



Civil society monitoring report on the quality
of the national strategic framework
for Roma equality, inclusion, and participation
in Spain

Prepared by:
Plataforma Khetane
Presencia Gitana
FAGIC
May 2022



EUROPEAN COMMISSION

Directorate-General for Justice and Consumers
Directorate D — Equality and Union Citizenship
Unit D1 Non-Discrimination and Roma Coordination

*European Commission
B-1049 Brussels*

Civil society monitoring report on the quality
of the national strategic framework
for Roma equality, inclusion, and participation
in Spain

***EUROPE DIRECT is a service to help you find answers
to your questions about the European Union***

Freephone number (*):
00 800 6 7 8 9 10 11

(*) The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you)

LEGAL NOTICE

"The European Commission support for the production of this publication does not constitute endorsement of the contents which reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein."

More information on the European Union is available on the Internet (<http://www.europa.eu>).

Luxembourg: Publications Office of the European Union, 2022

Print	ISBN	XXX-XX-XX-XXXXX-X	doi:	XX.XXXX/XXXXXX	Catalogue number	XX-XX-XX-XXX-EN-X
PDF	ISBN	XXX-XX-XX-XXXXX-X	doi:	XX.XXXX/XXXXXX	Catalogue number	XX-XX-XX-XXX-EN-X

© European Union, 2022

Reproduction is authorised provided the source is acknowledged.

The report was prepared by the Roma Civil Monitor coalition in Spain, led by *Plataforma Khetane del Movimiento Asociativo Gitano del Estado Español* (PK) and including *Asociación Nacional Presencia Gitana* (ANPG) and *Federación de Asociaciones Gitanas de Cataluña* (FAGIC).

The report was prepared as part of the initiative '**Preparatory Action – Roma Civil Monitoring – Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review**' implemented by a consortium led by the Democracy Institute of Central European University (DI/CEU), including the European Roma Grassroots Organisations Network (ERGO Network), the *Fundación Secretariado Gitano* (FSG) and the European Roma Rights Centre (ERRC). The initiative was funded by the European Commission's Directorate-General Justice and Consumers (DG Just) within service contract no. JUST/2020/RPAA/PR/EQUA/0095.

The report represents the findings of the authors, and it does not necessarily reflect the views of the consortium or the European Commission who cannot be held responsible for any use which may be made of the information contained therein.

CONTENTS

LIST OF ABBREVIATIONS	6
EXECUTIVE SUMMARY	7
INTRODUCTION	9
1. PARTICIPATION	10
1.1. Roma participation in the NRSF preparation	10
1.2. Roma participation in the NRSF implementation, monitoring, and evaluation	11
1.3. System of policy consultation with civil society and stakeholders	12
1.4. Empowerment of Roma communities at the local level.....	12
1.5. Capacity-building of Roma civil society	12
2. RELEVANCE	14
2.1. Fighting antigypsyism and discrimination.....	14
2.2. Education	14
2.3. Employment	15
2.4. Healthcare.....	16
2.5. Housing, essential services, and environmental justice	17
2.6. Social protection.....	18
2.7. Social services	18
2.8. Child protection	19
2.9. Promoting (awareness of) Roma arts, culture, and history	19
3. EXPECTED EFFECTIVENESS	21
3.1. Coherence with related domestic and European policies.....	21
3.2. Responsibility for NRSF coordination and monitoring	21
3.3. Quality of the plan	22
3.4. Funding	22
3.5. Monitoring and evaluation.....	23
3.6. Assessment of the expected effectiveness and sustainability	23
4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK	24
4.1. Reflecting diversity among Roma.....	24
4.2. Combining mainstream and targeted approaches.....	24
4.3. Usage of instruments introduced by the Council Recommendation	25
CONCLUSIONS AND RECOMMENDATIONS	26
REFERENCES	29
ANNEX: LIST OF PROBLEMS AND CONDITIONS	31

LIST OF ABBREVIATIONS

AGE	Spanish National General Administration
ANPG	<i>Asociación Nacional Presencia Gitana</i>
BOE	Spanish Official Newsletter
CCAA	Spanish Autonomous Regions
CEDRE	Council for the Elimination of Racial or Ethnic Discrimination
CEPG	National Advisory Roma Council
COE	Council of Europe
CSO(s)	Civil Society Organisation(s)
EC	European Commission
ECRI	European Commission against Racism and Intolerance
EU	European Union
EURSF	EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030
FAGIC	<i>Federación de Asociaciones Gitanas de Cataluña</i>
FRA	European Union Agency for Fundamental Rights
FSG	<i>Fundación Secretariado Gitano</i>
MDSA	Ministry of Social Rights and 2030 Agenda
MSCBS	Ministry of Health, Consumption and Social Welfare
MSSSI	Ministry of Health, Social Services and Equality
NRCP	National Roma Contact Point
NRIS	National Roma Integration Strategy in Spain 2012-2020
NRSF	National Strategy for Roma Equality, Inclusion and Participation 2021-2030
PK	<i>Plataforma Khetane</i>
RCM	Roma Civil Monitor
RCS	Roma and pro-Roma civil society

EXECUTIVE SUMMARY

The main strength of the 'National Strategy for Roma Equality, Inclusion and Participation 2021-2030' (NRSF) in Spain is its inclusion of the fight against antigypsyism as a cross-cutting issue, representing an advance on the 'National Roma Integration Strategy 2012-2020' (NRIS). However, we observe shortcomings relating to the commitment implicit in the 'EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030' (EURSF) to the creation of indicators which can provide the data necessary for the design of effective public policies, as well as the funding and monitoring of the achievement of objectives set out in it. The significant delay in drafting the first Operational Plan presents an obvious difficulty, given that it will not be approved before September or October 2022. This will be almost a year after the approval of the NRSF, and 22 months after it nominally came into force.

Participation

Roma participation in the drafting of the NRSF in Spain was treated as a formality, and cannot be considered to have been either significant or effective. There was a distinct lack of time devoted to the process, along with an absence of methods able to foster real participation. Not enough spaces for debate and deliberation were designed to facilitate the genuine involvement of stakeholders.

