

2019 NATIONAL PLATFORM ON ROMA INTEGRATION

11 June 2019, Podgorica

:: POLICY RECOMMENDATIONS ::

INTRODUCTION

The fourth National Platform on Roma Integration in Montenegro was held on 11 June 2019, jointly organised by the Regional Cooperation Council's (RCC) Roma Integration Team (Roma Integration) and the Ministry of Human and Minority Rights (MHMR) of Montenegro. The event gathered relevant central and local government representatives, civil society, international organisations and other stakeholders.

Besides the earlier practice of presenting the annual report on the implementation of Roma integration policies, the Roma Integration Action Team presented the triannual Roma Integration [Roadmap 2019-2021](#) which stipulates topics of technical assistance in the fields of employment and housing. The document was developed in cooperation with the Government of Montenegro to support integration of Roma¹ in Montenegro. Following the presentation, the participants engaged in panel discussions that reflected appropriate approaches towards implementing the technical assistance in question, as well as other required interventions in employment and housing. The Operational Conclusions from the 2018 Roma Seminar were also discussed.

This Policy Brief reflects the discussions and is aimed to assist the Government of Montenegro in prioritizing, budgeting and formulating more effective Roma integration policies in the upcoming years. The findings will also serve as a starting point for the definition of the next Operational Conclusions in the 2020 Roma Seminar. Lastly, the proposals from the National Platform will be incorporated in the technical assistance in accordance with the [Roadmap](#).

ACHIEVEMENTS 2018 AND 2019 & GENERAL RECOMMENDATIONS

The Government of Montenegro continues to recognize the integration of Roma as an important issue. The Roma civil society continues to participate in planning and implementation of Roma integration policies. Brief presentation of the annual Report on the Implementation of the Roma Integration Public Policy in Montenegro for 2018 is provided below.

In education, Roma enrolment rates are increasing. The budget expenditure increased in both 2018 and 2019. This is partly due to the fact that the funding of measures related to provision of textbooks for Roma is now an obligation of the Ministry of Education. Previously the MHMR covered part of the funding. The MHMR has retained the existing funds and is in a position to allocate them for other policy measures. This was recommended in the National Platform in 2018.

In housing, as reported by the NRCP, Roma benefited from 13 housing units in Niksic constructed through the Regional Housing Programme (RHP), 171 housing units in Podgorica with additional 48 housing units constructed through the Instrument for Pre-Accession Assistance (IPA), and 2 housing units in Berane. In Herceg Novi municipality, housing situation was resolved for 27 Roma in cooperation with HELP-Hilfe zur Selbsthilfe.

Related to employment, Roma participation in employment measures is as follows: 72 (25 female) persons participated in active labour market measures; 26 (9 female) persons in adult education and training programmes; 15 persons in public works (cleaning actions) at the central level and 18 at the local level (in 7 municipalities); 13 (9 female) persons in pilot program to activate hard-to-employ persons to engage in the labour market; and 82 (48) persons in seasonal work. One person

¹ Here, the term 'Roma' is used in line with the terminology of European institutions and international organisations, to refer to a number of different groups (such as Roma, Sinti, Kale, Gypsies, Romanichels, Boyash, Ashkali, Egyptians, Yenish, Dom, Lom, Rom, Abdal) and also includes travellers, without denying the unique features and varieties of lifestyles and situations of these groups.



with tertiary education was employed in Niksic in the civil society, together with two persons with higher secondary education (in the civil society and the local government), all on contract basis. Montenegro is striving to ensure that all university educated Roma find employment as a motivation for young generations not to drop-out from the education system. According to a research by the NGO Center for Democracy and Human Rights (CEDEM), support for anti-discrimination policies for Roma integration has increased from 66% (2010) to 77.2% (2018). This was the highest increase of support for integration policies for a single vulnerable group.

On horizontal issues, Montenegro is participating in the Roma Responsive Budgeting Initiative led by the Roma Integration project. The [Guidelines for Roma Responsive Budgeting](#) were developed in 2018 within the inter-governmental working group that also included Montenegro representatives. In 2019, Montenegrin civil servants were trained to perform Roma responsive budgeting of policies and action plans, based on existing evidences of Roma needs and policies' successes. At the same time, test phase of the [Guidelines](#)' application implemented by the Roma Integration is ongoing and will continue in 2020.

