The third National Platform on Roma Integration in Kosovo*, organized jointly by the National Roma Contact Point in Kosovo* - the Office of Good Governance of the Prime Minister’s Office, and the Regional Cooperation Council’s Roma Integration 2020, was held on 21 September 2018, with 30 participants including relevant officials from the line ministries and other institutions, Roma and pro-Roma civil society organizations, and representatives of international organizations. The representatives of the institutions presented the 2017 annual report on the implementation of the Roma integration policy in Kosovo* submitted by the government, followed by discussions by the participants. This paper reflects the discussions and highlights the recommendations emerging from the discussions towards the institutions, with a view to contribute to more effective and efficient implementation of the Roma integration policy in Kosovo*.

The opening remarks by the representatives of the Regional Cooperation Council’s Roma Integration 2020 Action Team, the European Union Office in Kosovo* and the Government of Kosovo*, the efforts of the Regional Cooperation Council to lead the regional process regarding the integration of Roma as part of the EU accession, and the support to the governments in the region were commended and supported to continue. The National Platform on Roma Integration is an important meeting serving the transparency and accountability of the government by presenting the 2017 annual report on the implementation of the Roma integration policy and enabling space for constructive dialogue with the civil society, municipalities and international organizations to identify the challenges and priorities for budgeting and implementation in 2019. The absence of the National Roma Contact Point and the low participation of the civil society at the meeting were regretful.

Stronger coordination and cooperation between the line ministries and full engagement of the municipalities is necessary to achieve the objectives. The contact points at central and local level institutions serve as a mechanism to coordinate, implement, monitor and report. Both the mechanisms are in place and the adoption of local action plans is ongoing with the participation of the civil society. At the time of the National Platform, 11 municipalities had adopted action plans and more had designated contact points. The local contact points form a Task Force meeting quarterly. Meetings with the civil society by sectors are regularly conducted.

Strengthened role and support of the National Roma Contact Point is also necessary in order to lead and coordinate in full capacity, and guide the line ministries and municipalities in the implementation of the commitments.

The importance of the participation of the Kosovo* government in the Roma Integration 2020 initiative was stressed. The High Level Event expected by the end of 2018 under the auspices of the Prime Minister of the Former Yugoslav Republic of Macedonia with the ministers from the enlargement region responsible for Roma integration was announced. The meeting is expected to reconfirm the commitment of the enlargement region to strengthen the work on Roma integration and possibly result in a signed Regional Declaration, defining ambitious and specific objectives to be achieved by the time each of the economies join the EU.

The 2017 annual report of Kosovo* was submitted in August 2018. Assessment of the report has been done, and the key conclusion is that there is still a considerable gap in collecting statistical data. The report strongly relies on outdated data from 2014. There is a challenge in collecting administrative data, particularly with the Ministry of Health. The Ministry of Labour and Social Welfare and the Ministry of Education, Science and Technology have established data collection

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1 The term Roma encompasses diverse groups, including Roma, Gypsies, Travellers, Manouches, Egyptians, Ashkali, Sinti, Boyash and other. Roma is the term commonly used in EU policy documents and discussions. In the context of Kosovo* the term Roma encompasses Roma and Ashkali communities.

2 This designation is without prejudice to positions on status, and is in line with UNSCR 1244(1999) and the ICJ Opinion on the Kosovo declaration of independence.
system that are further developed, while the Ministry of Environment and Spatial Planning works on establishing it and it is expected by the end of next year.

In some cases, where 2017 Regional Roma Survey\(^2\) (2017RRS) data were used, regression is noticeable. For instance, inclusion of Roma children in preschool, according to the strategy, started with 53.9% in 2016 and was expected to increase to 70% by 2019. Instead of increase, there is a decrease to 24% (2017RRS). Similar regression is noticed in the other priority areas, when 2017RRS data are used. Appropriate official data from the Statistical Office (including use of administrative data) may serve to more representative picture on the ground. Strengthening monitoring, data collection and reporting may be one of the recommendations from the meeting, along with other recommendations defined through the constructive dialogue at the meeting.

The National Roma Contact Point of Kosovo\(^*\) prepares a report for the Kosovo\(^*\) government in a free format, and another one in line with the regionally adopted standards.