The NRSF structures Roma participation around the National Advisory Roma Council (CEPG). It should be borne in mind that this consulting arm of the Spanish government has never received sufficient funding to undertake its functions, which means that its capacity for auditing or for making proposals is limited. In addition, the 20 organisations comprising the CEPG lack the authority to represent Civil Society Organisations (CSOs) as a group, given that they were not elected by CSOs but were designated as members by the Government.¹ This represents a significant structural weakness and means that a large part of Roma and pro-Roma civil society (RCS) and a large number of CSOs do not know about the NRSF or its main objectives.

Relevance

The NRSF addresses the main challenges facing the Roma population in Spain but does so in an imprecise manner and without the necessary specificity. The key areas (Social Inclusion Axis) have incorporated a cross-cutting approach, mainly using the approach of the objectives related to the Equality Axis. However, it seriously lacks ambition in terms of compliance indicators in significant areas such as education and employment. Similarly, the lack of target policies in education and housing is also striking, with strong resistance from the ministers in charge of their respective areas to introducing them.

Two important points are worth noting. The first is that the NRSF does not address the situation of the migrant Roma population, a phenomenon that is structural and enduring over time. The second is that the general lack of concreteness in the measures established within the NRSF most notably affects the fight against antigypsyism and this may lead to it being diluted and not promoting the necessary changes indicated by the EURSF. Regarding the Participation Axis, this appears in a theoretical way, but the opportunity to take advantage of this approach as a relevant element for social inclusion has not been taken into account.

¹ Royal Decree 891/2005, of 22 July 2005, which which created the CEPG. See: https://www.mdsocialesa2030.gob.es/derechos-sociales/poblacion-gitana/docs/CEPG/real_decreto_891-2005_creacion_CEPG.pdf

Expected effectiveness

Consistency can be observed, at least in terms of structure, between European policies and the EURSF. This is not the case with national policies, regarding which we have noted, through an examination of the NRSF and various interviews with experts, an absence of coordination between different levels of public administration. The coordination between policies aimed at Spain's Roma population has been left to chance.

In terms of sustainable evaluation, the various experts who were interviewed agreed with the statement of the Roma expert about the intersectional gender perspective: "We must demand that ministries make periodic reports showing what resources are used for Roma at a national, regional and local level, and to which operators or organisations these funds are awarded".

Alignment with the EU Strategic Framework

Regarding the use of instruments emerging from the recommendations of the Council of the European Union of 12 March 2021,² we can observe that, although the NRSF attempts to preserve the contextual essence of the EURSF, its ideas and values have not been adequately translated and operationalised in specific measures; for example, the NRSF mentions a range of factors that can affect the personal development of Roma citizens. It makes explicit reference to certain groups of Roma that are significant in size, but does not provide a detailed discussion of other groups that we believe should also be included. Examples are the LGBTI+ Roma population, disabled Roma, and the migrant Roma population, which are not discussed in detail in the NRSF despite being explicitly mentioned in the EURSF.

² Recommendation of the Council of the European Union of 12 March 2021: [Council Recommendations of 12 March 2021 on Roma equality, inclusion and participation](#)

INTRODUCTION

National Roma strategic framework

After the evaluation of the NRIS, which ended in 2020, the NRSF was approved by the Spanish government on 2 November 2021. When the strategy was presented, it was announced that it would involve two operational plans each of five years' duration, although at the time of writing this report, neither of these has yet been approved.

About this report

This report analyses the document approved by the Spanish government, and is structured around four main topics: participation, relevance, expected effectiveness, and alignment of the NRSF with the EURSF. Based on these analyses, 12 recommendations are made to the various stakeholders.

The methodologies that were used were deployed in four distinct stages:

- Document analysis including: NRSF; EURSF; NRIS; 'EU Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation'; 'Study of the perception of discrimination based on racial or ethnic origin' (CEDRE, 2020); the new Education Law (LOMLOE); 'Comparative study on the situation of the Roma population in Spain in relation to employment and poverty 2018' (FSG, 2019); 'Second European Union Minorities and Discrimination Survey' (FRA, 2017); 'Report on Racial Discrimination in the Field of Housing and Informal Settlements' (Ministry of Equality, 2022).
- Structured individual and/or group interviews with stakeholders:
 - o ten online interviews (three of these were refused or our requests for interview were not answered) with people in positions of responsibility at three levels of the public administration (National Roma Contact Point (NRCP), Ministries responsible for key policies, regional governments and local councils).
 - o one online focus group with six civil society organisations (CSOs).
 - o four online interviews with experts (in education, health, housing, and the intersectional gender perspective).
- Participative creation of the main lines of argument based on consensus between the organisations in the RCM coalition by means of weekly online meetings.
- Consultation on the draft report with the 20 organisations comprising the CEPG and the 27 organisations which comprise the PK.

This report has been created by Spain's RCM 2021-2025 coalition, led by *Plataforma Khetane del Movimiento Asociativo Gitano del Estado Español* (PK), and also including *Asociación Nacional Presencia Gitana* (ANPG) and *Federación de Asociaciones Gitanas de Cataluña* (FAGIC). The individuals who participated were Iñaki Vázquez Arencón (PK); Fabian Daniel Sánchez García (ANPG); Francisco Vargas Porrás and Annabel Carballo Mesa (FAGIC); and Pedro Aguilera Cortés as a volunteer collaborator.

We are grateful for the participation and collaboration of all the people, organisations, and institutions we interviewed in order to produce this report.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

Roma participation in the drafting of the NRSF in Spain was treated as a formality, and cannot be considered to have been either significant or effective. There was a distinct lack of time devoted to the process, along with an absence of methods able to foster real participation. Not enough spaces for debate and deliberation were designed to allow for the genuine involvement of stakeholders.

The draft of the NRSF was produced by the Directorate General for Family Diversity and Social Services (DGDFSS), the government department responsible for its creation within the Ministry of Social Rights and 2030 Agenda (MDSA)³ of the Spanish government, which is the government department that is responsible for the NRCP. It was sent on 6 September 2021, by electronic mail, exclusively to the 20 organisations that form part of the CEPG, to be debated in eight working groups organised by topic.⁴ These debates were held online between 13 and 17 September that year. Therefore, the organisations had between seven and eleven days to study the document and to draft proposals to improve the text. As a collective, the organisations of the CEPG reported that they were not able to analyse the draft within a such tight deadline in such a way as to do justice to the complexity and scope of the NRSF.