Montenegro has provided full support in the process of preparation of the [Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process](#) adopted in the Western Balkans Summit in Poznan. Montenegro highlights its political commitment to Roma integration. The [Roadmap](#) document will also serve to support achievement of the [Declaration](#) stated goals and targets.

- The National Roma Contact Point (NRCP) should maintain the National Platform on Roma Integration as a platform for the dialogue among all relevant stakeholders.
- Capacities of the Ministry of Human and Minority Rights together with that of the NRCP and his office should be substantially strengthened in relation to the policy planning, monitoring and implementation.
- The capacity-building of policy implementers at the local and central level should continue, including for the Commission for monitoring of the implementation of the Strategy for Social Inclusion of Roma and Egyptians in Montenegro 2016 - 2020 (Roma Integration Strategy).
- The monitoring process should continue to be improved, especially on collection of budgetary and impact information. The Ministry of Human and Minority Rights should initiate a request towards the MONSTAT Statistical Office for the official collection of impact information on a periodical basis. Collection of gender disaggregated information in case of measures implemented by the central and local Government should be further improved.
- Sufficient budget should be committed for the Roma integration action plans so that planned policies are implemented. Cooperation of the line ministries and the Ministry of Finance needs strengthening.
- Montenegro should continue to participate in the Roma Responsive Budgeting Initiative and officially adopt recommendations for the improvement of budgeting procedures at the end of each budget year.
- The Ministry of Labour and Social Care (as one of crucial line ministries for employment and social housing policies) should assume its role in formulating, budgeting, monitoring and reporting on the Roma integration policies as to ensure that Roadmap stated targets are timely achieved.
- The civil society should increase capacities to discuss the National Platform proposed topics, point to lingering and emerging issues, and offer solutions.
- Participation of Roma community in the planning and implementation of activities at the local level should be promoted and guaranteed, though their direct representation and participation (besides that of non-governmental organisations).
- The practice of incorporating Operational Conclusions in the Roma integration action plans should continue. Conclusions from the National Platform events should also be incorporated in the action planning.
- Instead of adopting annual action plans, the economy should consider to adopt action plans of longer duration.

ROADMAP CONSIDERATIONS AND RECOMMENDATIONS FOR ACTION

To support the achievement of the [Declaration](#) stated goals and targets, the [Roma Integration Roadmap 2019-2021](#) was prepared in cooperation of the line ministries and the Roma Integration project. The document envisages governmental priority areas and technical assistance to reach the desired targets. The document is based on available data, including the 2017 Regional Roma Survey. This is in line with the previous year recommendation to base policies on existing information. The anticipated technical assistance is entirely based on goals, targets, and measures from the [Roma Integration Strategy, 2018](#) and [2019](#) Action Plans, and 2018 Operational Conclusions. The planned technical assistance together with the most important considerations and discussions takeaways from the National Platform are summarized below.

EMPLOYMENT

The 2017 UNDP Regional Roma Survey [results](#) for Montenegro indicated that the employment rate of Roma is 14%, compared to 37% for their non-Roma neighbours and 52% for total population. Compared to 2010, this is a decrease in the employment rate of Roma. The [2019 EC Progress Report](#) confirmed that achieved results are insufficient and that negative trend was observed recently. At the same time, 61% of Roma engage in undeclared work. The [Roadmap](#) sets as the target to achieve the Roma employment rate of 25% by the time of the European Union (EU) accession by transforming at least 20% of the current undeclared into declared work. Anecdotal evidence clearly points that significant number of Roma in undeclared work engage in individual secondary raw materials (waste) collection. There is an opportunity to increase the employment rate for Roma by piloting sustainable formalisation of work of informal secondary raw material collectors.

