



Erich Brost Stiftung



Quantitative indicators for the Decade of Roma Inclusion progress monitoring

Review of the existing experience and possible approaches

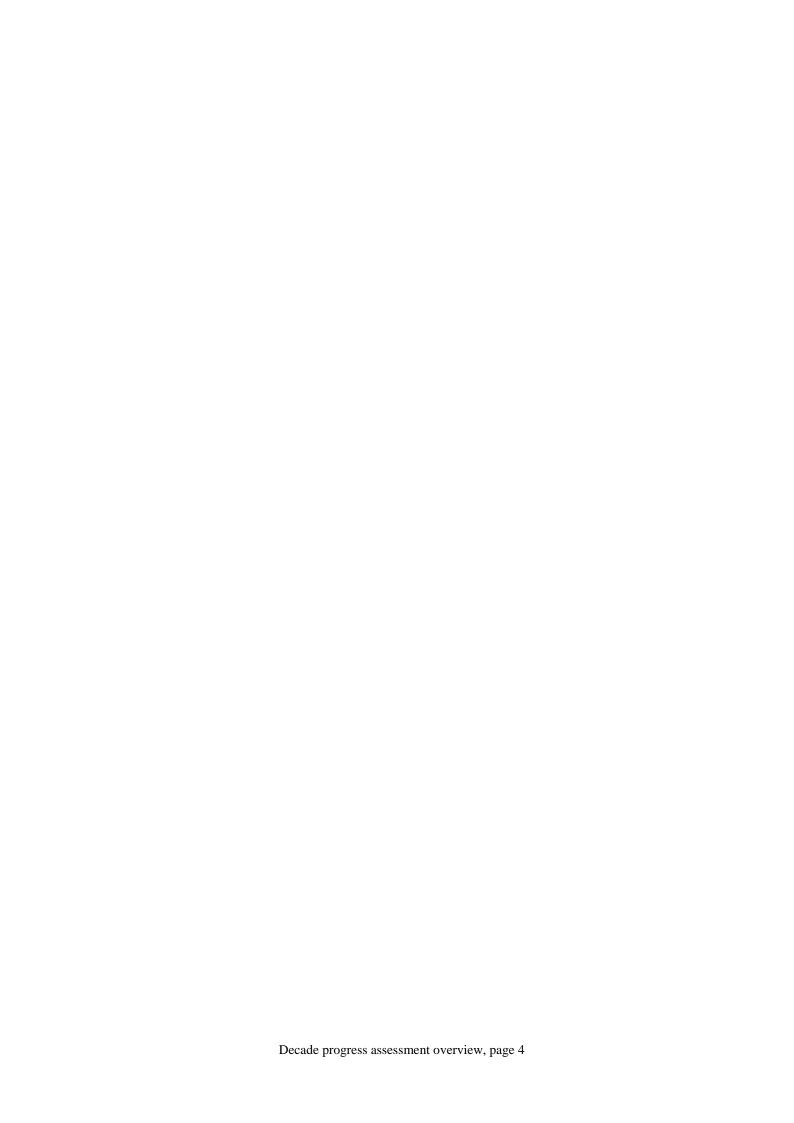
Working meeting with the members of the Decade implementation bodies in Decade countries

Belgrade, 29th October 2007



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1. Background of this initiative

This meeting is part of the sustained work in the field of ethnically disaggregated data and indicators that UNDP Bratislava Regional Centre is leading since 2001. The first step in this regard was the implementation of a comparative regional survey on the status of the Roma communities in Central and Eastern Europe and the publication of a comprehensive analytical report, which was the first regional publication on the status of Roma in CEE based on comparative quantitative data. ¹

The report "Avoiding the Dependency Trap", published in January 2003, has played a key role for the progress of the Decade for the simple reason that for the first time its authors have called for the setting and achieving Millennium Development Goals (MDG) targets not only for the average national level but also for vulnerable groups and Roma in particular. Taking in to consideration the fact that the time frame and the priorities of the Decade and the MDGs are identical, the report can be seen as the first document calling for an initiative which led later to the creation of the "Decade of Roma Inclusion 2005-2015".

The Decade of Roma Inclusion (2005-2015) is an explicit commitment by nine governments in Central and Southeast Europe to combat Roma's poverty, exclusion and discrimination. More specifically, the governments of Bulgaria, Croatia, the Czech Republic, Hungary, Macedonia, Montenegro, Romania, Serbia, and Slovakia have pledged to secure:

Adoption of National Action Plans (NAPs) in the Decade's four priority areas: education, employment, health, and housing;

- Efficient and timely implementation of the NAPs, committing sufficient financial resources for this purpose;
- Coordination between line ministries and relevant government institutions in order to maintain coherence and continuity in NAP implementation;
- Transparency and sharing of information regarding the Decade within the government and with civil society, making available disaggregated data in accordance with international standards on data collection and data protection;
- Effective participation of Romani civil society in the implementation and monitoring of the NAPs; and
- An effective monitoring mechanism, which includes a way to measure progress in NAP implementation at the national level.

Being aware of the strategic importance of monitoring and of adequate indicators for the success of the Decade, UNDP's regional office has started working in the field of ethnically disaggregated data and monitoring even before the official start of the Decade. In June 2004 in Bratislava a conference was held devoted to the topic of "Measuring vulnerability: Problems and Possible Approaches to Ethnically Sensitive Statistics". One of the main conclusions of this conference was that issues related to ethnically disaggregated data are too complex and serious to be approached superficially. In 2004-2005 a large-scale survey on the status of Roma communities in the countries of Central and South-Eastern Europe was completed (for the West Balkans it covered also internally displaced persons). The

² The summary of the meeting is enclosed in Annex 1. Although the meeting took place three years ago a number of aroused questions and suggestions are still interesting.

¹ The data and the report are available (in English, Bulgarian, Hungarian and Slovak) on the website на адрес http://roma.undp.sk

database produced within the survey is still the most detailed comparative base of quantitative data on Roma's status. ³

Continuing the work in the field of monitoring and quantitative indicators, in 2006 UNDP in association with the Foundation Friedrich-Ebert and the European Center for Minority Issues started working on the development of a methodology for the assessment of the progress of the Decade. In the process of project implementation set of deficits in its implementation were identified that could jeopardize the achievement of its main goals. The methodology was discusses at the technical meeting held in December 2006 in Pezinok (Slovak Republic), which brought together members of the national teams responsible for NAP implementation with representatives of international organizations with a clear stake in the success of the Decade.

During the meeting in Pezinok, the need for practical guidance on implementation and improvement of arrangements for monitoring and evaluation (M&E) in the NAPs became apparent. Also clarified in the course of the technical meeting was the complementarity between this present initiative and the initiative Decade Watch of the Open Society Foundation and the World Bank. While the Decade Watch was developed as an initiative of Romani NGOs in the participating countries of the Decade and accordingly provides a view from Romani civil society on progress made since the Decade began more than two years ago, the UNDP-ECMI initiative focuses on what the national teams need to accomplish in order to attain the goals declared in their respective NAPs.