Regarding the composition of the online working groups, along the 20 organisations of the CEPG, the PK was also accepted as a member from outside the CEPG. Given the refusal of the participating CSOs to validate the process, the Spanish authorities requested a delay in the delivery of the strategy to the European Commission (EC) in order to allow the organisations to better draft their proposals. As a counterpoint to this, we wish to record the satisfaction of the CSOs that were interviewed at being able to present proposals, given that this had not been possible during the drafting of the NRIS. The NRSF debating process was finally completed on 19 October (just 40 days after receiving the first draft), following ratification in the CEPG plenary session of 14 October, and was approved by the Cabinet on 2 November 2021.

To produce the draft, the DGDFSS worked in collaboration with the consultancy Fresno Consulting,⁵ which jointly coordinated the drafting of the different sections of the document with the relevant ministries. This aspect is one of the strengths of the NRSF given that, although it was the responsibility of a department which carries little political weight, it achieved sufficient involvement from the relevant ministries, and thus can be said to be a proposal originating from the government as a whole.

On the other hand, it is worth noting that there was no participation in the production of the draft, prior to its delivery, either by the CSOs or by experts and/or academics. This prevented the CSOs from feeling fully involved in the proposal, as they were not aware of any aspect of its content until they received the draft.

Based on the interviews carried out with regional and local authorities, we can conclude that there was also no significant consultation or deliberation process involving these key agents, despite the following statement in the minutes of the CEPG plenary session of 14 October: "the consultation process with Spanish Regions has been carried out by the Technical Cooperation Group, which met last September". This fact is especially significant

³ MDSA website: <https://www.mdsocialesa2030.gob.es/>

⁴ The eight working groups covered: education; poverty, social exclusion, participation and empowerment; employment; promotion and recognition of Roma culture; housing and essential services; antigypsyism and non-discrimination; equality and gender violence; and health.

⁵ Fresno Consulting website: <https://www.fresnoconsulting.es/>

given that it is the regional authorities, as public authorities with devolved powers, which are responsible for implementing the main inclusion policies in Spain (in education, employment, health, and housing). However, they were not able to participate actively in creating them. As for the experts whom we have interviewed, they stated that they were not consulted at any time. When the NRCP was consulted on this aspect, we were told that the involvement of experts took place during the NRIS thematic participatory assessment sessions, in which CSOs also participated, during December 2020, but not in the drafting of the NRSF which took place from January to September 2021.

1.2. Roma participation in the NRSF implementation, monitoring, and evaluation

The NRSF structures Roma participation around the CEPG.⁶ It should be borne in mind that this consulting arm of the Spanish government has never received sufficient funding to undertake its functions, which means that its capacity for auditing or for making proposals is limited. In addition, the 20 organisations composing the CEPG lack the authority to represent CSOs as a group, as they were not elected by CSOs but were designated as members by the government.⁷ This represents a significant structural weakness and means that a large part of RCS as well as a large number of CSOs do not know about the NRSF or its main objectives, as already happened with the NRIS, this being one of the main complaints made by Roma and pro-Roma organisations.

The NRSF proposes the creation of consulting groups and regional participation. This proposal, which has not yet been sufficiently concretely detailed, could represent a qualitative step forward in terms of Roma participation and long-term collaboration between RCS and the public authorities. Commitment to the creation of coordination mechanisms between pre-existing spaces for Roma participation (CEPG, regional and local consulting boards) are mentioned. However, they are not specified with clarity, despite the insistence of CSOs on the need to work with this objective in mind.⁸

It is worth noting that we only found Roma working for departments responsible for the implementation of the strategies (at a national and regional level) in one region: Catalonia. The NRCP has not hired any Roma person for such a role, and neither has the DGDFSS. Undoubtedly, the incorporation of measures to facilitate the access of Roma to these teams would facilitate Roma participation and the awareness of these departments of the development of the NRSF. On the other hand, the NRSF foresees its implementation with all three levels of administration (national, regional, and local) and with the involvement of CSOs carrying out publicly funded projects, so the same impact measurement criteria should be established for all parties that are involved.

Special attention should be paid to the way in which the NRCP establishes the potential financing of projects using European funds, particularly the European Social Fund Plus (ESF+). Despite the fact that when the NRSF was adopted the negotiations related to the partnership agreement on cohesion policy funds had not yet started, the lack of specification of criteria and general guidelines on funding objectives may be a barrier to Roma organisations with a strong territorial presence accessing these funds for the implementation of their projects, given that in Spain to date, only one pro-Roma

⁶ The CEPG, through its thematic working groups, is one of the four spaces in which the NRSF will be monitored, as specified in its Governance section. The NRSF briefly defines the timeline for monitoring and evaluation, which will basically take place in two phases: a mid-term evaluation, and a final evaluation.

⁷ Royal Decree 891/2005, of 22 July 2005, which created the CEPG. See: https://www.mdsocialesa2030.gob.es/derechos-sociales/poblacion-gitana/docs/CEPG/real_decreto_891-2005_creacion_CEPG.pdf

⁸ RCM report 2020, p 3, Recommendation Number 10. See: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-3-spain-2019-eprint-fin.pdf>

organisation has access to the ESF+. In 2021, a working group was created within the CEPG on the topic of European funding, with the participation of CSOs, to facilitate the planning of activities and programmes related to the Roma population. This group affirmed the pressing need for broader access to these funds, as many RCS groups are not able to access such funds owing to the requirement for applicants to demonstrate advanced management capacities. This requirement conflicts with the reality of Roma organisations in Spain (which are scattered across the various Spanish Autonomous Regions). However, it is difficult for the authors of this report to analyse mere guidelines without knowing how far they have been specified and developed. This matter should be examined thoroughly when the first Operational Plan is presented.

1.3. System of policy consultation with civil society and stakeholders

Political consultation with RCS has not been a habitual process in Spain, with the exception of those consultations carried out in recent months by the Ministry of Equality.⁹ The creation of the CEPG in 2005 was a milestone which was intended to meet this need, but in practice, according to the CSOs that were interviewed, it has not translated into political consultation processes of sufficient quality to be genuinely considered spaces and processes for political deliberation and consultation on policy initiatives or legislative proposals. The NRSF provides guidance, once again without any concrete detail, concerning working towards the empowerment of RCS to create conditions that enable its active participation.

Regarding the internal diversity of the Roma population, the NRSF encourages the formation of associations for Roma youth, Roma women, and Roma LGBTI+ people, although it does not specify how or in what ways this should be done. Nevertheless, we consider this a strength of the NRSF and an opportunity, while waiting to see how it is specified in the operational plans.