Roma who currently engage in this work are in precarious situation as they earn minimum income, have no health and social insurance. There is little chance that they will be entitled to retirement pensions. The existing legislation does not recognise their work. Strict application of the current legislation would mean the end of work for the informal waste collectors, which would leave them without any source of income. At the same time, population that receives family support benefits is not inclined to formalise their work as their accumulated income would diminish (due to losing right to social benefits). To account for this situation, the formalisation needs to ensure that income after formalisation remains the same or is increased compared to the current one. Other benefits of the formalisation will be the possibility to receive pensions and the entitlement for credit and other support - as legal businesses.

To assist the Government to reach the [Roadmap](#) targets and contribute to the development of a comprehensive policy for the formalisation of undeclared work, the Roma Integration project agreed to support it with technical assistance to develop comprehensive programme for the formalisation of work of the secondary raw materials collectors. Montenegro has already engaged on this path as the NGO Young Roma submitted an initiative to the Center for Vocational Education to standardise the profession of secondary raw materials collectors. Standardisation is a necessary precondition for the formalisation of any work. In connection with this, the Roma Integration project agreed with the Government to support it in:

- data collection
- preparation of accompanying primary and secondary legislation
- preparation of a funding proposal for piloting the formalisation programme once basic preconditions are met

In relation to the offered support, the National Platform agreed that any formalisation programme needs to target totality of situation of the waste collectors, specifically the following main considerations:

a) Ensure that the income is not diminished (which would push the targeted population deeper into poverty) and increase the security of beneficiaries. To account for this, a specific support package is required in the transitional period until their income is stabilised and increased.

Support package can be secured through their preferential treatment relating to the taxation of labour and social and health insurance contributions. Modalities of support can be tax subsidies; flat rate contributions; and/or keeping the right to benefit from social aid while employed. Introducing the proposed practices would be in line with the treatment of workers in agriculture,

and is justified by the social benefits of Roma integration and their contribution to waste management and environment protection.

The subsidies need to last until exit from the social situation is ensured and the income increased and stabilised. This is a realistic expectation as long as informal secondary raw material collectors are integrated in the formal waste management system. The recycling business will grow in the economy and should become more lucrative. Such development is set at part of the EU integration path as the transposed legislation stipulates percentage quotas for different types of collected waste (secondary raw materials) that need to be recycled annually. The quotas are not nearly reached at the moment.

As a first step towards the programme development, a cost-benefit analysis is necessary that will take into account current contributions of all family members and offer a model that is agreeable for informal waste collectors. Besides the cost-benefit analysis, first step also has to be identification of the size of targeted population and their motivation for formalisation. Data collection should also pinpoint the best and most sustainable waste collection practices currently performed, as practices differ in different parts of the economy with some being more successful than others.

Important consideration in relation to the total income of a certain household from waste collection is that children also engage in this work. In order to avoid that complete younger generations are steered towards waste collection the programme should consider including an educational component, such as support and requirements for children to participate and remain in education.

b) Integrate informal waste collectors into the existing integrated waste management system

Existing practices of informal waste collectors should be recognised in the legislation. At the same time, the practices will need to be altered to a necessary extent in order to be fitting for a well-regulated system organised in accordance with EU standards. As such, their recognition and integration requires to appropriately regulate: criteria for obtaining licences together with modalities of collection, obtaining, transporting, storing, as well as treating waste.

Current legislative criteria do not allow formal access to individual secondary raw materials collectors, while obtaining materials manually from containers is generally not considered viable and sustainable option. To account for this, other possibilities need to be sought. Some of these include: cooperation with municipal services so that access and rights are provided to private collectors in certain (specially designated) areas or allowing them to collect materials from specially marked containers, similar to granting concessions; but also collecting directly from companies and households.

In relation to the previous, the practice of purchase of secondary raw materials from informal collectors differs from one municipality to another. Some municipalities consider that there is legal basis to purchase from individuals while other do not. This issue emerged as one of the specific matters that need to be regulated in the sense of their integration in the waste management system.

c) Provide informal waste collectors with one-time support in trainings and equipment to facilitate formalisation of the work according to the standards

The target population is often without or with very low level of education which requires training and capacitating them to perform work according to the standards and to properly operate the necessary equipment.

The trainings need to cover issues such as: types of waste relating to their potential worth but also health hazard; complying with work-related standards including tax compliance; environmental, health and other work-related standards; obtaining driving and other relevant licences for operating equipment.