Drawing on the productive exchange of the technical meeting, ECMI has worked with UNDP to produce a set of materials designed to facilitate improvement of M&E arrangements in the participating countries of the Decade and experts of UNDP have designed a methodology to ethnically disaggregate statistical information. These materials are summarized in the current document which presents an overview of the mechanisms for monitoring and evaluation in the country-members of the Decade. It introduces some basic terminology, presents different approaches adopted in the countries – members of the Decade and summarizes the conclusions made from the implementation in Bulgaria of the methodology to ethnically disaggregate statistical information. ⁴

2. Terminological clarification: monitoring and evaluation

The monitoring and evaluation of minority-specific programs is relatively new.⁵ As a result, it is important to keep in mind that there are various approaches to M&E in this field, bringing with them differences in definitions and recommended methods. Nonetheless, there is agreement on some basic concepts:

- *Monitoring* is generally defined as a continuous function that aims to provide indications to management and key stakeholders as to whether implementation is proceeding according to plan in order to allow necessary adjustments to be made throughout implementation.
- Evaluation is the periodic assessment of the relevance, performance, efficiency and impact of a programme with respect to its stated objectives. Evaluations are often (but not always) conducted with the assistance of external evaluators, who may in some cases be appropriately selected from among the peers of those responsible for programme implementation. The benefits of participatory

³ The database as well as the main statistical indicators are available on the website http://vulnerability.undp.sk

⁴ The two databases are enclosed to the documents from the meeting – one for each participating country. They have detailed information about the different instruments and mechanisms for M&E included in the NAP. The evaluation included in the current document is based on information from the National Action Plan – Decade of Roma Inclusion, published on the official website of the Decade: www.romadecade.org. More information was presented in the course of the working meeting which took place in December 2006.

⁵A brainstorming seminar on this issue was organized by the Council of Europe in 2004. See *Monitoring and Evaluation of National Programmes/Strategies for Roma or Travellers: Brainstorming Seminar between Key Practitioners to Share Ways Forward*, Strasbourg, Council of Europe, 2-3 September 2004.

methods for M&E of minority programmes are also widely recognized, with such methods involving stakeholders in assessing their own work.

- Indicators can be understood as evidence about a state of affairs. They may be quantitative or qualitative, with quantitative indicators useful for providing objective measures to be nuanced and explained by qualitative indicators. Indicators are typically used to measure inputs (financial and physical resources), outputs (goods and services produced by the use of the inputs), outcomes (level of access to public services, use of these services and level of satisfaction of users; access to credit; representation in public and political institutions), and impact (the ultimate effect of an action or intervention on key dimensions of well-being of the individuals).
- *Targets* are goals expressed in terms of quantified levels of indicators to be reached within a given timeframe.

At least four different types of M&E can be distinguished, with the determination of which type of M&E is most appropriate depending on the aspect of the programme being examined.

Formative evaluation provides information necessary to define realistic goals and objectives, aiding decision makers in making decisions about effective, feasible interventions and how best to carry them out. Formative evaluation can also be used as an exploratory tool in the course of implementation to help adjust objectives to real needs and changing situations. In both cases, it is extremely important that interventions are planned in a participatory fashion with key stakeholders.

Process evaluation, also called *monitoring*, assesses how well implementation is proceeding, focusing on both *inputs* (the basic resources required in terms of manpower, money, material, and time) and *outputs* (immediate improvements expressed as commodities distributed, materials produced, staff trained, and service units delivered). Process evaluation, however, does not demonstrate whether interventions are effective. While much of process evaluation is conducted on a quantitative basis, qualitative evidence of how and why a programme works or fails to work is equally important in answering process evaluation questions.

Effectiveness evaluation assesses the extent to which objectives have been achieved, focusing on the outcomes and impacts of interventions. Usually quantitative, effectiveness evaluation is integrally linked to both formative and process evaluation: On the one hand the selection of appropriate measures of outcome and impact relies on careful prior definition of programme goals and objectives; on the other hand, assessing the process of programme implementation in conjunction with effectiveness evaluation helps to avoid erroneous conclusions regarding the effectiveness of the intervention.

Cost-effectiveness analysis expands effectiveness evaluation by adding a measure of programme cost per unit of effect. By comparing the costs and consequences of various interventions, cost effectiveness estimates can assist in priority setting, resource allocation decisions, and programme design. As its name suggests, cost-effectiveness analysis is a quantitative approach to M&E.

3. Review: Monitoring and evaluation in the Decade NAPs

3.1. Institutional arrangements

The question of institutional arrangements draws attention to the possible existence of a government body on the national level that is responsible for coordinating administration and implementation of the NAP, as well as to any particular arrangements for local authorities' involvement and NAP implementation on the local level. Because the NAPs do not generally contain information on local-

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level mechanisms for implementation, the remainder of this section focuses on national-level arrangements. ⁶ Issues addressed under this heading include but are not limited to:

- Whether there is an institution at the national level with particular responsibility for managing the overall monitoring process;
- How effective the powers of such institution are:
- Whether the institution may require regular reporting from other government offices and ministries:
- Whether the institution may issue reports (how often, to whom, and whether the reports are made public); and
- The extent to which monitoring responsibilities are clarified in the NAP's individual fields of intervention, as well as with regard to the cross-cutting issues.

The analysis conducted by ECMI in late 2006-early 2007 revealed that most of the NAPs do not provide for the establishment of a special monitoring body which will possess the managerial control over implementation of M&E procedures. Even in cases when such provisions exist, there is no information available in the NAPs regarding the particular status, competences and responsibilities of the monitoring body, its co-ordination with other relevant authorities, or whether it possesses powers to require regular reporting from other government offices and ministries. In most cases, however, the monitoring process is assigned to the Decade Country Working Groups. This is the case with the Macedonian NAP, for example, which provides for transforming the Country Working Group into a Monitoring and Evaluation Team.

Many of the NAPs foresee different monitoring bodies for the individual fields of intervention (education, housing, employment, health care or some country-specific cross-cutting issues), and sometimes for particular activities. In the Montenegrin NAP, for example, while the authorized institution for monitoring in the area of employment is the Employment Agency of Montenegro (EAM), monitoring responsibilities in the field of housing are shared between the existing Decade Working Group, municipalities, the Public Communal Company and the Ministry of Environmental Protection and Urban Planning. The Montenegrin NAP also provides for the development of mechanisms for supervision of preschool education institutions attended by Romani children to be conducted by the Educational Inspection and Unit for Quality Assessment.

By way of contrast, the Croatian NAP offers a good example of clear provisions regarding M&E responsibilities, reporting requirements and their frequency. By the Croatian NAP, the ministries and other relevant government bodies that are responsible for the implementation of particular tasks will determine during each year of the Decade the measures to be implemented over the next year and will submit their proposals to the Commission for Monitoring the Implementation of the National Programme for Roma.