The Operational Conclusions from the Roma Seminar in Kosovo\(^*\) organized by the Government and the European Commission in February 2018 were not adopted at the time of the National Platform.

The civil society representatives shared the experience of preparing five local action plans in Kosovo\(^*\) and invited the civil society to share their good examples.

### GENERAL RECOMMENDATIONS

- Continue the Regional Cooperation Council’s Roma integration initiative, involving Kosovo\(^*\).
- Institutionalize the National Platform on Roma Integration as an official consultation mechanism in Kosovo\(^*\), engaging the contact points mechanism at central and local level, wide range of civil society organizations and international organizations.
- Involve more civil society organizations in the dialogue on Roma integration, including by areas.
- Strengthen the capacity and the role of the National Roma Contact Point to lead, coordinate and guide the implementation of Roma integration policies with the responsible institutions at central and local level.
- Join the regional initiative for Regional Declaration on Roma Integration within EU Accession.
- Fully develop a comprehensive monitoring system, engaging the Kosovo\(^*\) Agency of Statistics and using the administrative sources of data from the line ministries and other institutions, and consolidate the reporting mechanisms towards the Government, the EU and the Regional Cooperation Council.
- Address the challenges and gaps identified with the 2017 Regional Roma Survey and implement the existing commitments in order to make a difference to the people and communities.
- Institutionalize the responsibilities of the local governments within the Roma integration policy.
- Adopt the Operational Conclusions from the Roma Seminar in February 2018.
- Consider the proposal by the Ministry of Agriculture, Rural Development and Forestry on designating Deputy Ministers belonging to the Roma community at each Ministry to ensure implementation of the Roma integration policy and participation of Roma in mainstream programmes and public services.

### EDUCATION

The education in Kosovo\(^*\) is governed by the general objective of inclusiveness and quality of education. Education at all levels is provided in four languages: Albanian, Serbian, Bosniak and Turkish. The education of Roma is governed by the Strategy for Education in Kosovo\(^*\) 2017-2021 and the Strategy for Social Inclusion of Roma in Kosovo\(^*\) 2017-2021. The Ministry of Education, Science and Technology is implementing the Strategy for all the three communities: Roma, Ashkali and Egyptians, although the Strategy refers only to Roma and Ashkali.

Roma are included in 21 primary schools and 14 secondary schools referred to as mixed schools, as the language of instruction is Albanian, Bosniak and Turkish. There are also Roma students enrolled

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in the schools providing education in Serbian language according to Serbian curricula. The following data on enrolled students in the 2017/18 school year are provided:

<table>
<thead>
<tr>
<th></th>
<th>Roma</th>
<th>Ashkali</th>
<th>Egyptians</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preschool</td>
<td>103</td>
<td>257</td>
<td>55</td>
</tr>
<tr>
<td>Lower elementary</td>
<td>173</td>
<td>318</td>
<td>742</td>
</tr>
<tr>
<td>Upper elementary</td>
<td>156</td>
<td>255</td>
<td>152</td>
</tr>
<tr>
<td>University - bachelor</td>
<td>11</td>
<td>34</td>
<td>27</td>
</tr>
<tr>
<td>University - masters</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Accommodation in dormitories</td>
<td>10</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Awareness campaign has been delivered by the Ministry of Education, Science and Technology on the enrolment of children in preschool education for the whole society in Kosovo* including Roma. There is no information on the specific outreach to Roma with this campaign.

The subject “Roma language, history and culture” is offered to Roma students, but is thought only in 4 schools for 84 pupils in Prizren due to the unpaid engagement, good will and enthusiasm of the local teacher. According to the Ministry of Education, Science and Technology, there has not been a demand for the subject by the municipalities, mainly because teachers are paid by the number of classes and teaching this subject does not provide for sufficient number of classes. At a training organized for teachers of this subject and mentors of Roma pupils, only 2 teachers participated. Three text-books for the subject (Romani Chib 1, 2, and 3) are published and distributed, while higher language proficiency text-books are planned for publishing, but depend on specific demands.

Free text-books for all the pupils for all the subjects in lower elementary education are provided by the Ministry of Education, Science and Technology, including for Roma.

Repatriated students are reintegrated in the mainstream education and receive additional language classes according to curricula developed by the Council of Europe. Such service is provided to 14 Roma, 57 Ashkali, 6 Egyptian (pre-university) students in the 2017/18 school year.