In addition, the collectors should be provided with the equipment for collection, transportation and treatment of waste. Where required, the authorities could allocate and donate land in industrial zones for materials storage and treatment.

The necessary support can be connected with the measure in [2019 Roma Integration Action Plan](#) that envisages special credit lines for Roma to start their own business.

Related to the considerations as described above, promising practices exist in Montenegro which should be complemented and developed further.

Specifically for informal waste collectors, the NGO Young Roma already implemented a project to train informal waste collectors and has assisted in the creation of a professional syndicate of informal waste collectors. These important experiences need to be built upon. Further strengthening the network of waste collectors will be beneficial for the exchange of experiences and to strengthen their negotiating position *vis-à-vis* purchasers, related to the price of goods. At the moment, the syndicate is not very active as waste collectors are not in a position to allocate sufficient time to participate in it.

The Employment Agency of Montenegro is engaged in activating and employing long-term unemployed people without qualifications. In such cases the Agency first prepares job-seekers for an occupation before mediating in their employment. Special attention is given to Roma job-seekers. Currently, the occupation that is most sought is hairdressing. This draws attention to the need to offer trainings for new occupations and at the same time motivate Roma to participate in the new employment programmes. Roma employment mediators should be part of the process so to identify, inform, and motivate Roma about relevant programmes.

The Employment Agency has further signed a Memorandum of Cooperation with the Roma Council. The Roma Council now has access to the Employment Agency's database of employment-seekers and strives to motivate Roma to participate in active labour market measures. In 2018, the cooperation has resulted in the employment of Roma in public utility companies - through public work programmes. While public work is short-term, good emerging practice is that employers were willing to contribute to wages on top of the guaranteed minimum wage, resulting in the wage increase.

Up to date, initiatives for standardisation of occupations in Montenegro have led to increased interest for the occupations, but also for the standardisation of new occupations. So far the occupations of Roma mediator (social inclusion associate) in education, employment, health and social security were standardised. The practice needs to continue and not only for mediation-related work. In addition to the occupation of waste collectors, the National Platform participants' experiences show that a significant number of needed crafts are not standardised. Some of the already standardised occupations could lead to sustainable employment of Roma but there is little awareness about them. Employment potential of standardising certain crafts and training Roma for the new and existing occupations needs to be assessed at the national level.

- Lessons learned during formalisation of other types of work should be utilised in order to develop appropriate and sustainable work standard for waste collectors. The working group for standardisation needs to take into account the whole situation, including the possible modalities of performing work, organisational models, necessary support, and relationship with other stakeholders together with the need to establish contacts.
- Initial data collection is necessary to develop an appropriate pilot programme for the formalisation of work of individual waste collectors. It should cover: the size of potential beneficiary population and their motivation; cost-benefit analysis of formalisation and appropriate funding mechanisms; legislation amendment requirements - legal analysis.
- Promising examples of EU countries allowing to individuals to earn from waste collection should be examined and mirrored.
- Development of the pilot programme needs to be participative. Meetings with experts and targeted population should be organised to collect information about the needs of beneficiaries, exchange experiences, and motivate them.
- Relevant stakeholders should be involved to create pre-conditions for participation and strengthening of the professional syndicate of waste collectors.
- Participation of the Ministry of Labour and Social Welfare and the Ministry of Finance is a *sine qua non* for the successful formalisation of informal work. The two institutions should engage more on the issue.
- The formalisation should go in hand with the development of relevant active labour market measures that should also cover obtaining of driving and other relevant licences.
- The formalisation programme should incorporate financial and in-kind support in equipment and location/premises for performing work. This can be achieved by establishing a special fund for Roma employment (previous year recommendation) and/or a special credit line for