In relation to the monitoring and supervision of the NRSF itself, we would stress again that relying wholly on the CEPG is insufficient to achieve adequate participation. There may not be enough significant Roma participation in the monitoring and evaluation process, given the weaknesses of the CEPG explained above. Some of the Roma experts we have interviewed, particularly the expert on the intersectional gender approach, indicated that the evaluation of the NRSF, once quantitative data are available, should be led by an independent group of experts, Roma in the majority, in order to provide an evaluation with the necessary impartiality and rigour based on methods of scientific analysis.

1.4. Empowerment of Roma communities at the local level

The NRSF does not specifically tackle this area, which forms a central element of the EURSF. Such empowerment should foster ownership along with action aimed expressly at bringing about social and political change. It must be understood as a planned, inclusive and participative process, involving Roma communities, local authorities, and organisations. The NRSF's failure to address this area is without doubt one of its most significant weaknesses.

1.5. Capacity-building of Roma civil society

Capacity-building in RCS is explicitly mentioned in the text of the NRSF, although once again without the necessary concrete detail. Capacity-building is undoubtedly an area which is very highly valued by the CSOs that were interviewed, representing a long-held aspiration which they have voiced frequently in recent years. This means that

⁹ Public consultation prior to the drafting of legislation in the form of an Organic Law against Racism, Racial Discrimination and related forms of intolerance. See: <https://www.igualdad.gob.es/consulta-previa-ley-organica-contra-el-racismo.aspx>

empowerment should be accompanied by a much more equitable distribution of funding.¹⁰ To date, there has been no specific line of funding for improving the capacities of Roma organisations, nor does the NRSF specify that this is a factor to be taken into account in the coming years. Thus, the difficulty in acquiring management, communication, organisation and advocacy skills, among others, prevents Roma organisations from accessing new projects and funding that are essential for their development and sustainability. Roma organisations in Spain are highly dispersed and have very little experience and capacity for coordination between them; most of them have very small technical teams, saturated with bureaucratic work, with little capacity to implement new methods. The leadership of these same organisations, although heterogenous, is clearly deficient in terms of its capacity to develop fruitful dialogue with public administrations so as to implement projects that address the different expressions of discrimination and antigypsyism that they suffer. The specification of such capacity-building processes will be key to the participation of Roma throughout the life of the NRSF.

¹⁰ RCM report 2017. See the figure, table, and explanatory text on p. 23 in the chapter on Governance at: <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-spain-2017-eprint-fin-4.pdf>

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

The most recent data available from the European Union Agency for Fundamental Rights¹¹ (FRA) and the 'Study of the perception of discrimination based on racial or ethnic origin' carried out by the Council for the Elimination of Racial or Ethnic Discrimination (CEDRE) indicate that the Roma population is the ethnic group in Spain which suffers the greatest discrimination in all areas. For example, 72% of Spanish Roma state that they have suffered discrimination in some specific area of their lives (for example, in employment, health, housing, etc.).¹² The root causes of this situation lies in institutional and structural antigypsyism which has persisted for centuries, provoking mistrust amongst the Roma population towards institutions, and seen, for example, in the under-reporting of antigypsyism by its Roma victims.

Antigypsyism¹³ is seen in various areas of social, political, economic, and cultural life, and is combined in some cases with other kinds of discrimination, leading to the intersectional and multiple discrimination suffered by the LGBTI+ persons, by Roma women, by disabled Roma, and by the migrant Roma population.

In the NRSF, the fight against antigypsyism and discrimination is accorded greater importance than in the previous strategy. It is identified as a strategic line with two specific objectives, as well as a cross-cutting axis running through other areas (such as employment, health, and education) throughout the NRSF.

The two specific objectives are significant and relate to some of the most pressing problems associated with antigypsyism. On the one hand, these include the need to prevent and reduce antigypsyism in all its forms, including intersectional and multiple discrimination, anti-Roma hate crimes, and hate speech. On the other hand, they relate to the possibility for victims of antigypsyism to exercise their rights, guaranteeing assistance and specialist support. No concrete measures related to the two specific objectives of the NRSF are established; only general actions to be promoted by various authorities, along with planned legislation related to non-discrimination. The National Roma Contact Point (NRCP) indicates that specific measures will appear in the operational plans, along with a budget earmarked for their implementation.

However, some proposals made by CSOs, generally through the CEPG, have not been included in the NRSF. These include proposals for the creation of an 'Observatory on Antigypsyism' with mechanisms to monitor anti-Roma and discriminatory action, and the inclusion of specific indicators related to the reduction of antigypsyism in social networks and in the media.

The NRSF also fails to include methods for the production of (anonymised) data broken down by ethnic origin, which would allow antigypsyism to be monitored. However, as set out in the NRSF, the Ministry of Equality has opened a debate on the value of systematically including such data in statistics and studies carried out at the national level.

2.2. Education

Education is the area which has seen most progress concerning the objectives established in the NRIS, although these objectives have not been achieved. The rate of school

¹¹ https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-travellers-six-countries_en.pdf

¹² Perception of discrimination based on racial or ethnic origin on the part of its potential victims 2020: https://igualdadynodiscriminacion.igualdad.gob.es/Perc_Discr_RAacial.pdf

¹³ <https://cps.ceu.edu/roma-civil-monitor-reports>

attendance by Roma boys and girls at the beginning of compulsory education is 98%. However, the rate of early school dropout has increased, standing currently at 70%, while the proportion of Roma attending segregated schools is as large as 28%.¹⁴ This creates a significant educational gap between Roma and the rest of the population. In addition, there is a gender gap due to the fact that there is a smaller percentage of Roma women who have completed primary and secondary education. Furthermore, the severe digital gap which exists in relation to the majority population, arising from a lack of infrastructure, equipment, and skills, obstructs the access of a large part of the Roma population to a high-quality education. This has negative repercussions for their educational success.

Among the most important objectives to tackle, we would highlight the following: increasing the attendance of Roma boys and girls aged up to three years old in infant education; a reduction in early school dropout; a reduction in school segregation; the eradication of adult illiteracy; and the reduction of antigypsyism at the various educational stages. These topics are explicitly covered in the NRSF and are well-defined, with relevant objectives and specific indicators. However, the NRSF does not include concrete measures for achieving these objectives, offering only vague guidelines for action by the National General Administration (AGE), regional administrations, and local bodies, without accompanying budgets. More concrete measures will need to be specified in the operational plans.

