (articles 21-27)

Funding (articles 28-34)

The new system - which began to take shape in the last few years of the previous RSC Strategy 2012-2020 (see the PAL and PAR projects) - has led to the de facto creation of a network of regions and metropolitan cities and municipalities that have voluntarily intervened within a **multi-level and multi-stakeholder governance model**. This is a step to be completed and strengthened, from a conceptual and operational point of view, to overcome the phase of the mere formal establishment of a round table in order to achieve the creation of a national and local network, as an instrument of accompaniment and policy definition, comparison and constant monitoring of the Strategy also in connection with similar networks existing at European level. **As envisaged by Enabling Condition 4.5. for access to European funds of the 2021-2027** programming cycle, adherence to the National Roma and Sinti Integration Strategy, and therefore to the proposed governance system, shall be a prerequisite for recognition of eligibility also in terms of access to programming and to European funding sources envisaged in support of the Strategy.

⁵³ The IHRA's non-binding definition of antigypsyism explicitly includes an "institutional" form of antigypsyism discrimination: "Antigypsyism/anti-Roma/Sinti discrimination is a manifestation of individual expressions and acts, as well as institutional policies and practices of marginalisation, exclusion, physical violence, devaluation of Roma and Sinti culture and lifestyles, and hate speech directed at Sinti and Roma and other individuals and groups, stigmatised or persecuted during the Nazi era, and even today, stigmatised as "Gypsies". This leads to the treatment of Roma and Sinti people as a supposedly alien group and associates them with a series of derogatory stereotypes and distorted images that represent a specific form of racism."

Within the new multi-level and multi-stakeholder approach, which will actively involve representatives of the Platform and the Forum, this Strategy intends to promote the construction or strengthening of the following governance elements:

- 1) An **inter-institutional coordination group**, coordinated by the National Contact Point, with the central Administrations, ANCI⁵⁴, the Conference of the Regions and Autonomous Provinces and a representation of the Roma and Sinti communities expressed by the Forum, which envisages the development of strategic-political guidelines and exchanges of information on a quarterly basis, aimed at monitoring the degree of national and territorial adhesion to the principles of the Strategy, the operability of its implementation status and the efficiency/effectiveness of the measures and programmes put in place.
- 2) The establishment of a **network of metropolitan cities and municipalities**, coordinated by the National Contact Point, through adhesion to specific memoranda of understanding with local organisations and actively involving the ANCI. The specific goal of this network is the creation and implementation of Local Action Plans (P.A.L.), directly involving the Roma and Sinti communities (as expressed by the Forum) and accessing appropriate funding measures.
- 3) The promotion of a **network of Regions**, coordinated by the National Contact Point, which actively involves the Conference of Regions and Autonomous Provinces and the regional structures of the ANCI. The specific goal of this network is the creation and implementation of Regional Action Plans (P.A.R.), directly involving the Roma and Sinti communities (expressed by the Forum) and access to adequate funding measures.
- 4) Formal connection between the **National Network of Municipalities and Regions** to be established and the network of **anti-discrimination centres** set up at central level (UNAR and OSCAD Contact Center, Observatory for security against discriminatory acts of the Department of Public Security of the Ministry of Interior), and at local and regional level, existing or in the process of implementation⁵⁵, with the aim of strengthening the identification, opposition and removal of all forms of discrimination and facilitating dialogue and territorial mediation.
- 5) The **strengthening of the role of the NCP** in terms of human resources (also through a progressive involvement of Roma and Sinti professionals and experts) and instruments in order to enhance its ability to coordinate the National Strategy at national and European level. With reference to the latter, the strategic role of the National Contact Point within EU bodies (Roma Contact Point, FRA Working Party, Euroma Network), European bodies (ADI-ROM of the Council of Europe, OSCE-ODIHR) and international bodies (United Nations) is highlighted.
- 6) The definition of a **monitoring and assessment system**, as envisaged by the European framework (for details on operation see the dedicated paragraph 4.4. "Steering, monitoring and assessment"), with particular reference to the accountability process on an annual basis, expressly envisaged by the European Commission on the progress of the strategic document.
- 7) Strengthening the role and operation of the **National Platform and Forum** in terms of access and participation, with the definition of stringent and effective criteria on functions - also in terms of representation and representativeness (for details see the dedicated part in this paragraph).
- 8) The establishment of **dedicated multi-stakeholder working groups, including representatives of the Forum of Roma and Sinti Communities and of the National Platform**, with the aim of investigating specific issues of priority and significant interest for the implementation of the Strategy. These include:
 - a) A **"Statistical" Working Group**, coordinated by Istat, aimed at overcoming the information and statistical gap, in collaboration with the Fundamental Right Agency (FRA) of the European Union.
 - b) A **"European Funds" Working Group**, coordinated by the NCP, with the Cohesion Agency and the Authorities of the main National and Regional Operational Programmes, aimed at the inclusion of a specific goal dedicated to the inclusion of Roma and Sinti communities and the enhancement of the role of the NCP and of Roma and Sinti representation within the Monitoring Committees.

⁵⁴ As far as the ANCI is concerned, there is an opportunity to disseminate this strategic document within its competent committees and, more generally, within the network of member municipalities.

⁵⁵ As envisaged by art. 44 par. 12 of the Consolidated Act on Immigration, see National Strategy RSC 2012-2020, page 26.

- c) A **Working Group on the “Definition of Legal Status”**, coordinated by the Ministry of Interior.
- d) A **Working Group on “Juridical recognition”**, coordinated by the NCP, aimed at facilitating and promoting discussion and debate.
- e) An **“Observatory on Contemporary Forms of Antigypsyism”**, coordinated by the National Contact Point, with a focus on **intersectional and multiple discrimination**, paying particular attention to gender discrimination⁵⁶.

2.3 The role of the Platform and Forum 2021-2030

The National Platform and the Community Forum represent operational tools for dialogue between the UNAR, civil society, central and local administrations involved in the National Strategy. The Platform and the Community Forum were established by Decree (REP/D 44 2017) of the Head of the Department for Equal Opportunities of 11 September 2017⁵⁷ following an expression of interest published on 29 May 2017, with the admission of 79 associations from all over the country. This instrument was created with the aim of bridging the gap in the mechanisms of dialogue between institutions and civil society and allowed the formalisation of the comparison between members and delegates on specific thematic areas with central and local administrations.

For 2021-2030, also in consideration of the experience gained, the proposals of the Platform's members and the growing interest in this participatory instrument, the main aim is to consolidate the Platform. As emerged in the proposals, there is a need to define and promote active and qualified participation of the Roma and Sinti communities in the various consultative and decision-making processes.

Here is a **list of some implementation proposals concerning the National Platform and the Community Forum**, to be developed in different phases, with the aim of guaranteeing systematic support to the National Contact Point and other Administrations for the commitment to dialogue, advocacy and cooperation with national and local authorities, to promote the capacity building of civil society and third sector bodies:

- **Update of the administrative procedures of the Platform and the Forum**, in terms of access and participation, with the definition of **stringent and effective criteria** on the functions - also in terms of representation and representativeness - the areas of jurisdiction and the permanence within it of the associations concerned.
- **Ensure the funding** of the operation of the Platform and the Forum with national and European resources, with the integration of funds and the search for specific resources.
- Promotion of the **participation of young Roma and Sinti** - involved by the associations in empowerment and training courses - in thematic subgroups, activating effective collaboration and an active role in the decision-making process.
- **Involvement and participation of a Roma and Sinti representative, selected by the Forum and the Platform**, in the Monitoring Committees of the NOPs and ROPs, in order to monitor the decision-making processes and the state of implementation of the measures undertaken with structural and European investment funds, aimed at improving the educational, socio-economic, health and housing conditions of Roma and Sinti communities and preventing the risks of discrimination against them.
- Active and qualified participation in the monitoring of national strategies - in relation to the European initiative Roma Civil Monitoring - applying a bottom-up methodology based on knowledge and experience in the territories to influence decision-making processes and adapt them to the needs of communities.
- Participation in decentralised networks (at regional or municipal level) made up of members of associations, thematic experts, members of PAs present on the territories, implementing the

⁵⁶ See chapter 3 of this strategic document.

⁵⁷ The decree is available at:

https://www.unar.it/portale/documents/20125/51449/Decreto_Piattaforma-_Forum_RSC.pdf/06de03f4-931e-13de-d7d3-1be36e3bb440?t=1619795451434

regional networks of the strategy (with the composition of academics, Roma and Sinti people with professional knowledge and skills, a civil society activist, a delegate of local institutions, in order to: foster the participation of Roma and Sinti communities in the political activities of territorial and local institutions, provide thematic support to local authorities and civil society aimed at planning actions and promoting the inclusion of the minority.

- Confirmation of the prerogatives of the Forum on linguistic and cultural aspects, maintaining a central role and a tangible involvement in terms of consultation for the resolution of critical issues in the territories, encouraging its inclusion in decision-making mechanisms and innovative systems of co-planning and co-design for the development of new initiatives.
- Promotion of transnational collaboration and cooperation and exchange with other European organisations and participative models.

3. THEMATIC AREAS

3.1 ANTIGYPSYISM AND THE FIGHT AGAINST DISCRIMINATION

3.1.1 Analysis of context, critical issues and ongoing problems

The assessment of the National Strategies adopted by the EU, which covered 2011-2017, as seen in the introductory chapter, was based on an extensive review of secondary literature, reports and databases, in-depth country studies, stakeholder interviews, an open public consultation, a survey of non-governmental organisations, the results of the 2016 survey of the European Union Agency for Fundamental Rights (FRA) and a validation workshop. The assessment concluded that the four priority areas of the previous framework (employment, education, healthcare and housing) continue to be key to Roma and Sinti equality and inclusion, highlighting, however, that the specific aim of non-discrimination must make use of an inclusion-based approach with an emphasis on preventing and fighting discrimination, with specific reference to antigypsyism. The Recommendation (2021/C 93/01) identifies it explicitly as “*a form of racism that is still widely accepted and which originates from the way society in general sees and treats those considered as “gypsies” in a historical process of “othering” based on stereotypes and attitudes, albeit unintentional or unconscious*” and points out that “*since 2005, the European Parliament has been using the term antigypsyism in its reports and resolutions*” indicating antigypsyism as “*the root cause of their social exclusion and discrimination*”.

In the light of the assessment process and the indications supplied by the Recommendation, and also in consideration of the assessment process of the previous RSC Strategy 2012-2020 in the introduction to this document, it is essential to recognise the existence of a specific form of racism that also affects the Roma and Sinti communities in our country at various levels. We use the term "antigypsyism"⁵⁸ to identify a feeling of hostility that has been widespread and deep-rooted for centuries, accepted and elaborated by society to the point of sanctioning the normality of relations between Roma, Sinti and Gagé (non-Roma) communities. While the practice it defines is much older, the use of the term 'antigypsyism' in specific literature and official reporting is quite recent⁵⁹. As far as Italy is concerned, the RSC Strategy 2012-2020 already highlighted a hostility towards the Roma and Sinti minority, defined as “*complex historical and cultural phenomenon, fraught with highly negative effects on the living conditions of the Roma and Sinti populations and which, in the course of the 20th century, led to the tragedy of the Porrajmos*”⁶⁰. A few years earlier, institutional recognition of antigypsyism was present in another general policy document of the Ministry of Education, “*The Italian way for intercultural schools and the integration of foreign pupils*”⁶¹, which stated that “*antigypsyism takes on the aspect of a specific form of racism that intercultural education must counter, also through knowledge of the history of the Roma and Sinti populations*”. At international level, one of the first institutional documents to address the issue of discrimination against Roma and Sinti in detail is the resolution of the European Parliament adopted on 28 April 2005, which calls on the European Commission to intervene “*to combat antigypsyism/Romaphobia across Europe*”, in the awareness “*of the importance of urgently eliminating continuing violent racism and racial discrimination against the Roma people*”, as “*all forms of impunity for racist attacks, hate speech by extremist groups, illegal evictions and persecution by the police motivated by antigypsyism and Romaphobia affect the weakening of the rule of law and democracy*”⁶². According to the European Commission against Racism and Intolerance (ECRI) of the Council of Europe “*antigypsyism is a particularly persistent, violent, recurrent and common form of racism, [...] an ideology based on racial superiority, a form of de-humanisation and institutional racism nurtured by historical discrimination, which is expressed, among*

⁵⁸In English *antigypsyism*, in French *antitsiganisme*, in German *antiziganismus*.

⁵⁹ See: 1) Leonardo Piasere, *Scenari dell'antiziganismo. Tra Europa e Italia, tra antropologia e politica*, Seid, Firenze 2012
2) Alessandro Simoni, *Rom, antiziganismo e cultura giuridica. Prospettive di analisi*, CISU, Roma 2019.

⁶⁰ Cf. RSC Strategy 2012-2020, page 23.

⁶¹ Cf. MIUR (2007), *La via italiana per la scuola interculturale e l'integrazione degli alunni stranieri*.

⁶² Cf. *European Parliament resolution on the Roma situation in the European Union*, (P6_TA(2005)0151) 8 April 2005, available at: https://www.europarl.europa.eu/doceo/document/TA-6-2005-0151_IT.html?redirect

other forms, through violence, hate speech, exploitation, stigmatisation and the most blatant forms of discrimination”⁶³. A significant contribution to the international debate on the recognition of antigypsyism is also represented by the non-legally binding definition drafted and adopted on 8 October 2020 by the International Holocaust Remembrance Alliance (IHRA)⁶⁴, the intergovernmental organisation founded in 1998 that brings together governments and experts from 35 countries to strengthen, promote and disseminate Holocaust education.

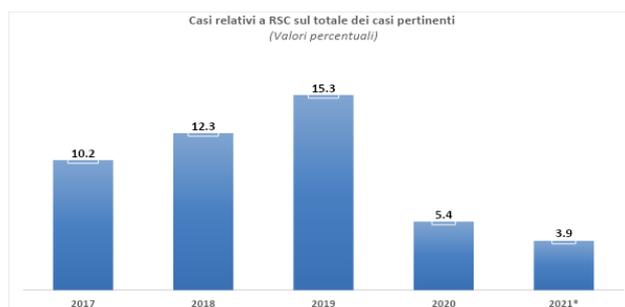
Regardless of the definitions, the image of the Romani minority in negative terms in the general perception is confirmed by various studies and surveys, often cited in literature and in official documents produced by institutions. In a rather old ISPO survey, 47% of those interviewed saw the Roma mainly as "thieves", "delinquents" and "idlers", while 35% linked their image exclusively to the so-called "nomad camps", and more generally to the degradation and dirtiness⁶⁵ of big cities. It should be noted that, ten years on, that perception has changed little. In 2019, according to the European Commission and Eurobarometer⁶⁶, one in two Italians still believed that society would not benefit from a reduction in discrimination against Roma and Sinti. And six out of ten said they felt uncomfortable having a Roma colleague. These are, of course, only surveys, which do not provide a complete and scientifically grounded picture of the situation. What clearly emerges, however, is a complexity rooted in the perception of the Romani population and day-to-day relations with them. **The data collected over the last five years by the UNAR Contact Center confirms that the negative perception mentioned above can lead to an increase in the level of discrimination experienced by Roma and Sinti communities in our country (Tables 1, 2 and 3).**

Table 1 - Cases related to Roma and Sinti - 2017-2021 (absolute values)

	2017	2018	2019	2020	2021*
Total	206	284	226	49	46

SOURCE: Elaboration of data from CONTACT CENTER UNAR

*from 01/01/21 to 16/11/2021



FONTE: SOURCE: Elaboration of data from CONTACT CENTER UNAR
*from 01/01/21 to 16/11/2021

⁶³ Cf. European Commission against Racism and Intolerance (ECRI), *General Policy Recommendation no. 3, The fight against racism and intolerance towards the Roma*, 1998.

⁶⁴ For further details, see: 1) (in Italian) <https://www.unar.it/portale/-/l-international-holocaust-remembrance-alliance-ihra-adotta-una-definizione-internazionale-di-antiziganismo> 2) (in English) <https://www.holocaustremembrance.com/press-releases/ihra-adopts-working-definition-antigypsyismanti-roma-discrimination>

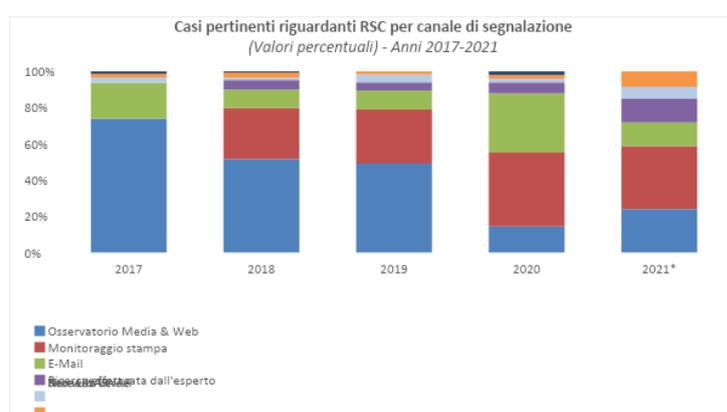
⁶⁵ Cf. Istituto per gli Studi sulla Pubblica Opinione (ISPO) and Ministry of the Interior (2008), *What do Italians know and think about Roma and Sinti people?*

⁶⁶ Cf. European Commission (2019), *Perception of minorities in the EU: Roma people, Special Eurobarometer 493 - "Discrimination in the European Union"* available at: https://data.europa.eu/data/datasets/s2251_91_4_493_eng?locale=en

Table 2 - Cases related to Roma and Sinti by reporting channel 2017-2021 (percentage values)

	2017	2018	2019	2020	2021*
Media & Web Observatory	73.8	51.4	49.1	14.3	23.9
Press monitoring	0.0	28.2	29.6	40.8	34.8
E-Mail	19.9	10.2	10.6	32.7	13.0
Research carried out by the expert	0.0	5.3	4.4	6.1	13.0
UNAR website	2.9	1.4	4.4	2.0	6.5
Telephone helpline	1.9	2.8	1.8	2.0	8.7
UNAR network	1.5	0.7	0.0	2.0	0.0
Total	100.0	100.0	100.0	100.0	100.0

SOURCE: Elaboration of data from CONTACT CENTER UNAR
*from 01/01/21 to 16/11/2021



SOURCE: Elaboration of data from CONTACT CENTER UNAR
*from 01/01/21 to 16/11/2021

Table 3 - Cases related to Roma and Sinti by environment 2017-2021 (percentage values)

	2017	2018	2019	2020	2021*
Home	1.0	1.1	2.2	8.2	8.7
Provision of services by public bodies	25.2	26.1	17.3	20.4	17.4
Provision of services by public establishments	0.0	0.4	0.9	2.0	2.2
Provision of financial services	0.5	0.0	0.0	0.0	0.0
Police force	1.5	2.1	3.5	0.0	2.2
Work	0.0	1.1	0.0	4.1	2.2
Healthcare	0.5	0.0	0.9	4.1	4.3
School and Education	1.0	0.4	0.9	8.2	17.4
Free time**	1.5	0.4	3.1	0.0	6.5
Public transport	0.5	0.4	0.0	0.0	0.0
Public life	68.4	68.3	71.2	53.1	39.1
Total	100.0	100.0	100.0	100.0	100.0

SOURCE: Elaboration of data from CONTACT CENTER UNAR
*from 01/01/21 to 16/11/2021 - ** including sport

From a reading of the data reported above, a special focus is required on the main area (which records more cases for each year of reference) in which this discrimination actually occurred, linked to the provision of services by public bodies. The prevalence of this area somehow confirms what has been said so far about the relevance of institutional discrimination within the broader phenomenon of antigypsyism.

Also, with regard to hate speech, according to data provided by UNAR, cases of discrimination recorded against Roma and Sinti people on social media and social networks are of major significance, making the Romani minority one of the most exposed to online hate speech. In 2019, during just one month of hate speech content analysis and monitoring carried out by the UNAR, within the "hate topic" on Roma and Sinti people, 779 conversations/posts with potentially discriminatory content were detected on the main social media (Twitter, Facebook, YouTube, Instagram). The most frequently used words of hatred in the posts highlight the use of the term 'gypsy', with a negative and derogatory meaning, to address Roma and Sinti people and the persistence of a negative stereotyped image linking them to all forms of crime, especially theft (it is the most common keyword in a volume of about 7000 conversations referring to Roma people). A first consideration is that the fluid and dynamic world of the Web and social networks confirms an already detectable fact: racism and intolerance towards gypsies do not only concern the most extremist and intolerant fringes of our society, but are creeping in transversally among citizens (in urban and rural areas, in groups characterised by different age, gender, economic and social conditions) and in the most diverse places of debate.

However, if we want to further summarise the critical framework, it is possible to note, first of all, **a transversal nature of the phenomenon of discrimination against Roma and Sinti people** that affects **all areas of daily life**, from transport to the right to housing, access to the world of work, healthcare, the right to study, both in real life (off-line) and in virtual life (on-line). Consequently, it seems possible to affirm that **antigypsyism** represents a **neuralgic and transversal obstacle** to the real implementation of any strategic framework aimed at Roma and Sinti inclusion. For this reason, with reference to the axes of inclusion highlighted by this document, mention is made of a series of specific problems on which in-depth study is provided in the measures contained in each area of jurisdiction:

- The rate of **antigypsyism in the public sphere** - with particular reference to social media - and in political debate is a significant factor and worthy of particular consideration. Recent studies⁶⁷ also highlight *“the strong complexity of contemporary antigypsyism, which is always characterised by a varied combination of multiple categorisation processes”*. It is precisely the character of complexity that makes this specific form of racism one of *“the hardest to decodify”*.
- The phenomenon of **intersectional discrimination**: it is important to acknowledge the specific needs or vulnerabilities of certain groups, including women, young people, children, LGBTI+ people, the elderly, people with disabilities, third-country nationals or stateless persons and Roma with non-Italian citizenship.
- **Discrimination in access to housing** is particularly relevant, as also highlighted by the IHRA document, which places specific emphasis on the correlation between antigypsyism, the right to housing and housing segregation, including among discriminatory behaviour the *“approval or encouragement of mechanisms that directly exclude Sinti and Roma people on the basis of racial discrimination, such as (...) policies that lead to community segregation”* as well as the

⁶⁷ Stefania Pontrandolfo, Eva Rizzin, *La produzione dell'antiziganismo nei discorsi politici dell'Italia contemporanea*, in *Antropologia Pubblica*, 6 (1) 2020, ISSN: 2531-8799, available at: <https://riviste-clueb.online/index.php/anpub/article/view/172/282>

See also: 1) Report *“Categorizzare le forme di odio. Antisemitismo, islamofobia, antiziganismo”*, drawn up by Stefano Pasta, Cristina Balloi, Milena Santerini (Mediavox, Observatory on online hatred – Intercultural Relations Research Centre - Università Cattolica del Sacro Cuore - Milan) within the project *REASON - REAct in the Struggle against Online hate speech* promoted by the UNAR in 2021; 2) Roberto Bortone, Alessandro Pistecchia, *Tre passi per attraversare Auschwitz*, in Eva Rizzin, (editor) *Attraversare Auschwitz, Storie di rom e sinti: identità, memorie e antiziganismo*, Gangemi Editore, Rome 2020; 3) Roberto Bortone, Alessandro Pistecchia, *Online hate speech, marginalized groups and minorities. Considerations on types of discrimination in the age of social networks and media*, in *Dynamics and Policies of Prejudice from the Eighteenth to the Twenty-first Century*, Cambridge Scholars Editions, UK, 2017; Alessandro Pistecchia, Roberto Bortone, *Hate speech e antiziganismo. Una riflessione sulle discriminazioni nell'era dei social*, IDOS, Dossier Statistico Immigrazione 2017, Confronti, 2017 pages. 233-237.