- the self-employment of Roma (2018 Action Plan) as the most socially and economically deprived group in the economy.
- Roma employment mediators should motivate Roma (informing them about the potential of work formalisation) and identify target population not registered with the Employment Agency.
- The good practice of increasing wages for public work participants should be continued and institutionalised.
- Assessment should be made at the national level about occupations relevant for Roma employment already standardised or that need to be standardised (such as crafts). This should be followed by work standardisation and employment programmes for Roma in these occupations.
- Roma should be trained to develop skills for tourism as one of the main pillars of the Montenegrin economy.
- In the northern region, Roma can participate in agricultural project some of which are already implemented at the local level. The approach should be recognised, systematised, and promoted in the action plans.
- New model for motivating employers to employ Roma should be developed. Subsidies for employers to employ vulnerable groups were revoked in 2019.
- Measures for combatting discrimination by employers and in the work place need to be developed.
- Employment support should be combined with the support in housing, as an integral approach to Roma integration. The formalisation programmes should consider an educational component.

HOUSING

Montenegro does not possess precise data about the situation of Roma in housing, while anecdotal evidence strongly points out to a very poor housing situation. The only data collected by Montenegro is part of the [Roma Integration Strategy](#) and indicate that approximately 40% of Roma housing is illegal. This is corroborated by the 2017 Regional Roma Survey [results](#) according to which 77% of Roma live in segregated settlements, 60% live in housing not up to adequate standard, and 94% face severe material deprivation. Overcrowding and discrimination in the labour market are additional issues recognised by the Delegation of the European Union. The [2019 EC Progress Report](#) recognised successes made through Konik Camps closure and invited Montenegro to strive to resolve housing problems for domicile Roma, commit to promote legalisation, and avoid eviction risks.

To assist the Government in resolving the issues, it was agreed to prioritise legalisation of Roma housing and Roma informal settlements so to lower the number of illegal dwellings to 15% by the time of the EU accession. It is expected that the deadline for housing legalisation will be re-opened due to high interest from home-owners, as the last deadline was closed on 16 July 2018. In addition, Roma should further benefit from social housing support as the legislation explicitly prioritises them, although the provision is not well operationalised.

The Roma Integration project offered to support the Government of Montenegro in:

- comparing existing data on housing, identifying Roma informal settlements and Roma owned housing units, and identifying additional data collection requirements
- identifying legislation gaps and offering appropriate legislative solutions
- preparing a funding proposal for settlement² (or housing units) legalisation or alternatively a social housing project
- developing methodology of a participative integral approach combining housing and employment support; the support can be extended to policy planning at the local level

² Settlement legalisation is understood as a project for a settlement revitalisation that connects: inclusion of the settlement in urban plans; reconfiguration of the settlement where necessary to comply with urban planning and other standards; infrastructure and desegregation works; legalisation of individual housing units; and provision of social housing that fits into the reconfigured plan where necessary (for housing units that cannot be legalised for justified reasons).

The meeting agreed that in order to successfully operationalise the Roma Integration support and improve the housing policies for Roma in Montenegro the following main considerations need to be met:

a) Establish the locations, size and structure of Roma settlements; collect information about available social housing; and establish the size of population in need of housing support (per different types of support)

Proper database will be necessary to plan social housing programmes at the national and local level and to ensure appropriate prioritisation of groups recognised in the Law on Social Housing.

The only available information (in the Social Housing Programme 2017-2020) about available social housing indicates that approximately 2000 units are available. The institutions representatives agree that this information is not precise. In addition, it is necessary to establish the size of population in need, including Roma. The Social Care Centres need to be involved to provide up-to-date information about the population in need.

In 2019, the Roma Integration project engaged consultants to develop methodology for mapping informal Roma settlements and to perform initial mapping exercise according to the proposed methodology. The exercise will support Montenegro in the planning of housing policies.