In the NRSF, the Ministry of Education and Vocational Training (MEFP) introduces a change in approach; in contrast to its previous strategy, the AGE will not create specific programmes focused solely on the Roma population or on other groups. Only the inclusion of the history and culture of the Roma in curricula across the whole of Spain will receive specific attention; other activities will be carried out by means of programmes aimed at all members of the population in situations of vulnerability, among whom a large number of Roma are included. The MEFP has indicated that this is an attempt to avoid segregation. On the other hand, the NRSF does reflect a link with the new Education Law (LOMLOE).

The MEFP has decided not to ask about ethnic origin when compiling statistics on education, not only for Roma pupils but in general, and this contributes to the lack of relevant data for a large number of indicators.

2.3. Employment

The situation of Roma in Spain in terms of employment gives real cause for concern. The Roma population in Spain amounts to approximately one million people who, as well as suffering chronic unemployment, have unemployment rates of over 50% (around 60% of Roma women are unemployed, and 65% of young Roma). These figures indicate the generalised exclusion from the labour market suffered by Roma, leading to a permanent situation of poverty. Furthermore, the figures for early school dropout (70%) and for young people who are neither in work nor in education or training (NEETs – 57% among women and 42% among men)¹⁵ augur a similar or even bleaker future in terms of employment for the next generation.

The significant challenges facing the Roma in the current decade in the area of employment are identified in the NRSF, although the objectives that are defined are hardly ambitious. One of these is to increase the employment rate among Roma; the NRSF proposes an increase to 35% (30% for women and 40% for men) as an objective for 2030. Another challenge identified in the NRSF is that of reducing job insecurity and discrimination in access to employment for Roma, and the objective thus established is to increase salaried

¹⁴ Second European Union Minorities and Discrimination Survey (FRA, 2017): https://fra.europa.eu/sites/default/files/fra_uploads/fra-2017-eu-midis-ii-main-results_en.pdf

¹⁵ Comparative study on the situation of the Roma population in Spain in relation to employment and poverty 2018 (FSG 2019): <https://www.gitanos.org/EstudioEmpleoPoblacionGitanaEspana2018.pdf>

employment for Roma to 70% by 2030. As a third objective, the NRSF plans to reduce the number of NEETs to 50% among young Roma women and 35% among young Roma men by 2023, and to 40% among young Roma women and 30% among young Roma men by 2030.

One area which deserves particular attention is the way in which the NRSF discusses street trading, a form of work which fits perfectly with the Roma tendency to avoid the hierarchies involved in industrialising processes. This is argued at length by the Roma lawyer and activist Pastora Filigrana in her book *El Pueblo Gitano contra el Sistema Mundo* (Roma against the World System; Akal, 2020).¹⁶ This view represents a substantial change from the approach of the past in that it recognises street trading as a strategically important economic sector, involving 80% of the Roma population in Spain, and requiring public policies to rescue and sustain it, as indicated in the RCM report 2020 on Spain.¹⁷

The specific inclusion of the Roma population in the general plans of the 'Spanish Strategy of Active Support for Employment 2021-2024' should be noted as a positive element. These plans aim for an increase in the employment rate for people in situations of vulnerability (including the Roma population), a reduction in the NEET rate, and an increase in the rate of inclusion in the labour market of Roma women.

2.4. Healthcare

The Spanish Constitution of 1978 establishes, in Article 43, the right to the protection of health and to healthcare for all citizens. The activities intended to give effect to the right to health protection are governed by a set of regulations with the force of law: the General Health Law (1986); the National Health System (Cohesion and Quality) Law (2003); the Medicines (Guarantees and Rational Use) Law (2006); the General Public Health Law (2011); and the Royal Decree-Law on urgent measures for the sustainability of the National Health System and the improvement of quality and safety (2012). There are also various specific regional laws in this area.

The universal Spanish health system offers free healthcare to everyone, including Roma. However, although inclusion in the health system is total, studies carried out in the area (most recently in 2014)¹⁸ reveal that the state of health of the Roma population is several degrees worse than the state of health of the majority population. Among several variables worth highlighting is the life expectancy of Roma in Spain, which is 10 or 15 years below the average. The incidence of chronic illnesses among Roma is also considerably higher than in the general population.

The NRSF includes health as one of the key aspects of social inclusion, echoing the focus of the previous strategy of 2012-2020. Cross-cutting issues are now also given prominence: the fight against antigypsyism, the gender perspective, and the recognition of Roma culture.

The integrated approach proposed by the NRSF may prove positive for tackling health as an aspect of social inclusion, given that it takes a more inclusive approach to health. Incorporating the cross-cutting elements mentioned above into the area of health can improve healthcare and also the understanding of the specific measures and resources available to Roma.

As positive measures, we highlight the proposals related to intercultural training for health professionals, as well as the creation of services for intercultural mediation between Roma

¹⁶ *El Pueblo Gitano contra el Sistema Mundo* (Akal, 2020): <https://www.akal.com/pg-cont-sist-mund/>

¹⁷ RCM Report 2020 on Spain, p. 12: <https://cps.ceu.edu/rcm-3-spain-2019.pdf>

¹⁸ Second National Health Survey of the Roma Population 2014: <https://sanidad.gob.es/ENS14G.pdf>

and pro-Roma organisations and the health service. In addition, the NRSF's specific objective related to health puts particular emphasis on the populations of Roma children and of elderly Roma.

As a negative element, we note the failure to incorporate measures for dealing with the difficulties facing certain groups of Roma migrants in accessing health services. These relate mainly to obtaining a national health card, owing to difficulties encountered when attempting to register with local authorities, as indicated by the 'Report on Racial Discrimination in the Field of Housing and Informal Settlements' (Ministry of Equality, 2022).¹⁹

2.5. Housing, essential services, and environmental justice

In attempting to access housing, the Roma population encounters one of the most significant obstacles to their effective social inclusion. While this situation has improved in recent decades (although it would have been hard for it to become worse, with a large part of the urban Roma population living in 'third world' conditions), resettlement policies along with significant public investment have succeeded only in turning a large proportion of shanty towns and inadequate housing into 'vertical shanty towns', bringing with them quasi-generalised residential segregation. Roma ghetto neighbourhoods exist in practically every city in Spain, now shared with migrant populations. While these areas may be an improvement on slum settlements, these neighbourhoods limit the possibility of social advancement for their residents, keeping them physically and mentally cut off from mainstream services, with segregated schools, fewer job prospects, and fewer cultural activities on offer, and associated with generalised social stigma. In these neighbourhoods, studies on housing and the Roma population (1991, 2007, 2015)²⁰ have found some material improvements, as well as the continuing existence of poverty and a lack of opportunities for advancement in social terms or in the labour market.

