

## 2017 NATIONAL PLATFORM ON ROMA INTEGRATION IN BOSNIA AND HERZEGOVINA

25 September 2017, Sarajevo

**:: POLICY RECOMMENDATIONS ::**

### INTRODUCTION

The second National Platform on Roma integration in Bosnia and Herzegovina was organized by the Regional Cooperation Council Roma Integration 2020 Action Team on 25 September 2017 in Sarajevo, at the premises of the European Union (EU) Delegation. Around 40 participants were present, including the representatives of the Roma Integration 2020 Action Team, the National Roma Contact Point and her team from the Ministry of Human Rights and Refugees, the EU Delegation, relevant institutions from central and local level of governance, civil society and representatives of the international organizations.

The National Platform mirrors similar meetings organized within the EU Member States and serves to review the developments during the previous year regarding Roma integration and input the discussions on the operational conclusions at the Roma Seminar organized biennially by the Government and the European Commission.

The National Platform reviewed the [2016 progress report](#) and the implementation of the 2015 operational conclusions, looking at the challenges and priorities for the upcoming period. Roma Integration 2020 has cooperated closely with the Government of Bosnia and Herzegovina and the EU Delegation in drafting the newly adopted Action Plan, including the necessary implementing details and the regional monitoring and reporting standards. The project Action Team is committed to continue the cooperation with the Government of Bosnia and Herzegovina in further improving the budgeting and monitoring processes.

### CONTEXT AND OVERVIEW

The integration of Roma is part of three inter-linked processes: the internal efforts of Bosnia and Herzegovina, the regional efforts through the Roma Integration 2020 project, and the EU integration efforts. Further harmonization of these three levels of efforts for Roma integration shall be pursued. The Ministry of Human Rights and Refugees and the Council of Ministers' Board on Roma are increasing the institutional coordination, including for the assessment of the progress on the previous and the formulation of the forthcoming operational conclusions. There is an intention to further increase institutional coordination for implementation and monitoring.

The Government reported that a number of meetings have been held relevant for the integration of Roma, including the Sub-Committee on Justice, Freedom and Security, Sub-Committee on Innovation, Information Technology and Social Policy, and Sub-Committee on Stabilization and Association in the framework of the EU integration. Roma integration, and particularly the implementation of the operational conclusions, that are based on the strategy and action plan of Bosnia and Herzegovina, have been discussed at these meetings. The operational conclusions and the policy of Bosnia and Herzegovina are evolving around the priority areas of civil registration, education, employment, social protection, health and housing.

The new Action Plan 2017-2020 is based on various recommendations, including the discussions of the Board on Roma. The format of the action plan has been changed on the recommendation by the Roma Integration 2020, with a view to facilitate the monitoring of its implementation. At the same time the National Roma Contact Point coordinated the effort of sublimating all the available data, including from the institutions and the civil society, into a single comprehensive report. Roma Integration 2020 provided expert support in this effort, which resulted in a report that contains a large volume of reliable statistical data, including their sources.



On behalf of the Council of Ministers' Board on Roma, the developments in the integration of Roma have been recognized, but the demand to budget and implement the action plan in the area of education the same way as the other areas has been repeatedly highlighted.

The delay in the adoption of the new Action Plan, and the buffer period without having an official action plan to refer to, created insecurity within the Roma community and made the monitoring of the government actions for Roma integration difficult.

The Board on Roma discusses and proposes to the government, while the institutions, primarily the Council of Ministers and the Ministry of Human Rights and Refugees, are making the decisions and implementing. Certain institutions are encouraged to cooperate more closely with the Board on Roma, including the Agency for Gender Equality, the Ministry of Civil Affairs that is responsible for education at the state level, the Agency for Labour and Employment, the Ministry of Security, the Ministry of Internal Affairs, the Ministry of Justice, the Ministry of Finance and Treasury, the Directorate for EU Integration, the Institutes of Health, including the relevant institutions at the levels of entities and municipalities.

As a general overview, the civil society in Bosnia and Herzegovina noted that the country reports on the situation of minorities, particularly Roma, are not reflecting the reality. Country reports should focus on the efforts that the institutions have undertaken to improve the status of minorities, rather than the efforts of the civil society. Reports should also reflect on the recommendations that have not been followed up and on the challenges encountered. Particular remark is that the 2016 progress report on the integration of Roma is not available in local language.