Among NAPs which foresee the creation of specialized monitoring bodies, the Hungarian NAP anticipates the establishment of such an organ to promote planning, conduct follow-up of the process of implementation, evaluate programme implementation, and incorporate evaluation feedback into planning. The Bulgarian NAP also foresees the establishment of a monitoring body within the National Council on Ethnic and Demographic Issues.⁷

⁶ As indicated at the technical meeting by members of the respective Country Working Groups, some local-level mechanisms nonetheless exist in the Decade countries.

⁷ No such body had been established as of mid 2007.

Because there are advantages and disadvantages connected with both the establishment of a specialized monitoring body and the sharing of managerial and monitoring responsibilities by the implementing bodies, determining which institutional framework should be adopted across the board is no easy task. Where no specialized administrative body exists specifically for the monitoring process, institutions with a broader mandate should develop capacity for dealing particularly with monitoring issues. Thus, a government body responsible for NAP coordination and administration on the national, regional, or local level could establish monitoring units and/or appoint specialized staff for M&E-related issues.

3.2. Participatory monitoring and evaluation

Provisions for participatory M&E highlight the extent to which stakeholders at various levels engage in M&E activities, share control over the content, process, and results of those activities and engage in taking or identifying corrective actions.

While participatory M&E receives mention in the Decade NAPs, most often the reference is to participation as a principle rather than an instrument. The Montenegrin NAP, for example, declares on page 18 that "[s]ocial partnership is a principle that none of the activities aimed at enhancing Roma population status could be organized without" and claims that Romani representatives took part in both development and implementation of NAP activities. Cooperation and consultations with Romani NGOs in data collection are also foreseen in the Croatian NAP. In similar fashion, the Bulgarian NAP envisions effective coordination and cooperation between the governmental, non-governmental and municipal administrations and organizations at all level of implementation and M&E the Decade activities. In none of the NAPs, however, is there a particular mechanism or specific information available about the ways to involve and engage stakeholders in the design, processes, and use of M&E. Moreover, it is impossible to obtain any information from other official sources as to whether the stakeholders at various levels engage in and share control over monitoring and evaluation activities and the use of their findings, or in the selection of indicators.

3.3. Monitoring arrangements

Although there is no comprehensive M&E planning in the Decade countries' NAPs, all provide for various types of monitoring tools and controlling mechanisms in different fields of intervention. The Croatian NAP, for example, foresees that relevant ministries and other government bodies will be responsible for the implementation of particular tasks and measures to be determined each year of the Decade, as well as for the submission of proposals to the Commission for Monitoring the Implementation of the National Programme for Roma. The Montenegrin NAP calls for mechanisms for supervision of preschool education institutions attended by Romani children to be developed by the Educational Inspection and Unit for Quality Assessment. According to the Macedonian NAP, on the other hand, the Monitoring and Evaluation Team's first activity will be to choose a relevant methodology and draft an M&E plan.

More specific monitoring activities are foreseen in the NAPs for particular initiatives.

A good example of specific monitoring arrangements for each of the Decade priority areas comes from Serbia. Thus, in the priority area of education, the Serbian NAP calls for systematic monitoring of development of Romani children by educational institutions, further breaking down the envisaged monitoring into three phases:

• Designing indicators and instruments;

NAP provide for Romani associations' involvement.

⁸ The Romani NGO network "Roma Circle" took part in the working group which elaborated the Montenegrin NAP. According to the NAP, the network consists of 12 NGOs and has considerable experience in data collection on the Romani population, gained during the drafting of Montenegro's *Poverty Reduction Strategy Paper*. In similar fashion, many of the planned measures in each of the fields of intervention of the Montenegrin

- Piloting and finalizing indicators and instruments; and
- Preparing manuals for systemic monitoring.

Rare in the NAPs are references to qualitative methods, such as surveys or follow-up consultations. Another common weakness is the lack of funding allocations for M&E-related capacity-building, monitoring and collection of data (particularly baseline data).

3.4. Reporting requirements

Although most of the Decade NAPs include arrangements regarding responsible authorities and M&E instruments, it is often unclear what kind of reports should be prepared, which institutions should prepare them, to which institutions they should be provided, in what timeframe, and on the basis of which data. Thus, the Montenegrin NAP calls for a monitoring process every three months and evaluation every six months, but reporting arrangements are not specified. Similarly, the Hungarian NAP envisions promotion of planning and follow-up of the process of implementation by a specialized Monitoring Body, but without relevant timelines and reporting requirements. In much the same way, the Bulgarian NAP provides for elaboration of a monitoring and controlling mechanism by the National Council for Cooperation on Ethnic and Demographic Issues at the Council of Ministers with the help of its regional experts on ethnic and demographic issues, but makes no mention of corresponding reporting requirements and timelines.

Still, some elements of good practice deserve to be mentioned. One such element comes from the Hungarian NAP, which provides for the development of a standardised reporting system, standardised professional evaluation and a financial follow-up system. Another instance of good practice is the Romanian NAP's specific reporting requirements for each of the stated goals in the area of education. For example, specific reporting requirements associated with the goal "To increase participation of Roma children in pre-school education" are:

- Semi-annual reports from each school for the inspectorate and from each county inspectorate for the ministry;
- Annual reports on Romani education from the Ministry of Education; and
- Annual reports from the National Office on Roma on the implementation of the strategy.

Significant though they are, however, these elements of good practice are not sufficient to address the apparent lack of specific arrangements to ensure continuous monitoring of the implementation and effects of all measures outlined in the NAPs. The overall impression that emerges is that although most of the NAPs include particular reporting requirements in different fields of intervention, none includes a comprehensive set of reporting requirements bringing together all M&E activities (data collection and evaluation activities in particular) and all M&E bodies, along with these bodies' responsibilities for monitoring in the individual fields of intervention as well as the cross-cutting issues.

3.5. Data availability and collection

Although most of the NAPs specify data sources and responsible institutions for at least some of the Decade priority areas, a common weakness remains the lack of clear provisions regarding data availability, possible data sources, and the institutions responsible for data collection, compilation, analysis, and reporting. Also insufficiently clear in most of the NAPs are the frequency of reporting and the sources of funding for data collection and analysis. The Czech NAP, for example, indicates possible data sources for the priority area of housing and recommends that more data be collected in the process of monitoring. However, in the other three priority areas, the Czech NAP contains no indications concerning data availability, possible data sources, or particular institutions responsible for collecting, disseminating, reviewing and using relevant data. Better in this regard is the Romanian

NAP, which recognizes specific data needs in each of the priority areas. Still, the enumeration of activities for data collection is incomplete. The NAPs of some other Decade countries (e.g., Hungary) do not include any provisions regarding data availability, possible data sources, dissemination, review or usage of data.