“implementation of policies without a legal basis or the establishment of conditions allowing arbitrary or discriminatory evictions of Roma and Sinti communities and individuals”⁶⁸.

- **Episodes of violence, conflict and protest.** The ISTAT survey on housing transitions⁶⁹ showed that problems of coexistence with neighbours characterised 31 projects, while episodes of protest by citizens occurred in 20 projects. The issues that triggered such episodes include the general conditions of degradation that characterise some camps, the issue of waste that has not been disposed of or has been burnt, and the entry of Roma and Sinti families into housing after they have been assigned social housing. With reference to the latter, it should be noted that some serious episodes of discrimination-driven protests occurred in several cities, and in particular in the suburbs of Rome, in 2019, making national headlines⁷⁰.

3.1.2 Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01:

Art. 2 - Member States should consolidate efforts to adopt and implement measures to promote equality and effectively prevent and combat discrimination, antigypsyism, and social and economic exclusion, as well as their root causes. Those efforts should include measures such as the following

The **fight against antigypsyism** is, in this document, the **transversal pillar of the four axes** outlined in the specific chapters. With reference to the intervention processes, the Ministry of the Interior in the consultative phase expressed its willingness to collaborate by making the network of Prefectures available for the coordination and promotion of activities and projects aimed at supporting communities and fighting discrimination. **The set of measures**, goals and indicators aimed at fighting discrimination, set out below, could, however, constitute an **autonomous strategic plan**, the need for which is expressly recognised:

- 1) **Strengthen the role of the UNAR Contact Center:**
 - a) in the **collection of reports** of direct and indirect discrimination against Roma and Sinti people, both online and offline, also to counter the phenomenon of under-recording;
 - b) in **monitoring hate speech**: understanding today's narrative is an essential element for assessing, imagining and constructing different narratives that can have a real impact on prejudice and stereotypes, helping to define points of contact and coexistence;
 - c) in **victim support activities** with particular reference to certain groups most at risk of multiple and intersectional discrimination such as women, children, LGBTI+ people, people with disabilities, stateless people;
 - d) in **legal support activities**, in close cooperation with the associations of the Community Forum and the UNAR Registry (Art. 6 of Legislative Decree 215/2003).
- 2) Promote **continuous and recognised training activities** for categories of public officials and others (healthcare workers, doctors, nurses, social workers, police, court staff, school staff and media professionals), aimed at the knowledge of Roma and Sinti cultures, language and history, including remembrance of persecution.
- 3) Launch of a **specific survey on the level of antigypsyism in society** (including perception and representative sample), also with reference to the various axes mentioned in this strategic document.

⁶⁸ See also: <https://www.unar.it/portale/-/l-international-holocaust-remembrance-alliance-ihra-adotta-una-definizione-internazionale-di-antiziganismo>

⁶⁹ See “Abitare in transizione”. Indagine sui progetti di transizione abitativa rivolti alle popolazioni rom, sinte e caminanti, link: <https://www.istat.it/it/files//2021/03/Abitare-in-transizione-F.pdf>

⁷⁰ In recent years, with reference to hate crimes, the recognition of aggravating circumstances due to racial-ethnic hatred for episodes such as that, which made national headlines, relating to the violence and assault at the Turin-Continassa camp in 2011 should also be remembered.

- 4) Promote **actions to support and facilitate discussion and debate** in order to strengthen the proposals, experiences and awareness acquired by those directly involved in the processes aimed at the recognition of national minority status and Nazi-fascist extermination.
- 5) Promote **information campaigns, communication and positive narratives**, through:
 - a) An **institutional campaign against antigypsyism**;
 - b) **Empowerment activities targeting young people and women**, supporting peer-to-peer meetings and exchanges, intercultural learning and non-formal education (in cooperation with other bodies, such as the National Agency for Youth and the Youth Department of the Council of Europe, with which a multi-annual cooperation has been established).
- 6) Envisage **communication materials** to convey and disseminate the contents of this Strategy, particularly among specific and particularly vulnerable targets, e.g.: through maps of available services, infographics and/or multilingual posters (also in the *Romanés* language).

Insight box no. 3

A national communication campaign against antigypsyism

The proposal, to be developed during the 2021-2030 Strategy, aims to strengthen the activities of the UNAR and institutional and non-institutional stakeholders on the issue of fighting racism and xenophobia, recognising antigypsyism as one of the main obstacles to the full inclusion of communities. In order to achieve important results, the project will have to make use of experts and consultants with knowledge of the value and language system of the Roma and Sinti communities: associations, youth organisations and networks of facilitators will be able to guarantee the territorial capillarity of the interventions, the levels of participation and the impact of the project actions on the communities.

Project beneficiaries may be:

1. "Active" addressees of the campaign: activists, community members, associations registered with the National Platform, institutional players, communication professionals, stakeholders;
2. "General" addressees of the campaign: mainstream society, which will be affected in various ways by the messages promoted within the campaign.

In this context, the following actions, divided into three main areas of intervention, can be developed:

- activation of a communication campaign aimed at fighting a particular form of prejudice and discrimination that affects communities, defined in literature as "antigypsyism". The campaign will be implemented in two phases/modes (national campaign; territorial campaign);
- creation of a network of institutional stakeholders and civil society activists capable of promoting the campaign themes at local/territorial level;
- activation and implementation of training courses for communication professionals, institutional stakeholders and members of the Roma and Sinti communities

Project phases and development:

- National campaign activated by creating videos/ads/infographics to be circulated on the main social networks at national level;
- "Territorial" communication and mediation campaign to be activated in selected territories starting from the problems related to conflict identified by the UNAR and to be carried out through targeted events to raise awareness and disseminate the issues covered by the campaign;
- Study materials and educational models to be promoted among communication professionals and central and local administrations;
- Tried and tested training modules to be included in the training offer of PA staff, regional orders and schools of journalism;

- Surveys and thematic reports on the level of antigypsyism at national level and in the territories identified;
- Partnerships for planning joint initiatives; networks for exchanging good practices and thematic proposals.

AXIS - ANTIGYPSYISM. PREVENTION, CONTRAST AND REMOVAL

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives:

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative-quantitative analysis
Strengthen the role of the UNAR Contact Center (A)	Facilitate access and collection of reports of direct and indirect discrimination against Roma and Sinti, both online and offline, also to counter the phenomenon of under-reporting and under-recording	Number of awareness-raising campaigns launched Number of anti-discrimination centres activated Number of annual complaints collected	Effectiveness and satisfaction perceived by participants in initiatives and users of anti-discrimination centres, measured through focus groups and interviews; Level of perceived satisfaction with the outcomes of complaints made by victims of discrimination
Strengthen the role of the UNAR Contact Center (B)	Provide support to victims with particular reference to some categories more at risk of multiple and intersectional discrimination such as women, children, LGBTI+ people, people with disabilities, de facto stateless people; Legal support in close cooperation with the Associations of the Forum and the UNAR Register (Art. 5 Legislative Decree 215/2003)	Number of people legally supported per year Number of legal opinions provided Number of victims supported in court by associations with legal standing	% of cases treated and successfully resolved compared to the number of complaints filed; % of strategic cases that led to a detectable impact in case law
Promote continuous and recognised training activities	Recognised continuous training activities and courses for the categories of civil servants and otherwise (social-health workers, doctors, nurses, social workers, police, justice personnel, school personnel and mass media operators), aimed at familiarising with the culture, language and history of Roma and Sinti, including remembrance of the persecution;	Number of participants Number of interventions carried out	% of participants who completed the course out of total participants Level of satisfaction of the participants with what they learned

<p>Promote information campaigns, communication, positive narratives</p>	<p>Institutional campaign against antigypsyism and stereotypes;</p> <p>Youth and women empowerment activities, supporting peer meeting and exchange, intercultural learning and non-formal education (in collaboration with other bodies, such as the National Agency for Youth and the Youth Department of the Council of Europe, with which a multi-year cooperation has been established).</p>	<p>Number of awareness-raising campaigns carried out;</p> <p>Number of participants in training activities.</p>	<p>Level of satisfaction of the participants with awareness-raising activities;</p> <p>Level of satisfaction of the participants with what they learned;</p> <p>% of increased willingness of course participants to take part in public and social activities.</p>
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3.2 ACCESS TO QUALITY INCLUSIVE GENERAL EDUCATION AND EDUCATIONAL PROPOSALS

3.2.1 Analysis of context, critical issues and ongoing problems

The collection of data on the educational attainment levels of Roma and Sinti students in Italy, as discussed earlier in this document, represents a critical element. The survey method was frequently influenced by the stereotypes present in Italy's majority society, so much so that between the 1960s and the 2000s, the term "nomadic pupil", under which their presence in Italian schools was recorded, essentially made it possible to identify the percentage of inhabitants of the "nomadic camps" alone (around 20% of the total Roma and Sinti population in Italy) in the schools, without being able to account for that part of the community that remained in a condition of social invisibility, since it avoided declaring its membership. The last available disaggregated data on Roma and Sinti schooling dates back to academic year 2014/2015, after which the nationwide survey was discontinued, partly due to privacy concerns and difficulties and risks related to the rules regarding ethnic registration. Today's lack of specific disaggregated data represents an element of difficulty, particularly in assessing actions being promoted for educational inclusion at the present time⁷¹.

In view of the difficulties described above, the few outdated surveys available confirm the inadequate level of education as one of the main causes of the insecure living conditions of the Roma and Sinti communities, as also indicated in the RSC Strategy 2012-2020. Schools are an instrument for public education aimed at everyone, but they are also the institution through which processes of construction of our individual identities and recognition of our social roles are activated; the conflict that has long been active with Roma and Sinti communities has preserved the image of schools as being "schools for others". **The school institution** is still, however, above all **the place where Roma and Sinti children can meet their peers**. It is therefore essential to consider the image of the school that is sedimented in the memory of the older generations and the conditions of life at school that characterise the younger generations today, in order to identify the fundamental elements for building a positive experience, because it is inclusive and respectful of the identity of all. From this point of view, **knowing and acknowledging the painful aspects of schooling** experienced by Roma and Sinti children can help **deconstruct a negative memory of schooling** and really support the current education process at community level and not only as a pathway to success for an individual, **ensuring the prevention and elimination of any form of segregation** in education.

The need to affirm a principle - political and pedagogical - on **non-residence and access criteria, exemptions and facilities on "school welfare"** (nursery schools, crèches, summer and extracurricular activities, pre-school and after-school activities, facilities) also emerged. The proposals aim to consider the following criteria: enrolment in compulsory education, educational services for 0-6 years and vocational training beyond compulsory education. Lack of residence, which in the case of EU Roma or Roma of former Yugoslav origin often means being without a job or a home, cannot contribute to lower scores in the ranking lists for these services for minors.

The area of access to education also calls for a specific in-depth study of the **short and medium-term effects that the impact of the COVID-19 pandemic** has had on the real possibilities for poorer Roma and Sinti families at risk of exclusion to guarantee their children continuity at school using the DAD (Distance Learning) format, which has become necessary due to the obstacles to attending school in person in all Italian schools. A survey conducted by the Community of Sant'Egidio in May 2020, involving about 800 children from 44 schools in 27 neighbourhoods of the capital, confirmed these critical issues, highlighting how "61% of 6-10 year olds in Rome did not take part in online lessons"⁷². Among these children, who are already subject to high levels of pre-pandemic school drop-out, it is

⁷¹ The report entitled "*The Roma, Sinti and Caminanti condition in Italy*", drawn up by the Extraordinary Commission for the protection and promotion of human rights of the Senate and published in 2012, indicated the same problems in dealing with incomplete and uncertain data and a fairly high margin of discretion in the surveys. The report is available at: <https://www.senato.it/documenti/repository/commissioni/dirittiumani16/Rapporto%20conclusivo%20indagine%20rom,%20inti%20e%20caminanti.pdf>.

⁷² Data from the enquiry entitled "*There's a need for school*" (May 2020) available at: <https://www.santegidio.org/pageID/30284/langID/it/itemID/40140/C-%C3%A8-bisogno-di-scuola-dati-e-proposte-sull-emergenza-educativa-aggravata-dalla-pandemia-Una-rilevazione-realizzata-dalle-Scuole-della-Pace-di-Sant-Egidio.html>

presumably necessary to include Roma and Sinti pupils. Data from another survey, specific to the Roma and Sinti universe, conducted throughout the country by the SWG Observatory in collaboration with the Kethane Movement (Roma and Sinti for Italy)⁷³, confirmed the negative trend in terms of access and attendance by Roma and Sinti minors, which has been aggravated by the pandemic.

Insight box no. 4

Memories of school and school today⁷⁴

The Roma and Sinti communities currently present in Italy are extremely heterogeneous: there are communities of Sinti and Roma that have been settled in Italy since the 13th century; there have been arrivals of Roma from the former Yugoslavia since the 1970s, but mainly to flee the Balkan wars of the 1990s; there have been arrivals of Roma from Eastern Europe since the 1990s and particularly since 2000, with the entry of some countries, such as Romania, into the EU. The images of school that have been preserved among the members of the different communities have settled in their collective memory in a differentiated way, but it is necessary to point out that the construction of the interventions addressed to them in the school context have always referred to a standardisation linked to the stereotype of the "nomadic gypsy" lacking culture and requiring re-education. This image has been applied to all communities indiscriminately. The first national interventions aimed at schooling Sinti and Roma children were the special classes for nomads, i.e.: differential classes reserved for "gypsies", established in the 1960s and effectively closed in the 1980s. These classes were attended in particular by Sinti from northern and central Italy, who were engaged in itinerant work, and by some Roma in some southern Italian cities. The memory of this experience is characterised by a perception of childhood suffering, strong prejudice experienced by Roma and Sinti children and poor school-age learning. In southern Italy, those Roma communities established since ancient times, who were already settled in homes (even if they were also engaged in itinerant work) and were lucky enough not to attend the "special classes for gypsies" (because they had not been activated in their areas of residence), were able to attend mainstream classes and participate in the schooling provided for all other nationals. The memories of schooling of the two communities are very different: on one hand, Sinti and Roma children who experienced the special classes remember this experience as a prevarication suffered and an attack on their community, aimed at their cultural erasure; on the other hand, those Roma children in the south who were able to attend classes together with the other pupils, participated in mainstream education and have no memories of opposition to their education: their experiences were characterised by successes or failures, but they did not have to perceive conflict. In the experience of the historically settled Roma communities in southern Italy, the long absence of the policy of nomadic camps on their territory also played a decisive role: the stigmatisation linked to residence in an ethnic place was not implemented. Despite the experience of better inclusion in the south, the arrival of Roma people from Yugoslavia in the 1990s and the subsequent arrivals from Eastern Europe led to the implementation of ethnic housing policies linked to nomadic camps throughout the country, and this also negatively affected the school experiences of newly arrived Roma children. In many cases, residence in camps led to a stigmatisation of the presence of Roma children at school, and even families from the Slavic territories who had reached Italy with a sufficient level of parental education experienced a regression in terms of their children's educational pathways: the minors often received a lower level of schooling than the previous generations had had in their homeland. Inclusion actions, built up over recent decades within individual schools, have been able to reverse this tendency towards an oppositional relationship with school, frequently seen as an

⁷³ The research entitled "*Roms and Sinti and school*" promoted by Kethane-SWG (September 2020) is available at: https://b10a2541-efba-49cf-a116-8ae061a99526.filesusr.com/ugd/4b6dbc_89e68a23341047e8beaf716a62fc8f6f.pdf Starting with the phenomenon of prolonged absenteeism, which is in fact the precursor to dropping out, Save the Children estimate that around 34,000 secondary school students could be added to the school dropouts at the end of the year. See also their survey "*The impact of the coronavirus on educational poverty*" (April 2020) available at: <https://www.savethechildren.it/press/coronavirus-scuola-save-children-didattica-distanza-centrale-nel-nuovo-decreto-sulla#:~:text=Per%20sostenere%20studenti%20e%20scuole,di%20fuori%20dal%20contesto%20scuola>.

⁷⁴ The table shows an extract of an in-depth study carried out on this subject by Prof. Luca Bravi, previously involved by the UNAR in research and project development activities.

instrument of negation and destruction of Roma and Sinti culture. This has been achieved above all through the reconstruction of a relationship of trust with individual families and local communities. The problematic element of camouflaging Roma and Sinti children at school as a form of personal protection from prejudice continues to be constant, even in cases of students who are perfectly integrated in the classroom: the younger generations, who are building more prolonged pathways within schools of all levels, constantly report the need not to declare their Roma/Sinti identity and to live in a condition of day-to-day psychological discomfort due to the fragmentation between the identity that they have within their community and that built outside, particularly in the classroom, where camouflage often also means the necessary distancing from customs, language, and references to their community of origin. From this point of view, reference to the UN Convention on the Rights of the Child (1989) and the European Convention on the Exercise of Children's Rights (1996) emphasises the fact that the right to education is also to be understood as intended to **guarantee the harmonious development of the child's personality, self-expression and the protection of their identity**.

It is also necessary to consider the fact that, frequently, the first time that a child discovers the stereotype of the "nomadic gypsy" applied to itself as a stigmatising element, often occurs during the first years of primary school; the time spent at lower secondary school is usually reported by minors as the moment of the most marked identity-related suffering, which is highlighted in the early stages of adolescence; the time spent at upper secondary school on the other hand is described by many students as a time when they have the opportunity to recover the value of their belonging to a community and to express it publicly. Although the data is incomplete, the most frequent drop-outs from school by Roma and Sinti pupils occur during secondary school: the suffering shown in the construction of personal identity is one of the elements on which psychological support can be provided, but on which education can also intervene more forcefully by building a schooling experience that reduces the conflict between "two worlds" (Roma and non-Roma) that should not be perceived in opposition to each other, but in relation to each other, in order **to build a relationship of mutual trust**.

3.2.2 Tools for school inclusion. Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01

Art. 5 - Member States should ensure that all Roma have effective equal access to and are able to participate in all forms and stages of education, from early childhood education and childcare to tertiary education, including second chance education, adult education, and lifelong learning.

Art. 6 - Member States should improve equal access to quality and inclusive education of Roma pupils

Art. 7 - Member States should work towards overcoming all discrimination, inequality and disadvantages in terms of educational opportunities, outcomes and attainment

In order to make the school environment the main place of contact and inclusion, the previous RSC Strategy 2012-2020 proposed some specific goals:

- Specific goal 1.1: Encourage pre-schooling and schooling of Roma and Sinti children, promoting non-discriminatory access (enrolment, attendance, results) to schools of all levels and countering school drop-out of Roma and Sinti children in primary and secondary schools;
- Specific goal 1.2: Increase the participation of young Roma and Sinti people in university education, higher education and training/work, also by providing them with access to honour loans, scholarships and other opportunities and facilities envisaged by the legislation in force;
- Specific goal 1.3: Encourage interaction and cooperation between schools, out-of-school areas, families and Roma and Sinti communities.

While the specific goals mentioned above are still valid, the new strategic document envisages a **set of interventions**, defined as the *tools of school inclusion*, with reference to Roma and Sinti communities, to be included within the projects to be carried out at national and local level:

- 1) **Launch of a national research project on the level of inclusion of Roma and Sinti children in the school system.** Within the framework of the substantial lack of reliable disaggregated data outlined in this document, it seems essential to enhance a qualitative-quantitative approach that is able to **catalogue surveys and available data sources**, launching new analyses where necessary, and ensuring a survey focus aimed at:
 - a) **defining local, even before national, good practices** aimed at liaising with Roma and Sinti communities that have links with schools, due to the presence of pupils belonging to the communities⁷⁵; there is also a proposal to **collect and promote cases of successful continuation of studies, both in secondary education and towards university**, paying particular attention to paths towards higher education **for girls**, in order to suggest positive models to be recognised and disseminated as examples and potential opportunities among peers;
 - b) **identification of administrative and regulatory elements that hinder** one or more phases of the **school inclusion** process (barriers to enrolment, attendance and success at school; requests for specific documentation and/or unnecessary certification; use of discriminatory forms and/or practices; excessive distance of the school premises from the place of habitual residence);

⁷⁵ Good local experiences, based on direct participation, inclusive teaching, educational projects that are not standardised on ethnicity, but on valuing the positive contribution of the communities and on a network approach that is not limited to the sphere of education and upbringing, may represent examples to be extended at national level, given the heterogeneity of the needs and characteristics of these communities. See, among others: Roberto Bortone, *Un futuro da scrivere. Percorsi europei di scolarizzazione dei rom*, Collana UNAR, Istiss Editore, Rome 2013.