The main recommendation is to improve the system of monitoring in the future to reflect the facts on the ground. Such monitoring should include the budget, the expenditures and sources, and the results from the spending. It should also go beyond central institutions submitting a simple questionnaire to the lower level institutions. The public budget of 5 million convertible marks for Roma integration is lower than previous year and is assessed as insufficient.

The expert engaged by the Roma Integration 2020 to assist the government in preparing the 2016 progress report explained that the report was based on the previous action plan. The aims in the process have been to assess the achievement of each planned measure through quantifiable data that are traceable to their source, and identify the challenges for monitoring and reporting translated into recommendations for improvement of the process.

One of the key challenges is that the main responsible and coordinating institution for Roma issues, the Ministry of Human Rights and Refugees, has no mechanism to adequately and efficiently perform its role in the area of education, in which no budget has been allocated for Roma integration, unlike the areas of employment, housing and health. The Ministry also does not have mechanisms to properly monitor the spending of the budget allocated to Roma integration and to continuously and comprehensively collect data on the results of the measures. "Soft" measures, including situation analysis and data collection, researches, campaigns, etc. are not being implemented as enhanced coordination among institutions is required and effects and impact are difficult to measure. Expert observations by thematic areas are provided below along with the institutional overview on the implementation of Roma integration policies, points emerging from the dialogue at the National Platform and specific recommendations.

## GENERAL RECOMMENDATIONS

- Continue the strong cooperation within the Roma Integration 2020 project for further improvement of monitoring and budgeting of Roma integration policies.
- Increase institutional capacities to follow up the recommendations and operational conclusions, cooperate and coordinate planning, budgeting, implementation and monitoring of Roma integration.
- Improve the system of monitoring and reporting using the regionally adopted standards through the Roma Integration 2020 project, and in coordination with all relevant stakeholders focus on establishing mechanisms to generate relevant reliable data.
- Include the Action Plan on Education in the general Action Plan 2017-2020 for integration of Roma and budget and implement it in the same way as the other thematic areas.





- Align the timeline for revision and/or adoption of new action plans with the public budgeting timeline.
- Include more closely relevant institutions at all the levels of governance (state, entity and local), including municipalities, dealing with all the thematic areas of the Strategy, particularly education, in the implementation of the action plans and the operational conclusions for the integration of Roma.
- Reports reflecting the situation of Roma in Bosnia and Herzegovina submitted to intergovernmental organizations should focus on the efforts of the institutions rather than civil society, refer to all the commitments and recommendations, and be published in English and local languages.
- Systemic and comprehensive monitoring should be built to reflect the facts on the ground and to include information on the budget planned and spent, including sources of funding.
- Sufficient public budget should be allocated to achieve the objectives for Roma integration.
- While the grant-making principle of implementation of allocated funds for Roma integration is good and appreciated, it should be further developed to ensure effective use of funding and conditionality for the implementing institutions to allocate own resources and to implement measures with sustainable changes on the ground.
- Comprehensive data collection system for both results-oriented monitoring and impact assessment should be established, populated with baseline and regularly collected data, with the involvement of all the relevant implementing institutions, the social centres and the statistical offices. The reporting should be focused on the implementation of the strategy and action plan for Roma as adopted.
- Annual prioritization of measures is recommended to take place each year based on evidence, and set priorities should be considered within the budgeting, including at local, regional and central level, taking into account the period needed for the allocated funds to become operational in each sector.
- The needs of Romani women and girls should be considered in the action plan for Roma integration.

## EDUCATION

The expert summary of the 2016 progress report highlighted that the action plan on education is not part of the general action plan for the implementation of the strategy (covering housing, employment and health). It is very general and contains ambitious objectives that shall be relevant during a long period of time. Two objectives are set in education: inclusion of Roma children into compulsory primary education and support to Roma children for completion of secondary and higher education are being continuously implemented, while the third objective: preservation and promotion of the Roma language, culture and history is not being implemented.

Data on Roma children included into different levels of education for 2013 are from the census, while for 2015 and 2016 are based on the information on the number of children receiving support from the affirmative measures, and thus have limited reliability. Data on university education are not available. 196.455 EUR has been spent in 2016 on integration of Roma in education, according to estimates based on data from various sources.

The coordinating institution reported on the implementation of the operational conclusions in the area of education, firstly noting that immediately after the adoption of the plan on education an expert team for its monitoring has been established with the participation of the relevant central and regional institutions responsible for education, which has worked on the progress report. The reporting on education has been gradually evolving throughout the years, in 2016 containing inputs from all the relevant institutions.

