

2018 NATIONAL PLATFORM ON ROMA INTEGRATION

BOSNIA AND HERZEGOVINA

28 September 2018, Sarajevo

:: POLICY RECOMMENDATIONS ::

INTRODUCTION

The third [National Platform on Roma integration](#) in Bosnia and Herzegovina was jointly organized by the Regional Cooperation Council Roma Integration 2020 (RI2020) Action Team and the Ministry of Human Rights and Refugees (MHRR). The meeting gathered around 35 participants including representatives of the Roma Integration 2020, the EU Delegation, relevant representatives of central and local governments, civil society, international organizations, as well as the National Roma Contact Point and her team.

The National Platform mirrors similar meetings organized within the EU Member States to review the Roma integration developments in the previous year. The meeting served as an opportunity to present the [2017 Monitoring Report](#). Discussions in the meeting evolved around the implementing priorities and challenges, and the implementation of the 2018 Operational Conclusions. The civil society representatives provided crucial inputs about observed situation in the field, raising important questions which need resolving.

Besides presenting the 2017 report, the progress in implementing Operational Conclusions was assessed. The Operational Conclusions are adopted at Roma Inclusion Seminars organized biennially by the Government and the European Commission. The Operational Conclusions currently in effect were adopted in 2018.

This paper summarizes the expert observations by thematic priorities, along with the main points emerged from discussions and aims to assist the Government to further improve implementation of Roma Integration policies.

GENERAL CONCLUSIONS AND RECOMMENDATIONS

The division of responsibilities in Bosnia and Herzegovina is such that the Board on Roma discusses questions of interest for Roma integration and provides policy proposals to the Government, while the Council of Ministers and the MHRR are tasked with decision-making and implementation. In this regards, the institutional cooperation in Bosnia and Herzegovina is continuously improving. During the 2018 National Platform meeting, the MHRR and the Board on Roma agreed to have thematic meetings on specific topics, most notably problems in housing and intervention needs.

The important issue which remains unresolved is that the MHRR, as the main institution for coordinating Roma integration policies, lacks the mandate to perform its role in the field of education. Education is not under the federal jurisdiction. In 2018, efforts were made to overcome the issue, as the Framework Action Plan on Educational Needs of Roma 2018-2022 was adopted by the Council of Ministers. This way, the legal basis for Roma integration efforts in education was strengthened and should facilitate the implementation and monitoring process in the future. Increased support from the Ministry of Civil Affairs (responsible for education at the federal level) is required to ensure successful implementation of the Framework Action Plan.

The 2017 Monitoring Report was prepared according to the adopted regional monitoring standards, with the assistance of the Roma Integration 2020. The 2017 Report is the first which follows the Action Plan 2017-2020 covering priorities of employment, housing and health care. The priority of education was reported according to the 2013-2016 Action Plan on Education. The report includes information on the activities performed through the MHRR, but not those implemented by the civil society and international organizations. The exception is the priority of education where such information is also provided.



The 2017 report only contains information provided to the MHRR by 31 May 2018. Additional information on implemented activities were received in the meantime. The report will be completed with additional information and sent to the Council of Ministers for adoption by the end of 2018. This will be the first report to be adopted by the Council of Ministers. The updated report will also contain information on activities implemented outside the governmental system with clear indications which organizations implemented the reported activities.

The Government considers the Operational Conclusions as a tool which lead the implementing process. Considering this, the MHRR also plans an assessment of progress made in the implementation of the 2018 Operational Conclusions within the updated 2017 Monitoring Report. This will become standard practice and all future monitoring reports should also incorporate information on implementation of Operational Conclusions.

The data collection has improved compared to 2016 but the lack of information remains an issue. The information on the exact amount of funds spent is not readily available as the MHRR does not have mechanisms to properly monitor spending of the budget allocated for Roma Integration. Thus, assessments of expenditure were provided. The RI2020 is negotiating with the Agency for Statistics to develop a methodology to improve data collection on the number of Roma beneficiaries and the collection of impact indicators. The 2017 report did not include relevant impact assessment.