Carrier guidance brochures for Roma are developed, and visits and discussions with Roma students in the last year of lower elementary school are delivered. Affirmative measure for enrolment in upper elementary (secondary) vocational and general school is implemented whereby Roma are enrolled regardless of their previous educational attainment and the results of the attainment tests.

The Ministry of Education, Science and Technology adopted an affirmative enrolment measure at public universities for all non-majority candidates, by setting 12% quota at public universities for such candidates and ensuring accommodation in dormitories for the enrolled students (according to Administrative Instruction number 09/2016). Admission tests for university are offered in Albanian, Serbian, Bosniak and Turkish language.

Financial support to Roma students is provided in several ways. The Ministry of Education, Science and Technology distributes a merit based scholarship to talented students, with limited total number of scholarships - only 62 in total for 2017/18 (no information on the number of Roma receiving this scholarship). Additionally, in cooperation with the Roma Education Fund, 107 Roma receive scholarships, and by the Voice of Roma, Ashkali and Egyptians (funded by GIZ) 115 Roma receive semi-scholarship (learning aids).

The Ministry of Education, Science and Technology plans to review the administrative instruction on establishing and functioning of education centres at a request by the civil society. Consultations are currently ongoing. The education centres provide supplementary classes and community based activities to Roma. It also plans to implement a programme funded by the EU on facilitated enrolment of Roma in preschool and upper secondary education, including additional 100 scholarships for students in upper elementary education.

The discussion in the area of education raised a number of issues, including:

- Merit based scholarships should not be presented as a measure for Roma in the area of education, as Roma rarely comply with such criteria. Instead, financial support should be provided to socially deprived Roma to ensure minimum conditions to attend education, as lack of financial means is allegedly one of the key obstacles causing discontinuation of education, the other key obstacle being discrimination.
- The publication of text-books on Roma language should be driven by the guaranteed rights rather than by demand.
The selection of municipalities and schools delivering the Roma language subject should not be politicized, as in the case with the municipality Obilic. The Ministry of Education, Science and Technology should have greater role in monitoring the implementation of the legislation at municipal level, including in regards to the teaching of Romani language.

The affirmative measure for enrolment in public universities is allegedly abused by candidates belonging to the majority community, while more than 70 Roma in 2017 have been refused enrolment at public university. In total, only some 300 Roma in all years of education are attending university education.

The affirmative measure for enrolment at public universities of non-majority candidates sets a quota, but still requires that the candidates fulfil the enrolment criteria as any other candidate (which does not address inequalities in the starting position). Roma compete with other non-majority candidates for the allocated places within the quota. Their disadvantage in comparison with those candidates, besides the candidates from the majority community, is not taken into account. In case the quota is not fulfilled by non-majority candidates, it is effectively reduced at the benefit of the majority candidates, which is usually the case.

The announcement for accommodation of university students in dormitories in the 2017/18 school year failed to reflect the affirmative measure for non-majority students (consequently students did not declare their ethnicity and very limited number of them received accommodation). As the Ministry of Education, Science and Technology has not received any complaints, this issue has not been inspected.

The key challenge in education for Roma - the transition from one level of education to another, is not effectively addressed.

Most of the municipalities (such as Shtime, but not Istok) provide scholarships for university students, and with the Action Plans on Roma have designated a portion of these scholarships to Roma. In Shtime, Roma candidates for universities are also provided with administrative support in preparing the documentation required for enrolment at universities and other related services.

The Ministry of Education, Science and Technology’s Department for Communities has one person on the staff only. It is expected that the civil society will take over the responsibility of outreaching to Roma.

Many of the students awarded scholarships during the previous school year have not received the funds by the end of the year. According to the Ministry of Education, Science and Technology such delay is a result of incidental technical issues within the Roma Education Fund, but it was guaranteed that all the students will receive all of the funds.

A number of Roma are enrolled in schools in Obilic, Mitrovica, Gnjilan, and other municipalities providing education according to the curricula of Serbia (and in Serbian language). After completion, they are allegedly not able to continue their education within the mainstream Kosovo* education system.

Many Roma have dropped out from education before completing even mandatory education, and usually cannot be reintegrated because of their age. Incomplete education has further consequences in employment.