In the area of education 8 operational conclusions were formulated with 23 corresponding activities, out of which 15 are implemented, 1 is partially implemented and 7 are not implemented.

The activities that have been implemented include: annual conference with the ministries on education, 2015/16 report, free-of-charge preschool education for 37 Roma children (in 9 municipalities); 984 free text-books in primary and 13 in secondary education, transport for 114 pupils in primary and 7 in secondary education, and free meal for 325 pupils; preparatory education for primary education for 151 Roma children and preschool programmes for 110 Roma children;





annulment of the fee for extracurricular education / exam for 12 Roma children at primary schools; 46 scholarships (22 from municipalities, 24 through projects) for secondary, and 3 scholarships for university students; 96 informative meetings within Roma communities on enrolment in preschool education; promotion of Roma parents participation within the school management; 75 educational activities for 212 teachers and 11 teaching assistants for work with Roma; regular data collection on the rate of enrolment and completion of school for Roma children; 48 educational activities for 817 teachers, 1.237 children and 534 parents on non-discrimination.

The measure that is partially implemented refers to the Roma teaching assistants that are involved through projects funded by donors.

Measures that are not implemented include: establishing expert team at state level, establishing of daily centres (those mentioned in the report are for street children), free-of-charge preparatory classes for enrolment into secondary and higher education (as mostly there are no entry exams, and instead the Ministry submits case-based recommendation for enrolment), ensuring boarding accommodation for students, ensuring funding and informing the civil society on adult learning programmes.

There is no information on budget spent - instead it is estimated based on the number of beneficiaries and costs of activities. The data on Roma outside of the educational system is unknown, while the data on Roma in education for 2015/16 are provided below:

	# Roma in primary education	# Roma completing primary	# Roma in secondary education	# Roma completing secondary education	# Roma in tertiary education
2015	2.051	243	108	43	5
2016	1.842	151	112	38	7

The dialogue between the institutions and civil society revolved around the key issues, including the need to incorporate the action plan on education in the general action plan for the implementation of the strategy, to increase significantly the allocated budget throughout the responsible institutions, to continue the dialogue on targeted vs mainstreamed approach in education (by which Roma would be treated as vulnerable along with other vulnerable persons), to increase the coordination among relevant institutions and stakeholders dealing with education, to implement the neglected objective on education in Romani language and promotion of Romani identity and culture through education.

The Ministry of Civil Affairs is criticized for not assuming responsibility towards Roma integration in the area of education. The need is expressed to deal with discrimination in education in order to gradually decrease the need for affirmative measures for Roma.

Mid-term programme on employment is being developed, mainly focusing on employability, and it should be influenced to ensure Roma benefit, primarily with vocational training and adult learning.

The EU integration directorate is developing an IPA II programme combining three sectors: education, employment and social policy. This programme should also meaningfully and deliberately include Roma. Lastly, concern is expressed regarding the “hidden” expenses in education, including accompanying educational materials, clothing, fee for insurance, etc. that are not affordable to unemployed Roma.

### Recommendations

- Include the action plan on education as part of the general action plan for the implementation of the strategy, ensure the leadership of the Ministry of Civil Affairs and cantonal ministries on education for this area, and ensure the main responsible coordinating institution, the Ministry of Human Rights and Refugees performs its role efficiently in the area of education as well.
- Develop further the system of collecting ethnically disaggregated data in preschool, primary and secondary education, including data on drop-out, and establish such system for data in tertiary education.
- Upgrade the system of monitoring the spent budget for integration of Roma in education to reflect the exact information on expenditures, ensure all relevant institutions in education are allocating adequate budget formulated programmatically, and discontinue the gradual decline of allocated budget.





- Introduce and strictly apply non-discrimination mechanisms in education.
- By the end of 2017 the coordinating Ministry should prepare comprehensive elaboration on the reasons for which the objectives on the promotion of Roma identity and culture through education have not been implemented, including recommendations for improvement of this situation.
- All the responsible institutions from the entities, cantons and municipalities, with the participation of the civil society, are expected to develop their own action plans on inclusive education of Roma children for 2018 in line with the overall action plan; it is also recommended that for this purpose program budgeting is introduced.
- The next IPA programming must include Roma education.