The Decade countries vary in their attitude to data sources, but have in common that none of them outlines a set of activities for transforming raw data into usable information, or for verifying data. Although the Romanian NAP identifies gaps in the official record on Romani communities and their needs, it nonetheless refers mainly to the official results of the 2002 census. The Montenegrin NAP, on the other hand, considers both official and unofficial data sources as potentially reliable, referring to the official results of the census held in November 2003, as well as to unofficial research regarding the number of Roma in Montenegro. Finally, the Slovak NAP recognizes the need for verification of the statistical data of insurance companies and the Regional Public Healthcare Office.

The NAPs generally include specific provisions in at least some of the fields of intervention regarding particular institutions responsible for data collection, dissemination, review and application. The Hungarian NAP, for example, calls for regular representative surveys to supplement the data gathered by government organs. The Montenegrin NAP, on the other hand, designates various bodies as responsible for data collection in each of the fields of intervention. At the same time, however, most of the NAPs treat data collection as a one-off activity rather than an ongoing process and pay insufficient attention to the need for disaggregated data (e.g., by age, employment status, gender, and geographic area), also suffering from a lack of clarity in the division of responsibilities for collecting and analyzing information.

To the extent that NAPs address the issue of baseline data, they also make clear the insufficient availability of such information. Whereas the Hungarian and Montenegrin NAPs foresee specific activities for the collection of baseline data, the Macedonian NAP only identifies the need for baseline data collection in general. The Slovak NAP, on the other hand, states that all the needed baseline data are available but that they cannot be identified in the document. Overall, the NAPs suffer from an absence of clear timelines for data collection activities and fail to specify funding sources for baseline studies, as well as for ongoing collection and review of data. Moreover, it is impossible to understand from the NAPs which institutions are responsible for baseline data collection and whether there is a concrete work plan for related activities.

Most of the NAPs also do not clearly articulate needs for qualitative data, with activities for collecting such data accordingly lacking. Partial exceptions to this generalization include the Czech NAP, which includes qualitative indicators in the field of housing, as well as the Bulgarian NAP, which calls for qualitative research with focus groups, albeit without specific timelines and resource allocations.

3.6. Following up on monitoring

Many of the NAPs do not include a clear mechanism to ensure that action is taken on the results of the monitoring, with the few provisions in the NAPs usually presenting follow-up as a principle without outlining measures necessary to make it also a functioning instrument. A case in point is the Montenegrin NAP, which calls for monitoring every three months and evaluation every six months, but does not specify a mechanism to ensure that action is taken on the results of the M&E activities. The Hungarian NAP, on the other hand, provides for the establishment of a standardized professional evaluation and financial follow-up system, while the Slovak NAP provides for regular reviews of the fulfilment of the objectives with an eye to making any necessary modifications to the NAP in the course of the Decade. Finally, the Czech NAP provides for follow-up in the form of monitoring studies to be commissioned by the Office for the Roma Community Affairs of the Ministry of Interior.

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⁹ Baseline data consist of information needed to establish a basis for comparison, evaluation, and target setting.

With the exception of the above-mentioned examples, the NAPs lack provisions for regularly reviewing the fulfilment of objectives and modifying the activities during the process of implementation accordingly. As a result, monitoring activities do not sufficiently influence decision-making related to NAP implementation. Also unclear in the NAPs are:

- The frequency with which relevant activities will be reviewed;
- Which institutions are responsible for periodic review;
- Whether regular stakeholder meetings are planned for lessons learning and forward planning; and
- Other management arrangements to ensure that action is taken on the results of the monitoring.

3.7. Comprehensiveness of NAP design

3.7.1. Distinctions among indicators, goals, objectives, targets, and activities

The Decade NAPs include a mix of goals, objectives, tools, instruments, activities, indicators and targets. Generally lacking, however, are clear distinctions among these categories, as is a comprehensive conceptual framework which relates the various categories to one another. Closely related to this is a general lack of quantified targets for the main indicators. Additional problems stem from the lack of sufficient information for M&E provided by the selected indicators, as well as from the absence of clear provisions for regular review of indicators in consultation with stakeholders. Yet another common weakness is the lack of a clear relation between the designated indicators and the availability of data, which calls into question the feasibility of any M&E. Finally, some of the goals set in the NAPs (e.g., "All Roma boys and girls pass elementary school" (Slovakia) and "Elimination of all segregated classes and schools" (Hungary) are simply unrealistic.

In the Hungarian and Slovak NAPs in particular, many of the proposed indicators are actually goals. Moreover, in many cases even the correctly designated indicators are ambiguous or the data necessary to fill them cannot be collected. In light of the fact that no baseline data are available in the Hungarian NAP, it is also unclear how no improvement over the current situation could be measured. The Bulgarian NAP presents a different type of case, including a large matrix of indicators. The problem here is that such a matrix would require a complex mechanism for collecting the necessary data, but the Bulgarian NAP does not contain the corresponding provisions for data collection.

3.7.2. Output to outcome and impact assessments

In general, the NAPs do not include well developed arrangements for outcome or impact assessment, leaving the impression that efforts to date have been focused more or less exclusively on input and output indicators. Exceptions in this regard come from the Czech Republic and Montenegro. Whereas the Czech NAP provides for analysis of the annual reports produced by schools and other educational institutions, its Montenegrin counterpart calls for specific monitoring of educational outcomes of Romani students and the development of criteria for assessment and monitoring the quality of education provided by institutions in relation to the needs of Romani children.

3.7.3. External evaluation

While several of the Decade NAPs do not recognize the need for external evaluation, some NAPs contain arrangements for external evaluation of specific measures. The Slovak NAP foresees that members of an otherwise undefined "Roma forum" will be responsible for external M&E, but does not contain provisions about how or how often such exercises will be conducted. The Hungarian NAP, on the other hand, contains a model of monitoring activities which includes "internal" monitoring to be harmonized with the relevant ministries' planning and follow-up, as well as "external" monitoring to follow up social processes, but also does not provide details on concrete arrangements. Finally, the

Czech NAP calls for monitoring by the central government in co-operation with non-profit and research organisations, with additional input expected from NGOs active in the field of anti-discrimination.

The sparseness of provisions in the NAPs on outcome and impact assessments and on external evaluation yields the overall impression that M&E does not constitute an integral part of NAP design. As a result, information may not be available to decision-making bodies in a timely manner or to ensure that the NAPs are able to demonstrate accountability to stakeholders. Given the importance of evaluation results for making adjustments in NAP implementation, in the absence of substantial changes to M&E arrangements in the NAPs, it is highly unlikely that relevant information will effect mid-course corrections.

4. Guidelines for improving Decade progress monitoring

Monitoring and evaluation in relation to the National Action Plans of the Decade of Roma Inclusion are crucial for ensuring that accurate and up-to-date information is available throughout the period of NAP implementation. More specifically, M&E allows:

- Tracking of progress towards the achievement of specific objectives and targets; as well as
- Transmission of information to relevant decision-makers about shortcomings in implementation in order to improve NAP design, optimize resource allocation, and refine the measures to be implemented in future.