- c) **identification of negative elements of the school climate** (presence of elements of school segregation and/or misdiagnosis of pupils; presence of episodes of anti-gypsy bullying in the classroom or in extracurricular activities, both on-line and off-line);
 - d) **recognition of the teaching materials used in schools of all levels**, highlighting those of a "neutral" nature (there is no mention of the Roma and Sinti communities, their history, language and culture), a "positive" nature (there is mention of them in the terms defined and explained in point 4) or a negative nature (there are stigmatising terms or terms that can be traced back to prejudice).
- 2) **Territorial sample survey on the level of early school drop-out of children from Roma and Sinti communities.** Given that, as extensively explained above, it is impossible to conduct a national census that includes ethnic data, in order to build an indicator that defines the level of national school drop-outs among Roma and Sinti communities as plausibly as possible, we propose a territorial survey that includes a sampling proportionate to the number of estimated presences on the individual territory, referring to residential contexts in which there are camps or areas with a high Roma and Sinti population density.
- 3) **Interventions on "families and school".** The most recent inclusion interventions co-designed and shared with individual family units, not conceived in a standardised and univocal way for the "Roma/Sinti category", have shown that it is possible to embark on satisfactory educational paths starting from family support and sharing, sometimes assisted by the community dimension. In order for this process to be sustained, the tools are those of **co-planning and a constant relationship with family contacts**, not only from the point of view of school planning for minors, but also in terms of housing, economic, social and cultural aspects: **a network action that can sustain the link with families in a lasting and equal way.** In this action - also with reference to the possibilities offered by distance learning (DAD) - it is necessary to consider the inclusion of tools (including hardware tools such as personal computers and tablets or infrastructural tools such as free access to Wi-Fi networks) that can help overcome the gap in technological and digital skills of some of the families involved in the courses. It is also necessary to **invest in facilitating access to services in the 0-6 age bracket**, by: a) taking into account the problems linked to residence and the socio-economic situation of families when defining rankings and access criteria; b) when attributing the score for nursery schools for minors with tax domiciles in associations or virtual residences, consider the place where they actually live and not their registered place of residence, c) promotion of real access to enrolment for Roma and Sinti families, with the involvement of local networks during the enrolment period.
- 4) **Cultural and linguistic mediation.** In recent decades, cultural mediation/facilitation has proved to be a useful tool for building positive school paths, both for Sinti and Roma minors and for the teaching profession. Mediation is useful from a linguistic point of view, given the fact that Romanés is a widespread community language that is also linked to the cultural enhancement of the Roma/Sinti world: the presence of this language among those that can be activated within the school and institutional context is a first sign of recognition of presence and full citizenship in society. **The promotion of linguistic skills** is also a support for the use in the school context of correct terms referring to the communities of origin, which generate effective inclusion and bring people closer to non-stigmatising terminology. Mediation is a delicate but basic aspect: it can be activated at the level of organisation of the school complex to "translate" the educational and didactic actions carried out at school into common and shared meanings and to include elements of Sinti and Roma culture and life also in the school complexes; it can have an important value also in the classroom context, provided that it does not become stigmatising for Roma/Sinti pupils who may continue to be camouflaged in the school context. **Mediation and facilitation are understood here as the construction of a relationship also starting from the skills, values and knowledge that are part of the Roma and Sinti communities** and that often represent elements that have participated in the cultural, artistic and social contexts of past and present Europe. The mediation activity must involve the Roma and Sinti communities and must be implemented not with a view to permanence, but as

an accompanying activity with the final aim of creating conditions (in the school environment and in the family-school relationship) whereby this activity is no longer necessary.

- 5) **Interventions on teaching content (as an opportunity to meet).** The national indications have opened up a phase of broader planning with regard to teaching content, which no longer refers strictly to school curricula. From the point of view of building inclusive education processes, the introduction of civic education (Law no. 90/2019) as a cross-curricular subject offers ample opportunities in the coverage of topics related to citizenship and the Constitution. This approach refers, inter alia, consistently to the Recommendation (CM/Rec(2020)2) of the Committee of Ministers to member states of the Council of Europe on the inclusion of Roma/Sinti history in the classroom. **Knowledge, study and in-depth activities related to their history in Europe offer opportunities for teaching and building recognition of the presence of the Roma and Sinti populations in Europe's past.** It is particularly useful to include the history of the *Porrajmos* and, more generally, of the persecutions that have affected the Roma and Sinti communities in the context of school learning: these events offer an opportunity to build paths of recognition and knowledge of a page of history present within the memory of the Romani communities (often absent outside them) and are elements that can open up programming aimed at Constitutional issues and the recognition of full European citizenship. Particular attention should also be paid to the reconstruction and dissemination of knowledge in the Italian context of the facts that refer to the fascist dictatorship. These events are reflected in the memory of the Roma and Sinti communities that have long been settled in Italy and offer an opportunity for contact, comparison and mediation on the basis of historical recognition⁷⁶. Alongside the commemoration of the contexts in which the Roma and Sinti communities were victims of discrimination and persecution, there is a need for **educational programming linked to the cultural, artistic and social occasions in which the Roma and Sinti communities have contributed to the development of international, European and Italian culture**, so as to reconstruct the contribution that these communities have always made by living in intercultural contexts within schools and make it recognisable⁷⁷.
- 6) **Positive action to promote continued education and training⁷⁸.** One of the elements that the sociology of education emphasises as decisive in the education of minors, in order to promote adequate social integration as adults, is the possibility of remaining in education for a long time, to the point of enhancing lifelong learning. The educational experience of Roma and Sinti children appears to have difficulty in reaching secondary school, even though more recent local data shows that long-term planning certainly has positive effects on their staying in education. While on one hand, as already highlighted, it is useful to enhance the value of mediation and trust-building with Roma and Sinti families and communities, on the other hand, the economic difficulties faced by many community groups must be taken into account: these are conditions that reduce the possibility of staying at school due to the real need to support the family, especially during adolescence. From this point of view, the **experiences of support from associations and foundations that have activated scholarships, in addition to the calls for proposals already structured by the relevant bodies, have proved to be positive experiences**, as the rates of academic success up to at least the end of secondary school, have been achieved almost completely⁷⁹. Many of these experiences have continued all the way to

⁷⁶ The identification of a useful date for the commemoration of the extermination of the Roma and Sinti populations during the Nazi-fascist period is the subject of internal debate within the Romani communities, between those who propose full institutional recognition within the law that established the Holocaust Memorial Day (211/2000) in our country in 2000 and those who identify the date of 2 August 1944 (in memory of the night of the liquidation of the "Gypsy camp" of Auschwitz-Birkenau), commemorated at institutional level on public occasions, as a further possibility of recognition of a public memory.

⁷⁷ Educational planning can also identify key moments linked to the historical presence of Roma and Sinti communities in Italy, such as their documented arrival in Bologna in 1422.

⁷⁸ See also points 31 and 32 of the Concluding Observations addressed to Italy in 2019 by the UN Committee on the Rights of the Child. Unofficial translation by the Interministerial Committee on Human Rights (IACHR) and the Italian Committee for UNICEF: <https://www.unicef.it/pubblicazioni/osservazioni-conclusive-comitato-onu-2019/>.

⁷⁹ By way of example, we would like to highlight a number of paths linked to school support through the provision of scholarships, such as that implemented by Fondazione Anna Ruggiu in Sardinia (<https://fondazioneannaruggiu.wixsite.com/fondazioneannaruggiu>) or the programme entitled "Diritto alla scuola, diritto al futuro", implemented by the Community of Sant'Egidio in the cities of Rome, Naples and Milan

independent access to university studies and have been linked to the recognition of being Roma or Sinti. **The activation of study support processes at national level (and in reference to each school level/cycle) are therefore essential and useful** to bridge the existing gap and open up a different personal planning of the future that can take on a broader and more structured perspective. The training and educational inclusion activity aimed at Roma and Sinti minors also makes it possible to work at cultural and social level to deconstruct the antigypsyism element that characterises the majority society which is little recognised, and which school for all has a need and a duty to address.

7) **Training of teachers and school staff.** Training is the tool through which teachers - and other school operators - open up paths of reflection capable of transforming school and other contexts into environments that are inclusive of all differences, starting from the experience with Roma and Sinti children and families. The course aimed at teachers must take shape mainly on two levels:

- a) the plan of **educational accompaniment**, intended as a "basic" path for approaching the history and culture of the Roma and Sinti communities (with a focus on aspects related to antigypsyism, also in a historical key) and for the construction of cooperative teaching units within the classroom context. In this sense, the training activity must address the entire teaching and non-teaching staff, avoiding the repetition of specific courses focused on the contexts in which the presence of pupils belonging to the minority can be detected;
- b) the second aspect is **the role of context** in the activation of school inclusion processes. The cultural context in which schools are immersed influences the visions of the players whose lives revolve around the school: in this sense, anti-gypsy prejudice is rooted in society and acts through opinions, behaviour and social devices. Working on inclusion without reflecting on prejudice risks becoming a pointless endeavour. The approach cannot be exclusively methodological, but must bring about a paradigm shift that involves the entire educational community. For this reason, **continuous training should work on anti-gypsy prejudice**, encouraging intercultural and inclusive reflections and practices⁸⁰, starting by unhinging the mechanisms that feed practices of exclusion and racism. Activate a process of discussion and growth that includes everyone: teachers, families, local players; a sort of continuous training extended to the local area, aimed at developing a "community conscience" that enhances the different knowledge and tools at the service of an inclusive community. **Open the school to the territory** not only functionally, but with the aim of building a community that aims to include all its members. In situations where this has been possible, shared knowledge has been created beyond the confines of the classroom, and in this way the role of teachers and school staff has been returned to that of co-participants in the broader educational community, made up of all the players in the area. Without alliance and common growth between school, families and the territory, inclusion remains a bumpy process pursued in more or less isolated attempts.

(<https://www.santegidio.org/pageID/30400/langID/it/DIRITTO-ALLA-SCUOLA-DIRITTO-AL-FUTURO.html>). For a more comprehensive review of school inclusion projects, especially at local level, see the dynamic appendix included in this strategic document.

⁸⁰ See, among others: 1) Stefano Pasta, *Minori rom e servizi educativi. L'approccio interculturale*, in I. Pescarmora (editor), *Intercultura e infanzia nei servizi educativi 0-6 anni: prospettive in dialogo*, Aracne, Rome 2021, pp. 71-84 2) Luca Bravi, *Tra inclusione ed esclusione. Una storia sociale dell'educazione dei rom e dei sinti in Italia*, Unicopli, Milan 2009.

Insight box no. 5

The Child Guarantee

On the theme of combating child poverty, including educational poverty, UNICEF is working with the European Commission, national and local authorities and civil society organisations to test the Child Guarantee measure in seven EU Member States, including Italy.

The Child Guarantee is an initiative aimed at identifying innovative approaches to reduce the effects of poverty and social exclusion on particularly vulnerable children - such as children and young people with disabilities; those living outside their family of origin (e.g.: in residential care); those with a migrant and/or minority background (including Roma and Sinti children); those in difficult family contexts - in order to make such interventions a priority in national budgets and policy and programme planning processes.

Within the framework of the European Child Guarantee programme, UNICEF, together with the Ministry of Labour and Social Policies and the Department for Family Policies of the Presidency of the Council of Ministers, has set up a Youth Advisory Board (YAB) with the aim of promoting the participation of girls, children and teenagers - especially those who fall within the targets of the measure - in the testing phase of the Child Guarantee and in the process of drafting, implementing and monitoring the corresponding National Action Plan.

Insight box no. 6

Inclusion of Roma and Sinti and/or Traveller history in school curricula and teaching materials

(with reference to Recommendation CM/Rec(2020)2 of the Committee of Ministers to COE Member States adopted on 1 July 2020)

Foreword:

The term “**teaching materials**” is to be understood in its broadest sense and includes school textbooks, lesson plans, open educational resources and digital learning materials.

The **teaching methods** referred to in this text include non-formal education and extracurricular activities, immersive education, site visits, living history and living libraries, storytelling, social media, exhibitions, study visits, exchanges, gatherings, trainings, workshops and seminars.

Principles and proposals for action

1. **The teaching of Roma and Sinti history** and its inclusion in school curricula and teaching materials should:

- include a balanced and contextualised teaching of Roma and Sinti history, highlighting not only their presence on the national territory and within the historical context, but also the shared history,
- Include information on the contribution that the Roma and Sinti have made to national economies, particularly with regard to trade, metalwork and other crafting activities.

2. **The development and revision of teaching materials and methods should:**

- prepare flexible curricula and interactive pedagogies that recognise cultural differences, promote diversity and adopt a multi-perspective approach to capture the full complexity of history and ensure that a shared history is taught;
- include Roma and Sinti history in teaching and training and to update and adapt content according to the national context; to draw up a roadmap for implementing revised teaching materials and training methods, in cooperation with Roma and Sinti communities, civil society, academia, training institutions and teachers' organisations.

3. The teaching of the Holocaust and other historical persecutions of Roma and Sinti should:
 - be an integral part of teaching and learning about the Holocaust perpetrated by the Nazi regime and its allies and other violent attacks committed against the Roma and Sinti populations throughout Europe.

AXIS - ACCESS TO QUALITY INCLUSIVE GENERAL EDUCATION AND EDUCATIONAL PROPOSALS

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives:

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative-quantitative analysis
Increase equality of effective access to quality inclusive mainstream education	Register of local and national good practices concerning the relationship between Roma and Sinti communities and schools with pupils from these communities.	Number of good practices surveyed	Analysis of the quality and significance of the survey, according to its purpose, and according to a model enabling the transfer of practices to other contexts
	Activation of inclusive education pathways starting with family and community support and sharing.	Number of educational pathways activated Number of children and young people participating in the courses Number of families belonging to the Roma and Sinti communities involved	% of children and young people who complete the course out of the total number of participants % of children and young people who, as a result of the interventions carried out, achieve a qualification
.	Support measures for children who tend to be cared for by the family and the community at least until they reach school age	Number of interventions carried out Number of families belonging to the Roma and Sinti communities supported	Number of children/young people going to primary school at age 5 or 6, thanks to support provided to their families
Increase effective participation of Roma in mainstream inclusive quality education	Cultural and linguistic mediation interventions	Number of interventions carried out	Number of schools where the figure of the cultural mediator has been introduced
	Inclusion in the educational program of contents concerning the	Number of schools involved in the design of	Number of training interventions carried

	history and the cultural and artistic contribution of Roma and Sinti people	teaching units concerning Roma and Sinti	out in the schools involved
	Positive action to encourage continuation in education and training	Number of interventions implemented to fight early school leaving Number of children and young people involved in support actions	% of Roma and Sinti children and young people who, after having participated in support interventions, continue their studies out of the total number of participants
	Training for teachers and school staff	Number of interventions activated Number of teachers participating in interventions	Survey of the perceived usefulness of interventions through questionnaires, focus groups and/or in-depth interviews % of satisfied participants out of total participants

3.3 ACCESS TO SUSTAINABLE AND QUALITY EMPLOYMENT

3.3.1 Analysis of context, critical issues and ongoing problems

Despite the efforts made in the 2014-2020 ESF Programming and through the projects developed in the framework of the previous RSC Strategy 2012-2020, access to employment for many Roma and Sinti people of employable age is still severely limited by a generalised collective stigmatisation, low levels of education, low levels of vocational training, poor access to services, socio-legal and housing insecurity and high levels of social vulnerability. As seen above, **the Covid-19 pandemic** has exacerbated the economic crisis already present within the communities and in traditional subsistence economies such as travelling shows, trade and collecting and reselling. Consequently, the employment rate of Roma and Sinti, which according to the limited data available was already lower than the employment rate of the general population⁸¹, fell even further with the closures of businesses caused by the spread of the pandemic. **Traditional occupations** such as craftsman, fairground worker, circus performer, are beginning to be residual compared to even just ten years ago. In this context, as emerged from the consultation, it becomes necessary to supplement the section on employment of the RSC Strategy 2012-2020 with an analysis of the current and foreseeable changes in the working world and the need to adapt the opportunities for access to employment, linking the instruments to defined goals and measurable expected results, with regard to both projects and funding plans.

Even today, the **low level of professionalism** means that many Roma and Sinti find it hard to work in agriculture, craft industries, metalworking, maintenance of public and private gardens and parks, installation of alternative energy sources, collection and sale of second-hand clothes, collection of heavy waste or management of sorted waste, street and building cleaning, tailoring, catering and restaurant management; on the other hand, **work related to travelling shows**, circuses and the management of fairgrounds is still of residual but active economic importance, especially among the Sinti. Mention should also be made of the exposure of certain vulnerable and marginalised groups (such as Roma people who have migrated more recently, particularly from Romania and Bulgaria) to labour law violations, undeclared work and forced labour, both in construction and agricultural work, and of the need for measures and resources to combat these forms of extreme poverty⁸².

The participation of Roma and Sinti people in integrated social cooperatives facilitates introduction into the workforce and has in many cases made it possible to regularise situations of illegal and undeclared work, giving Roma and Sinti people professional status and enabling them to achieve a decent standard of living, paying rent, bills and their children's education. These are economic experiences that have been jeopardised by the pandemic and which must be safeguarded and strengthened, without forgetting full Roma and Sinti inclusion in mainstream and self-employment economic opportunities in other product sectors that provide a commercial repositioning of activities that are no longer able to provide an adequate income to maintain family life⁸³.

A **long-term labour inclusion strategy**, however, must bear in mind that the difficulties for Roma and Sinti in finding paid employment appropriate to their needs is still due to persistent factors: from conditions of cultural and social segregation, to difficult material conditions and low levels of schooling and professionalisation. Roma and Sinti employability is also undermined by factors of exclusion, such as:

- the scarce presence within mainstream services dealing with vocational training for employment and work;
- poor staying power in the labour market;
- lack of certifiable work experience; difficulty in entering normal recruitment processes and official job placement channels;
- low level of education as a result of high dropout rates from school;

⁸¹ See Chapter 1 of this strategic document.

⁸² Attention is drawn to the non-discriminatory access of Roma and Sinti, also to welfare and social security measures, which is limited by the aforementioned issues related to paperwork or residence, but also by barriers in accessing digital platforms.

⁸³ See also the elaboration of the Kethane Movement and its proposals for action within the National Recovery and Resilience Plan.

- the lack of continuity within the regulated training route and corresponding low levels of basic and specialist training;
- the low and inadequate level of access to new technologies;
- the presence of "undeclared" work of a family nature;
- inadequate skills, knowledge and abilities required to access a contracted and strictly regulated job;
- personal and family barriers or resistance to inclusion in training processes and female-oriented jobs that may contradict community social values;
- barriers in the working environment caused by prejudice, paperwork and residence problems for some Roma (of former Yugoslavian origin), which hinder access to training, employment and positive action to bridge the gap.

Another specific and important aspect of this line of action is the **protection of travelling shows** and the implementation of Law 337/1968, particularly for Sinti and Roma micro-businesses, where the crisis is jeopardising traditions and a fundamental historical and identity heritage..

Unequal access to the labour market is also accompanied by lower indices of competitiveness and adaptation to the labour market. There is still an urgent need to contribute with economic and financial plans and measures to reduce these inequalities, through personalised employment inclusion measures including: skills analysis, vocational training, psychological and motivational assistance, employment opportunities both in terms of self-employment and employment, according to a methodology that can be implemented by local authorities. The move towards employment is also related to a choice of normalisation of employment that has both direct and indirect implications, promoting the acquisition of responsibilities and obligations, regularity of income, the need to plan according to the resources available, a greater capacity for socialisation and social inclusion and the contribution to the construction of a positive collective image and mutual recognition and respect aimed at overcoming any stigmatisation.

Work is the cornerstone of the success of every inclusion policy, capable of definitively counteracting any prejudicial attitude towards Roma and Sinti people. With this in mind, the UNAR, within the Labour Axis of the 2021-2030 Strategy, hopes for the expansion of employment opportunities, both through access to employment and from an entrepreneurial perspective, with an improvement in the employability of the recipients and a consequent "normalisation" of their presence in the formal economy. It should also be remembered that if we want to talk about full and complete social inclusion, the impact of the 'work factor' is predominant compared to other factors, but work must be tackled in conjunction with other problems, from access to housing to education and healthcare, according to an integrated approach that must also be supported by investment in education, vocational training and apprenticeships.

The new 2021-2027 programming of the EES funds, especially ESF+, makes it possible to economically support targeted actions to promote the inclusion of the Roma and Sinti. In particular, the European Commission has called for the use of funds within the context of the Multiannual Financial Framework for 2021-2027 and Next Generation EU to address difficulties and meet socio-economic inclusion needs. Within the scope of the 2021-2027 programming, ESF plus is called upon to implement **Strategic Goal 4 "A more social and inclusive Europe through the implementation of the European Pillar of Social Rights"**, ensuring support in the fields of employment and professional mobility, education and training, and social inclusion, also in relation to the eradication of poverty. Within the framework of the thirteen specific goals⁸⁴ aimed at achieving high levels of employment, equitable social protection and a skilled and resilient workforce, the principles of the European Social Pillar include specific goal j), expressly called upon to "*promote the social and economic integration of marginalised communities like the Roma*". **Actions based on a combined mainstreaming approach with explicit but not exclusive target groups** can be promoted with this goal, promoting the principles of de-segregation and non-ghettoisation. Actions based on an integrated approach combining investments also in the field of employment, with integrated pathways for labour inclusion, counselling,

⁸⁴ Article 4, 1 letters a) to m) of Regulation (EU) 2021/1057 of the European Parliament and of the Council of 24 June 2021 establishing the European Social Fund Plus (ESF+) and repealing Regulation (EU) no. 1296/2013.

guidance and access to education and vocational training, e-skills, mentoring and coaching, self-employment, entrepreneurship/business creation, awareness-raising through engagement with key partners (local communities, NGOs, economic-productive sector, etc.) can be supported.

Over the next few years, the Strategy will be aimed at implementing a series of activities, actions, devices and operational tools capable of promoting a support process in the territories with the aim of encouraging the employment of Roma and Sinti people, as an essential element for a positive and lasting integration process. First and foremost, Roma and Sinti must be provided with **useful tools for career guidance** and stable and effective integration into the labour market. Specifically, it will be important to define methods and tools suitable for accompanying Roma and Sinti people in planning their professional development pathways, offering them the opportunity to enter the working world, on one hand, in a knowledgeable manner, thanks to the assessment and certification of their skills, and on the other, in a more qualified manner, thanks to the possibility of acquiring new skills that will offer them rapid access to the workplace.

The labour integration of Roma and Sinti, especially of unemployed and inactive young people, is closely linked to **personalised integration paths** that take into account their motivations, abilities and skills as well as the obstacles and disadvantages and reasons for their unemployment or inactivity. Poor qualifications, lack of experience in the labour market, lack of reference points close to the labour market and the weight of the family environment make it necessary to design actions that take into account the starting point of each person and the surrounding context. In order for the person to be included in the labour market, it is necessary to design very personalised actions, taking into account the skills, knowledge and abilities of each person, their previous work experience, and their vocational training or schooling, which are usually very poor among the Roma and Sinti population.