## HOUSING

There are six aims in the area of housing, two of which are not implemented, while within the rest, out of 14 measures, 6 are being implemented continuously. In 2016 the implementation of these measures resulted in 29 constructed housing units, 5 infrastructure interventions, and 43 units for social housing. The delay in the implementation of the budget in housing is two years after being adopted because of the long procedures of decisions on distribution of the funds, as well as the time required for actual building of housing units. The complete budget spent in 2016 is estimated at 849.000 EUR as a calculation of different implemented projects, some of which are transferred funds from previous years. The allocation for 2017 is lower (half million EUR).

There are five operational conclusions in the area of housing: continuous implementation of the housing action plan with allocated budget; creation of local action plans; securing social housing for houseless Roma; legalization of informal settlements where Roma live; integral approach to housing and employment. These objectives include 11 measures, 9 of which are fully implemented, while 2 are not implemented at all. Those not implemented are the legalization of informal settlements and integral programmes for housing and employment.

While the results in the area of housing are recognized and appreciated, cases (in Tuzla, for example) are noted where houses are constructed or reconstructed during inadequate season for construction, resulting in houses with very high level of mould and humidity, thus posing health risk for the people, particularly children living in those houses. There are also reported cases of constructed units not connected to communal utilities for a long period of time.

As municipalities are grant recipients and responsible for the implementation, it is primarily within the scope of their responsibilities to ensure quality and timely construction of housing units, including resolving of other issues (adequate legal and technical documentation, proper infrastructure, etc.) and connection of the housing units to communal utilities.

Besides criticism towards the decrease of public funding for housing of Roma to million KM, further comments are made that 25.000 KM are insufficient per housing unit, and 100.000 KM per project to local governments are also very limited (which is not the case with international organizations implementing such projects, as they secure matching funds) and are not corresponding to different local contexts.

As the legalization of houses is related to the registration of address required for civil registration, it is highly important to either solve the issue of legalization or provide an alternative or change of the civil registration criteria to enable civil registration, although civil registration may be possible with filed request for legalization.

### Recommendations

- Efficient procedures for implementation of the allocated budget in housing should be established.
- The cost per housing units should also be revised to reflect the real cost. The cost per individual project should take the local context into account;
- The criteria for distribution of housing units should be improved; in addition co-funding and integral approach to housing ensuring comprehensive package of socio-economic services should be ensured.
- Mechanisms on local level should be established to control and ensure quality standards for construction of housing units, including analysis of already constructed housing units.





- The coordinating ministry should initiate local programmes for legalization of informal settlements where Roma live, and in cooperation with the employment services should initiate employment programmes linked to housing programmes.

## EMPLOYMENT

Under the overall aim to improve the employability and employment of Roma, four specific objectives are planned. Only one is implemented - programmes for stimulating employment, resulting in employment of 103 Roma in 2016. There is no information on the sustainability of the employment gained through the programmes. Three of the objectives are not being implemented at all: vocational training programme, change of regulation for employment of Roma, and information campaign among Roma for the public services in employment. 357.905 EUR has been spent in 2016 (planned for 2015) on integration of Roma in employment. The delay in spending the allocated budget is due to administrative procedures.

There are three operational conclusions in this area: integral approach to employment for sustainable housing; increased engagement of the municipalities in the employment plan implementation; immediate action to improve the monitoring in the area of employment. Out of the 7 planned activities under these three objectives, 4 are fully implemented, 1 partially, and 2 are not implemented.

One of the measures not implemented is related to integral programmes for housing and employment, while the other measure not implemented is related to employment and self-employment.

The Ministry of Human Rights and Refugees is advised to make use of its regular meetings with the employment services to request data on the inclusion of Roma in mainstream measures for employment, since there are Roma that gain employment through such measures as well.

Declaration of ethnicity at the employment services is voluntary, but the response of the services is that data are not collected. The identification at the employment services as Roma should be improved in terms of making such a possibility available, informing citizens of the benefits and properly recording their own declaration.

Employment in the private sector and the self-employment support should last longer to ensure sustainable employment, as Roma are very often ending up as unemployed.

Institutions at central, entity, cantonal and municipal level are expected to allocate own resources for employment of Roma, but some of them are not considering the Roma integration policy a valid legal basis for such allocation.

### Recommendations

- Design and implement additional measures that may increase the effectiveness of sustainable employment of Roma, including in the public sector.
- Remove administrative barriers to efficient and prompt distribution of allocated funds for the purpose of employment of Roma.
- Improve the monitoring in the area of employment, introduce follow up monitoring of the programme beneficiaries, and make sure voluntary declaration at the employment services is properly done by public servants.
- Consider prolonging the time of support provided for employment and self-employment of Roma and adjust the support to the actual situation of the person to ensure access to services in the most adequate way.
- The employment services shall partner with municipalities to implement employment and self-employment projects, initiate participation of Roma in public works, and ensure on-job-training of Roma for known employers.
- The central, entity, cantonal and municipal institutions responsible for employment should be instructed on the legal basis for allocation of funds for the implementation of Roma integration policies and should ensure funding.
- Social entrepreneurship should be considered as possibility to ensure employment of Roma.