Although elements of M&E are present to varying degree in all of the Decade NAPs, none integrates a comprehensive M&E framework with all the main components sketched in preceding review. With this in mind, ECMI has worked with UNDP in developing the set of guidelines on the following pages for the purpose of supporting the Country Working Groups in their efforts to improve M&E arrangements in the NAPs.

While all Decade participating countries previously developed NAPs as a condition for joining the Decade, the guidelines below begin at the drafting stage. This approach simultaneously serves two purposes:

- Providing the Country Working Groups with a resource which can be tapped in the case of an opportunity to revise the existing NAPs the course of the Decade; and
- Facilitating the development of like-minded action plans on the part of countries not currently participating in the Decade.

4.1. Drafting the National Action Plans

4.1.1. Consultation among government organs

Consultations within the government are crucial for ensuring that the measures outlined in the NAPs can actually be implemented by the responsible institutions. This applies not only to consultations between relevant line ministries on the one hand and government offices for Roma on the other, but also to consultations among the relevant line ministries.

4.1.2. Consultation with Romani representatives

Romani non-governmental organizations and public figures are particularly valuable partners to public agencies and can assist them in making policies more realizable. Given that such organizations and individuals are often better attuned to the particular disadvantages that Roma face, they should be actively consulted in all phases of decision-making, and can also act as focal points or liaisons with beneficiary groups, particularly at the local level.

Necessary for the success of these consultations are:

- Prior identification of the organizations and individuals likely to have a legitimate interest in the NAPs
- A differentiated approach to the various segments of the Romani population
- Allocation of sufficient human and material resources to encourage full participation of segments of the Romani population which may be more difficult to reach.

4.1.3. Pursuing consensus through public discussion

Consensus among the key stakeholders mentioned above as well as within society at large on the main goals and intended results of the NAPs is vital to NAP implementation and to the success of the Decade as a whole. With this in mind, the NAPs should be discussed at national-, regional, and local-level public events held in the drafting stage, with stakeholder input incorporated in the final product.

4.2. Assessing the National Action Plans

4.2.1. Reviewing NAP design quality

Before a comprehensive framework of M&E activities can be generated, it must first be clear what is to be monitored and evaluated. For this reason, an overall review of the NAPs is a necessary for assessing existing M&E arrangements. The initial emphasis should therefore be placed on:

- Coverage of the four Decade priority areas (education, employment, health, and housing)
- Incorporation of Decade cross-cutting issues (discrimination, gender, poverty)
- Specification of the issues to be addressed by the NAP, including distinctions among goals, objectives, and important side effects
- Whether stated goals and objectives are plausible, realistic, and clearly connected to the target groups' priority needs, as identified in cooperation with representatives of the target groups
- Identification of segments of Romani populations with distinct needs (e.g., women, children, disabled)
- Specification of outputs to be delivered at national, regional, and local levels
- Appropriate budget allocations for specified outputs, with overall costs by priority area disaggregated into the costs of individual interventions
- Fit between measures taken in different priority areas and streamlining of issues across multiple institutions, including information sharing and functional linkages between departments in different line ministries
- Extent to which probable effects of NAP implementation on relations between Roma and non-Roma have been taken into account.

4.2.2. Appraising M&E arrangements

With an eye to building a comprehensive framework of M&E activities to be undertaken in the course of the Decade, each Country Working Group should undertake a systematic examination of M&E arrangements in the NAPs in order to identify missing elements and plan necessary revisions. Issues to be raised in the course of the review include whether:

- M&E responsibilities have been assigned in each of the Decade priority areas and for the identified cross-cutting issues
- Appropriate performance indicators have been provided for each activity
- Qualitative as well as quantitative methods are foreseen, with qualitative measures included among the indicators
- Data sources are identified and regularly updated data available to feed the indicators
- Data collection methods, frequency, and responsibilities are adequately specified

- Baseline studies have been conducted for setting appropriate targets in each of the priority
- Target groups' needs are adequately described and quantified as outputs to be provided through activities undertaken in the framework of NAP implementation
- Quantified thresholds and milestones have been set
- Procedures for analysis, review, and use of performance data have been adequately specified
- Reporting requirements specify how reports will be produced, to whom they will be addressed, and with what frequency they are expected
- Regular reviews of the NAPs or parts of them have been foreseen and how such reviews are to be conducted
- Regular stakeholder meetings have been envisaged for lessons learning and forward planning
- Concrete mechanisms exist to ensure that action is taken on the findings of M&E activities
- Technical assistance is available (if needed)
- Financial resources for M&E activities have been allocated from the appropriate budgets

For the purposes of the review of M&E arrangements in the NAPs, a team should be established which includes representatives of Romani NGOs as well as members of the Country Working Group. Beyond the issues listed above concerning M&E arrangements in the NAPs, the review team should consider the following more general questions:

- Are the M&E activities going as planned?
- How are findings from M&E activities so far being used and disseminated? Are there changes required to increase the relevance of M&E to decision-making?
- Are there methodological issues that need to be addressed or changes that need to be made to the M&E design?
- How will necessary changes be made? Which institutions are responsible for implementing these changes?
- Are there sufficient human and material resources to carry out the M&E activities as currently planned and after any necessary changes? What must be done to secure the necessary resources?

Following the initial review, countries should continue to review their M&E arrangements periodically, introducing necessary corrections in order to keep them current and relevant.

4.3. Building capacity for effective monitoring and evaluation

4.3.1. Building implementation capacity

In each participating country of the Decade, a national-level administrative body should be established within the appropriate institutional and legal frameworks for coordinating NAP implementation. At minimum, the functions of such a body should include the following:

- Coordination among institutions involved in NAP implementation at national, regional, and local levels
- Serving as government focal point for contacts with relevant civil society organizations and with the international donor community
- Contributing to the development of a comprehensive M&E framework for NAP implementation, including the establishment of networks of relevant individuals and institutions
- Receiving and following up on regular progress reports from agencies charged with NAP implementation
- Organizing training and research (whether in-house or commissioned of other institutions) on topics relevant to NAP implementation at national, regional, and local levels
- Ensuring continuous input from qualified Roma employed for this purpose.

4.3.2. Building monitoring capacity

In addition to coordinating NAP implementation, specialized administrative capacity is needed to coordinate the monitoring process at national, regional, and local levels. Options for this purpose include the creation of a distinct administrative body and the establishment of specialized units or staff within the existing administrative body responsible for coordinating NAP implementation in general. Regardless of the specific option chosen, those appointed to coordinate the monitoring process should be involved in process monitoring of both inputs and outputs, evaluating outcomes and impacts, and commissioning other evaluations on specific topics as necessary.