Related to the legalisation it will also be necessary to infer how the identified settlements and objects relate to the existing or upcoming urban planning documents and whether the objects are appropriate for legalisation. Not all Roma housing can be legalised due to not being considered a 'structure' according to the Law on Spatial Planning and Construction of Structures (Art. 68). The main reason is that some of the housing is constructed from inappropriate and not durable materials. While exact data on illegal dwellings and their compliance is unavailable, Montenegro has set up the online [Geoportal](#) that includes substantial information about housing (without ethnical disaggregation). Two sustainable housing options exist in cases of housing units not considered a 'structure', one is their reconstruction up to the legalisation standard (where possible) and the other is provision of social housing.

b) Improve the general understanding and capacities for applying the Law on Social Housing

When considering available social housing, lingering issue is the general lack of understanding of conditions for benefitting from social housing. The beneficiaries tend to consider social housing their property, while the municipalities rarely perform periodic revisions of the fulfilment of conditions for benefitting from social housing. As a result, sometimes households remain in social housing after they have ceased to fulfil the conditions. At the same time, those most in need cannot benefit from the housing in question due to limited supply. According to the legislation, revisions can be performed only by the local level, while the central level can only give recommendations.

The Law on Social housing considers Roma as one of priority groups (Art. 4). The Law also includes criteria for entitlement to social housing (Art. 8) such as: housing situation, income, length of residence, number of household members, invalidity, health condition, and age. The prioritisation methodology is lacking. An instruction to municipalities about relationship between prioritisation under article 4 and criteria under Article 8 does not exist. As interpreted by the representatives of relevant institutions, the priority groups are de facto only proposed to the local level as the only explicitly referred criteria are under Article 8. The local level has a free hand to define allocation criteria and decide which of the priority groups in the Law will be effectively prioritised. Priority groups are also defined in the Law on Local Self-Government and municipality statutes which additionally complicates the situation.

In addition, there is no official method to collect information about ethnic belonging at the local level. Such legal gap effectively prevents appropriate prioritisation of Roma and officially collecting information about Roma who benefit from social housing.

To appropriately implement the Law on Social Housing it is necessary to both define the prioritization methodology and to ensure that the information about ethnic belonging (of Roma as a priority group) is officially collected, on voluntary basis.

On training requirements, the capacities for defining high quality programmes, action plans, and methodology of execution of housing programmes at the local level are not sufficient.

c) Improve models of financing social housing construction and its later maintenance

When contributing to social housing projects, the local authorities sometimes allocate land and cover costs of connection to utilities. However, funds for construction works are often not available which remains the largest obstacle in executing social housing projects. The issue should be resolved in a joint effort by the Ministry of Sustainable Development and Tourism, the municipalities, the international and local organisations.

Related to the maintenance costs, social housing is municipality ownership. In this sense, in a case when certain social housing contract expires and is not revised, the municipality is obliged to cover utility costs as the legal owner. In some situations this has led to utility bills not being paid for a number of years and significant municipal debts.

Improper planning of social housing costs and ambivalence about the obligations of different actors jeopardise the sustainability of social housing. This can be accounted for by collecting data about ongoing and unplanned costs based on the experience of stakeholders directly involved in the housing maintenance (such as the Housing Agency in case of Podgorica).

Recent local level experiences with social housing show that proper informing has led to good maintenance of social housing. In addition, engaging beneficiaries in joint activities has been contributing to activating of work-capable Roma and promoting a sense of housing ownership.

Lastly, the most important condition for the sustainability of social housing is to support beneficiary population in employment.

d) Amend the legalisation legislation so that it better accounts for the needs of Roma in housing and their specific situation

The legislation on legalisation envisages financial fines for those who do not legalise their dwelling or do not submit an application on time. No considerations exist for social aid beneficiaries and owners of illegal structures serving as primary residence.

Applying for legalisation is overly expensive for most of the vulnerable Roma. The costs should cover preparation of a geodetic elaborate, fee for connection to utilities, land costs (when not owned by Roma), and other costs.

In order to be legalised an object also needs to be in accordance with the urban plans. As noted by the Ministry of Sustainable Development and Tourism, ensuring the compliance is a complicated procedure. There is little chance that vulnerable Roma can engage in this process without the technical and legal support.

In line with the considerations as above, some successful practices exist in Montenegro that can be utilised in setting up a system that will better respond to the Roma needs. In Tivat municipality, the proposal was reached to construct access roads to informal settlements through the dialogue of Roma community and the municipality, supported by the ROMACTED project. This is a promising practice of the participative approach.