Roma and Sinti people will be included in **individual career guidance, reception and induction activities** (career guidance interviews; assessment of skills, identification of unexpressed skills, definition of an individual professional development project, aimed at the potential work placement of participants) and **work orientation** (coaching; career guidance and training to actively seek employment; company scouting and job searches). The success of work placements is closely linked both to the enhancement of the skills, possibilities and aspirations of each individual involved in the work placement programmes and to appropriate vocational training.

The possibilities of access to employment are broadened through a system of active policies that includes work training and support measures, including apprenticeships, internships and self-employment, as follows:

- initiation of **training activities** with a view to professional qualification and retraining, self-employment and immediate job placement.
- inclusion in **courses to improve digital skills** (assessment of skills, provision of tailor-made, flexible and quality training and validation and recognition of the skills acquired).
- activation of **apprenticeships, traineeships and dual training schemes**.

Lastly, given that labour integration measures have a greater chance of success when Roma and Sinti are involved as mediators/facilitators, social workers or other service providers, it makes sense to promote interventions that envisage this approach.

3.3.2 Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01

Art. 8 - Member States should promote effective equal access for Roma, in particular young Roma, to quality and sustainable employment

The promotion of training and access to employment are prerequisites for the social integration of Roma and Sinti populations within the national territory. Despite numerous interventions at national level over the years, also thanks to the support of the ESF, the working condition of Roma and Sinti people is still problematic due to the constant difficulties of integration, the lack of professional qualifications, and the social marginality in which they find themselves. It is necessary to consider, for example, that the number of young NEETs from Roma and Sinti communities is much higher than the rest of the population, as emerges from the most recent reports and non-exhaustive surveys. This situation is destined to deteriorate due to the pandemic crisis as the effects of the economic recession tend to exacerbate inequalities. From this point of view, active labour market policies, including the strengthened Youth Guarantee, should be more explicitly targeted at Roma and Sinti (young people and women⁸⁵). In order to ensure sustainable and quality employment, especially for young Roma and Sinti, it is absolutely crucial to continue investing in integrated training, career guidance and job placement policies with the involvement of central, regional and municipal administrations, third sector organisations and all the social players in areas with Roma and Sinti populations.

Intervention measures can be, based on partnerships with public and private institutions with skills in training and employment:

- **Work coaching activities**, with direct interventions on Roma and Sinti youngsters, adults and women, for the improvement of their vocational training and employability conditions. These interventions will be based on measures of support and personalised accompaniment, which may also include the involvement of the family/community of reference, through: customised projects, curriculum analysis, assessment of skills, occupational diagnosis and design of the customised integration programme. This process will hopefully be accompanied by an action aimed at the surrounding environment from the scholastic/educational point of view and by career guidance, pre-training/training and job hunting processes supported by the development of the technical and social skills necessary to enter the ordinary labour market, as well as by mentorship and tutoring tools, customised itineraries and constant follow-up of the paths activated.
- **Intermediation with the labour market**, to identify job requirements and opportunities, encourage the relationship between the supply and demand for labour, offering solutions to the needs of the working world or specific responses to market demands through job opportunities and apprenticeships. These interventions will be activated to favour the direct participation of Roma and Sinti people in the labour market, through: alliances and partnerships in the labour market, identification of new market and employment basins; relationships and networks of collaboration between authorities, institutions and enterprises; framework agreements for the promotion of employment; support for planning, apprenticeship and employment development for public and private economic players and the world of associations. Intermediation in the labour market may be based on: analysis of job vacancies and the development of tools for researching and exploring the market and job offers; offering companies a mediation system to connect supply and demand; support for recruitment, information and technical advice; accompaniment in the labour market, follow-up and support to ensure job continuity; cooperation agreements with companies for the creation of training contexts linked to in-house traineeships (inter-company training, training with recruitment bonuses); actions to support protected employment initiatives and transition to standard employment in protected working

⁸⁵ Council Recommendation of 30 October 2020 on a bridge to work, strengthening the Youth Guarantee and replacing the Council Recommendation of 22 April 2013 on the establishment of a Youth Guarantee.

environments. Thanks to the activation of conventions with associations and qualified intermediaries, it will be possible to develop a scouting activity with the targets and to stimulate the offer from the most disadvantaged subjects and the associations that protect their rights. On-the-job training can be promoted to test innovative models of professionalisation and job placement for Roma and Sinti, aimed at expanding job opportunities in non-stigmatising production sectors.

- **Pro-active policies** Pro-active policies to combat prejudice can be aimed at raising awareness in society in general and among the players involved in the labour market, in order to foster the process of socio-economic inclusion of Roma and Sinti. Awareness-raising actions can also be aimed at Roma and Sinti, to foster greater readiness for socio-economic inclusion in formal employment sectors. The training of social intervention professionals and the organisation of debates and reflections can be accompanied by awareness-raising actions that help to deconstruct stereotypes and improve the social image of the communities. Technical assistance for public administrations and social organisations in the design of plans and measures can help to make training and employment more effective. A particular synergistic action can be developed with the Regional Tables and the Local Action Plans for the inclusion of Roma and Sinti, in order to guarantee them tangible opportunities and resources for training and employment and to promote them in the territories and among the communities of reference.

The real challenge is to identify, among the main possible areas of intervention for training and promoting access to employment, integrated system actions that propose going beyond emergency interventions to implement appropriate measures aimed at Roma and Sinti, particularly young people and women. Achieving this goal requires a strong political and administrative desire to promote employability conditions based on the full inclusion of Roma and Sinti in education, training and employment systems, and careful awareness-raising of both the economic and business fabric and the Roma and Sinti communities themselves. The measures to be developed should be result-oriented (e.g.: number of vocational training courses activated, apprenticeships and traineeships undertaken, employment contracts obtained), assessable in terms of efficiency and effectiveness, according to process and result indicators capable of measuring the results of the actions taken.

In order to address the **crisis faced by many self-employed businesses**, which have become more unstable as a result of the economic crisis and the pandemic, there is an urgent need to promote tools, methods and mechanisms for repositioning them on the market, in order to enter other more promising sectors. It is also necessary to regularise irregular or unstable work and develop new self-employment initiatives, not least for young people and women who have never entered the workforce. There is an urgent need to build strong empowerment by implementing actions and processes that aim to **implement the managerial skills** of Roma and Sinti communities.

It is therefore necessary to encourage a path of growth and cultural and managerial strengthening of community representation through specific **training courses**. We need to work to encourage the acquisition of skills, the implementation of planning abilities and experiential learning among Roma and Sinti, in order to promote self-entrepreneurship and job placement of beneficiaries outside the logic of welfarism.

Among the tools to be implemented to create or strengthen skills for self-employment, the development of business feasibility projects and the accompaniment to the writing of business plans, the formation of a business culture and support to business development, providing advice in the initial and start-up phases, strengthening the launch of the process (support, drafting of business plans, securing guarantees and funding for self-employment, training and support to administrative and commercial management, development of strategic and operational marketing skills, etc.) can be promoted.

It seems useful to launch:

- **Surveys addressed** to the various subjects (associations, third sector bodies, etc.) working with communities interested in carrying out **intermediation activities in the labour market**. This survey should also be carried out to understand the real interest and level of need related

to self-employment. Thematic meetings should then be held on specific contents, of a theoretical and/or technical nature, focusing on thematic areas such as:

- Accompanying the implementation of the business plan;
 - Entrepreneurial development;
 - Cooperation and social economy.
- **Tailor-made actions** to support self-employment can be promoted, with the development of one-to-one business feasibility projects, training in enterprise culture and support for business development, also providing advice to encourage the possible **legalisation of informal economic and work activities**.
 - **Business incubators for launching start-ups** can promote the protected launch of entrepreneurial experiences. Authorities and organisations with proven experience in supporting start-ups, including those aimed at people with a low level of professionalism but in response to strong demand from the labour market, could promote the development of new businesses capable of creating employment, giving priority to business experiences involving Roma, Sinti and entrepreneurs from outside these groups. It will be desirable to link the proposed start-up experiences with other projects already developed for the beneficiaries by the local authorities in the field of housing, education or socio-health policies. Within the framework of the development of self-employment initiatives, internship allowances and reimbursement of expenses, special contributions like prizes for the best business ideas developed at the end of the training courses by beneficiaries interested in launching a start-up, could be envisaged⁸⁶.
 - The **development of digital skills** should be a prerequisite for every intervention. Digital exclusion is a fundamental element to be countered - both in the school curriculum and in the transition to vocational training and work. Sustainable development of self-employment initiatives also depends on conscious and solid access to digital technologies, which can be promoted by means of special training courses or guidance and accompaniment of the public training offer, also through distance learning opportunities.

Insight Box no. 7

Ecological transition and circular economy⁸⁷

The second-hand consumer market sector is an important segment of the "circular" supply chain. According to current estimates, its value in Italy is around €21 billion a year (Doxa) and it employs around 100,000 people. Its exploitation and proper regulation would allow not only more employment but also greater environmental sustainability, especially in big cities, as well as an effective fight against waste. According to some surveys (Kethane-Rete Operatori Nazionali Usato, 2021) about 40% of the Italian Roma and Sinti population formally or informally carries out activities related to the circular economy (iron collection and waste recycling, qualification and sale of used objects), which are a fundamental source of income for families and are considered to be socially useful work. Proper product and tax recognition, a clear framework of regulations with local administrations, and incentives for corporate and cooperative forms in the sector are not only desirable but can no longer be postponed. This type of work segment is perfectly in line with the goal of full sustainability set out in the NRRP.

The proposals:

⁸⁶ Contributions may be granted in accordance with the terms and conditions laid down in Regulation (EU) no. 1407/2013 of the Commission of 18 December 2013, as amended by Regulation (EU) no. 972/2020 on the application of articles 107 and 108 of the Treaty to "de minimis" aid.

⁸⁷ Proposal drafted by the Kethane Movement - Roma and Sinti for Italy, available on: https://www.kethane.org/_files/ugd/4b6dbc_d9c896241b8a4df88551764fb97555b2.pdf.

- Define used goods. All unregistered movable tangible property, which has already been used and can be reused in its original condition;
- Formal recognition as "second-hand operators" of parties carrying out activities concerning the identification, collection, sorting, repair, restoration, preparation for re-use and marketing on behalf of third parties, at wholesale and retail level, of used goods.
- Ensure the participation of second-hand operators in the collective systems of Extended Producer Responsibility, so that they can contribute with their core business and know-how to the construction and management of models that prioritise re-use and preparation for re-use.
- Establish the commercial discipline for second-hand operators and release the sale of used goods from prior authorisation, defining the figure of the operator, contemplating the coherent range of facilities, including tax and incentives for the "public utility" of the activity.
- Creation of a specific ATECO code for shops on behalf of third parties, equating the VAT scheme for second-hand goods to the existing preferential scheme for antiques (pursuant to article 39 of Decree-Law no. 41 of 23 February 1995, converted, with amendments, by Law no. 85 of 22 March 1995).
- Overcoming the phenomenon of "rummaging" and informal retailing through the implementation of chains of preparation for re-use where the skills and productive potential of second-hand operators, especially vulnerable ones, are constructively pooled.

Job & enterprise creation⁸⁸

Individual training, aimed at the creation of either a single job, a sole proprietorship, or a small business, is proposed. These techniques start from the "skills assessment" of each person in order to detect their inclinations, aspirations and potentials and then compare them with the job opportunities to be sought - in our case - particularly in three areas:

- a. hat of proximity, i.e.: within the immediate social context, in which a "reading of the territory" reveals the need for services and goods that remain unfulfilled because they are of little interest to productive organisations that aim for high rates of return;
- b. that of traditional jobs, regularising activities usually carried out on the cheap and promoting skills and trades at risk of disappearing;
- c. what is currently referred to as the circular economy, which actually re-proposes activities, obviously with a modernised approach, that were largely carried out before they disappeared under the pressure of the waste economy and in which the knowledge and skills of Roma and Sinti communities can also be harnessed.

The fact that these are individual training courses, in each of which a project and a subject, i.e.: a productive activity and the person who will carry it out, are constructed at the same time, does not preclude the possibility of following and supporting the training courses of several subjects at the same time, as the process will be articulated in the same phases for all of them. In other words, a kind of incubator could be set up in the form of "training courses for work and small enterprise" (which can be funded, according to previous experience, by the ESF). These courses should be structured according to a single model in phases and modules that should follow the sequence of steps in the design process: (i) identification of the business idea; (ii) feasibility check, in relation to the existence of a potential demand and therefore of economic sustainability; (iii) structuring of the activity; (iv) consideration of the pertinent regulatory framework; (v) identification and sourcing of funding; (vi) planning of the start-up of the activity; (vii) formalisation of the activity in accordance with the pertinent regulations.

Particular mention should be made of activities falling within the circular economy. These should be allocated within special Recovery, Refurbishment and Recycling Centres where the following should be organised: the collection, also on the basis of special agreements with municipalities and town councils, of materials and objects to be saved from disposal in landfills, as they can be reused even if

⁸⁸ Proposal drafted by the association Cittadinanza e Minoranze.

in different forms (recovery); their sanitisation; their adequate treatment either to extend the life of the products by restoring their functionality or to recover raw/secondary materials and/or the energy and know-how incorporated in them (refurbishment); the sale of the resulting products. As well as creating jobs, the other important effects of these centres would be a reduction in rubbish, with consequent benefits for the environment, and the elimination of senseless waste. Abandoned buildings could be reused for the establishment of these Recovery, Refurbishment and Recycling Centres.

AXIS - ACCESS TO SUSTAINABLE AND QUALITY EMPLOYMENT

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives:

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative-quantitative analysis
Encourage the promotion of training and non-discriminatory access to projects aimed at entering the labour market	Accompaniment of Roma and Sinti users in planning their own career path, through evaluation and certification and thanks to the possibility of acquiring new functional skills for rapid access to the world of work.	Number of interventions carried out Number of users contacted	% of users who, as a result of the interventions, enrol in an education or vocational training course or start up a company
	Activation of integrated pathways for employment inclusion, counselling, guidance and access to education and vocational training, with the involvement of central, regional and municipal administrations, non-profit bodies and all the social entities existing in territories where Roma and Sinti people live	Number of training courses activated Number of participants in training courses Number of guidance and counselling interventions carried out Number of people belonging to Roma communities contacted	% of participants who completed the course out of total participants % of people who participated in integrated work placement activities who found a job, out of the total number of participants, 3-6 months after interventions
Activation of active policies, tools, devices and support for the regularisation or replacement of self-employment and entrepreneurial development	Fact-finding surveys addressed to the various subjects (associations, non-profit bodies, etc.) working with the communities interested in carrying out intermediation activities in the labour market, to identify the actual interest and the degree of need connected with self-employment.	Number of surveys performed Number of reports issued	Analysis of the quality and significance of the surveys carried out, with respect to the objectives
	Tailor-made actions to support self-employment, by drawing up business feasibility projects and business plans, training in business	Number of interventions carried out	% of enterprises created or regularised out of total beneficiaries of

	culture and creation and consultancy in the initial stages (drawing up business plans, seeking guarantees and funding for self-employment, etc.).	Number of people belonging to Roma communities contacted	support measures carried out, 3 to 6 months after the end of the measures
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3.4 ACCESS TO ADEQUATE ACCOMMODATION AND THE RIGHT TO HOUSING

3.4.1 Analysis of context, critical issues and ongoing problems

The right to housing remains a central and complex issue, to which civil society and European institutions devote particular attention and interest. The condition of housing marginality of the inhabitants of camps⁸⁹ and outlying areas⁹⁰ - as far as can be seen from the sources available⁹¹ - is a factor that exacerbates discrimination, with consequences on the right to education, access to healthcare, work and territorial services. The problems experienced by camp residents during the COVID-19 pandemic have also confirmed the dramatic nature of marginalisation and isolation, causing further socio-economic hardship, consequences on access to education, and antigypsyism⁹².

Although, as already highlighted above, the Roma and Sinti population living in camps in conditions of housing poverty is a minority compared to the overall presence in Italy, it represents a situation of residential segregation directly related to access to work, education, healthcare and social services. Housing is therefore considered to be a key element in the process of overcoming social deprivation and harmonious integration into society, in order to combat extreme poverty.

Within the scope of the RSC Strategy 2012-2020, the priority of “*definitively overcoming emergency logics and large mono-ethnic settlements and respecting local opportunities, family unity and a strategy based on equitable displacement*” was indicated⁹³, introducing the concept - which emerged and is still proposed by the Sinti and Roma - of a “**wide range of housing solutions**”. Operational conditions for the identification of housing solutions, drawn up in cooperation with the ANCI and civil society, had been included. These envisaged, first and foremost, the need to combat the segregation, isolation and marginalisation of people, while also emphasising the direct participation of the beneficiaries of the interventions at all stages, using mediators/facilitators and Roma and Sinti professionals. As regards the first specific goal (4.1) with reference to the housing axis of the RSC Strategy 2012-2020, “*to encourage integrated policies of inter-institutional cooperation for housing supply to RSC*”, it can be noted that the UNAR, by virtue of its function of accountability to the European Commission, has promoted an action of institutional coordination aimed at ensuring:

- the correct use of resources from EU funds and programmes (NOP Inclusion; NOP Metro; Regional OP);
- monitoring of non-discriminatory access to social housing⁹⁴;
- the complementary nature of the interventions for the different sources of funding;
- monitoring of the activities proposed at local level, with the active involvement of those directly concerned.

⁸⁹ With regard to the term “camp”, in view of the specificity of this chapter on the theme of “housing”, it is appropriate (albeit only in general terms and with an awareness of the evolving nature of the housing process) to specify the following: “authorised” camp can mean a space managed by the local administration, which regulates access and presence; “tolerated” camps are areas that do not enjoy real institutional management. Despite being equipped (to a certain extent), they are not managed by any particular body or association, but are monitored by the local authorities on whose territory they are located (cf. ANCI, CITTALIA, *Rom, Sinti and Caminanti Camps in Italy*, page 13). A further type of camp consists of what are known as “spontaneous” camps, spaces “*in extremely unstable environmental conditions (and often subject to repeated demolition), or areas that are only occupied at certain times of the year by groups practising forms of circular mobility*” (cf. ANCI, CITTALIA (Cf. ANCI, CITTALIA, *Rom, Sinti and Caminanti Camps in Italy*, page 16). Other general considerations that are useful in defining a camp include the location (how far away it is from the city centre and public services), the ownership of the area (private or state-owned), the types of accommodation present (camper vans, mobile homes, caravans, buildings, containers), the population present, the length of time it has been in existence and the essential infrastructure and services present. With regard to family areas, please see the specific details in the document.

⁹⁰ This refers to neighbourhoods, suburbs and areas with a strong Roma and Sinti presence (including long-standing camps), characterised by unstable access to services and problems in key areas such as access to employment and school dropout rates.

⁹¹ See the paragraph on “*The condition of the Roma and Sinti in Italy and the subject of data collection*” in this strategic document.

⁹² *Coronavirus pandemic in the EU – impact on Roma and Travellers*, published by the Fundamental Rights Agency, June 2020.

⁹³ Cf. RSC Strategy 2012-2020, page 51.

⁹⁴ The issue of access to social housing was the subject of a Fact-finding-visit by the European Commission - in the cities of Milan and Rome, in June 2019.

On these fronts, which made direct involvement of local government indispensable, since 2018 the UNAR has promoted the "P.A.L." (Local Action Plans), which placed the housing issue at the heart of their interventions. Through local Tables of dialogue and coordination promoted by municipal administrations like Rome, Cagliari, Milan, Genoa, Naples, Bari, Messina and Catania, the synergy of policies and interventions with participation in social, political, economic and civic life was promoted. In addition, the UNAR in cooperation with the Conference of Regions and Autonomous Provinces, promoted the launch of the P.A.R. (Regional Action Plans), which envisage the provision, in synergy with that carried out at municipal level, of direct technical support to the regions for planning, and more effective access to the financial resources available to implement social and housing inclusion measures for Roma and Sinti at greater risk of social vulnerability.

Also within the RSC Strategy 2012-2020, the second specific goal (4.2) envisaged "*promoting housing solutions that meet the specific needs and requirements of RSC families*", proposing a wide range of options (social housing in ordinary public housing, support for renting or buying ordinary private housing, self-building and self-recovery paths accompanied by social inclusion projects, renting of publicly-owned farmhouses. It should be noted, however, that the weakness of governance and inter-institutional cooperation, as mentioned above, has led to a lack of local adhesion to both the principles and the goals mentioned above. This dichotomy can be seen in the coexistence of positive experiences but also in arbitrary and impromptu actions, such as the repetition of evictions, assisted repatriation practices and "temporary" relocation in facilities that do not meet people's needs (especially those of the most fragile families), as repeatedly highlighted by international organisations. Reports and other available sources⁹⁵ show that the RSC Strategy 2012-2020 guidelines have not prevented the **practice of evictions carried out without regard for international standards and recommendations**⁹⁶. Attention was also drawn to less conspicuous but nevertheless critical eviction practices for the people involved, carried out by means of constant pressure aimed at determining the spontaneous abandonment of the camp⁹⁷.