The Government will perform a mapping of Roma needs. The mapping exercise will be funded through IPA. Needs of Roma and information requirements may vary across the territory of Bosnia and Herzegovina, thus lower levels of governance will have the opportunity to state which specific information they require. This way, the social mapping can be tailor-made dependant on the needs. The civil society will have the opportunity to set forth their information requirements through the Board on Roma. Following a successful mapping, the economy will have information on the size of Roma population in need, their needs, and funding requirements.

Besides the funding allocated for social mapping, significant IPA funds are currently negotiated to establish a system for monitoring social inclusion of vulnerable groups through centres for social work and employment offices. The lack of support from the Ministry of Civil Affairs is considered an obstacle in funds programming. Available funds could cover the costs of developing relevant software and procuring IT equipment in order to establish a horizontal monitoring system across the whole territory of Bosnia and Herzegovina. An inter-governmental meeting is planned to try to resolve the issue and establish support from the Ministry of Civil Affairs.

Performing social mapping and establishing an effective system for monitoring social inclusion is necessary for evidence-based policy planning and prioritization. Having precise information on the needs of Roma and the size of population in need is slowly becoming a main pre-requirement for negotiating future donor funding. As noted by the MHRR, future IPA funding will not be obtained unless requests for support are based on observed needs supported by evidence.

The budgetary practice in Bosnia and Herzegovina cannot effectively be considered programme budgeting. In addition to this, the approach to budgeting applied by local authorities varies from one municipality to another. In the period before all levels of governance are ready to move from line-item to programme budgeting, the Government plans do advocate for including programme budgeting format within the Roma Integration Action Plans to be able to collect more comprehensive information on utilization of funds. The Local Action Plans should follow by incorporating the same programme budgeting matrix for comprehensive budgetary information collection.

The funding for Roma integration policies needs to increase, but the utilization of available funds can improve as well. The Government of Bosnia and Herzegovina, together with other Governments of the enlargement region, is cooperating with the RI2020 to adopt minimum regional standards for Roma responsible budgeting. The process of adopting minimum standards will be completed by the end of 2018. Depending on the institutional capacities, the Roma responsible budgeting standards can be gradually applied from 2019 onwards. Capacity building for the application of Roma responsible budgeting standards will also be provided.

- The Roma Integration 2020 Action Team is committed to continue cooperation with the Government of Bosnia and Herzegovina to improve the budgeting process by developing Roma responsible budgeting standards and to further support the monitoring process through strengthened cooperation with the Agency for Statistics.





- The institutional cooperation with the MHRR needs to continue improving for the benefit of Roma integration policy planning, budgeting, implementation and monitoring. Only about 50% of activities planned in the 2017-2020 Action Plan were implemented. The meeting reiterated the need for stronger involvement of the Labour and Employment Agency, the Institutes of Health, and the local authorities.
- The future monitoring reports need to contain precise information on utilized funds, number of beneficiaries disaggregated by sex, as well as impact assessment.
- The updated 2017 Monitoring report should contain additional information on activities implemented by the civil society and international organizations. Clear reference to organizations which implemented activities should be made. Additional information will provide a more comprehensive overview of activities implemented in Bosnia and Herzegovina and are a pre-condition for better policy coordination and avoiding overlapping actions. The Roma civil society organizations are invited to provide relevant information to the MHRR.
- The scope of data collected through current templates provided by the MHRR to the implementing partners should increase. With regards to budgets, the existing possibility to provide information on cash spent on policy implementation should be enriched with information on the worth of services provided.
- The Local Action Plans on Roma integration should be adopted throughout the economy. The related monitoring templates should require comprehensive information on areas of intervention, number of beneficiaries, funds spent, funds unspent, lacking funds, sources of funding, and impact.
- The social mapping of the needs of Roma will be performed from 2019 onwards. The monitoring system for following social inclusion of vulnerable groups needs to be established to be able to perform evidence-based prioritization of policies.
- The support from the Ministry of Civil Affairs is required in the field of education and to establish the system for monitoring social inclusion.
- Future IPA funding for social policies will be directed to vulnerable population as a whole and will support mainstream policies. Out of the aggregated funds, funds aimed at Roma integration should be clearly earmarked. This will allow to assess scope of utilized funds and their impact. The civil society should seriously engage to advocate for earmarking funds for Roma to avoid that Roma are neglected within the new approach.
- About 50 Roma individuals who did not benefit from civil registration are still in the process of registering. The MHRR noted that there might be additional cases that are not visible to the system. To prevent further instances of non-registered children the Government plans to automatically provide children born in hospitals with birth certificates.
- The MHRR should initiate judicial processing of cases of misappropriation of funds or unjustified non-implementation of funded activities.