The NRSF establishes the priority of reducing residential segregation, currently measured at 2.9%, to 1.9% in 2025, and 1% in 2030. It also calls for the eradication of slum settlements and inadequate housing by 2030. In terms of guaranteeing essential services, it finds that 27% of households have access to heating and proposes raising this to 38% in 2025 and 50% in 2030. We believe that, in addition to severe residential segregation, estimated at 2.9%, the use of other indicators of residential segregation would be appropriate. The CSOs suggested indicators which could show different levels of the concentration of Roma and migrants, giving a more realistic picture. In addition, we consider that indicators are needed to address the problem of inadequate housing.

As a positive element, the NRSF applies a cross-cutting focus on the fight against antigypsyism, leading in this case to a focus on discrimination in access to housing, although it does not propose specific measures in this area beyond the implementation of programmes and seminars, or the monitoring of offences recorded in this area. We also highlight the importance of applying a gender focus and offering support to victims of gender violence in the area of housing. Even taking into account the fact that Spain has a highly developed gender approach with regard to its policies against gender violence, we consider it very important that the NRSF incorporates this approach in relation to the situation faced by Roma women who are victims of gender violence to increase their opportunity to find housing.

Access to housing is one of the main social problems in Spain. Although the eradication of slums and substandard housing is covered within the programs of the current 'National Housing Plan 2022-2025', as it was in the previous period 2018-2021, the dimension of

¹⁹ Report on Racial Discrimination in Housing and Informal Settlements, Recommendation 5, page 98: https://www.igualdad.gob.es/ministerio/dgigualdadtrato/Documents/Informe_Discriminacion_racial_2022.pdf

²⁰ Map of housing and the Roma population 2007 and 2015: [2007.pdf](#) [2015.pdf](#)

the structural problem of access to housing in Spain far exceeds the capacity associated with this plan, which makes us anticipate that the impact, even with an increase in the budget, will be insufficient.²¹

2.6. Social protection

The Roma are the ethnic group which suffers the highest level of poverty and social exclusion in Spain. The indicator 'At Risk of Poverty and/or Exclusion' (AROPE) shows that 92% of Roma are at risk of poverty and social exclusion, compared with 29.3% of the general population, while 65.6% of Roma are at risk of severe poverty.²²

Despite these horrifying statistics, only 33.2% of Roma households in situations of severe poverty receive social welfare assistance, which means that it is necessary to guarantee access to financial and social aid for the Roma population. The guaranteed income system should also make it possible to drive forward processes of social, economic, and labour market inclusion for Roma, as well as to encourage their autonomy.

In 2020, the Spanish government introduced the 'Minimum Living Income' (IMV), a form of financial support provided through the social security system for people without income, as a right attached to their citizenship. However, various factors, such as administrative obstacles and a lack of information, have made access to IMV and other minimum income schemes problematic for many Roma families. There is also a lack of precise data regarding the number of Roma who are receiving this income.

The part of the NRSF related to "Poverty and social exclusion" establishes several specific objectives with indicators attached, such as improving access to social and financial assistance for those members of the Roma population with the least financial resources, and a reduction in the incidence of poverty and social exclusion among Roma. Although the relevant issues have been identified and objectives have been defined, the proposed activities that appear in the NRSF, such as "periodic monitoring of the degree of coverage of welfare assistance offered to Roma in situations of severe poverty", have not been specified in terms of concrete measures with budgets allocated for the Roma population.

2.7. Social services

Roma experience great difficulty accessing and benefiting from the essential public services to which they have a right as full citizens, as confirmed by various experts on the matter who have been consulted. Furthermore, these public services are in many cases insufficient, paternalistic in approach, or discriminatory towards the Roma population, and there is a lack of cooperation between social services and other governmental departments and organisations, such as the National Public Employment Service (SEPE).

The situation has worsened as a consequence of COVID-19, and CSOs stress the need to propose an integrative, collaborative alliance, operating at all levels between social services and the Roma, led by the AGE.

The NRSF does not include a specific focus on social services, nor does it establish objectives relating to them. It does identify some of the relevant issues, but not sufficiently. For example, the NRSF only includes activities to be promoted in relation to social services as part of its more general focus on "Poverty and social exclusion". These include: the improvement of cooperation between social services and Public Employment and Education Services; the design of specific training courses to enable staff to offer social assistance services which avoid reproducing paternalistic or anti-Roma dynamics;

²¹ <https://elpais.com/opinion/2022-01-20/afrentar-el-problema-de-la-vivienda.html>

²² Comparative study on the situation of the Roma population in Spain in relation to employment and poverty 2018 (FSG 2019): https://www.gitanos.org/Estudio_empleo_poblacion_gitana_en_Espana_2018.pdf

the periodic monitoring of access to basic services and resources; and the improvement of information services offered to Roma. As in the other areas that are discussed, these guidelines for action are not made specific, nor do they have any budget allocated to them.

2.8. Child protection

According to the most recent data that is available, the child poverty rate for the Spanish Roma population stands at 89%, while the severe child poverty rate (relating to those under 18 living in Roma households in situations of extreme poverty) is 70.2%.²³ These horrifying data show that it is essential to take specific measures to reduce child poverty and extreme poverty in the Roma population.

The NRSF identifies this problem and tackles it as part of its more general focus on "Poverty and social exclusion", which suggests that the AGE has not considered the protection of children as a specific focus. The objective of "Reducing the incidence of child poverty in the Roma population and breaking the intergenerational poverty cycle" aims to reduce the rate of child poverty in the Roma population from 89% to 31% by 2030. To achieve this goal, it is merely indicated, without further specification, that integrated programmes and activities will be carried out. The aims of these programmes and activities will be to promote socio-educational inclusion for children, as well as to cover their basic needs (food, adequate housing, health, etc.), taking advantage of the framework defined by the Child Guarantee and the ESF+.