Within this complex and uneven framework, lies the effort to map the real housing situation of Roma and Sinti in Italy, which is necessary for the preparation of policy makers and fundamental for the promotion of coherent interventions. The ANCI-Cittalia national survey on camps - promoted at the beginning of the previous RSC Strategy 2012-2020 - and published in 2015, which has already been mentioned, estimated the presence in the camps of fewer than **30 thousand people**, downsizing the framework reference. This aspect was again treated through a new survey curated by ISTAT, carried out between 2019 and 2020, aimed at updating the data relating to the camps estimated to be 373, in 126 municipalities, with a further downsized presence, amounting to about **15 thousand people**. This last survey also analysed the **downtrend of the presences within the camps**, made evident by the data just mentioned, making it possible to assume a positive causal link with the impulse provided by the RSC Strategy 2012-2020 to the process of housing transition from some types of camps to different forms of accommodation. The main results so far show that 42 municipalities claim to have activated housing transition projects between 2012 and 2019, with a total of 96 projects analysed. The municipalities with the highest number of projects activated were Sesto Fiorentino (Florence), Trento, Moncalieri (Turin) and Rome, indicating **3120 individuals transited into stable housing** through specific projects. The largest numbers were found in Piedmont (870 individuals moved), Sardinia (843),

⁹⁵ According to the 2021 Report prepared by Associazione 21 luglio, *Roma Communities in Formal and Informal Camps in Italy*, approximately 70 "forced eviction" operations took place in our country in 2020. Net of the impossibility, in this paper, of verifying the actual procedures employed by the pertinent authorities, comparing figures from recent years (145 evictions in 2019, 195 in 2018, 230 in 2017 and 250 in 2016), it is possible to see a decrease in this practice, amounting to 51.7% compared to 2019 and 72% compared to 2016. For further details, see: https://www.21luglio.org/2018/wp-content/uploads/2021/10/Rapporto_2021_web_con_indice.pdf

⁹⁶ See: 1) United Nations, *Basic principles and guidelines on development-based evictions and displacement*, A/HRC/4/18, Available at: https://www2.ohchr.org/english/issues/housing/docs/guidelines_en.pdf
2) Sgomberi: *principi e linee guida per la tutela dei diritti umani*, Rivista LIL, UNAR 2013 available at: <https://www.unar.it/portale/documents/20125/56037/LIL-3-41.pdf/3ed9e5f5-762d-bff9-af0a-35338bc2a4d2?t=1620206960040>

⁹⁷ Moreover, on the issue of prisons, recent studies (Miscioscia, 2021), have shown the need to encourage the use of alternative measures to the sentence even for Roma/Sinti people who do not have optimal housing conditions. Figures show that, at present, the alternative measures are arranged and implemented to a lesser extent for the population groups experiencing housing poverty.

Tuscany (436), Emilia-Romagna (250), and Trentino Alto-Adige (205). In 52.8% of the projects, actions aimed at facilitating access to social housing and inclusion in the housing emergency lists were implemented, while in 42.7% of the projects, the provision of housing found on the real estate market was envisaged. The criteria used to select beneficiaries for access to the projects included, in order of importance, residence in the municipality, used by 73 out of 96 projects, residence permit (indicated in 44 cases) and documented permanence in the municipality (in 38 cases, including living in a camp or parking area), as well as school enrolment of minors (in 24 cases). 40 projects included support for the regularisation of legal status. Neighbourhood conflict prevention and mediation actions were explicitly implemented in 44 projects.

Within the framework of knowledge on the situation of Roma and Sinti people living in Italy, civil society, and specifically the members of the National Roma and Sinti Platform, represented an important resource thanks to their widespread presence in the territory and the heterogeneity of their information sources. Recent data⁹⁸ confirms the trend towards **progressive reduction of the presence in the camps** mentioned above, also taking into account a variety of reasons (certainly not all attributable to housing transition projects), referring to new migratory routes to return to the country of origin or to other countries in the European area, but also to dispersion and splitting up into smaller camps, occupation of buildings (some of which dilapidated) that leave a situation of housing emergency that is ultimately unchanged. Alongside the detection of housing inclusion projects, which have been growing steadily since 2016, it is also appropriate, as highlighted in the foreword to the strategic document, to note the tendency not to build new camps and a substantial reduction in the practice of evictions implemented without compliance with standards and the provision of suitable alternative tools, in the same reference period. These are dynamic phenomena that require further specific investigation. Further indications on the quality of the housing transitions undertaken will be provided in the second part of the ISTAT survey - currently underway - which will make data and information available to help assess the gap in terms of social inclusion and discrimination between Roma and Sinti beneficiaries of transition projects and those still living in camps; data and information that are fundamental for the Public Administration and all stakeholders involved.

3.4.2 Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01:

Art. 10 - Access to adequate desegregated housing and essential services Member States should ensure equal treatment of Roma people in access to adequate desegregated housing and essential services

The general goal of the new housing axis is *to increase effective equality of access to adequate and non-segregating housing and essential services* (Sectoral Goal 7), which can be achieved through specific targets linked to indicators. Targets for 2030 indicate a reduction (by at least one third of the gap) in terms of housing poverty (the gap is 43%, to be reduced to at least 30%, in terms of overcrowding; the gap is 60%, to be reduced to 40%; at least 95% with access to running water (in the EU average of 70%). The goals indicate the need to continue the research and survey process in order to have an up-to-date picture of the housing situation and to assess the intermediate steps and the impact of the measures to be implemented, as described below, in line with the governance system envisaged in this Strategy (see chapter 2):

1) Promotion of surveys and research activities:

- Continue **analysing** the impact of **transitional housing policies** on those directly concerned, assessing both the impact of participation/co-design by recipients within the pathways and the access criteria.

⁹⁸ 2020 annual report of Associazione 21 luglio, available at: www.21luglio.org.

- Analyse the **quality of the social-housing conditions** of Roma and Sinti people in **contexts of historical presence** and potential marginality.
 - Promote **surveys and mapping** with reference to **family areas** and analysis of **regulatory effects** in some specific contexts on the regularisation of agricultural areas owned by members of the minority group.
 - Monitoring and **analysis of administrative and regulatory acts** (at regional and municipal level) concerning access to social housing.
- 2) **Strengthening the local authority's capacity to act:**
- **Capacity building of local authorities** to facilitate access to European funds for the housing transition of Roma and Sinti in a housing emergency situation.
 - Technical information support for the collection of information and data on housing transition and inclusion projects implemented at local and regional level and on the availability of public housing.
 - Promoting **training courses and inter-municipal dialogue/confrontation**, with study visits and transnational cooperation, to strengthen project management skills and the management of the housing requirements of vulnerable groups.
- 3) **Mediation, information and awareness-raising:**
- Development of guidance and counselling paths to access local housing opportunities.
 - Promotion of information campaigns and awareness-raising activities to overcome prejudice, discrimination, mediate conflicts and promote access to housing.
- 4) **Inter-institutional activities:**
- Establishment of an **inter-institutional unit to promote access to housing** to support the implementation of local, regional and national public policies, the quality and effectiveness of accompanying interventions and the transition from camps to houses and different forms of housing, with the participation of Forum delegates.
- 5) **Access to social housing, the private market and other forms of housing:**
- **Promote guidelines** for the improvement and **harmonisation of access to public housing** in particularly vulnerable situations and to facilitate the housing allocation process. More specifically, local authorities (the Regions for regional laws and the municipalities for the criteria with which to attribute points) are required to recognise the particular housing situations of Roma and Sinti, with particular reference to camps, working to facilitate the access of those entitled to social housing. Specifically, in the administrative action to close a camp, reference should be made to the specific contingencies linked to the camp's history and characteristics, and the points procedure should assess whether the closure action is equivalent to that of the eviction procedure; in terms of assigning points, it is also appropriate to assess the recognition of the "social importance" of those living in camps and other forms of unstable housing; it is desirable for the local administration to encourage the overcoming of problems related to registration formalities (changes in family status) of families living in parking areas or spaces in camps; it is appropriate to consider that the various forms of accommodation, in camps for example, can be recognised as housing in terms of possible assignment of points due to the presence of architectural barriers, unhygienic conditions.
 - Promote the coexistence of **different, complementary and multiple solutions**, encouraging **the experimentation of:**
 - measures to **support the rental and purchase of ordinary private housing** (abandoned public farmhouses) also creating special networks, **specific memoranda of understanding** involving institutions, **real estate agencies**, trade associations, construction agencies, foundations, aimed at housing inclusion in the private sector of categories at risk of discrimination like Roma and Sinti;
 - **cohousing** (ensuring sustainability and respect for the principles of family unity, peaceful coexistence and non-overcrowding, in conjunction with those concerned);
 - **self-building, self-recovery and redevelopment** (cottages, farm buildings or abandoned buildings);

- it is also appropriate to take into account - as emerged in the consultative process and in compliance with local regulations and security protocols - the need for **meeting spaces and temporary accommodation** of certain groups for celebratory occasions linked to the religious denomination of a numerically significant part of the communities (e.g.: the "gypsy evangelical mission").

Insight Box no. 8

Family areas

In continuity with the RSC Strategy 2012-2020, the creation of family areas is a desirable solution - as explicitly indicated by the associations of the National Platform and the Forum of Roma and Sinti communities - to meet the need to maintain housing systems suitable for the coexistence of the extended family and the maintenance of traditional economic activities, such as travelling shows. Due to the complexity of the issue and the extensive debate - which is still ongoing even within the Roma and Sinti communities - it is appropriate to draw attention to the interest shown by different local administrations in relation to family areas, considered in the context of housing transition actions, not only as places of origin but also as a suitable type of accommodation within the project activities. Within this framework, all proposals and administrative interventions on family areas must include, as a preliminary step, a feasibility analysis by the competent local institutions involved and, together with an assessment of each individual situation, in close cooperation with the Forum's target groups and associations. The feasibility analysis is aimed at:

- the protection and inclusion of the people who live there;
- compliance with the standards laid down by the legislation in force;
- prevention of the risks of marginalisation and segregation of residents, as well as obstacles to the right to education, access to social and health services and employment;
- the preparation of projects for families and individual recipients (with specific attention to women and young people) who, over time, may express the need for and interest in different housing solutions.

The housing axis in the Emilia Romagna Regional Law no. 11/2015⁹⁹

Art.3. The Region, the municipalities and their unions, set up pursuant to Regional Law no. 21 of 2012, with respect for the life choices and cultural traditions of Roma and Sinti people, under conditions of full equality with other citizens and in relation to the legal status of individuals, promote processes of autonomy, emancipation and social integration, and in particular:

- a) support the overcoming of large parking areas, as referred to in article 4 of Regional Law no. 47 of 23 November 1988 (Regulations for nomadic minorities in Emilia-Romagna), as sources of exclusion and discrimination, according to the guidelines of the Regional Strategy;
- b) promote the experimentation and **development of innovative public camp solutions, such as public and private family areas**. These solutions are governed by an act of the Regional Council, having obtained the approval of the local authorities at the session of the Council of Local Authorities, which establishes specific technical requirements related to the protection of human dignity, such as health, hygiene, safety, accessibility and integration, and specific urban planning and building requirements, in compliance with the provisions of paragraphs 2 and 3;
- c) promote processes of transition to conventional forms of housing;
- d) support initiatives, also of an experimental nature, of self-building and self-recovery, as part of paths towards socio-economic and housing autonomy.

⁹⁹ The full legislation is available at: <https://sociale.regione.emilia-romagna.it/esclusione-sociale-e-poverta/la-legge-regionale-11-2015>

2. The realisation of the family areas mentioned in paragraph 1, letter b), is regulated by a municipal programme, which identifies, among other things, the areas of the municipal territory suitable for their location, outside the areas referred to in articles a2, a3bis, a13, a14 and a15 of the annex to regional law no. 20 of 24 March 2000 (General regulations on the protection and use of the territory). Approval of the programme is subject to verification of subjectivity pursuant to article 12 of Legislative Decree no. 152 of 3 April 2006 (Environmental Regulations), and does not entail a change in the urban planning classification of the areas in which the family areas are to be built or a change in the intended use of any existing building units used".

The Directive on technical requirements for family areas in Emilia Romagna

As we know, Emilia Romagna Regional Law no. 11/2015 recognises family areas as being of "public interest". On the basis of this specificity, a "directive" was issued on the technical requirements of family areas, defined in terms of building aspects, urban planning and also social aspects, approved by Regional Council Resolution no. 43 of 25 January 2016. Directive 43/2016 introduces the right of the Municipalities of the Emilia Romagna Region to provide on their territory areas to be allocated, on an extraordinary and temporary basis, to this type of housing. The family areas, which must be identified through a specific municipal programme, to be approved with a special variant of the POC (Municipal Operational Plan), in compliance with the constraints imposed by the regulations on the protection and use of the territory, are therefore not subject to change of use (confirming the temporary nature of the solution). Further confirmation is given by the fact that it is impossible to build brick housing modules, favouring prefabricated structures (which are removable and therefore temporary) that, thanks to the new technologies on the market, make it possible to guarantee adequate quality standards for building structures. The directive defines the path for the realisation of new family areas, both public and private, as well as the modalities for the reuse of private areas developed without permission and acquired by the Municipality (or with procedures in progress) before the entry into force of Regional Law 11/2015.

Insight Box no. 9

Living in transition. Survey on housing transition projects for Roma and Sinti populations ISTAT (2021)

Reflections and UNAR guidelines

GUIDELINE no. 1 - Support the coexistence of different, complementary and multiple interventions with respect to the housing issue in support of Roma and Sinti populations living in camps. Recognise antigypsyism as a key element

The ultimate goal of the projects is the autonomy of the households and their progressive emancipation, also taking into account aspects related to the household's income and capacity to save, which are central to ensuring the sustainability of transition costs. In almost two-thirds of the projects the prevailing issue in operational management concerns the beneficiaries' difficulties in meeting housing costs (e.g.: rent, bills). Support with the regularisation of legal status, including renewal of expired personal documents or irregular administrative positions, is a measure adopted by 40 projects. All the projects that envisage the regularisation of legal status also include actions to support housing autonomy.

The more objective aspects, such as those of an economic nature, are those that are given most consideration in transition projects. In addition to accompaniment in the sense of material support for autonomy, for the transition process to be successful, it is necessary to invest in mediation and social accompaniment by the local authority implementing the project, also in synergy with the third sector. According to the survey, while 40 projects include measures for conflict management, insufficient attention is still paid to strategies for integrating Roma and Sinti people into the new relational situation and to negotiating with standardised housing models. Antigypsyism continues

to be a key issue to reflect on and intervene in the process of housing inclusion and escape from marginalised settlements. This specific form of racism towards Roma and Sinti, in the period of analysis of this research, has undergone phases of escalation, serving as a pretext for violent actions and hate crimes (see the 2011 assaults on the "Continassa" settlement in Turin and other similar episodes), hindering the entry of Roma and Sinti from camps into ordinary housing, as happened recently in some urban peripheries.

GUIDELINE no. 2 - Integration across different axes, full use of available resources and cooperation between local and regional levels

All projects intervene mainly with reference to the housing axis of the RSC Strategy 2012-2020. However, most projects also act on the other three axes, work, healthcare and education. A total of 36 projects act simultaneously on the four axes of the RSC Strategy 2012-2020, highlighting how, at least in the preamble, the aim is to lend unity to a series of actions and measures according to an integrated approach to inclusion. Three-fifths of the transitional housing projects considered (55 projects out of 89) include at least two fields of action among those envisaged by the RSC Strategy 2012-2020. Less than two-fifths of the projects, on the other hand, exclusively include housing as an area of action. However, the survey shows a low level of coordination and dialogue between local promoters and regional authorities. This poor connection with the regions has a negative impact on the relocation situation: it reduces the range of potentially viable housing solutions and, equally, with regard to the availability of resources from ordinary and European funds, it limits the planning and spending capacity.

GUIDELINE no. 3 - Creation of a support network for recipients and personalisation of interventions

Two-thirds of the projects analysed involve collaboration between proposing bodies and associations of various kinds, which are expressions of civil society. The idea of "networking" is also present in the field of social planning for the inclusion of Roma and Sinti populations. The construction and management of projects with targeted and complementary partnerships can ensure greater effectiveness in the management of very complex situations, which require the participation of different skills, roles and bodies. This synergy could be even more effective if implemented in the design phase. Awareness of the specific needs of families and the territory would make it possible to "customise" interventions and better target projects, avoiding the occurrence of problems during the project.

GUIDELINE no. 4 - Correct application of the principle of equitable relocation

Although the survey did not envisage a specific question (but envisaged some "other" modality, with an open field), no reference was found to specific actions aimed at favouring the maintenance of relations with the community of origin. This is a significant aspect also in order to avoid that the housing transition necessarily implies a break with the family-housing context of origin. Also the principle of fair displacement, if not correctly applied and assessed "case by case" - also considering the social and economic relations already existing in the context of origin - may have a detrimental effect. When defining strategies, each project should assess a careful synergy between accompanying measures, the principle of equitable displacement and the system of relations established by the recipients in the places where the camps are located.

GUIDELINE no. 5 - Implement, in the planning phase, of a preliminary study on the legal status of potential recipients and envisage "emersion" actions (see also Par. 4.3)

A recurring problem concerns the legal status (lack of regularisation) of potential beneficiaries: this issue was found in about 1/3 of the housing transition projects (29 projects out of 89). They are mainly located in Tuscany (16 projects, of which 16 in Sesto Fiorentino and one in Florence), Piedmont (three projects: two projects in Moncalieri and one in Chieri) and Lazio (three projects, in Rome). In these projects (26 projects out of 29), measures to accompany the regularisation of legal status were envisaged. A preliminary study, with the cooperation of the third sector or Prefectures, could facilitate the development of more targeted and effective projects. In particular, the

regularisation of the legal situation of individuals could be carried out before the publication of calls for projects. Alternatively, it could be considered as an accompanying measure for families wishing to participate in the projects.

GUIDELINE no. 6 - Calibrate transition projects on the basis of data and analyses from cross-cutting indicators (length of existence and type of camp, level of school drop-outs, rate of access to employment, quality of relations with neighbours, level of access to public services, etc.).

The experience of the years of implementation of the RSC Strategy 2012-2020 marked the transition from a form of "total" emergency related to the so-called "nomadic emergency" to the persistence of a status of "structural emergency". The existence of historical camps has stabilised and crystallised, exacerbating old forms of antigypsyism and complicating initial attempts at discontinuity with the housing/Roma issue. As many as 73% of the total number of declared camps have existed for more than ten years, and almost 17% have existed for five to ten years. The percentages of more recent camps are smaller: 13 camps have been in existence for 2-5 years, ten camps for one or two years, and only four have been in existence for less than a year. As many as 122 out of 144 authorised/recognised camps can be defined as "historical", as they have been in the municipality for more than ten years. However, there has also been a change that has affected symbolic elements, such as the terminology used by stakeholders and PA, which has gradually and predominantly abandoned definitions that attributed to Roma and Sinti a "bureaucratic" identity linked to a presumed nomadism and a condition of estrangement from the social and community fabric. Transitional housing projects also reflect these changes, such as the issue of so-called assisted repatriation, which was evoked and re-proposed in the emergency phase for EU citizens¹⁰⁰ or non-EU citizens (Roma from the former Yugoslavia already subject to expulsions challenged with appeals and judgments that have created new legal perspectives). The analysis of the transition projects proposed here shows that these measures are present to a limited extent in the paths accompanying the exit from the camps. In conclusion, in the awareness of the persistent socio-economic criticality of the most marginalised part of the communities, to which the UNAR has paid particular attention, the reduction of attempts to build new equipped camps, also noted by civil society, constitutes an element of fundamental discontinuity.

GUIDELINE no. 7 - Envisage an ex-post monitoring action in the design phase, going beyond the duration of the projects

The monitoring or assessment of transitional housing projects appears to be a general practice in 85 out of 89 projects (valid answers). As many as 82 of the projects analysed envisage annual or more frequent monitoring. Monitoring is occasional for only two projects, and every two years for one project. However, there is a need for an ex-post assessment to check that the project has long-term effects that can only be measured after its natural conclusion.

¹⁰⁰ For more historical information on the Roma people in Romania and the Carpathian-Danubian space, see also A. Pistecchia, *La minoranza romani: i rom romeni dalla schiavitù a Ceausescu*, Armando, Rome, 2011.

AXIS - ACCESS TO ADEQUATE HOUSING AND THE RIGHT TO HOUSING

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives:

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative analysis
Promote housing solutions that meet the specific needs and requirements of RSC families	Promotion of surveys and research activities	Number of surveys performed Number of reports issued	Analysis of the quality and significance of the surveys carried out, of their usefulness and/or pertinence with respect to mapping the real housing situation of Roma and Sinti in Italy, necessary for training policy makers and fundamental for the promotion of coherent interventions.
	Strengthening the capacity of the local authority to act Capacity building of local authorities to facilitate access to European funds for the housing transition of Roma and Sinti in housing emergency situations	Number of interventions addressed to local authorities Number of training courses activated Number of participants in training courses (gender, age, role and administration)	Survey of the perceived usefulness of interventions through questionnaires, focus groups and/or in-depth interviews % of satisfied participants out of total participants
	Mediation, information and awareness-raising: guidance and counselling paths for access to territorial housing opportunities. Promotion of information campaigns and awareness-raising activities to overcome prejudices, discrimination, mediate conflict and promote access to housing	Number of guidance and counselling interventions carried out Number of people belonging to Roma communities intercepted Number of information campaigns carried out	% of people who participated in guidance and counselling activities who found accommodation, out of the total number of participants, 3-6 months after the interventions
	Inter-institutional activity: Definition of an inter-institutional unit for the promotion of access to housing to support the implementation of local, regional and national public policies, the quality and effectiveness of accompanying interventions and transition from settlements to housing and forms of social housing	Number of inter-institutional units set up	Analysis of the functionality of the structures activated in terms of facilitating access to housing and supporting the relative policies
	Promote guidelines to improve and harmonize methods of access to public housing in situations of	Number of guidelines developed	Analysis of the functioning of the Guidelines with

	particular vulnerability and to facilitate the housing assignment process.		respect to the objectives
	Encouragement and experimentation of social housing, cohousing and self-building, self-rehabilitation and redevelopment (rustic, agricultural or abandoned buildings) measures	Number of experiments carried out	Analysis of the experiments carried out according to their sustainability and transferability and the possibility of modelling
Promote integrated policies of inter-institutional cooperation for housing offered to RSCs	Creation of <i>ad hoc</i> networks, also through specific memoranda of understanding, involving public bodies and companies	Number of Memoranda of Understanding signed	Analysis of the functioning of the networks created through focus groups and in-depth interviews with partners

3.5 HEALTHCARE AND ACCESS TO QUALITY SOCIAL AND HEALTH SERVICES

3.5.1 Context analysis, critical aspects and open problems

As already highlighted, in Italy, despite the numerous interventions carried out so far, many Roma and Sinti still live in conditions of serious social marginalization, material deprivation and poor integration. This condition, combined with lifestyles and behaviour at risk, negatively affects the health of these communities, including in terms of psycho-social unease, makes them the subject of particular attention by public health.

With regard to access to health services, it should be noted that the law guarantees the possibility of access to treatment even to foreign or EU citizens who are not registered with the National Health Service, through the STP code and, in many regions, the ENI code. Despite this, there are difficulties in accessing services and care for Roma and Sinti communities, especially when it comes to prevention and mental health programmes. To tackle this problem, in 2015, Italy adopted a specific document aimed at providing indications on the actions to be implemented to promote and safeguard the health of these communities. This document, called "**Health Action Plan for and with Roma, Sinti and Caminanti communities**"¹⁰¹, (hereinafter, Health Action Plan) was produced at a round table set up by the Ministry of Health, implementing the guidelines on health of the previous RSC Strategy 2012-2020.