**EDUCATION RECOMMENDATIONS**

- The efforts to include Roma in preschool education should be scaled up, including, but not only by implementing the announced programme funded by EU.
- The Ministry of Education, Science and Technology should, in cooperation with the relevant municipalities, develop and implement a programme for teaching the “Roma language, history and culture” subject to all the interested pupils, without conditioning it with a demand by the municipalities and ensuring teachers of this subject are provided adequate and motivating salary to deliver the classes. Text-books on “Roma language, history and culture” for higher language proficiency should be published, regardless of demands.
- Scholarships to Roma students in upper elementary and university education should be provided as financial support (rather than merit based scholarships) by the Ministry of Education, Science and Technology in order to ensure minimum conditions for socially deprived Roma to attend education.
- The allegations of abuse of the affirmative enrolment in the public universities for non-majority candidates should be investigated. Revision of the affirmative measure should be considered to allocate specific quota for Roma (possibly as an annex to the administrative
instruction), taking into account the unequal starting position of Roma when applying for enrolment at universities. Information on Roma applicants, those accepted and those refused from enrolment at public universities, should be collected and used to guide the policy.

- The Ministry of Education, Science and Technology should regularly supervise and ensure the affirmative measure for accommodation of non-majority university students in dormitories is clearly reflected in the public call for accommodation in dormitories.
- The positive practice of municipalities allocating specific scholarships to Roma from the overall scholarships they provide to university students, and providing administrative assistance for Roma to benefit from the measures in tertiary education, should be promoted and sustained.
- Effective measures to improve the transition of Roma students from one level of education to another should be developed and implemented, including for students attending education provided according to Serbian curricula that wish to continue their education within the mainstream Kosovo* education system.
- The existing mechanisms for reintegration in education and adult education should be activated for Roma that have dropped out from education, including for those not able to provide evidence (school certificates) for education attended abroad.
- The Ministry of Education, Science and Technology should strengthen its capacities to implement the Strategy for integration of Roma and the corresponding mainstream and affirmative measures required to achieve the objectives of the Strategy.
- Discrimination in education should be tackled.

EMPLOYMENT AND SOCIAL WELFARE

The institutions dealing with employment were not represented at the National Platform to present the annual report on the integration of Roma in Kosovo* for 2017. The topic was not discussed.

In the area of social welfare, the Roma integration policy is implemented through the inclusion of Roma within the mainstream social welfare public services, including social assistance scheme (monetary transfers) and family and social care schemes. The following table provides an overview of the participation of Roma in the social welfare public services in 2017:

<table>
<thead>
<tr>
<th>Social service</th>
<th>Roma beneficiaries</th>
<th>Ashkali beneficiaries</th>
<th>% of Roma and Ashkali from total beneficiaries</th>
<th>Budget spent for Roma and Ashkali (EUR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social assistance - temporary monthly allowance to families in need of social assistance (poor families) according to criteria set by law.</td>
<td>953</td>
<td>1,321</td>
<td>8.73%</td>
<td>2.7 mil</td>
</tr>
<tr>
<td>Utility payment subsidy - for recipients of social assistance, additional 135 EUR per year for covering utility expenses.</td>
<td></td>
<td>2,279</td>
<td></td>
<td>370,000</td>
</tr>
<tr>
<td>One-time assistance - both for recipients of social assistance and others, covering extraordinary expenses (repairing house damage, funeral costs, loss of documents, etc.), assistance of 100-300 EUR (once per year)</td>
<td>9</td>
<td>9%</td>
<td></td>
<td>1,900</td>
</tr>
<tr>
<td>Disabled children allowance - for severely disabled children at age 1-18, 100 EUR per month.</td>
<td>37</td>
<td>58</td>
<td>3.21%</td>
<td>100,000</td>
</tr>
<tr>
<td>Foster care for abandoned or children without parental care (in families) - 75 EUR per month per child.</td>
<td>32</td>
<td>29</td>
<td>11%</td>
<td>82,000</td>
</tr>
<tr>
<td>Foster care for abandoned or children without parental care (out of families) - 150 EUR per month per child.</td>
<td>5</td>
<td>7</td>
<td>21%</td>
<td></td>
</tr>
<tr>
<td>Domestic violence victims care in social centres</td>
<td>10</td>
<td>3</td>
<td>4.7%</td>
<td></td>
</tr>
<tr>
<td>Trafficking victims shelter</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential housing (for elderly, children, children with disabilities, adults with mental illness)</td>
<td>11</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Ministry of Labour and Social Welfare is collaborating with other governmental, international, civil society and other organizations to provide additional social services and assistance, including specified for particular vulnerable groups. Such services include, for instance, distribution of clothing confiscated by the customs or food packages provided by the Embassy of the United Arab Emirates to poor families across Kosovo.*