The NRCP has indicated that it will collaborate with the Directorate General for the Rights of Children and Adolescents in the implementation of the 'Youth Guarantee', which covers boys and girls in situations of vulnerability, including Roma boys and girls. Therefore, in accordance with the NRSF, no specific measures are planned exclusively for Roma children, although the NRCP indicates that its operational programmes will focus more explicitly on the issues facing Roma children, not only in terms of poverty and exclusion but also in terms of the detection of violence, mistreatment, etc.

2.9. Promoting (awareness of) Roma arts, culture, and history

Spanish institutions and society in general are coming to accept, little by little, that the recognition of the history and culture of the Roma is a historic debt which must be repaid as a step towards the inclusion of the Roma and towards increasing social cohesion. Previous policies and initiatives, from the very repressive to the paternalistic, have had little effect. This is due to the fact that most have tried to modify or even eliminate Roma idiosyncrasy, rather than treating it as a positive, enriching element of our Spanish cultural heritage. For this reason, the NRSF has included this cultural recognition as a strategic element within the focus on equality in order to foster the empowerment of Roma and collectives.

However, in relation to this strategic goal, only one specific objective is defined: "promoting awareness and dissemination of Roma history and culture to encourage recognition and reconciliation". The indicators that are proposed relate to references to the Roma in primary and compulsory secondary education. Although this may have some positive value, the restricted approach shows that this area is accorded minor importance within the NRSF.

The guidelines offered to administrative bodies for the dissemination of Roma culture are also positive. However, they could be made more concrete with the specification of objectives, along with indicators associated with the meeting of these objectives. In this way they could be quantified, referring, for example, to the percentage of teachers who

²³ Comparative study on the situation of the Roma population in Spain in relation to employment and poverty 2018 (FSG 2019): https://www.gitanos.org/Estudio_empleo_pob_gitana_en_Espana_2018.pdf

have received training in Roma history and culture, or to the inclusion of content on public television, where the presence of Roma history and culture is still unheard of.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

Some correspondence can be observed, at least in terms of structure, between European policies and the EURSF. This is not observed in the case of national policies, for which we have observed, through the examination of the NRSF and various interviews with experts, a lack of coordination between the different levels of public administration. The interrelationship between the policies aimed at the Roma population in Spain has been left to chance, since there has been no coordination between the different levels of the administration so that policies aimed at the Roma population have the same focus, as we have been able to verify through the interviews.

Thus, the 'State Housing Plan' for the period 2022-2025 does not explicitly mention the Roma as one of the especially vulnerable groups, according to Chapter 5 of the Plan. However, we can find, for example, explicit mention of people with disabilities (to whom Chapter 9 is dedicated) or people who are victims of gender violence (Chapter 5). Implicitly, we may find elements closely related but not exclusive to Roma, as is the case of reference to slums (Chapter 14).

Therefore, we identify the improbable impact of the NRSF in the design of national mainstream policies, thus relegating issues related to the Roma community to mainstreaming or chance.

3.2. Responsibility for NRSF coordination and monitoring

Most key people interviewed for the preparation of this report were ignorant of the structure and/or functioning of the NRCP. This issue highlights the difficulty to be expected in achieving successful coordination between the various actors that are involved.

In the interview carried out with Fernando Macías Aranda, an expert in education, he told us that "when the moment of truth arrived, the Catalan Government, for example, implemented the Comprehensive Plan for the Roma²⁴ and took into account the objectives of Europe and some objectives of the NRIS, but might not have taken them into account. Implementation in the CCAA is not being given [supported by] national leadership...".

From this statement we can glean the considerable disconnect between general/national policies and the way in which this is actualised at the regional and local level. This disconnect could create obvious difficulties for the NRCP in terms of fulfilling the tasks and objectives that have been defined, such as:

- Centralising and coordinating the design, implementation and evaluation of the NRSF and other issues related with the inclusion of the Roma population at national, regional and local level.
- Facilitating the coordination between the various actors involved in the NRSF: Ministries and directorates of the AGE, Spanish Autonomous Regions (CCAA), local organisations and RCS.

In summary, the interviews demonstrated the inadequacy of the NRCP to coordinate the management and cohesion of policies aimed at the Roma population with the different levels of public administration.

²⁴ The Comprehensive Plan for the Roma in Catalonia can be consulted at: https://participa.gencat.cat/uploads/decidim/attachment/file/1206/Plan_Integral_Pueblo_Gitano_17-20_Digital.pdf

“The NRSF is therefore a danger on two fronts. On one hand, because the national administration does not tell the regional governments how to work. Not well, not badly. It doesn’t say anything. And because even when the regions going it alone deliver impactful data, they aren’t taken into account...”.²⁵

3.3. Quality of the plan

At the time of writing this report, the first Operational Plan of the NRSF is not in force. It should be highlighted that while the NRSF was approved in November 2021, almost six months later this plan is still not yet in force. This fact may indicate that the speed at which the public administration operates does not always favour the fulfilment of the objectives that are defined.

Therefore, the NRSF does not have specific timelines or deadlines for the moment, since, as we have indicated in the previous paragraph, the operational plans have not been launched.

We observe a serious imbalance in the form of a lack of definitive and concrete operational plans related to levels of work and workloads. This will be examined in more detail later on.

3.4. Funding

The sources of funding that are planned to be used in the implementation of the NRSF are described in the document itself. They are the following:

- ‘Roma Development Plan’ (Ministry of Social Rights and Agenda 2030 of the Spanish Government);
- Contributions from income-tax funding at the national level, and subsidies to strengthen the third sector devoted to social action;
- ‘European Social Fund Plus’ (ESF+);
- ‘European Regional Development Fund’ (ERDF).

As we commented in Section 3.3, the operational plans are not in force, so we cannot comment more specifically on the forms of financing of the NRSF.

The NRSF states the following: “the main differentiation will be between the amounts allocated to the budgets allocated to mainstream or generalist policies and those for targeted or specific actions...”.²⁶ However, Joan Batlle i Bastardas, an expert on housing, stated in the interview he gave to our team that the resources allocated to mainstream policies, to which the NRSF must adhere to ensure the soundness of the actions planned, are either insufficient or non-existent:

“On the subject of housing, the NRSF refers to the National Housing Plan (PEV) as a source of funding to tackle the objectives in this area, but the PEV budget is the same as it was ten years ago – and not for Roma! Rather, it’s for all groups who find themselves in situations of insecurity or vulnerability... It’s not enough [...] In the end it’s about scattering crumbs for the poor, and that’s not good enough”.