The Health Action Plan turned out to be largely inapplicable in many territorial contexts of the country: a survey carried out by the INMP in 2018, on behalf of the Ministry of Health as part of the central actions of the 2017 CCM Programme¹⁰², showed that it was formally implemented in only a few regions (Piedmont, Lombardy, Emilia Romagna, Lazio and Sicily). This has led to the emergence of the need for the National Health Service (hereinafter NHS) to support the drafting and adoption of local implementation protocols of the Health Action Plan for and with Roma and Sinti communities, able to transition the indications contained in the national policy documents into the organisational reality of the services.

On this basis, over the two-year period 2018-2019 the "*Health Project - Promotion of strategies and tools for equal access to healthcare for Rom, Sinti and Caminanti*", coordinated by UNAR and INMP and financed as part of the Inclusion PON 2014-2020 was developed, with the aim of fostering the acquisition by territorial health authorities of knowledge and skills to support the implementation of the "Health Action Plan for and with Roma, Sinti and Caminanti communities" (hereinafter Health Action Plan), with a view to equal access to prevention and treatment offered by the National Health Service (NHS), in the framework of Public Health for marginalised and remote localities (SPP).

The specific objectives of the Project were to:

- 1) Develop and validate information tools for hard-to-reach groups¹⁰³ to favour orientation towards social and healthcare services and materials for health education.
- 2) Support the use of Roma and Sinti mediators/facilitators in healthcare.
- 3) Spread the culture of Public Health for marginalised and remote localities (SPP) to take on hard-to-reach groups, with particular reference to Roma and Sinti populations.
- 4) Support the local implementation of the Health Action Plan, through the development of corporate protocols.

The project involved 7 local health authorities: LHA Napoli 2 Nord, LHA Napoli 3 Sud, LHA Roma 1, LHA Roma 2, LHA Milano, LHA Cagliari, LHA Salerno.

During the implementation of the RSC Strategy 2012-2020 and, in particular, during the project

¹⁰¹ Available at https://www.salute.gov.it/portale/documentazione/p6_2_2_1.jsp?lingua=italiano&id=2451.

¹⁰² CCM Project 2017 - Survey of activities and territorial networks for the implementation of the Health Action Plan for and with RSC communities and identification of best practices to support implementation, carried out by INMP, Caritas of Rome and Italian Society of Migration Medicine (with the involvement of GrIS).

¹⁰³ People with difficulties in accessing health and social services due to their geographical location or for socio-economic and cultural reasons (marginal housing, lack of confidence).

activities on the "Health"¹⁰⁴ front, some relevant critical issues emerged with respect to the healthcare of Roma and Sinti people and access to services.

In particular, with reference to access to health services, the Local Health Authorities:

- were unfamiliar with the location, characteristics and health needs of Roma and Sinti communities present in the area;
- needed to build and broaden a network of intervention with local councils and private social organizations active in the territories;
- had difficulty relating to the communities;
- Antigypsyism and health: the project results (training, interviews carried out with healthcare workers, testimonies collected through trained facilitators)¹⁰⁵ show how forms of prejudice and poor knowledge of the complexity of Roma realities are still present.

In this context, attitudes of mutual mistrust between Roma and Sinti and healthcare operators remain widespread and unchanged in some areas which require training and information directly involving Roma and Sinti professionals and users - including by "facilitating" specific professional figures - to ensure mutual understanding and to disseminate the relative legislation. This "distance" takes the practical form, in the field of health, of:

- little screening during pregnancy and, more generally, little attention to sexual and reproductive healthcare for women;
- reduced participation in prevention programmes and activities;
- reduced participation in the proposed pathways, especially those in the psychological sphere;
- inappropriate use of facilities and recourse to emergency services only;
- little continuity, dropping-out of care pathways, especially with regard to chronic diseases;
- mistrust of services and difficulties in dealing with red tape;
- mistrust of Covid-19 vaccinations.

In addition, some areas of intervention that affect the health of Roma and Sinti emerge. In particular, there is a need to pay particular attention to the following areas:

- alcohol addiction and gambling;
- lifestyle-related cardiovascular diseases;
- mental health issues.

3.5.2 Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on equality, inclusion and participation of Roma and Sinti - 2021/C 93/01

Art. 9 - Health and access to quality healthcare and social services. "Member States should ensure effective equal access without barriers to quality healthcare and social services, especially for those groups that are most at risk or those living in marginalised or remote localities".

Considering the recommendations of the European Commission valid for the Italian context, as well as what emerged from the activities and projects implemented during the previous RSC Strategy 2012-2020, it appears that the Health Action Plan for and with Roma and Sinti communities is still a valid tool, the indications for intervention of which, appropriately updated, can help to meet the health needs of Roma and Sinti in the perspective of the new Strategy. With reference to the measures that can be implemented to deal with the criticalities highlighted above, these can be traced to several areas:

¹⁰⁴ Reference is made to the RSC Health Project and the interviews carried out with healthcare professionals, the training courses carried out in the Territorial Health Authorities and the work carried out with non-profit bodies as part of the Project.

¹⁰⁵ As part of the Health Project, the training event "Promoting the health of Roma Sinti and Caminanti: a path to overcome stigma and promote inclusion" was organized. The course was held in April in telematic mode and included three teaching modules (15, 22, 29 April 2021) during which moments of frontal teaching alternated with group activities. The latter was primarily animated by the Workshop on Antigypsyism and Stigma. The aim of the workshop was to make the participants - all healthcare workers - reflect critically on their possible prejudices or stereotypes of the Roma and Sinti population.

1) Research and data collection

- A. Promote **survey, study and research activities** on the state of health and access to services of Roma and Sinti populations, and in general groups considered at risk of poverty, to provide objective data on which to design interventions and measure their effectiveness. In identifying critical areas with respect to access and assistance, and possible solutions, Roma and Sinti also need to be involved in the design phase, through participatory research activities.
- B. Promote **the exchange and transfer of best practices** in the field of public health for Roma and Sinti, e.g. by carrying out systematic literature reviews to find out what has been done in the various national and international contexts, and modelling and disseminating effective experiences.
- C. Local Health Authorities operating on the territory must be aware of the Roma and Sinti communities present and continuously intervene in their favour. To this end, the **analysis of needs and understanding of the groups' requirements**, is necessary so as to effectively plan interventions. One thing that emerges in particular, is the need to develop activities aimed at informing women of childbearing age and thereby provide a greater awareness of the needs and expectations of the new generations.

Indicators:

- National pilot survey on the gap between life expectancy of Roma and Sinti groups and the general population.
- Surveys on the level of relevant and perceived discrimination in access to social and healthcare services by Roma and Sinti groups.
- Implementation of a Web platform for disseminating materials of social and health interest for Roma and Sinti;

2) Training of social-healthcare personnel and system mediation (social-healthcare integration)

- A. The Covid-19 experience is emblematic of the need for systematic as opposed to occasional collaboration at the national level of local health authorities (Regions), local council social services (Municipalities), Roma and Sinti communities and private social organisations. While initially isolation acted as a protective factor for these communities as regards exposure to the disease, at present distrust and distance from health services are representing an obstacle to vaccination. In this regard, we need to **deepen our knowledge of the reasons behind these choices**.
- B. Develop **permanent training activities for all healthcare and social workers**, in order to foster knowledge of Roma and Sinti, improve the relational capacity of social and healthcare professionals and actively prevent and combat antigypsyism and unconscious prejudices.
- C. **Train social and healthcare service operators** on the regulations regarding access to the NHS by foreigners and EU citizens.
- D. Introduce **systemic mediation activities to improve** the accessibility of services and foster continuity in care pathways. Among these, internal initiatives within hospitals to guarantee coordination and dialogue between the various services, the creation of personalised and suitable pathways for specific types of patients, the introduction of contact and support figures such as case managers, to help in dealing with bureaucratic procedures.
- E. **Encourage discussion and exchange of information between public health services**, municipalities, non-profit bodies and Roma and Sinti communities, for example by creating stable hospital working groups.

Indicators:

- Training courses for NHS operators, municipal social services and private social services;
- Support local implementation of the RSC Health Action Plan, through the development of hospital protocols.

3) Cultural mediation and facilitation:

- A. Mediation and facilitation need to be developed and used to break down cultural resistance, reduce "spontaneous" mediation by family and friends of patients, and address language barriers, especially for older people.
- B. In order to facilitate and improve the relationship with the Roma and Sinti communities, the training of figures able to bridge the divide between the community and the social-healthcare services, such as facilitators, able to bring out the needs of the groups, acting as a reference point for the services and, if necessary accompanying access, would be desirable.

Indicators:

- Provide a stable and systematic educational course in healthcare at local health authorities for Roma and Sinti mediators/facilitators on a national scale.

4) Outreach and health education interventions:

- A. Given the presence of settlements far from the inhabited centre and from clinics and services, there is still the need to permanently activate **outreach** interventions (therefore not only on the basis of specific, contingent or particular needs), in order to implement the active offer of preventive measures (especially vaccinations for children) and to provide information on access to services, working however **towards the normalization of the relationship with health facilities**. Such activities can also help overcome the mutual distrust that exists between healthcare professionals and Roma and Sinti. Given the evidence regarding the difficult health conditions of some of the most marginalized communities, specific health promotion and protection intervention is needed (positive actions) with the active participation of members of the Roma and Sinti communities in the areas of greatest need (hot zones), conducted by the local health authorities, by private social organisations and developed in part starting with the findings of the systematic survey of national and international literature carried out within the project. A mapping, including digital mapping, and the promotion of existing networks of public and private-social healthcare institutions with the guarantee of low-threshold access services, as well as networks of trained and operational medical personnel at the territorial level, will be made available through information and awareness-raising campaigns in Roma and Sinti settlements, and will make it possible to promote actions such as: analysis of the health of children and adolescents; immunisation campaigns and promotion of the national health service, with the choice of paediatrician and family doctor; information materials, also in *Romansh* language, on the available medical centres.
- B. Develop **health education activities**, including during outreach activities, especially to raise awareness among Roma about primary prevention measures, such as programs to promote a healthy lifestyle and prevent substance abuse, and to improve access to mental health and maternity protection services. In general, more women and young people need to be involved to increase everyone's contact and familiarity with the services. For health education it could be particularly useful to develop peer to peer education activities.
 - **Production of up-to-date information materials in different languages**, especially regarding check-ups to be carried out during pregnancy, to be used in clinics with the aim of improving women's health literacy and education. Alongside traditional paper-based materials there is an emerging need for audio-video and web products, validated and suitable for people with low health literacy.

AXIS - HEALTHCARE AND ACCESS TO QUALITY SOCIAL AND HEALTH SERVICES

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives:

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative analysis
<p>Develop and validate information tools for hard-to-reach groups to favour orientation towards social and healthcare services and materials for health education</p>	<p>Survey, study and research activities on the state of health and access to services of Roma and Sinti populations, and in general groups considered at risk of poverty</p>	<p>Number of surveys performed Number of reports issued</p>	<p>Analysis of the quality and significance of the surveys carried out, of their usefulness/relevance to the design of subsequent interventions and with respect to detection of the level of discrimination in access to social and health services by Roma and Sinti groups</p>
	<p>Implementation of a Web platform for disseminating materials of social and health interest to Roma and Sinti</p>	<p>Platform realized</p>	<p>Functionality of the platform with respect to the objectives</p>
	<p>Exchange and transfer of best practice in public health for Roma and Sinti</p>	<p>Number of exchanges made Number of reports issued</p>	<p>Analysis of the activities carried out in terms of sustainability of the transfer and the possibility of modelling and dissemination of effective experiences</p>
	<p>Carry out analysis of the needs and requirements of the groups</p>	<p>Number of surveys performed Number of reports issued</p>	<p>Analysis of the activities carried out in terms of their usefulness for the design of training and awareness-raising activities</p>
<p>Support the use of Roma and Sinti mediators/facilitators in healthcare.</p> <p>Promote discussion and exchange of information between public health services, municipalities, non-profit bodies and RSC communities</p> <p>To make the training of Roma and Sinti mediators/facilitators at local health authorities stable</p>	<p>Training of social-healthcare personnel and system mediation (social-healthcare integration)</p>	<p>Number of courses activated Number of participants in training activities (variables to be measured: gender, age, educational qualification) % of operators trained out of the total number attending the course (participation/abandonment rate) Number of interventions able to sustain the exchange of information between the relevant health services in the territory</p>	<p>Survey of the perceived usefulness of interventions through questionnaires, focus groups and/or in-depth interviews</p> <p>% of satisfied participants out of total participants</p>

and systematic on a national level	Creation of stable company working groups	Presence/absence of working groups	
Spreading the culture of Public Health for marginalised and remote localities (SPP) to take on hard-to-reach groups, with particular reference to RSC populations.	Mediation and cultural facilitation, useful to improve the accessibility of services and to support continuity in care pathways.	<p>Number of initiatives within the health authorities for ensuring coordination and dialogue between different services</p> <p>Number of personalized and adapted pathways for specific types of patients</p> <p>Number of information campaigns on access to services</p> <p>Presence/absence of reference and support figures such as case managers, including to offer support in dealing with bureaucratic procedures.</p> <p>Presence/absence of specific health promotion and protection interventions (positive actions) with the active participation of members of the Roma and Sinti communities in the areas of greatest need (hot zones), carried out by the local health authorities</p>	Qualitative analysis of the interventions carried out through questionnaires, focus groups or in-depth interviews, to assess their effectiveness and usefulness
	Outreach and health education interventions	<p>Number of interventions carried out</p> <p>Presence/absence of programs to promote a healthy lifestyle and prevent substance abuse</p>	Qualitative analysis of the interventions carried out through questionnaires, focus groups or in-depth interviews, to assess their effectiveness and usefulness
	Production of updated information materials in different languages	Number of products manufactured	Survey of the quality and significance of the products produced
Support the local implementation of the Health Action Plan, through the development of corporate protocols.	n.a	<p>Number of Municipalities/Cities participating in the creation of Action Plans</p> <p>Number of Action Plans activated/animated</p> <p>Number of company protocols signed</p>	Survey of the relevance of the Action Plans, through in-depth interviews with those responsible for the Plans or the administrations involved

3.6 PROMOTING (AWARENESS OF) ROMA AND SINTI ART, HISTORY AND CULTURE

3.6.1 Context analysis, critical aspects and open problems

At the instigation of the National Platform and the Forum of Communities, the theme of promoting knowledge of Roma and Sinti art, music, history and culture becomes a key element of this strategic document for fighting discrimination and antigypsyism. The contribution of Roma and Sinti to European history, music and art represents for Italy, an experience of recognising the creative and intercultural dimension of the Roma and Sinti communities. Re-examining elements of history and current affairs through art and language, marked by dramatic pages but also by talent and high cultural expression, can encourage a non-stereotypical knowledge of a diverse reality often little known for its excellence.

This thematic area includes:

- a) the promotion of artistic and cultural initiatives;
- b) knowledge of *Romani*¹⁰⁶ history and language, with its hoped-for dissemination in school settings and in the general education system¹⁰⁷

In the implementation of the RSC Strategy 2012-2020, interventions on these thematic areas have been developed widely at the territorial level with concerts, exhibitions, meetings, publications, awards, workshops and various and varied initiatives. It is worth noting the **regulatory** passage of **the Calabria Region**, which through the "Regional Law 25 November 2019, no. 41 - Integration and promotion of the *Romani* minority and amendment to the Regional Law 19 April 1995, no. 19", has focused on public initiatives to promote awareness-raising of the Roma holocaust, with a dedicated budget.

The need to strengthen the proposals and paths embarked on, sometimes neglected in the allocation of funds and programs at local level, relates on the one hand to the lack of knowledge of history, to the impoverishment of memory, to the fact that direct and indirect accounts lie far back, to a folklorization¹⁰⁸ that in the past has fed existing stereotypes. The lack of knowledge and recognition of the extermination of Roma and Sinti is confirmed by a survey conducted by the Istituto Tecné addressed to the citizens of Milan and presented in November 2021, which showed that 18% of the sample interviewed denied the extermination and 32% had no knowledge of it.

3.6.2 Measures to be implemented and indicators

EU Council Recommendation of 12 March 2021 on equality, inclusion and participation of Roma and Sinti - 2021/C 93/01 art 2

g) measures to promote awareness of Roma cultures, language and history, including remembrance of the Roma Holocaust and reconciliation processes in society, inter alia through action providing relevant training for teachers and designing appropriate school curricula, since this awareness is vital for reducing prejudice and antigypsyism as important causes of discrimination;

h) measures to foster positive narratives about Roma and Roma role models, and a better understanding of the challenges that Roma face, including by means of support for inter-community encounters and inter-cultural learning.

EU indications provided by Communication n. 620/2020 "ANNEX I" Guidelines for planning

¹⁰⁶ UNESCO has recognized November 5 as *World Romani Language Day*, thanks to the action of Roma and Sinti associations, see <https://en.unesco.org/commemorations/romanilanguageday>. On the theme of promoting Roma and Sinti history and language, there is a constant commitment of various associations of the Forum of Roma and Sinti Communities (Them romanò, Associazione Romani, Upré Roma, Associazione Sinti di Prato, Nevo Drom, Romano Drom, Rom per il Futuro).

¹⁰⁷ See Chap. 3.2 of this strategy document.

¹⁰⁸ On this point see: Santino Spinelli, *Rom, genti libere. Storia, arte e cultura di un popolo misconosciuto*, Baldini e Castoldi, Milano 2012.

In the new framework, a guiding principle is the need to program coordinated and complementary **long-term initiatives**, (including the development of **specific programmes**), with a primary role for Roma and Sinti people and associations.

Another key element is the **involvement of stakeholders at a central, municipal and regional level** (**Ministry of Culture**, Municipal Departments of Culture, Universities and artistic-cultural centres and associations), also through memoranda of understanding, as envisaged by the governance of this strategic framework, and co-financing initiatives. During the inter-institutional discussion phase, the Central Directorate for Civil Rights, Citizenship and Minorities of the **Ministry of the Interior** proposed its support and monitoring - through the network of Prefectures - of initiatives aimed at increasing knowledge of the Romani language and culture, from the standpoint of minority protection. Consultations and discussion with other European realities revealed the need to work on collective knowledge tools (such as archives, virtual museums) structured and sustainable from the economic point of view, promoting **networking and stable collaborations** with institutions such as the European Roma Institute for Arts and Culture (ERAC), the Digital Roma Archive, the Sinti and Roma Documentation Centre of Heidelberg in Germany. Collaboration with ERAC could also be developed to decide on an Italian model Roma and Sinti cultural institute.

1. Promotion of artistic and cultural initiatives:

- Support, through targeted projects, the knowledge of Roma and Sinti arts, music, traditions, to promote knowledge of the contribution of Roma and Sinti to Italian and European history.
- Promote photographic exhibitions, film festivals and museum initiatives on Sinti and Roma culture with a strong focus on communication and participation of the media and social communication channels.
- In connection with the work axis, provide the opportunity to support entrepreneurs and self-employed Roma and Sinti running local businesses that promote traditional activities of the communities of an artistic and cultural nature.
- Include in public, mainstream and nationwide cultural events and manifestations initiatives to raise awareness and promote Roma and Sinti art, music and culture.

2. Knowledge and promotion of Roma and Sinti history and language

- Support the realization of in-depth studies on the Roma and Sinti language and organise courses/lessons in the language, with focus on the different variants and specificities;
- Promote studies, research and publications at an academic level on the above thematic areas for promotion within university programs.
- Promote an integrated approach to participation and recognition of the Nazi-Fascist genocide of Roma and Sinti.
- Include Romani history and language in school curricula and textbooks (on this element, see Paragraph 3.4).
- promote training activities and intercultural awareness-raising campaigns in public administrations and locally as needed.

Indicators

- The provision of budgets and co-funding - both at central and local level - for initiatives related to these issues;
- Educational and informative paths related to art, culture and identity issues to be proposed to the Public Administration and various stakeholders (or proposed independently by the same).
- Participation of the "gagé" population in Roma and Sinti artistic-cultural events;
- Include cultural initiatives promoted by Roma and Sinti in the calendar of national cultural events.
- Increase awareness and knowledge of Roma and Sinti historical and linguistic elements among institutions, territories, and the general population;

- Experiments and innovative proposals for teaching elements of Roma and Sinti history and culture in schools;
- Definition and support of memorial spaces, monuments and other commemorative works in places not previously valued, accompanied by initiatives and events.

AXIS - "PROMOTING AWARENESS OF ROMA ART, HISTORY AND CULTURE"

The following table identifies the output indicators and outcomes in relation to the planned actions and the objectives

Table - Objectives, actions, evaluation of outputs and evaluation of outcomes

Objectives	Actions	Output evaluation (in itinere implementation) Quantitative analysis through the calculation of indicators based on the collected monitoring data	Evaluation of outcome (result at the end of the interventions) Qualitative-quantitative analysis
To support, with targeted projects, the knowledge of Roma arts, music, traditions, to promote knowledge of the contribution of Roma and Sinti to Italian and European history	Promotion of artistic and cultural initiatives	Number of interventions carried out Number of participants Number of Roma and Sinti entrepreneurs and self-employed with local businesses that promote traditional activities of the communities of an artistic and cultural nature	Effectiveness and sustainability perceived by participants in initiatives carried out, measured through focus groups and interviews
	Activation of training and information courses on art, culture and identity issues addressed to Public Administration operators	Number of training or information events activated Number of participants in training courses	Level of satisfaction of the participants with the course
Dissemination and promotion of Roma and Sinti history and language	Realization of courses/lessons in language, with focus on the different variants and specificities	Number of interventions carried out Number of participants	Level of satisfaction of the participants with what they learned
	Promote studies, research and publications at an academic level on the above thematic areas within university programs	Number of studies and research carried out	Quality and significance of the research carried out
	Promote training activities and intercultural awareness-raising campaigns in public administrations and in the territories, as needed	Number of training activities and number of awareness-raising campaigns carried out Number of participants in training activities	Level of satisfaction of participants in training activities

4. INTERVENTION PROCESSES

4.1 Capacity building, empowerment and participation

EU Council Recommendation of 12 March 2021 on equality, inclusion and participation of Roma and Sinti - 2021/C 93/01

Art. 4 - | Member States should, as appropriate, step-up meaningful participation by and consultation of Roma/Sinti people, including women, children, young people, elderly people, and persons with disabilities, in order to provide effective support for Roma equality and non-discrimination.