CONCLUSIONS AND RECOMMENDATIONS ON EDUCATION

Actions implemented in the field of education were monitored according to the Action Plan on Education 2013-2016 due to stated impossibility to monitor them according to the Action Plan for 2017-2020. The monitoring process was further complicated by the fact that the MHRR does not have the mandate over education policy. In order to receive required information the MHRR submitted requests for information to line ministries at entity levels and informed them of the obligations of Bosnia and Herzegovina under the Roma Integration Strategy. The information included in the report were the most accurate that could be collected due to the explained circumstances, but are incomplete.

Policy implementation and monitoring is expected to improve as the new Framework Action Plan on Educational Needs of Roma 2018-2022 was adopted. For the purpose of monitoring in education, Bosnia and Herzegovina prepared a monitoring template specifically for education. The monitoring template for education is compliant with the regionally adopted template for reporting on Roma integration policies prepared by the RI2020.

The Framework Action Plan was prepared following a consultative process which included all relevant institutions and the civil society. The civil society proposals have been directly transposed into the Action Plan. The Action Plan is budgeted although national funds are in fact secured by





redirecting funds previously allocated for employment (activities in employment are not yielding expected results) to finance education mediators.

The entities and cantons are expected to follow up by adopting entity/cantonal action plans on education. Four cantons have already formed working groups to adopt such action plans.

The first aim according to the report is to include Roma children in compulsory primary education. The measure for continuous increasing of the number of Roma children in pre-school education, and the measure for providing free of charge school books, transportation and lunch for Roma children in primary education - were both implemented.

The second aim is motivating Roma children to continue with secondary and tertiary education. The aim includes two measures which were partially implemented. The policy measures in question are providing free of charge school books and transportation for Roma high-school students, but also providing scholarships to Roma high-school students who regularly attend school.

The third aim refers to preserving Roma language and culture. In 2017, as in the period before it, no activities were implemented. Notwithstanding the absence of activities reported, the civil society notified the meeting that Roma language is taught at the University of Philosophy since 1 September 2018.

Official information on the number of Roma children in all levels of education is not available. The reported number of Roma children enrolled in pre-school education (201) should be further confirmed as the same number was reported in 2015. The number of Roma children enrolled in primary education has increased while information for children enrolled in secondary education was not available.

It is compulsory to attend education up to 15 years of age. Thus, children are being formally and automatically enrolled in schools until they turn 15. Even in case when a child never attended school or has left it (school dropouts), the system cannot account for this specific situation. Considering this, even if the official information on the number of Roma children registered in primary and secondary education would exist, such number would not be relevant to point to the real situation in education.