4.3.3. Making M&E participatory

With an eye to maximizing stakeholder input in M&E activities and follow-up, the administrative bodies which coordinate NAP implementation and/or monitoring should promote the establishment of M&E networks of individuals, organizations, and institutions. Such networks should include government, actors implementing the NAPs, and representatives of the target groups in an ongoing discussion which goes beyond checking the implementation of inputs and outputs in attending to short-term outcomes and longer-term impacts from multiple perspectives. Whether as part of these networks or separate from them, a standing mechanism should be established for consultation with Romani NGOs on issues which arise in the course of NAP implementation.

4.3.4. Providing necessary training

Training in M&E techniques should be provided to relevant actors in governmental and non-governmental sectors. While the specifics of the training programmes should be adapted to the recipients' identified needs, such programmes should ensure a common minimum level of knowledge concerning the central concepts of M&E in general as well as participatory M&E techniques for minority-focused programmes in particular.

4.4. Monitoring implementation

The implementation and effects of all measures in the NAPs should be continuously monitored as an integral part of the policy process. Monitoring can be carried out by implementing institutions, but should also involve key stakeholders in civil society. General issues which should receive attention through process monitoring include the following:

- Implementation of planned activities according to schedule by priority area (and, where applicable, reasons for observed failure to meet deadlines)
- Presence, legal status, and competencies of institutional framework responsible for NAP implementation
- Degree and effectiveness of Romani participation in NAP implementation at all levels
- Degree and effectiveness of local authorities' involvement in NAP implementation
- Sufficiency of budget allocations for planned activities
- Reporting on NAP implementation and feedback mechanisms for adjustment of NAPs
- Existence and success of attempts to improve NAPs

4.5. Evaluating implementation

In addition to being monitored on an ongoing basis, NAP implementation should be evaluated at appropriate (and explicitly stated) intervals in terms of the following criteria:

- Effectiveness (degree of success in realizing stated objectives)
- Efficiency (adequacy of resources to desired results)

- Impact (effects of undertaken initiatives on people's lives, with attention to sustainability)
- In order to facilitate meaningful and practically relevant findings from periodic evaluations, the NAPs should specify:
- The objects of evaluation (i.e., outputs, outcomes, or impacts)
- The resources available for producing the objects of evaluation
- The timeframe within which the objects of evaluation are to be produced
- The frequency with which external evaluations will be conducted and the resources available for that purpose
- The concrete mechanisms by which stakeholders will be involved in the evaluation process
- The processes by which the evaluation findings will be fed back into the NAPs.

Whereas monitoring can be carried out primarily by institutions involved in NAP implementation, evaluations should generally be led by external, independent experts in order to maximize breadth of vision on the activities undertaken and their results.

4.6. Disseminating and discussing findings

Detailed information (to be generated by the M&E activities described in the previous section) on progress and shortcomings in NAP implementation should be published on at least an annual basis for release to the widest possible audience. Such information can be most appropriately presented as an annual report issued by the administrative body with responsibility for coordinating NAP implementation and/or monitoring.

In order to ensure that the information reaches all interested parties, the reports should be disseminated through the following channels:

- Government and/or parliamentary hearings
- National and international expert forums
- Press conferences before national and international media
- Official websites of relevant government institutions

Beyond simply disseminating the findings of M&E activities, the administrative body with oversight over NAP implementation and/or monitoring should also take steps to ensure that the findings themselves and the ensuing discussion be incorporated in necessary adjustments to the NAPs.

4.7. Improving frameworks for monitoring and evaluation

4.7.1. Refining indicator design

As discussed in the overview of M&E arrangements across the Decade countries (above), there are several types of indicators relevant for assessing implementation of the Decade NAPs. While the types themselves receive attention below, indicators in all categories should have in common the characteristics which make them "SMART". All indicators should thus be:

• Specific – indicators are defined clearly in terms of their objects (i.e., what they indicate);

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- Measurable indicators' objects can be observed and recorded;
- Action-oriented indicators constitute appropriate bases for designing a course of action;
- Realistic indicators take into account resources available for data collection; and
- Timed indicators can be expected to show changes within the relevant timeframe.

Selecting SMART indicators for measuring implementation of the Decade NAPs requires attention to the following:

Goals for each priority area. In order to provide the basis for developing specific measures meant to address the existing situation while recognizing particularities of specific Romani communities, selected indicators should provide a clear picture of the different types of social exclusion enumerated in the NAPs, as well as of the commonalities which exist across the Decade countries.

Coordination. In addition to providing comparable data across Decade countries, the use of existing EU indicators where possible and appropriate reduces the investment of human and material resources necessary for completion of M&E activities.

Disaggregation. While aggregate, country-level indicators are useful for providing an overall picture of the situation, they tend to mask differences across segments of the Romani population which should be taken into account in designing appropriate policies.

Number of indicators. A smaller number of carefully selected indicators often provides more useful data than does a larger set, and generally does so at lower cost.

Benchmarking. With an eye to increasing the effectiveness of NAP implementation, selected indicators should allow definition of baselines and targets for NAP performance at national, regional, and local levels.

Balancing process and results. Selected indicators should focus not only on inputs and outputs, but also on outcomes and impacts.

Measuring quality as well as quantity. Just as qualitative data are no substitute for quantitative data, neither are quantitative data sufficient on their own, particularly where it comes to measuring satisfaction. The inclusion of qualitative indicators in M&E frameworks for the Decade NAPs is therefore crucial.

Follow-up. Selected indicators should lend themselves to annual reviews of progress towards the NAP objectives.

Stakeholder participation. Roma should be involved in the selection, application, and review of indicators and the data generated by them.

4.7.2. Collecting and handling data

While the process of selecting indicators must take into account the possibilities for data collection, the selected indicators should subsequently guide data collection activities. In this manner, the NAPs serve as frameworks for data collection.

Once it is clear which kinds of data are necessary to fill the selected indicators, the following recommendations apply:

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Choice of methods. Data-gathering techniques should be selected in such a way as to maximize the usefulness of the data they generate. Particular attention should be given to enhancing and contextualizing quantitative data with qualitative data through such techniques as focus groups and surveys.

Coordination. As mentioned in the previous section, the existence of common EU indicators offers a valuable resource to be tapped in the form of comparable data across Decade countries available at low cost.

Consistency. In order to ensure that collected data are meaningful as well as geographically and chronologically comparable, it is crucial that data-gathering techniques be applied in uniform fashion. To this end, training should be offered in the selected methods.

Regularity. Because indicators are to measure progress over a set period of time, data to fill them should be collected on at least an annual basis. Here, it is particularly important that baseline data be collected.

Disaggregation. Wherever possible, data should be recorded in such a way as to take account of age, disability, gender, geography, homelessness, poverty, and other variables which affect social exclusion.

Scale. Taking into account the high costs of data collection, targeted pilots should be considered as a means of collecting data to fill the selected indicators and provide the information necessary for possible adjustments to the NAPs.

Securing and demonstrating privacy. Given many Roma's lived experiences of abuse of personal data, it is particularly important not only to ensure that individual privacy is respected, but also to develop and demonstrate systems which render abuse impossible.