Tivat is also one of the municipalities that have established the body that performs revisions of the right to use social housing. Similar body also exists in Podgorica. Remaining municipalities can establish such professional bodies following the existing experiences. In order to resolve the emerging situations for households that need to move out from the social housing, Tivat also adopted a decision on alternative accommodation for households which cease to benefit from social housing. This is another promising practice that should be replicated.

The civil society noted that around 170 families in the southern region together with families in Bijelo Polje living near the road that is undergoing widening works are in risk of evictions. These and similar situations need to be prioritised based on the collected data.

- Settlement and households facing safety, health and climate, and eviction risks should be identified to inform proper policy planning. A list of settlements and housing units according to the degree of emergency needs to be set up to inform appropriate prioritisation of Roma according to the observed situations. The information gathering

should lean on the housing mapping exercise by the Roma Integration project and information provided by the civil society.

- The risk of forced evictions should be eliminated. In order to guarantee alternative accommodation for justifiably evicted persons, annual budget portion should be committed so that the issue is gradually and sustainably resolved across a number of years.
- The mechanism to collect official information about ethnic belonging at the local level (on voluntary basis) needs to be developed. This will resolve the current legal gap and is a minimum legal precondition for the prioritisation of Roma in social housing.
- The mechanism that will ensure guarantees that the priority groups from the Law on Social Housing will be effectively prioritised according to their needs to be introduced.
- Relevant policy and legal documents referring to priority groups (the Law on Social Housing, the Law on Local Self-Government, municipality statutes, etc.) should be compared and reassessed at the local level to clarify the matter and identify precedence of different documents. The comparison will contribute to resolve uncertainty of prioritisation and develop prioritisation mechanisms.
- Stakeholders with experience in developing and maintaining social housing programmes need to be engaged in the planning of social housing programmes and projects to properly estimate the construction, maintenance, and other costs.
- Due to the financial constraints, financing of housing policies for Roma would benefit from annual appropriations (at the central and local level) so to gradually and sustainably resolve the housing issue based on priorities established during the data collection.
- Informing affected communities and their participation in the planning of housing initiatives is a necessary pre-condition for the sustainability of interventions. In case of social housing, the communities also need to be consulted about locations and type of housing while taking care about desegregation. The participation and information methodology should be developed based on the RHP and the ROMACTED experiences.
- All municipalities should form expert bodies for period revisions of the right to social housing.
- All municipalities should adopt local programmes and action plans for social housing. The information exchange between the municipalities needs to be introduced so that good practices are shared and mirrored.
- The local level should be supported in capacity building for the preparation of housing policy documents and the implementation of housing policies.
- Integral approach combining housing and employment should be developed and introduced to ensure the sustainability of housing solutions. The inter-institutional cooperation in developing and implementing the integral approach should at least include the Ministry of Sustainable Development and Tourism, the Ministry of Employment and Social Welfare, the Ministry of Human and Minority Rights, the Ministry of Finance, and the local level.
- Once the legalisation process is re-opened, a working team composed of civil society and institutions' representatives should be formed to define the approach to informing Roma, technical and legal support required, and specific exemptions for vulnerable categories.
- The legislation on legalisation should be amended to account for the needs of vulnerable Roma. Efforts should be made to promote the legalisation of housing for Roma that do not own the construction land.
- All municipalities should define the legalisation costs, while aiming not to inflate the costs. The municipalities should aim to lower the costs of legalisation for objects of primary residence, following the example of Podgorica. The maximum of land and surface area for benefiting from such exemptions can be defined to avoid the misuse of such measures.
- Roma should be appropriately informed about the advantages of legalisation, its costs, consequences of not applying and similar. To properly perform this, some of the unavailable information (such as on the approximate total costs of legalisation) should be assessed.
- The households living in objects of primary residence that are already connected to utilities through their own intervention should be exempted from the costs of utility connections in the legalisation process.
- The technical and financial support for legalisation should be provided to vulnerable Roma households. The support can be combined with the conditionality to perform a form of public work in the settlement - towards the activation of vulnerable Roma and promoting a sense of ownership and responsibility for the received support.

- Fines for not applying for legalisation/not legalising an object should be revoked for the population belonging to a social category and/or living in objects of primary residence.
- Domicile Roma should benefit from measures in housing.