The new Community framework and Recommendation 2021/C 93/01 highlight the centrality of the social, political, economic and civic participation of Roma and Sinti, with an emphasis on certain elements:

- support for active citizenship, in particular of Roma and Sinti women and youth.
- promotion and development of skills and competencies.
- education in human rights and responsibilities.
- coordination of resources, networks and expertise in all areas to increase the involvement of young Roma in decision-making processes and help strengthen their leadership.

Before formulating proposals and articulating actions, a conceptual and methodological premise is necessary, deriving from the experiences acquired, including in the academic sphere, during the ten-year course of the 2012-2020 RSC Strategy, with reference to the themes of capacity building, empowerment and participation¹⁰⁹. There is a general consensus that the activation of empowerment processes is a fundamental resource for achieving the objectives of inclusion policies for Roma and Sinti groups and that it is particularly useful for the most disadvantaged groups within the Romani universe i.e. young people and women. This assumption goes hand in hand with the fact that the development of interventions for empowerment must, however, clearly define the dimension in which they intend to operate, so as to be able to evaluate the actual results in terms of improvement or failure of the policies adopted.

Behind this theme, which finds elements of agreement between institutions and associations, there are, however, also contradictions and risks that, historically, have invalidated a full process of social inclusion. In fact, the presence of Roma and Sinti or associations within the local or national political arena is not in itself a new element, especially if we look at the scenarios of the main Italian cities. On the contrary, one should start from the fact that the presence and participation of Roma and Sinti, individually or within associations, was one of the constant elements in the 1980s and 90s, years in which the so-called system of "nomad camps" was consolidated in large Italian cities, both in the emergency phases when they were launched, and during their cyclical, and still emergency restructuring until the first decade of 2000. In those years, paradoxically, many local administrations called in and involved Roma and Sinti leaders and representatives in the consultation phases that preceded intervention, recognising them as interlocutors, without however, actually giving them the opportunity to discuss the general guidelines of the policies and actions (already) decided. This model functioned not so much as a process of joint-planning but as an element for legitimising and justifying public policies, reinforcing the status-quo of separation and segregation; moreover, this method of participation produced effects of competition, if not conflict, within communities, increasing the distance in terms of power and possibilities. This premise, although not exhaustive, is essential in a phase in which it has been decided to strengthen a mechanism of real adhesion, from the bottom,

¹⁰⁹ This paragraph was written with the contribution of Prof. Ulderico Daniele, previously involved in the research and analysis activities envisaged by the National Roma and Sinti Platform. The text offers methodological suggestions and elements for reflection on the approach to the themes of participation, present in the framework and the Recommendation.

committing local and national administrations to systematically broaden participation, including in the policy elaboration and evaluation processes. These new elements had already materialized during drafting of the RSC Strategy 2012-2020 and were later markedly strengthened with the establishment of the National Roma and Sinti Platform and the Community Forum in 2017. This was, clearly, a significant change that structurally modified the arena of participation, stimulating new forms of organization at the local level and, above all, at the national level, promoting and supporting, at the same time, a generational change.

Within this strategic framework, the intention was to continue and strengthen this approach, first of all by carefully identifying the target groups for empowerment measures. In line with EU indications, the need to actively support certain segments of the Roma and Sinti population, in particular "women" and "young people", is clear and evident. However, to further improve the processes of political participation **the historical and social specificities of these segments of the population** need to be understood and applied to the contexts of intervention to better define the conditions, needs and personal and collective expectations, and the changes that can actually be pursued. For example, those Roma and Sinti living in structural conditions where empowerment paths may seem unrealistic or, at least, secondary: economic poverty, housing hardship, administrative invisibility, should be kept constantly in mind and then again educational poverty and forms of discrimination and outright racism suffered in informal social relationships and with institutions, are elements that already individually make any empowerment path difficult, but all of which some Roma and Sinti often have to face¹¹⁰.

In this sense, **a first phase of participatory research** (with Roma and Sinti women and youth) could be an action to recover and legitimize representation, challenging the stereotypes and discrimination dominating public debate. The knowledge acquired in the research phase could therefore be an effective resource for reaching and involving those who actually need empowerment and for providing them with tools and possibilities that are actually practicable in their daily life contexts. **The construction of broader alliances and networks** may be a subsequent meaningful objective of empowerment processes, since it would put Roma and Sinti individuals and groups in a situation of equal relations, more or less formalized, with people or groups who share the same conditions of hardship and discrimination, taking advantage of the local dimension. In addition, opportunities for discussion and elaboration of this type can also function at a symbolic and cultural level, allowing those involved to work in a potentially creative manner on stereotypes and prejudices that concern themselves and others.

A transversal task, entrusted to the institutions that support empowerment processes, relates to the need to always make the subjects involved aware of the expected objectives, foreseeing the expected changes in the scenario, ready to manage potential situations of conflict. A matter of institutional responsibility, one of the few possible guarantees that empowerment processes actually produce social change and are not just a rhetorical tool for legitimising and guaranteeing maintenance of the status quo. In this context, a series of strategic actions could prove useful and effective:

- The planning of **training paths** aimed at **increasing skills and knowledge in areas generally not covered** by school curricula but important in everyday life (e.g., digital skills or financial literacy).
- The **creation of non-institutionalized workshops and spaces** to encourage the circulation of knowledge and freedom of expression, local centres where young people can devise and experiment with new possibilities, forms of self-narration and self-representation, would allow them to work on their expressivity, aimed at young people in particular, and provide tools, resources and skills to encourage the development and expression of their needs through different registers and communication tools.

¹¹⁰ On this specific aspect for further details see, U. Daniele, *Questo campo fa schifo. Etnografia dell'adolescenza rom fra periferie e scenari globali*, Meti, Roma.

- The development of **collaborations and cooperation**, in the national (National Youth Agency) and international context (Youth Department of the Council of Europe¹¹¹, youth networks¹¹² in the field of associations and voluntary work etc.), to promote exchange activities and partnerships.
- **Promotion of the employment of qualified Roma and Sinti in public institutions** in order to enhance diversity and skills and provide positive role models.
- Support with other institutional stakeholders for the creation of **social innovation centres** (to be supported also through ESF+ transnational activities), focused also on the empowerment needs of Roma and Sinti.

Info box 10

Empowerment and gender approach. Contributions and proposals from the associations involved in the topic¹¹³

The 7th International Conference of Roma and Sinti Women organized in 2019 under the Finnish Presidency of the Council of Europe brought together more than 130 women, from academia, associations and NGOs working in the field. The overall theme focused on “*Access to Justice and Rights*” with seminars on complex issues such as the removal of Roma and Sinti children from their families, the issue of forced marriages, and preventing and combating domestic violence against women. The discussions led to a number of recommendations including:

- Assessment of the ways in which Roma and Sinti women access the means of protection offered by the legal system;
- Definition of gender equality indicators to be included in national inclusion strategies, with a comparative analysis of the impact of policies and programmes on women and men;
- Activities to resolve conflict and cooperate with local authorities and police forces.

Other proposals emerged from the project activities and from the recent commitment of the bodies involved:

- To favour awareness and discussion of topics related to intersectionality;
- To encourage debate within the National Roma and Sinti Platform on issues related to gender equality, violence against women, with a specific focus on the question of internal discrimination;
- To promote the participation of Roma and Sinti women in decision-making bodies related to public policies and political life;
- To improve the leadership capacity of Roma and Sinti women including by strengthening existing associations and supporting the creation of new forms of organisation.

¹¹¹ In recent years, UNAR has promoted the competent and active participation of young Roma and Sinti in order to increase their role in anti-discrimination actions, combining these paths with specific training and in-depth studies. The Office has a constant collaboration with the *Youth Department* of the Council of Europe, with which it organizes important annual training and awareness-raising events to fight antigypsyism and *online hate speech*, with the participation of young activists, information workers, students of journalism schools. On this subject see: <https://www.unar.it/portale/-/-perche-tanto-odio-seminario-di-formazione-sul-contrasto-all-antiziganismo-e-sull-hate-speech-online>

¹¹² With regard to the *empowerment* of Roma communities, reference can be made to a number of models that have been experimented over the years and proposed, during the consultation, by associations of the Community Forum (Romà Onlus, Romani Association, Stay Human Onlus), which have been engaged for years in involving young Roma, Sinti and *Gagè* in awareness-raising, training and intercultural mediation activities.

¹¹³ This report was elaborated and shared by the association *Romni onlus/Rete Rowni*. The commitment, also within the Forum of Roma and Sinti communities, has grown and intensified in part thanks to the activity of concerns and associations strongly committed to gender issues (such as the NGOs Romni Onlus, Rom in progress, Amici di Zefferino, Associazione Liberi).

4.2 Legal recognition and protection of minorities

One of the central issues related to the full inclusion of Roma and Sinti people in Italy remains the **lack of recognition as a minority**. In the Italian legal system, the concept of minority is related to linguistic specificity and is founded in the Constitution, which in article 6 reads: "*The Republic safeguards linguistic minorities with appropriate regulations*". At the end of the 1990s, the parliamentary debate that characterized the recognition of the minorities historically present in Italy, resulted in law no. 482 (of 15 December 1999), "*Regulations on the protection of linguistic and historical minorities*". The provision recognized twelve historical ethno-linguistic minorities (Albanian, Catalan, Germanic, Greek, Slovenian, Croatian, French, Franco-Provençal, Friulian, Ladin, Occitan and Sardinian) using language as a guiding criterion accompanied by the localization of the minority in a defined territory. In fact, in the face of the complexity of an unambiguous definition, the legislator ignored the specificities of the Romani language, making the principle of "territorial presence" prevail as a fundamental requirement for recognition, thus excluding the Roma and Sinti minority insofar as a "diffuse minority" throughout the national territory and therefore lacking an easily recognizable territorial concentration¹¹⁴. The protection of the Roma and Sinti minority was therefore postponed to a further legislative definition.

The debate on the issue of legislative recognition of Roma communities as minorities has continued since the 2012-2020 RSC Strategy: "*In Italy, the central issue is therefore related to the failure to recognize Roma, Sinti and Caminanti as a minority, through a national omnibus law, since, to date, Roma, Sinti and Caminanti acquire de jure rights exclusively as individuals; instead, they do not have rights as a "minority", because they are not yet regulated in this sense, from a legislative point of view*"¹¹⁵.

Moreover, the Italian Government's Observations on the Third Opinion of the Advisory Committee on the Implementation of the Framework Convention for the Protection of National Minorities¹¹⁶ (of 2011, coinciding with the launch of the RSC Strategy 2012-2020) stated that "*regardless of the assessment of the adequacy or otherwise of these measures, even in the absence of recognition of Roma communities as a minority in the formal sense, some form of recognition in a substantial sense can be discerned. From all the measures adopted, it does not seem possible to infer a refusal to recognise Roma and Sinti as national minorities outright. Rather, there seems to be an implicit, sectorial and variegated recognition that reflects, in the method of the interventions, the complexity of the institutional framework of our legal system*". This "implicit recognition" is abundantly reflected in the guidelines that the European Union has provided for when drafting the National Inclusion Strategies with the European Communication. 173¹¹⁷.

In the **period 2001-2006**, a series of legislative proposals followed one another, including many elements of protection on issues such as citizenship, registration, right of residence, clearly related to the situation experienced by Roma arriving from former Yugoslavia. Other elements of interest, which cut across the legislative proposals, are the references to the protection of culture and identity, teaching of the Romani language, safeguarding free movement within the national territory, with mentions of equipped rest and transit areas, which directly recall the regional legislation enacted in the 1980s. Although the areas of intervention included in the legislative proposals partially coincided with the operational axes of the 2012-2020 RSC Strategy, the language was still permeated by problematic words and definitions¹¹⁸.

More recently, the bill and the two draft laws were presented aimed at recognising the cultural peculiarities of Roma and Sinti:

¹¹⁴ See also P. Bonetti, A. Simoni, T. Vitale, *La condizione giuridica di Roma e Sinti in Italia*, Atti del Convegno internazionale (Milano, 16-18 giugno 2010).

¹¹⁵ See RSC Strategy 2012-2020, p. 18.

¹¹⁶ See <https://rm.coe.int/fcnm-leaflet-it-version-final/1680a42589>

¹¹⁷ See Communication No 173 of 4 April 2011, "*An EU Framework for National Roma Integration Strategies up to 2020*", endorsed by the Council at its meeting of 23-24 June 2011, available at <https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:52011DC0173&from=EN>

¹¹⁸ The recurrence of the terms "gypsies" and "nomads" with reference to ordinances and administrative acts, special offices or operative units operating in some local administrations, have been, over the years, object of dispute and, in some cases, of removal.

- bill no. 770 "*Regulations for the protection and equal opportunities of the Roma and Sinti minority*"¹¹⁹, presented by Senator Francesco Palermo;
- draft law no. 3162/2015 "*Amendments to Law No. 482 of 15 December 1999 and other provisions on the recognition of the historical linguistic minority speaking the Romani language*"¹²⁰;
- draft law no. 3541/2016 "*Regulations for the protection and equal opportunities of the historical-linguistic minority of Roma and Sinti*"¹²¹, borrowed entirely from a text ¹²² promoted by the *Federation Roma and Sinti Insieme* and by a National Committee of which several NGO activists are part, today members of the Forum of Roma and Sinti Communities.

Lastly, a brief comparative analysis of the two proposals which the current debate between associations, experts and academics on the subject is focused on is useful: the aforementioned bill no. S.770 "*Regulations for the protection and equal opportunities of the Roma and Sinti minority*" presented by Senator Palermo and the draft law for the *recognition of the Romani language as a historical linguistic minority*, written by Prof. Giovanni Agresti jointly with a number of associations, recently promoted by the Union of Romani Communities in Italy (U.C.R.I.) but not yet officially presented.

The first proposal (Palermo) sets out, in principle, to pursue the following objectives:

- Recognition and protection of the Roma and Sinti linguistic minority and of its cultural and linguistic rights, in accordance with Article 6 of the Italian Constitution, which provides that the Republic shall protect linguistic minorities by means of appropriate regulations, and with Italy's current international and European community obligations;
- the provision of positive actions aimed at ensuring equal opportunities to all members of the minority in order to remove those obstacles that de facto prevent them from achieving equality and participating in the social, economic and political life of the country, pursuant to Article 3 of the Constitution.

The second proposal (Agresti) focuses on formal recognition of the Roma and Sinti language, acting on two levels:

- within *Romani* communities (Roma, Sinti, *Kalé*, *Manouches* and *Romaniichels*) as the most effective means of achieving a common socio-cultural identity;
- outside the *Romani* minority as an important vehicle for cultural and political legitimisation.

In conclusion, the goal of achieving minority status, whether related to the cultural or linguistic specificities of the Rom and Sinti community contributes at a historical level to recognition of the persecutions and extermination suffered, guaranteeing a rapprochement between institutions, society and the Roma and Sinti communities, in the common effort to overcome the conditions of social and economic hardship that specifically concern a part of the Roma and Sinti population. Considering the extent of the obstacles (extreme marginality of some groups and widespread antigypsyism) that stand in the way of achieving this result, UNAR, as National Contact Point, will continue the work of coordinating and facilitating discussion and debate in order to strengthen the proposals, experiences and awareness acquired by those directly concerned.

4.3 How the statelessness question has evolved

As already highlighted¹²³ by the RSC Strategy 2012-2020, the **correlation** between the **marginal status** of Roma people living in Italy and the absence of a **defined legal status** is an element of extreme importance as it involves the sphere of people's civic participation and effective access to services. With the general objective of an accurate understanding of the phenomenon, as well as to analyse the

¹¹⁹ Available at <https://www.senato.it/leg/17/BGT/Schede/Ddliter/41204.htm>

¹²⁰ Available at <https://www.camera.it/leg17/126?idDocumento=3162>

¹²¹ Available at <https://www.camera.it/leg17/126?leg=17&idDocumento=3541>

¹²² Available at <http://lexsintirom.blogspot.com/p/la-legge.html>.

¹²³ See RSC Strategy 2012-2020, pp. 18-19.

positions of irregularity in terms of registration, documentation and residence, to remedy the *de facto* condition of statelessness and ensure the legal regularization of the status held, the RSC Strategy 2012-2020 had provided in its *governance* system for an *ad hoc*¹²⁴ Working Group, coordinated by the Central Directorate of the Ministry of Interior for Civil Rights, Citizenship and Minorities. The activities of the working group, which also involved UNHCR, UNAR, institutional representatives and civil society, shed light on a **complex reality, proposing different solutions, from *ad hoc* regulatory intervention to administrative simplification**. At the same time, during the ten-years of the RSC Strategy 2012-2020, there has been a **downsizing of the initial scenario** with about 15,000 Roma people affected by documentation problems¹²⁵: new surveys and sample surveys, also reported in the Advocacy Paper "*Recommendations of the Statelessness Round Table on the protection of stateless persons and the reduction of statelessness in Italy*" produced by UNHCR and referring to some local contexts¹²⁶ give an account of a much lower number of "invisible" people, in part thanks to the widening of the EU context to other countries and the reforms that have affected the law on obtaining citizenship, especially with reference to minors. In the UNHCR *advocacy paper* just mentioned, in the Recommendations section, the need is indicated, in this regard, " *to initiate measures aimed at regularizing the legal status and protecting stateless persons or persons at risk of statelessness belonging to Roma communities, including through information campaigns, targeted interventions of citizenship verification involving the various relevant counterparts, such as local administrations, police headquarters, prefectures and foreign representations in Italy, and, residually, the issuance of a residence permit in order to allow access to the procedure of determining statelessness by administrative means*".

In the appendix of the housing section of this strategic document, there is an in-depth study containing the guidelines developed in light of the results and indications of the research conducted by ISTAT on housing transitions. The indication collected during the survey on the housing transition projects conducted by local authorities regarding whether or not they had carried out "*in the planning phase, a preliminary study on the legal status of potential recipients and envisaged "emersion" actions*" is of particular interest for the topic of legal status. From the data collected it emerges that problems concerning the legal status (lack of regularization) of potential beneficiaries were found in 1/3 of the projects (29 projects out of 89), while in 26 projects out of 29, measures to accompany the regularization of the legal status were foreseen. The researchers' indication is to always envisage a **preliminary study**, with the collaboration of civil society, Roma and Sinti associations, prefectures and institutions involved, so as to encourage the development of more targeted and effective projects. In particular, the activity aimed at regularizing the legal situation of the individuals concerned by the accompanying measures, should be carried out prior to issuing announcements for access to the projects.

The need therefore emerges **to propose a fact-finding survey** on a territorial basis in order to have an updated and in-depth picture, identifying recurring situations and procedures for solving cases. The need to encompass a decidedly changed context and the **ratification law no. 162 of 29 September 2015**, by which Italy adopted and implemented the United Nations Convention on the reduction of statelessness, entered into in New York on 30 August 1961, may give **new impetus to the statelessness issue**. The **reconstitution of the Working Group on "Definition of Legal Status"**¹²⁷ is also part of this framework.

UNAR has intervened on the serious situations of exclusion and vulnerability, also related to the legal status of the person, according to its institutional mission, to affirm the principle of non-discrimination and the universality of intervention in support of vulnerable people and protection of rights (including special support measures in emergency contexts, as occurred in the first phase of the COVID-19 pandemic), recommending the extension of facilities and assistance to people without residence permits.

¹²⁴ See RSC Strategy 2012-2020, p. 34.

¹²⁵ See RSC Strategy 2012-2020, p. 77.

¹²⁶ See UNHCR, *Recommendations on the protection of stateless persons in Italy*, 2021, available at

https://www.unhcr.org/it/wp-content/uploads/sites/97/2021/11/Advocacy-Paper-Statelessness_Italy_ITA_Nov21_def.pdf

On this point see also the report produced by Associazione 21 Luglio, *Fantasmi Urbani, La condizione giuridica dei rom si origine jugoslava negli insediamenti italiani*, published in 2020, cited by UNHCR within the Recommendations, available at <https://www.21luglio.org/2018/wp-content/uploads/2021/02/fantasmi-urbani-edit.pdf>

¹²⁷ The Working Group is defined in Paragraph 2.2 of this strategy document.

Info Box 11

Access to justice for Roma women: the JUSTROM project¹²⁸

The EU-CoE Joint Programme "Access to Justice for Roma Women" (JUSTROM) adopted by UNAR which participated in the activities, focuses on multiple discrimination and aims to facilitate the improvement of access to justice for Roma women in Bulgaria, Greece, Italy and Romania. During the third phase of the project (JUSTROM-3¹²⁹) in Italy, focus was on the following target groups:

- Women of Roma origin, so that they can act as leaders within their communities to then be able to address the institutions concerned.
- Legal, judicial and prison professionals¹³⁰.
- Local level stakeholders (including universities).

Activities are organized around the following clusters:

- Support activities for the empowerment of Roma women at local level and for the strengthening of the dialogue with local authorities (e.g., through awareness-raising events, mentoring sessions and info days).
- Legal support activities in the field of access to justice, including, inter alia, on questions of citizenship and statelessness.
- Training activities.
- Exchange of experiences through multi-stakeholder actions, including study visits, seminars, visibility events, participation in international events.

4.4 Guidance, monitoring and evaluation

COUNCIL RECOMMENDATION of 12 March 2021 on Roma and Sinti equality, inclusion and participation - 2021/C 93/01

Art. 15. Member States should enable equality bodies to be closely involved in the design, implementation, monitoring and review of national Roma strategic frameworks for equality, inclusion and participation and relevant Union funds programmes

The **monitoring and evaluation (M&E) system** of the Strategy will be developed both in relation to the Strategy as a whole and to monitor the efficiency and effectiveness of the individual programs promoted within it. A specific action will cover the launch, development, promotion and implementation of Strategy governance and implementation of the six Branches of intervention. Monitoring will compare the implementation status of the actions with the predefined aims, objectives and actions, regularly monitoring achievement of the predetermined intermediate objectives. Monitoring will be coordinated by the National Contact Point (PCN) and will envisage use of **standardized structure, process and result indicators**, and **tools to collect and measure activities and results**¹³¹. Data collection systems will be set up and each program/project implementing the Strategy Axes will be required to collect and transmit to the PCN periodic surveys of the predefined indicators. Public Administrations and private social bodies involved in implementing the Strategy

¹²⁸ See 1) <https://www.coe.int/en/web/roma-and-travellers> e 2) <https://pjp-eu.coe.int/en/web/access-to-justice-for-roma-women/beneficiaries>;

¹²⁹ See <https://pjp-eu.coe.int/en/web/access-to-justice-for-roma-women/about-justrom3>

¹³⁰ Aspects of interest on which to focus possible interventions in the prison environment: 1) to encourage visits and contacts with relatives and children also for Roma who are in conditions of *de facto* statelessness; 2) to encourage the employment of Roma and Sinti cultural mediators with specific training on the subject in the Italian penitentiary system.