Dissemination. Subject to the previous recommendation, the collected data should be made available to relevant institutions in an easily usable form. To this end, the administrative bodies responsible for coordinating NAP implementation and/or monitoring should work to develop databases, possibly on the basis of a common template to be used in all Decade countries.

4.7.3. Budgeting for M&E

As noted in the preceding text, the activities associated with monitoring and evaluation of NAP implementation – like those associated with NAP implementation in general – require appropriate resource allocations. While responsibility for allocating the resources necessary for M&E activities (as well as for the Decade as a whole) lies primarily with the governments of the Decade countries, donor organizations should attend closely to possible needs for technical assistance in this area, particularly in the form of capacity-building.

In general terms, the costs associated with M&E activities should be reflected in the respective budgets of the institutions charged with implementing those activities, whether at the national, local, or regional level.

More specifically, resource allocations for M&E activities should take into account the need for:

- Baseline studies
- Regular data collection and review
- Continuous monitoring

- Periodic evaluation
- Training

5. The results of the pilot application of the methodology in Bulgaria

5.1. General principle

The pilot in Bulgaria proved that it is neither possible nor reasonable to invent and implement "Roma indicators". The very logic of the Decade and the NAPs is to integrate Roma in mainstream society. This suggests that for monitoring the Decade standard sets of socio-economic and human development indicators should be applied. This would provide room for comparability with the results of other data collection and monitoring exercises conducted on regular basis by NSI, sectoral agencies and line ministries.

In this regard the challenge is not so much in developing new indicators but

- (1) in identifying the universe under study (answering the question "who is Roma") and
- (2) feeding the standard indicators with ethnically disaggregated data.

Given the experience so far, including of EU member states, "counting Roma" is not an option. Even assuming it is technically feasible, such an exercise would have produced numerous negative consequences. This is why the approach suggested – and tested within the pilot – is based on the idea of **attaching ethnic markers to standard socioeconomic data**. It means that for monitoring the Decade and its priorities standard indicators are suggested but disaggregated by ethnicity using different types of ethnic markers.

5.2. Types of indicators

Strict distinction between "input", "output", "outcome" and "impact" indicators should be followed. This distinction is reflected in the suggested modification of the NAP for Bulgaria.

The pilot results suggest that the level of "goals" of the NAP needs "impact" indicators (the achieved goal within the given priority); at the level of "tasks" (or "targets") in most cases outcome indicators are needed. The level of "actions" require output indicators and in some cases – outcome indicators, depending how the specific "action" is formulated. Input indicators have operational nature and should be defined by the respective agencies drafting the particular operational plans and activities that are supposed to contribute to achieving the outcome.

5.3. Data sources

The experience from the pilot suggests that for adequate monitoring a combination of data sources is required. It includes (1) "hard statistics" – statistical monitoring data and data from administrative registries, (2) survey data (both regular surveys conducted by NSI and surveys conducted by NGOs) and (3) data from community-based monitoring. All three sources provide specific inputs and are supplementary to each other. Hence the major sources of data that can be used for feeding Decade progress monitoring are:

- Census data
- Sample surveys (HBS, LFS)
- Administrative registries
- Line ministries registries (in particular, Ministry of education, Ministry of health)

- Specialized agencies registries (Health insurance institute, National social insurance institute)
- Unanimous surveys conducted on the spot by service providers (labour offices, hospitals)
- Community-based data collection

All these sources provide different type of information which will be used both for ethnic markers and data disaggregation by ethnicity. Different types of indicators described in 5.2 also require data from different sources. For example

- "impact" can be monitored only in the long run and data from population census is appropriate for that purpose;
- "outcome" has shorter time-frame and data from HBS, LFS and other similar instruments are appropriate.
- "output" and "input" indicators belong to the operational planning of the process and should be monitored on the basis of data from individual institutions reporting systems. Defining the lines of reporting needs deliberate efforts and methodological support for the respective agencies may be necessary. This goes beyond the scope of the pilot however.

In most cases the data sources have the information necessary to feed in relevant indicators. It means that the challenges inmost cases are of administrative and not of methodological nature. In some cases however data is not collected on regular basis and specific recommendations are made in this regard I a separate annex.

In some cases data from several sources can be provided for the same indicator. For example, unemployment rate can be calculated and monitored on the basis of census data, on LFS data and on Labor offices registries. In such cases it is suggested that all three are used because they provide information on different aspects of the complex reality.

5.4. Getting ethnically disaggregated data – suggested approaches

There are five major options for producing ethnically disaggregated data:

- 1. Disaggregating hard statistics using personal identification numbers (EGN) as ethnic markers
- 2. Disaggregating hard statistics using territorial tags as ethnic markers
- 3. Extending the samples of regular sample surveys with Roma boosters
- 4. Custom "on the spot" surveys among recipients of social services
- 5. Community-based collection of data conducted by data collectors from the communities monitored

All of the approaches above are mutually reinforcing and complement each other and should be seen as integral pillars of comprehensive system of ethnically-sensitive data collection and monitoring. All five can work in the case of Bulgaria and are consistent with Bulgarian legislation and data collection standards. In some cases though additional legislation needs to be developed and passed to ensure full respect to privacy and individual data integrity.

5.4.1. Personal Identification Number (EGN) based tagging

It is based on the fact that census records ethnic affiliation (mother tongue) and individual respondents' unique personal identification number (EGN). Matching the census identity with EGN registration in administrative data bases makes possible identification of the representatives from the

respective ethnic group out of the total universe of the respective data base. This approach is applicable for extracting national-level ethnically disaggregated data on administrative (incl. population) statistics, registered unemployment, health treatment (both hospitalization and personal doctors visits), social insurance coverage (incl. labor contracts). Indicators like registered unemployment rates, morbidity rates, mortality rates social assistance coverage, formal/informal employment rates can be computed with high level of accuracy. For that purpose however explicit procedures for data anonimization and relevant administrative structure should be in place. Establishing such a structure is one of the proposals of the pilot.

5.4.2. Territorial markers tagging

This approach is based on the fact that most of the vulnerable Roma – those who are the explicit target group of the Decade – live excluded also territorially, in separate (often segregated) communities. Thus territorial mapping of those communities is possible.11 Once a detailed map of Roma-dominated communities is available, ethnic tags based on individual's address can be applied with the assumption that an individual living in an area identified as "predominantly Roma" is Roma. These tags can be used in line ministries registries (particularly Ministry of Education), personal doctors data bases etc.

Ethically-disaggregated data based on territorial markers tagging can be particularly important for monitoring Decade progress in education. One of the objectives of the Decade in this priority area is schools desegregation. If number of children attending a school in Roma neighborhood (presumably segregated) is monitored, the only "indicator" for progress in desegregation will be "decrease of segregated schools enrollment rate". However it won't show where are those not attending a segregated school – attending a mainstream one or not attending school at all. Tagging individual students' address with the ethnic mapping data will provide information on their ethnic affiliation regardless what type of school they are attending. The same approach is applicable to any data using individual's address (like for example medical establishments, employment/unemployment etc.).