- Official information on the number of Roma children enrolled in all levels of education does not exist. Collecting information on children attending schools, school dropouts, children repeating the class, and children who were never registered in the education system is required for their successful targeting in education policies. A systematic manner to collect the required information should be introduced. The lower levels of governance should widen the scope of information collected on enrolled children so that the MHRR can later collect this information. Before an official mechanism for data collection is introduced, the planned social mapping exercise can also be used to collect relevant information.
- The communication and coordination of the entity and cantonal level institutions with the MHRR should improve. The National Platform revealed that the MHRR is often not informed about entity or canton-specific developments in education.
- Separate funds to finance the new Framework Action Plan on Educational Needs of Roma 2018-2022 need to be allocated. Financing one priority by limiting funding in another is not a sustainable solution (currently funds are redirected from the employment priority).
- The MHRR is not in a position to define education priorities in the Framework Action Plan due to education not being under its jurisdiction. Support from the Ministry of Civil Affairs is required to serve as a link between the MHRR (performing coordinating role) and the entities.
- The civil society is not pleased with IPA II prioritization in education which is predominantly focused on preserving Roma language. The civil society requested that Roma representatives are included in the process of defining priorities.
- The MHRR should provide the civil society representatives with the 2017 information on education disaggregated by municipalities, as requested in the National Platform. The information can lead further civil society organizations' activities in parts of territory where they are active.

CONCLUSIONS AND RECOMMENDATIONS ON EMPLOYMENT





According to the official statistics approximately 2,650 Roma are unemployed. This number refers only to individuals registered at employment who declared as Roma. The Government assesses that the real number is up to twice as high.

The Action Plan 2017-2020 stipulates two employment programmes. The first programme relates to supporting and stimulating employment of Roma. Four measures are planned, out of which two were implemented. The first measure provides for developing efficient programmes for employment of Roma by defining application criteria which target Roma applicants. Programmes targeting Roma were published in 2017 but were published online. As a result, it is unlikely that many Roma individuals were informed of the specific criteria under such calls. The second implemented measure relates to incentives for employment and self-employment. According to the report, 123 Roma were employed through this measure out of whom 18 were self-employed.

The second programme is programme for education, additional qualifications and (re)qualification of Roma registered as unemployed with employment institutes. No activities were implemented in the second programme.

The budget for employment remains the same from one year to the next while policy effect and the number of employed Roma continues to increase (103 persons were employed in 2016). The Government clarified that this is due to the low interest for participating in employment programmes. Consequently, the funds from previous years are being utilized later than planned - leading to increased employment in years which follow. The MHRR and the Board on Roma recognized that the current approach in employment does not yield results and are in the process of defining a new approach to employment of Roma.

- The employment institutes' programmes targeting Roma should not be published only online. Additional activities are necessary to improve outreach and inform Roma in larger numbers.
- New approach in employment should be devised to increase the effect of employment measures and the interest for participation in employment programmes.
- Collection of information on unemployed Roma registered at employment offices can be improved by properly informing Roma individuals of the benefits of voluntary declaration of ethnicity.

CONCLUSIONS AND RECOMMENDATIONS ON HEALTH

The field of health is divided into four programmes. The first programme refers to Roma health mediators. Workshops for health mediators were organized in the Federation of Bosnia and Herzegovina, with the total expenditure assessed at 13,000.00 EUR. Activities to develop criteria for employment of Roma health mediators and systematize trainings programmes for Roma health mediators were not performed.

The second programme is ensuring access to health care in the Federation of Bosnia and Herzegovina. The priority includes one measure - allocating funds for financing health care rights of uninsured persons. The measure was implemented.

The third programme relates to preventive health care. Preventive examinations for breast and uterine cancer were provided to Roma women. The institutions are unable to increase the number of beneficiaries due to the limited funds.

The fourth priority stipulates health education and awareness raising on health issues. Planned activities, such as education on general health, reproductive health, how to exercise health care rights etc, were partially implemented.

The number of Roma covered by some form of health assistance has increased from 1,481 in 2016 to 2,376 in 2017. Meanwhile, the official statistic on the number of Roma without health insurance remains unavailable. The statistical information should be received from the Agency for Statistics or the entities' Ministries of Health and Health Insurance Funds.