## HEALTH

Data in the area of health are largely missing. Two aims are planned in the area of health. The first is ensuring access to health protection, with 5 measures, 2 of which are continuously implemented, while the rest are not. The second objective is health prevention and education, with 6 planned measures, 3 of which are continuously implemented and the rest are not implemented. The implementation of the measures resulted in 1.481 interventions for the benefit of Roma. The number of Roma without health insurance is not updated and still stands on 5.268. The budget spent on the implementation of the action plan in the area of health in 2016 is estimated at 215.000 EUR, based on calculations of average costs by beneficiary or measure.

The area of health and social protection is funded with the smallest amount compared to other areas (600.000 KM out of total 2.100.000 KM for the implementation of Roma integration policies). Five operational conclusions are adopted in this area including: continue to allocate budget and implement the action plan on health; engage local level in the implementation; increase the links of the health action plan with the other areas; improve the monitoring in the area of health; introduce Roma health mediators. Out of 10 planned measures under these objectives, 3 are fully implemented, 4 partially, and 3 not implemented at all. Nothing is implemented to engage local level in the implementation, increase the links of the health action plan with the other areas and to improve the independent monitoring in the area of health. Comments on the implementation of the action plan in the area of health are noted, including that vaccination is free of charge for all and there should not be specific budget allocated, that Romani women should access health services without additional payment, etc.

Roma without health insurance are refusing to participate in the measure for retroactive payment of health insurance, as they are not sure if they would be able to pay it themselves the following months. Since medications and health treatments are less affordable for Roma, it is proposed that lists of medications are published in the pharmacies and Roma get prescribed medication for free, while the Ministry of Human Rights and Refugees should reimburse the costs. The legal provisions for health insurance provide different possibilities that have not been properly explored to ensure Roma benefit, such as the legal provision for elderly that are not otherwise insured to be insured through the social centres.

### Recommendations

- Stronger commitment to the implementation of the planned measures contributing to achievement of the set aims is needed by all institutions.
- Concrete data on the implementation of Roma integration policy in the area of health and the situation of Roma regarding health need to be collected, including updated number of Roma with/without health insurance.
- The budget in the area of health needs to be more carefully planned, spent and reported.

## CIVIL REGISTRATION AND CROSS-CUTTING ISSUES

The area of civil registration is not included in the strategy and action plan, but is included in the operational conclusions of Bosnia and Herzegovina, thus the coordinating institution reported on the implementation of the relevant operational conclusions. The issue of civil registration is not significant, but still exists, and the intention of the Ministry for Human Rights and Refugees is to eliminate completely the problem.

The operational conclusions are: improve the legislation to allow facilitated civil registration; improve digital sharing of data of all the relevant institutions; increase the support for registering in the birth register; establish effective mechanism at local level to ensure birth registration; include Roma in the decision making of their interest, and in the formulation, implementation and monitoring of the Roma integration policy; define measures for political and socio-economic empowerment of Romani women and ensure their participation in the decision making; ensure systemic and comprehensive data collection in all the thematic areas and disaggregate data by ethnicity, sex, age and other demographic criteria; strengthen the role of the ombudsperson.

Out of the 14 planned activities under these objectives, 9 are fully implemented and 5 are partially implemented. Those partially implemented are: complete the registration of all unregistered





persons; establish digital sharing of data among institutions; trainings and campaigns for birth registration; comprehensive data collection on the civil registration of Roma.

Data from the civil society organization providing support for civil registration of Roma reports that around 50 Roma benefited of this service during the last year. However, the organization is criticized for prolonging for years certain cases that may be solved in months, just to have work. At the same time the organization is not reporting the number of solved cases. The Roma engaged with the projects for civil registration have been dismissed and are complaining. Under the cross-cutting issues the dialogue again highlighted the decrease of the public funding for Roma integration that needs to be reversed.

### **Recommendations**

- Establish digital sharing of data on Roma integration among all responsible institutions.
- Collect data on civil registration of Roma.
- Cooperate with civil society to outreach to Roma and ensure birth registration, including by providing legal assistance.