The tendency in the first half of 2018 is that the number of Roma beneficiaries from the social welfare services is increasing. By decisions of the Government, the amounts of monthly social assistance and assistance for children in foster care have increased in 2018. By the end of 2018 a study on the social welfare scheme and a concept for changing the social welfare scheme are expected.

The key challenges in the provision of social services to Roma are:

- Excessive drop-out of Roma families from the social welfare scheme because of the requirement for the members of the families at age 15-18 to attend secondary education (which is not obligatory).
- Exclusion from social assistance of those families where both the spouses are minor because of the requirement for the parents to be adult.

The discussion in the area of employment and social welfare raised the following issues:

- It is questionable how evidence on the attendance of secondary education is a compulsory requirement for social assistance, while secondary education is not compulsory, and the evidence on attending the compulsory primary education is not a requirement for social assistance.
- The announcement about the upcoming changes on the Law on the Social Assistance Scheme is important. The civil society, including Roma, should be consulted in the process.
- While families consisted of dependents only belong to the “category 1” and receive social assistance regardless of the age of the family members, families consisted of both dependents and unemployed members belong to the “category 2” and receive social assistance only until there is a child below the age of 5 in the family, although the need for social assistance does not diminish.

**EMPLOYMENT AND SOCIAL WELFARE RECOMMENDATIONS**

- The responsible institutions for employment should ensure full implementation of the Roma integration policy plans in this area, including fair representation of Roma in the public sector and increased inclusion of Roma in the active labour market measures.
- The legal requirements for social assistance, requiring family members of age 15-18 to attend secondary education, parents to be adults, and families with unemployed persons to have at least 1 child below the age of 5, effectively excluding families in need from social assistance, many of which Roma, should be removed. Other, non-repressive mechanisms should be sought to promote attendance of secondary education and prevent early marriages.
- The changes of the Law on the Social Assistance Scheme should be widely consulted with the civil society and the Roma communities, and the inputs provided should be reflected in the law. The changes should ensure social transfers are used to lift people out from poverty.

**HOUSING**

The overall objectives of the Social Housing Sector of the Ministry of Environment and Spatial Planning are to a) create conditions and safe housing for all residents; b) complete the legislative framework; c) develop adequate and affordable care for all citizens; and d) establish financial institutions to manage the social housing. The Law on Housing Financing Special Programmes is particularly important in this area among other laws regulating housing matters. However, the implementation of the law is limited due to lack of funding allocated for this purpose. Therefore, a new Law on Social Housing is being drafted in order to prioritize the issue, along with proposed changes of other laws in this area. The Law on Social Housing should regulate the entitlements for social housing for families living on social assistance, as well as low and middle income families. The idea of mixing law and middle income families is put forward in order to ensure buildings are not devastated, as allegedly is the case when only families living on social assistance inhabit the buildings. It should also provide for better inclusion of families with different backgrounds. The distribution should be 50% of social housing for social aid beneficiaries, 30% for low income families
and 20% for middle income families (the latter two would pay modest rent). With the new law, besides families in need of social assistance, families living in inadequate housing conditions may also benefit. Priority will be given to families with many children, with children or other persons with disabilities, single parent families, children without parental care, etc. The criteria for beneficiaries, among others, include social status and income level.

Current housing services are, unfortunately, limited to housing support to repatriated persons, but not Kosovo residents that live in difficult conditions. The services include rebuilding or renovating and furnishing the houses of repatriated persons. Roma benefit from this mainstream service - usually around 10% of the funding is spent on the housing needs of repatriated Roma families.

A project implemented with European Union funding by the Ministry and the NGO Develop Together from 2017 is working on a database on social housing status and demand. The database should include information on all the current social housing tenants and demands by those in need of social housing. The database should provide a good basis to develop a social housing programme for funding by donors (Western Balkans Investment Framework - WBIF and Council of Europe Development Bank - CEB are already approached for this purpose).