According to the testimonies, many Roma are not insured due to not falling under categories of persons covered by compulsory health insurance. The issue needs prompt resolving as this sometimes leads to fatal consequences. Vulnerable Roma do not have financial means to participate





in the measure for retroactive payment of health insurance, as also noted in the previous National Platform. Some of the civil society representatives proposed voluntary health insurance where benefactors would pay 600 KM annually to insure one individual. This cannot be a long-term policy approach nor a sustainable solution.

The meeting did not propose any sustainable solution to resolve the issue of insuring vulnerable Roma.

- Data collection on the implementation of planned measures in the field of health and the number of Roma with and without health insurance needs to improve. The upcoming social mapping exercise can be used to collect the required information.
- The budget utilized in the field of health needs to be provided in the updated 2017 Monitoring Report. Currently only an assessment is provided.
- The civil society is not pleased with IPA II prioritization in health which is primarily focused on Roma health mediators. The civil society requested that Roma representatives are included in the process of defining priorities.

CONCLUSIONS AND RECOMMENDATIONS ON HOUSING

The first programme in the field of housing refers to the legalization of housing units in informal settlements populated by Roma. Infrastructure projects for improving living conditions in Roma settlements were implemented.

The second programme envisages constructing social housing for Roma. Two measures are planned under the programme - one is constructing private housing and the other is constructing social housing. In reality, no real difference between two measures is made by the implementers of housing measures.

The third programme relates to improvement of housing conditions by reconstructing housing units which are either owned by Roma or have a different owner but are allocated for Roma. Reconstruction of housing owned by Roma was implemented in 2017.

The previous National Platform noted delays in the implementation of funds allocated for housing through the MHRR. The 2018 National Platform noted the same. A significant number of housing units were constructed with the funds from previous years (up to 2014) but were not completed before 2017. The 2017 report provided information on all constructions completed in 2017 with disaggregated information on the number of units erected with funds from 2014, 2015 and 2016, and the related expenditure.

Significant part of the National Platform discussions were dedicated to problems observed in housing. The civil society informed of housing which was not constructed according to the project, situations where infrastructure or electricity connections did not follow the erection of housing units, situations of misappropriation or misuse of funds, non-implementation of allocated funds, and similar.

Lingering issue with the construction of housing from funds allocated by the MHRR is that it does not have the mandate to supervise the construction process and attest the completed housing units. It is within the scope of municipalities' responsibilities to ensure quality and timely construction of housing units, including the connection to communal utilities. Notwithstanding this, the MHRR can perform monitoring visits through an implementing committee. This way it can urge the local level authorities to perform their legal duties - in case the intervention is necessary. The MHRR does not have the human capacities to perform monitoring visits of all housing constructed. For this reason, the MHRR needs to be provided with information from the field by other stakeholders.

In case when construction does not start or is not completed for a prolonged period of time, the MHRR can cancel the project. In such a case, the allocated funds are returned to the central budget and cannot be used for a new housing project. The MHRR is thus avoiding cancelling projects whenever possible and is seeking solutions which will lead to the subsequent initiation and finalization of projects. The civil society noted that as long as such projects are not cancelled a 'beneficiary family' cannot apply for another housing project and is in effect left without housing.

- Up to date more than 1000 housing units were allocated to Roma. According to the needs assessments, additional 2500+ housing units are required.





- Gender disaggregated information on housing beneficiaries should be provided. The information provided in the 2017 Monitoring Report included only assessments.
- The Board on Roma needs to have a thematic meeting focused on problematic housing projects to be considered on a case by case basis. Considering that the MHRR has the mandate to perform monitoring visits but has limited capacities, other stakeholders such as community representatives and civil society should assist it by providing information on problems observed.
- The MHRR should investigate cases of neglecting housing units from the moment they become ownership of municipalities.
- In cases of unjustified delays in implementation of projects, such as misuse or misappropriation of funds, the MHRR should initiate due proceedings. Some of these cases can be characterized as criminal offences and expressions of institutional anti-Gypsyism. The MHRR requested from the National Platform participants to officially provide it with information on problematic cases in order to be able to initiate proceedings.