Territorial markers tagging is thus complementary to PIN-tagging. But it has some benefits that the latter does not have. To certain extent it can be more reliable because solves the problem with understating ethnic identity during censuses. It is also less susceptible to fluctuations due to changes in political environment (revealing ethnic identity is heavily influenced by the political climate, rise and influence of extremist parties for example). Those benefits however come at a cost – it grasps the marginalized, visually excluded segment of the Roma population whilst the probability that integrated Roma will fall out of the scope of the data collection exercise is high.

In any case however using territorial markers tagging is important (and to certain extent – the only reliable) approach that can provide acceptably relevant estimate of the absolute number of the population in question (and not just shares as poverty rates and unemployment rates). The absolute number is crucial for needs assessment and hence for defining numeric targets. If targets (and resources) are determined on the basis of census data, the real needs will be inevitably underestimated.

5.4.3. Roma boosters in sample survey

Apparently this is the easiest way to get ethnically disaggregated data. Increasing the samples regular statistical data collection surveys (like HBS and LFS) would provide comprehensive information on income, expenditures consumption patterns, employment status and qualification of the labor force. Less data would be available on educational aspects of children and youth (not part of the LF). Still, this data would be important input for monitoring progress under Priority 3 (housing) and Priority 4 (employment).

¹⁰ The fact that census data underestimates the number of Roma population is not a problem because the similar degree of underreporting will appear both in the nominator and the denominator. In addition indicators computed on the basis of PIN-tagging can be correlated with other data to improve their robustness.

¹¹ Similar mapping of Roma communities was conducted in Slovakia and the exercise was successful.

In reality however constructing the random sample boosters may be a problem, mostly because of the unclear number of Roma population and the "flexible" nature of the very definition of "Roma". One possible compromise is accepting self-identification principle (during census) and constructing a random sample based on the population self-identified as Roma or having declared Roma as mother tongue (ideally both). In this case a Roma booster would bear the "genetic" features (and problems) of the EGN-based methods for statistical data disaggregation and shares both its benefits and detriments. Alternative could be constructing a sample on the basis of territorial mapping of Roma population – assuming that such mapping is in place. Similar to the latter is using GIS-based sampling, which to large extent is a variety of territorial tagging.

5.4.4. Custom surveys among social services recipients

This approach entails anonymous questionnaires (usually brief, consisting of just few questions) filled in by recipients of social services on voluntary basis. For example, unemployed person registering at the labor office is invited to fill in a questionnaire in addition to the regular forms. The questionnaire may include field "ethnicity" and is dropped in a sealed box to make linking of the questionnaire with the standard application impossible.

Such approach can be a good source of information both on the ethnic profile of the recipients of social services and of the way their providers work (for example, are there any ethnic-based prejudices). In the best case scenario (assuming there is no duplication of questionnaires) and their number is close to that of the recipients of social services) such survey could be representative just for the recipients, not for the whole ethnic group. This is something at least.

5.4.5. Community-based monitoring

Community-level data is particularly important in regards Decade progress assessment – and this is the information that is usually underrepresented in standard statistical instruments. This is why components 5.4.1, 5.4.2, 5.4.3 and 5.4.4 should be complemented by comprehensive system of quantitative and qualitative data collection at community level. Such a system should provide basic information on the communities in question based on standard questionnaires filled in on regular basis by designated member of the community after receiving training on basic data collection and reporting techniques. The system would provide:

- Quantitative information on the community status (number of households, their housing conditions, number of children attending school, their age and grade, number of drop-outs, number of new-born, number of vaccinated children etc.).
- Quantitative information on occurrence of certain events relevant from Decade monitoring
 perspective (power cuts and their duration, accidents, conflicts with majority or other Roma
 groups, NGOs activities etc.).

The data collected within the system of community monitoring will provide data on the status of Roma communities, their internal dynamics and the life in Roma neighborhoods, particularly in the closed ghettoes. In this regard they will provide data that will be complementary to other sources. For complementarity purposes its structure of data (and the design of the instruments used) should be as close as possible to other instruments for similar data collection. Necessary precondition if training of the local data collectors on basic data collection techniques and standards and establishing a system of incentives for responsible and reliable work as well as control system. Given the necessary investments, establishing and putting into operation of such a system would require time (a year at least).

There are major problems in this regard however. The Roma communities are "interested party" and data denerated within such methodologies can be complementary to the data from other sources. Local monitors can be under pressure from local leaders, they may be lacking the necessary qualifications

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and one training may be insufficient to offset these deficits. But the lack of "common interest" spirit ("us versus them" phenomenon) may emerge as a major problem.

Despite these potential (and probable) problems, efforts in community-based monitoring should be supported. Working in this direction is in fact a major contribution to overcoming the problems outlined above.

5.5. Involvement of Roma communities

"Nothing for Roma without Roma" turned into a kind of mantra – both of the regular meetings of the Decade and of the Governments and international organizations involved in the Decade. The reality however is quite different.

In the area of data and monitoring participation of Roma communities is a must if necessary information is to be acquired. Here several problems exist however. First, collection of statistical data is a prerogative of state institutions. NGOs and other organizations can collect data but it won't have official status and usually is being "taken into consideration" in the process of decision-making. Second, quality standards (of data collection process, data processing and interpretation) are difficult to achieve outside of established structures (not necessarily state – but established). Third, participation in data collection requires some minimum qualifications and expertise in the area of statistics and sociology, which is not sufficiently among Roma activists. These are the reasons why none of the Decade countries has implemented data collection and monitoring system with real (and not just formal) participation of Roma.

One step in addressing these gaps is the "Decade Watch" report (and the team behind it). But it is far from monitoring tool. It is an analysis based on description of steps and actions (does a strategy exist, is a structure established, is budget allocated, have Roma groups been involved etc.) and not on an analysis of their relevance, links to the objectives set in the NAPs, or adequacy in the national context etc. Being focused primarily on administrative and institutional inputs, it assesses the extent to which governments stick to their commitments and does not have real indicators linked to the NSAPs implementation. Thus it is an important input and can be extremely useful (particularly its country profiles) provided that it is being interpreted and presented correctly – as a snapshot of the status of governments' commitments as seen by the Roma activists and thus as an advocacy tool rather than a real progress monitoring tool.

The problems with Roma participation in Decade monitoring can be at least partially solved within a system of community-level data collection system (described in 5.4.5). Being part of the community, the data collectors involved in the process will have the trust of the people. They would have passed the necessary training and would work under the methodological guidance of National Statistics. Their work (as any work) should be paid, which would create the necessary incentives for qood quality work.

Ideally they could be part of regional structures of respective Departments or coordinating the Decade implementation in respective countries. The community data collection can be financed within joint projects between the respective Ministry and international organizations involved in the Decade implementation.