At municipal level, there are no designated housing officers. Therefore the housing portfolio is added to existing officers that need training in this area. They should collect and upload data in the database. The municipalities are also required to develop three-year housing programmes. 23 municipalities have such programmes at the moment and have collected information on the housing needs. In total, 773 families in the 23 municipalities expressed demands for their housing needs, but there is no ethnic disaggregation of the data. The implementation is very low as municipalities lack funding to build or renovate housing or to invest in social housing. The Ministry plans to pilot a social housing construction project in two municipalities resulting in 200 social housing units, and if successful extend the project to other municipalities. With the Ministry of Finance it is agreed to include a municipal budget line on housing that should be planned and used for rent payment and investments in housing, including social housing.

The discussion in the area of housing included the following:

- Municipal representatives were interested in the criteria for allocation of funding from central to municipal level for the implementation of the social housing programmes. The response was that the allocations will be demand driven.
- The conditions of the social housing units in Plemetina were criticized.
- On a question on an inventory of existing social housing, the representative of the Ministry responded that according to incomplete records, there are 51 facilities with a total of 1,179 units for social housing across Kosovo.

**HOUSING RECOMMENDATIONS**

- The new Law on Social Housing and other legislative projects in the area of housing should be widely consulted with the civil society and the Roma communities, and the inputs provided should be reflected in the legislation.
- The Ministry of Finance should, as a matter of urgency, allocate funding for social housing for the most vulnerable groups, including Roma. The social housing services should vary to cover a range of families with different housing needs. The distribution of funding to municipalities should be based on the needs.
- The pilot project for constructing social housing in two municipalities should ensure Roma benefit from the project.
- Municipal three-year housing programmes and budget lines should tackle the housing needs of Roma, including urban planning, infrastructure, housing support for upgrading existing houses to the minimum standards of decent housing, housing maintenance, legalization, relocation of households that cannot be legalized to decent affordable accommodation and social housing.
- Continue working on collecting information in housing and ensure possibility for ethnic disaggregation of the data.
- The government (central and/or local) should ensure maintenance and decent living conditions up to the minimum housing standards in the existing social housing units, including Plemetina. The funding proposal for social housing to donors should, besides erecting new ones, contain a component to rehabilitate existing ones.
- Housing legalization for Roma to gain their property rights must be pursued by adequate public measures and services.
HEALTH

The Ministry of Health is focused on improving the health care services for all the citizens of Kosovo*, including Roma. The Department for Citizen’s Rights to Health Care is responsible for the implementation of the Roma integration policy in the area of health. The Ministry has a special budget allocation to implement the Roma integration policy in the area of health each year. The available funding for the current year is 400,000 EUR. The budget is distributed to civil society organizations implementing projects promoting health among Roma in partnership with the public health centres in the municipalities with significant Roma population, according to the regulation 04/2017 of the Ministry of Health. 31 grants have been allocated, and the civil society is encouraged to follow the information from the Ministry of Health and apply for funding. The Ministry of Health is overseeing the implementation of the projects and regularly visits the municipalities eligible for funding.

Grievances on public health services by the citizens may be reported through a specialized phone line. The grievances are then reported to the health inspectorate and other relevant institutions for further handling.

The discussion in the area of health raised the following issues:

- Medicine distributed to public health centres intended for the members of the Roma community is allegedly misused by the public health canters’ staff.
- There are also allegations about discrimination and ill-treatment towards Roma by the medical staff at the public health centres.
- Health mediators are engaged by civil society organizations, but the public health system does not engage health mediators.

HEALTH RECOMMENDATIONS

- Allegations for misuse of medicine intended for Roma patients should be investigated, and mechanism should be established to prevent misuse and ensure Roma benefit.
- Discrimination against Roma in the area of health should be monitored and effectively tackled through various measures.
- Health mediators should be introduced at the public health centres to mediate between the health centres and the Roma community.

LOCAL LEVEL IMPLEMENTATION

The Ministry of Local Government Administration ensures implementation of the Roma integration policy at local level through four mechanisms:

- Grants for civil society organizations: 15 projects approved (out of 37 applications);
- Establishment of Local Committees for implementation and monitoring: 6 municipalities have established, 1 is in the process of establishing and 17 have not established yet this mechanism under the Local Offices for Communities and Returnees;
- Adoption and implementation of Local Action Plans for Roma integration and monitoring of their implementation; and
- Exemption from fees for registration of Roma.