¹³¹ In 2020 UNAR implemented a project assigned to the IRPPS of the National Research Council aimed at defining a plan to assess the RSC Strategy 2012-2020. The project had a dual objective of designing a preliminary framework of the targets achieved by the Strategy in 2012-2020 and of preparing a complete analysis outline for the entire period of the Strategy, including in relation to the new strategic plan.

measures shall provide **statistical surveys of the outputs and outcomes of the promoted projects** and/or the official statistical sources available to measure the thematic areas of the Strategy on a quarterly basis, to the Monitoring and Evaluation Unit (M&E) of the National Contact Point. The evaluation team will need to systematically and objectively monitor the relevance, impact and success or otherwise of the Strategy and its programmes.

As indicated in the Recommendation and in the Communication of the European Commission 620/2020¹³², a mid-term assessment will be made and the new strategic plan will be revised accordingly with the monitoring data and changes in the crucial elements of the context.

To this end, an M&E unit will be set up and trained, and will be responsible for coordinating the **collection and analysis of statistical data** from the administrations and existing statistical sources with reference to the thematic areas of the Strategy. Otherwise, possible outsourcing of the entire M&E action aspect may be considered.

The **Monitoring Team** will provide accurate and up-to-date analysis aimed at improving the effectiveness and efficiency of the activities of the 2021-2027 Strategy carried out. The service will support the PCN in building a permanent Strategy M&E system, designing and implementing one or more tools to monitor Strategy and programs, to provide useful information for planning and improve the interventions put in place. Impact and progress of the interventions to achieve the Strategy objectives will be monitored, and other stakeholders interested in data collection operations, such as Roma and Sinti Platform associations, municipalities, regions, NGOs, trade unions, health facilities, schools, etc.) may also be trained in the M&E system.

The available information will be systematically organized and aggregated, verifying **monitoring sources** (e.g. Ministries, Municipalities, Non-Governmental Organizations) **and results of the interventions** in order to consider possible remodelling and guidelines. Structure, process and result indicators will be prepared and used, on the basis of a comparison with similar tools developed within the *Working Party on the monitoring of the Roma Strategies* of the EU Fundamental Rights Agency (FRA). The Internal Monitoring and Evaluation Unit will guarantee, the entire monitoring process of the Strategy through a control room, for an increasingly effective and efficient planning of policies and measures.

Repository: The results of the monitoring actions, as also the products of the projects put in place, the measures implemented at the level of institutional programmes, the public funds used and the good practices developed will be included in a digital database accessible to all interested parties, which will allow Roma and Sinti and the world of associations to participate in the control processes of outcomes and project results, as well as the promotion of shadow reports on the implementation and impact status of the Strategy.

In conclusion, the Community framework provides for and encourages approaches and interventions governed by a participatory philosophy and principles of transparency. The Council Recommendation calls on Member States to ensure funding to support the plurality and independence of Roma and Sinti civil society, including youth organisations, thus enabling them to report on and monitor national strategic frameworks, as independent monitoring organisations, and to maintain their administrative capacity. Some possible courses of action are listed below.

- Use participatory design and evaluation methodologies, expressly involving Roma and Sinti, including training proposals to acquire basic skills in project monitoring and evaluation methods.
- Use impact assessment methodologies and therefore evaluate projects 2 and/or 5 years after their completion.

¹³² See section III.1. *Guidance for national action following a common but differentiated approach*, in the *Communication from the Commission to the European Parliament and the Council - A Union of Equality: EU Roma strategic framework for equality, inclusion and participation* - COM(2020) 620.

- Use SROI (Social Return on Investment) methodologies to assess the economic impact of the activities carried out under the Strategy and use the data emerging from ad hoc communication campaigns and in training courses for public administrations, planners and interested stakeholders.

4.5 National and Community sources of funding

The implementation of the actions and intervention objectives of this Strategy will draw from:

a) at national level

- state funds already allocated to the relevant items of expenditure of the central Administrations for the realization of the projects and interventions foreseen by the regulations in force;
- national and community funds related to national operational programmes financed by the European Social Fund and managed by central administrations
- national and community funds related to national operational programmes financed by the European Regional Development Fund
- the additional resources made available for specific items of expenditure by the Department for Equal Opportunities (Item 493 "Expenses for interventions related to rights and equal opportunities" - and Item 537 "Expenses for the functioning of UNAR", Centre of Responsibility 8 of the Budget of the Presidency of the Council of Ministers for the year 2021), respectively intended for the implementation of the system actions of the National Strategy by UNAR in its capacity as National Contact Point.

(b) at regional and local level

- funds under Regional Operational Programmes (PORs) are multi-sectoral, individual for each region and managed by regional administrations;
- national, regional and local funds independently managed by the Regions and by the system of local autonomies within the scope of the tasks institutionally assigned to them under the national and regional regulations in force in the sectors covered by the axes of intervention.

Focus on EU Programming 2021-2027

In continuity with the policies of socio-economic integration of migrants and marginalized communities implemented in the 2014-2020 programming period, and in line with what has been outlined more generally for active inclusion policies, during programming of the cohesion policy for the period 2021-2027, it was agreed that it would be appropriate to continue with an approach favouring personalised and integrated interventions for the socio-occupational integration of migrants and marginalised communities, providing an integrated range of services (guidance, accompaniment, training and recognition of skills, job placement, housing support, social services, accompaniment to social entrepreneurship paths, etc.), to access through the tool of job grants, already used in the previous programming, for a personalized and integrated commitment. Specifically, in the context of the 2021-2027 programming, **the strategic policy objective 4 (called OP4) "More social and inclusive Europe"**, provides within the specific objective 8 ESF Plus, "Promote the socio-economic integration of third country nationals and marginalised communities such as the Roma", actions to overcome prejudice and discrimination and housing segregation, promote equal treatment in access to education and training, employment, social and health services, with particular attention to young people, women and children belonging to Roma and Sinti communities.

During the course of the partnership discussion involving all the subjects of the institutional and economic-social partnership of the country, the need was pointed out to adopt a strategy that, under the

direction of the Central Administrations responsible for coordinating immigration and integration policies, is shared among the various levels of government, so as to use all the available financial sources in an integrated and complementary manner (starting from the FAMI Programme). This should valorise the networks and the various public (local authorities, educational and training institutions), job centres, private (companies and employment agencies) and non-profit bodies involved in planning integration measures, so as to coordinate policies and implement interventions on the territory. In order to contribute to the strategic objective of policy 4 (PO4) "A more social and inclusive Europe", the subject of Regulation (EU) 2021/1060 laying down common provisions on funds, and to implement the principles of the European Pillar of Social Rights, Italy is faced with multiple challenges that directly affect the well-being and opportunities for full participation in social life, in a context in which the conditions of various already vulnerable segments of the population (including Roma communities, people with disabilities and people with a migrant background) have worsened as a result of the pandemic. In particular, the issues to be addressed generally call for an intensification of ordinary action with reforms and investments in the fields of employment, education and training, social inclusion and protection and health policies, instrumental, inter alia, to the concrete implementation of the essential levels of services (LEP).

In light of the numerous interventions and the articulated mandate to which it must respond, in Italy the **Strategic Objective of Policy 4** (OP4) will be implemented in a coordinated manner with the National Recovery and Resilience Plan and with other European Union instruments, with Regional Programmes and with National Programmes, which will intervene with the FESR and the FSE Plus. The combination of the two funds in these areas of intervention will see the action of the FSE Plus aimed at contributing significantly to reducing conditions of disadvantage, supporting people and strengthening services while the FESR will focus on providing and adapting infrastructure and technology.

The Regional Operational Programmes (ROPs) that implement OP4 will intervene, in particular, to strengthen and innovate the ordinary supply chain of services and pursue common standards and homogeneous levels of performance among the various areas of the country (in the case of social services, education, health, active employment policies and training) or to guarantee the implementation of some measures considered priorities or strategic throughout the national territory or in certain areas (in the case of interventions in favour of certain population targets; interventions to strengthen infrastructures, territorial health care and social services in cities; interventions to enhance the contribution of culture and tourism in terms of social inclusion and innovation). These national interventions will guarantee a minimum level of investment and standard procedures in the areas identified, in a complementary manner to the strategies of the Regional Programmes that will be defined on the basis of the specific needs of the territories, while respecting the regulatory framework and European and national guidelines.

In the programming proposal of the Cohesion Policy 2021-2027, programmes have been included, foreseen within the funds covered by the Partnership Agreement, which concern social inclusion and protection actions and which are better described below:

- the Security and Legality (FESR) PON: focuses mainly on several priorities: supporting the public administration in the fight against corruption and organized crime, making productive areas safer, increasing the spread of legality and strengthening measures to support social inclusion through the rehabilitation of property confiscated from criminal organisations;
- the Health (FSE Plus + FESR) PON: this is an unprecedented Programme, aimed at overcoming territorial and social disparities by fighting health poverty and strengthening gender medicine, prevention and protection of people with psychological distress, particularly among the most vulnerable groups in less developed regions.
- the Inclusion and fight against poverty (FESR + FSE Plus) PON aims to structure and strengthen a network of services to fight poverty throughout the country, accompanying the disbursement of an economic benefit;
- the School and Skills FESR + FSE Plus PON: aims to create a high quality, effective and equitable education and training system to fight educational poverty and early school-leaving, particularly in the South;

- the METRO plus and medium-sized cities South FESR + FSE Plus PON: strengthens the similar experience of the previous cycle, extending it to medium-sized cities in Southern Italy and looking in particular at improving the quality of life in suburbs and marginal areas.

Over 2020, UNAR participated in programming the cohesion policy for the period 2021-2027 promoted by the Cohesion Policies Department of the Presidency of the Council of Ministers. The commitment of the Office was to address the discussion of new programmatic actions within the framework of the Thematic Round Table related to the Strategic Policy Objective 4 (OP) "A more social Europe". Within the OP4, actions were proposed and then merged into the draft Partnership Agreement sent to the European Commission Services for continuation of the informal dialogue and presented to the partnership. With regard to the actions proposed on the front of the fight against discrimination and for social inclusion of the most discriminated subjects, such as LGBT communities and Roma and Sinti communities, the European Commission has already provided a great drive and opportunity, through the new financial instruments aimed at implementing interventions on this front in the 2021-2027 SIE fund programming. The contents of the proposals under the European Pillar of Social Rights therefore relate to the inclusion of vulnerable groups and groups at risk of discrimination in the FSE+ and FESR 2021-2027 programme.

Among the proposed expected results is the need to improve the accessibility and quality of services to citizens in order to reduce social and territorial inequalities, in close connection with non-profit bodies; the need to stimulate active inclusion, promote equal opportunities, participation, and improve employability; the urgent need to promote the socio-economic integration of third-country nationals and marginalized communities such as Roma and Sinti. In this regard, interventions are foreseen to favour integrated programmes for job placement and social inclusion, facilitating access to a wide range of services. For Roma and Sinti communities, actions are foreseen to overcome prejudice, discrimination, housing segregation, provide equal treatment in education, training and access to jobs, interventions to combat extreme poverty and marginalization through food and material aid, and the launch of welfare and assistance paths aimed at autonomy: housing first and housing led in favour of individuals who are homeless or at risk of housing exclusion. Interventions are also envisaged to combat housing hardship for socially fragile persons; health services and long-term care in certain territories and population targets to strengthen the network of territorial services and reduce inequalities in access to services; social innovation programmes through specific actions aimed at strengthening bottom-up activation initiatives and the responses of the Public Administration, actions for the social and work integration of vulnerable persons.

Among the priorities shared in the Partnership Discussion Table for the Cohesion Policy 2021-2027, with specific reference to the Roma and Sinti communities, priorities were proposed addressed to:

- Cultural promotion, integration and participation in social processes, governance and capacity building, research activities, monitoring and awareness-raising of Roma and Sinti communities;
- Removal of structural and symbolic barriers to the development of educational opportunities and removal of discrimination barriers for Roma and Sinti schoolchildren at all levels, in order to promote school attendance and success and full education;
- Promotion of equal treatment and removal of discrimination and prejudice in vocational training and access to employed and self-employed jobs for the Roma and Sinti community with particular reference to young people and women;
- Removal of prejudices, stereotypes and discriminations and promotion of equal treatment in access to preventive healthcare and territorial social and health services, with particular reference to the most vulnerable segments of the population of Roma and Sinti origin;
- Removal of prejudices, discriminations and social conflicts in access to housing opportunities for Roma and Sinti, in a participatory perspective of overcoming emergency logics and large settlements by developing local opportunities for overcoming housing marginality based on fair location;
- Creation and strengthening of territorial inter-institutional networks for the prevention and contrast of antigypsyism/Romaphobia;

Index of the main acronyms and abbreviations used in the document

LHA - Local Health Authority;
ADI-ROM - Committee of Experts on Roma and Traveller Issues (Council of Europe);
ANCI - National Association of Italian Municipalities;
ANPAL - National Agency for Active Employment Policies;
CEDAW - Convention on the elimination of all forms of discrimination against women;
CERD - Convention on the elimination of all forms of racial discrimination;
CEU CPS - Centre for Policy Studies at the Central European University;
CNR - National Research Council;
CRC - Convention on the rights of the child;
CRPD - UN Convention on the rights of persons with disabilities;
DAD - Distance learning;
DGR - Resolution of the regional council;
ECRI - European Commission against Racism and Intolerance of the Council of Europe;
ENI (code) - Non Registered European;
ERGO (Network) - European Roma Grassroots Organisations;
ERAC - European Roma Institute for Arts and Culture;
ERRC - European Roma Rights Centre;
EU - European Union;
FAMI - Fund for asylum, migration and integration;
ERDF - European regional development fund;
ESF - European social fund;
ESF+ - European social fund plus;
FSG - Fundación Secretariado Gitano;
FRA - European Union Agency for Fundamental Rights;
GDPR - General Data Protection Regulation;
ICESCR - International covenant on economic, social and cultural rights;
ICCPR - International covenant on civil and political rights of the United Nations;
IHRA - International Holocaust Remembrance Alliance;
INMP - National Institute for health promotion of migrant populations and for the fight against poverty-related diseases;
ISMU (Foundation) - Initiatives and Studies on Multiethnicity;
ISPO - Institute for Studies on Public Opinion;
ISTAT - National Institute of Statistics;
LGBTI, LGBTIQ, LGBTIQ+ - an English acronym used to refer to lesbian, gay, bisexual, transgender, intersex and queer people. Finally, the sign "+" represents all the other identities included in the acronym;
MLPS - Ministry of Labour and Social Policies;
MIUR - Ministry of Education, University and Research (now Ministry of Education and Ministry of University and Research);
NEET (Not in Education, Employment or Training) - Indicator identifying the share of the population aged 15-29 that is neither employed nor in education or training;
ODIHR - Office for Democratic Institutions and Human Rights;
NGOs - non-governmental organisations;
OSCAD – Observatory on Discrimination of the Public Safety Department of the Ministry of the Interior
OSCE - Organization for Security and Co-operation in Europe;
PA - Public Administration;
P.A.L. - Local Action Plans;
P.A.R. - Regional Action Plans;
NCP - National Point of Contact;
NRP - National Recovery and Resilience Plan;
PO - Operational Programme;
POC - Municipal Operational Program;
PON - National Operational Programme (see, for example, PON "Inclusion", PON Metro, etc.);

REF - Roma Education Fund;
SPP - Remote Public Health;
SSN - National Health Service;
STP (Code) - Temporarily Present Foreigner;
TFEU - Treaty on the Functioning of the European Union;
U.C.R.I. - Union of Roma Communities in Italy;
UNAR - Office for the promotion of equal treatment and the removal of discrimination based on racial or ethnic origin;
UNECE - United Nations Economic Commission for Europe;
UNHCR - United Nations Refugee Organization Agency;

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DYNAMIC APPENDIX

Selection of the main national projects implemented (and ongoing) under the previous 2012-2020 RSC Strategy (at December 2021)

As part of the programming of Structural Funds 2014-2020, through the coordination activity of UNAR within the national programming tables, funds have been allocated for the implementation of the 2012-2020 RSC Strategy through the inclusion of a dedicated Thematic Objective (OT) that expressly provides for the "*Increase in the level of education, health conditions and participation of Roma, Sinti and Caminanti populations in society and employment under the National Strategy for Roma Inclusion*", with total resources of about 14 million euros. A discussion between regional and intermediate bodies allowed the inclusion of this objective within the National Metropolitan Operational Plan (PON Metro) and in some Regional Operational Plans (POR).

1. **"Housing Transitions" project with ISTAT. (Beginning: 2018; End: 2022; Amount: 200,000 euro)** Continuing from the previous research project on the topic and with the specific intention of monitoring the framework of interventions activated at local level and aimed at overcoming the settlements, in 2018 UNAR launched a two-year project - currently in progress and granted through an agreement with ISTAT - aimed at a qualitative and quantitative survey to define the number and methods by means of which - since the launch of the 2012-2020 RSC Strategy - people belonging to Roma and Sinti communities have left the so-called settlements to move to other forms of housing. The project, financed with funds from the Inclusion PON, is supported by the Statistical Working Group and the presence of a representative of the National RSC Platform.
2. **P.A.L. Project, "Local Action Plans". (Beginning: 2018; End: 2021; Amount: 550,000 euro)** In order to facilitate the complex governance process of the RSC Strategy 2012-2020 at the local level, a public project called "P.A.L." (Local Action Plans) was launched in 2018, again under the Inclusion PON, promoted by UNAR, for the realization of "Pilot interventions for the creation of local round tables and networks of citizens and local administrations". The aim of the project (which involves the cities of Rome, Cagliari, Milan, Genoa, Naples, Bari, Messina and Catania) is to set up and animate local round tables for dialogue and coordination based in the municipalities concerned, aimed at encouraging the synergy of policies and interventions in favour of Roma and Sinti communities, while promoting their participation in social, political, economic and civic life.
3. **"Culture and memory" Project with Formez PA. (Beginning: 2018; End: 2020; Amount: 300,000 euro).** Starting from the assumption that the memory of the Porrajmos (a word in the *Romanés* language indicating the persecution and extermination of about 500,000 Roma and Sinti during the Nazi-fascist period) is a fundamental step for the social and cultural recognition of this minority, as well as to reduce the high level of antigypsyism characterizing Italian society, a "path of remembrance" has been launched, which retraces the most significant moments and places related to the Porrajmos in Italy (the places of detention and sorting of Roma and Sinti communities active during the Second World War) and in Europe (notably Auschwitz). The project is implemented through an agreement with Formez PA and foresees specific training, awareness-raising and social animation activities throughout the national territory.
4. **Health" project with INMP. (Beginning: 2019; End: 2022; Amount: 950,000 euro).** To effectively implement the "Action Plan for RSC Health" (realized and approved in 2015 within the National Health Round Table), UNAR started a research/action project - in collaboration with INMP (National Institute for Migration and Poverty of the Ministry of Health) - with the aim of making access to care as equal as possible, especially in the contexts of extreme marginality represented by settlements. At the end of the first line of activities dedicated to study and training, the project will provide for a second project activity - of the same amount and for the same duration - aimed at testing the models developed throughout the country.

5. Project for the inclusion and integration of Roma, Sinti and Caminanti children (MLPS, MIUR, Istituto degli Innocenti).

The continuation of the "RSC Project" on the Inclusion PON for a second three-year period (2021-2023) confirms the main methodological and action lines of the RSC Project PON 2017-2020, aimed at consolidating work for more accessible schools, promoting paths to facilitate the access of families to services and establishing a multi-sectoral support network for the inclusion of Roma and Sinti minors. At the same time, the objective is to further investigate some work axes, among which the promotion of paths for the involvement and participation of Roma families and communities in local projects, basic training and the involvement of social and health workers, the involvement of kindergartens in some project activities, guidance and information for Roma and Sinti families and children in order to encourage them to continue secondary school education or vocational training. Special focus is also paid to strengthening actions aimed at access to health services, including through the promotion of targeted training for health workers, as well as providing paths for increasing the role and involvement of mothers and / or young Roma women. Finally, it is important to note that the project did not stop its main activities following the COVID-19 epidemiological health crisis; on the contrary, the territories managed to remodel actions and prepare measures to counteract the danger of early school leaving. Considering this, the importance of taking all possible actions and measures to counter the spread of the virus is highlighted in the new design. As regards governance activities - local round tables, multidisciplinary teams and other meetings - as well as training initiatives for teachers, assistants and social and health workers, training methodologies and tools will be used at a distance, in order to limit the risk of infection.

Projects being planned with European funds (about 9 million euros).

- 1) P.A.R. Project, "Regional Action Plans". (Estimated start: 2021; End: 2023; Amount: 1,200,000).** UNAR has undertaken the necessary procedures to provide regional bodies with a similar support and coordination tool to the governance model of the P.A.L. project, The project, called P.A.R. (Regional Action Plans) is financed with funds from the Inclusion PON, will start in the next three-year period 2019-2022 and will involve the regions that wish to use this tool to set up and animate the Regional Dialogue Round Tables, also provided for by the 2012-2020 RSC Strategy.
- 2) ACCEDER" project for access to the labour market. (Estimated start: 2022; end: 2023; Maximum amount: 8.6 million).** The definition and funding of measures within the Employment axis of the RSC Strategy 2012-2020 fall essentially within the program of the Inclusion PON and, specifically, the action 9.5.5., "Recognition of skills, training and employment mediation aimed at job placement, based on the model of good practice recognized at European level called Acceder Programme". The ACCEDER model, already tested in a pilot project in the context of the previous programming of Community funds (2007-2013), will be implemented through project interventions to be launched over the next three years throughout the country, harmonised with the income support and labour market access measures currently in force.
- 3) Project "Communication to counter antigypsyism". (Estimated start: late 2022; end: 2023; Maximum amount: 300,000).** A communication campaign is proposed to fight antigypsyism in all its forms, with an indicative budget of 300,000 euros per year of activity. The project will focus on conveying - mainly through social media - positive messages of inclusion and integration in education and employment, involving and targeting in particular the territories characterized by the presence of Roma and Sinti settlements and therefore exposed to possible tensions and conflicts.