The discussion related to the local level implementation included the following:

- Shtime municipality have established a Municipal Action Committee developing an action plan for integration of Roma with municipal department directors and civil society representatives. Difficulties have been faced in negotiating allocation of funding by the municipality (the funding provided is far less than the planned with the Local Action Plan). Many activities are funded by donors, although some co-funding is provided by the municipality. The estimation is that 60-70% of the plan will be implemented. Implemented activities include: building of 3 houses (funding from the Prime Minister Office), scholarships for students, 7 projects for family businesses (funded and implemented with the International Office for Migration), public lights at a village inhabited predominantly by Roma.
- The Ministry of Agriculture, Rural Development and Forestry suggests designating a Deputy Minister belonging to the Roma community at this and all other ministries in order to ensure proper implementation of the Roma integration strategy. The subsidies and grants offered
to farmers are not reaching Roma and other vulnerable communities because they do not have the necessary documents to prove their property rights over their land. The programme for involvement of youth in agriculture and the programme for equality in agriculture are also not used by Roma, as there are no initiatives by Roma. The latter programme, for example, has 2 million EUR for Mitrovica, and only half of the budget is used. A call for grants will be published beginning 2019 for projects focusing on agricultural training, field training, capacity building for farmers, food technology, food processing, etc. Roma civil society should follow and apply for funding.

**LOCAL LEVEL IMPLEMENTATION RECOMMENDATIONS**

- The coordination with and the implementation at local level need to be improved, including by ensuring the planned local mechanisms are functional (local action committees and local action plans). Municipalities should be obliged to allocate funding for the implementation of the action plan and should be financially supported by the central level government and donors, particularly in the areas of housing and employment.
- Housing legalization and regulation of property rights must be pursued for Roma and other vulnerable communities, *inter alia* in order to ensure they can benefit from subsidies and grants offered to farmers.
- Civil society organizations should be informed and encouraged to make use of the Ministry of Agriculture, Rural Development and Forestry programmes promoting agriculture among vulnerable groups and increasing their capacities for farming, including Roma.

**BUDGET ALLOCATIONS FOR ROMA INTEGRATION**

The Ministry of Finance does not have data on the budgetary allocations and expenditures for the implementation of the Roma integration policy. This is due to the lack of disaggregated data provided by the ministries that have various systems of data collection. The Ministry of Finance prioritizes for budgeting those priorities set by the ministries. The Ministry of Finance has not refused funding for any programme or project directly or indirectly targeting Roma that have been included in the priorities of the responsible ministry. Institutions responsible for implementation should also ensure, besides prioritizing, that the plans for the implementation of the Roma integration policy are elaborated and grounded / incorporated in the legislative framework, the costs are appropriately planned, and the budgeting requirements are presented to the Ministry of Finance.

The Ministry of Finance is not inclined to establish separate budget line or code for different issues, as there are many demands and often activities may be carried out using existing budget lines and codes. However, with proper justification, opening a new budget line is possible.

Municipalities are obliged by law to allocate proportional funding for the communities.

**BUDGET ALLOCATIONS FOR ROMA INTEGRATION RECOMMENDATIONS**

- The Ministry of Finance should develop instructions to the responsible ministries for the implementation of the Roma integration policies on collecting disaggregated data in order to oversee allocations and expenditures for this policy (both as part of the mainstream policies and as part of specific programmes targeting Roma). Introducing an officer at the ministry leading on this process may be beneficial.
- The ministries responsible for the implementation of the Roma integration policy should prioritize this issue in their sectoral strategies in order to ensure appropriate funding. The plans for the implementation of the Roma integration policy should be elaborated, based/incorporated in the legislative framework and budgeted. The budgetary needs should be then presented to the Ministry of Finance.
- The National Roma Contact Point, in cooperation with the Ministry of Finance, should elaborate and justify the need for a separate budget line and/or code for the Roma integration policy and pursue opening such budget line / code within the public budget or another financial mechanism that will ensure proper allocation of funding and monitoring of expenditure for the implementation of the Roma integration policy, both through mainstream and targeted policies and public services.