²⁵ Fernando Macías Aranda, Education expert. Interview carried out on 20 April 2022.

²⁶ National Strategy for the Equality, Inclusion and Participation of Roma 2021-2030, p. 77.

3.5. Monitoring and evaluation

Some interviewed experts told us about the problems that arise when outsourcing the evaluation of the NRSF to CSOs, as this could lead to various deficiencies when rigorously evaluating the impact of the NRSF among the Roma population.

“The NRSF is externalised and depends on CSOs, and this is a grave error. This externalisation follows the logic of subsidised projects, being more concerned with proving value for money than in analysing the impact achieved. This impact is left clouded in secrecy and cannot be either measured or evaluated [...] The structure of the NRCP standardises ineffectiveness. If to this you add the fact that the CCAA [has] no obligation to apply the NRSF, this creates gaps between different areas/regions”.²⁷

It appears that the framework structure for the monitoring of the NRSF has an acceptable level of rigour in the way it has been planned. However, we have observed that “there are indicators that are good, and others which don’t exist. There are some which are self-congratulatory (school attendance of Roma pupils [of] more than 99%)...”²⁸

According to expert interviews, negligible or minimum levels of impact are expected, and this will result in a practically insignificant impact among the Roma population. No ambitious impact indicators are observed and the lack of involvement on the part of the administration is clearly manifested in the non-specification of an operational plan, which has meant that practically a year of implementation of the NRSF has been lost.

3.6. Assessment of the expected effectiveness and sustainability

From the documentary analysis and the interviews carried out, we agree with the conclusion of the Roma expert on the intersectional gender perspective:

“We must demand that ministries make periodic reports showing what resources are used for Roma at national, regional and local level, and to which operators or organisations these funds are awarded, and probably we will be able to see that there are organisations which control more resources than the ministries themselves, without any type of control or evaluation”.

Ambitious and clearly defined targets can be found for some specific issues, with indicators that, in our opinion, could be improved, such as the rate of residential segregation. The NRSF would be improved if the human, financial, and technical resources for the achievement of the defined objectives were specified. On the other hand, coordination mechanisms between the different levels of public administration with binding capacity in the development of the NRSF are not clearly established.

²⁷ Roma expert on the intersectional gender perspective. Interview carried out on 4 April 2022.

²⁸ Roma expert on the intersectional gender perspective. Interview carried out on 4 April 2022.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

Based on the analysis presented here, we can state that the NRSF reflects the diversity of the Roma in Spain. However, this reflection of diversity is not found to an equal degree across the board. That is, the objectives and indicators related to each specific group vary in number and in operational specification.

The NRSF mentions a range of variables which may affect the personal development of Roma citizens. It makes explicit reference to certain groups of Roma which are significant in size, but does not provide a detailed discussion of other groups which we believe should also be included. Examples are the LGBTI+ Roma population, disabled Roma, and the migrant Roma population, which are not discussed in detail in the NRSF despite being explicitly mentioned in the ERSF. In the case of the LGBTI+ Roma population and of disabled Roma, the text mentions the multiple forms of discrimination these groups may face as an example of intersectional discrimination. However, it does not propose any specific action as part of the plans that are set out. This stands in contrast to the content related to Roma youth, Roma women, and Roma children.

We take a positive view of the fact that the NRSF explicitly includes differentiating elements such as gender and age, as we understand that this is one of the key ways in which the effectiveness of the proposed measures can be maximised. This can be clearly observed in the section devoted to Education.²⁹

4.2. Combining mainstream and targeted approaches

The approach envisioned in the NRSF towards some of the groups within the Roma community in Spain, as mentioned in the previous section, is based on the principle of “explicit, but not exclusive measures”. The document proposes that the integration of measures focused on the Roma population – that is, their inclusion in policies relating to vulnerable groups in general, rather than the creation of separate policy instruments – is considered a means of guaranteeing that Roma integration does not come at the cost of continued segregation.³⁰

It is true that different sections of the document discuss general and specific levels, this tendency being found throughout the document. However, it seems appropriate to qualify as a weakness the fact that the aforementioned groups are not considered as specific targets, as this indicates that the principle of having specific and general policies, as proposed by the ERSF, is not being followed. In this way, these groups remain invisible, reinforcing the image of Roma as a homogeneous whole.

We consider that in some cases intersectionality must be tackled in a specific manner in order to increase the effectiveness of the measures and thereby increase the visibility of these groups found within the Roma population. The creation of specific measures and target policies for these groups would help to:

- a) Increase the effectiveness of the policies;

²⁹ National Strategy for Roma Equality, Inclusion and Participation 2021-2030. See the table on Education on p.20 at: https://www.mdsocialesa2030.gob.es/derechos-sociales/poblacion-gitana/docs/estrategia_nacional/Estrategia_nacional_21_30/Estrategia_aprob_cm_2_nov_ENGLISH.pdf

³⁰ For a detailed explanation of the explicit but not exclusive approach along with other examples, see Principle No. 2 of the Vademecum The 10 Common Basic Principles for the Inclusion of Roma, at: <https://op.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

- b) Enhance the visibility of these parts of the Roma population;
- c) Contribute to a perception of the Roma population not as a homogeneous mass, but as a diverse community facing diverse and in some cases intersecting issues.

4.3. Usage of instruments introduced by the Council Recommendation

Regarding the use of instruments emerging from the recommendations of the Council of the European Union of 12 March 2021,³¹ we observe that, although the NRSF attempts to preserve the contextual essence of the EURSF, the operationalisation of the actions and/or tools is far from what is recommended.

“On paper they are stated (the objectives and recommendations of the EURSF), but not in the context in which they appear in the EURSF working paper. It must be ensured that in the operational plans they appear much more clearly and identifiably” (Roma expert on the intersectional gender perspective).

As an example, we observe that in its approach to the field of education (a key aspect for the majority of the experts who were consulted and interviewed), the NRSF focuses its efforts on providing Roma with resources and options which can facilitate school success (e.g., accompaniment, financial aid). In this way, the focus when approaching the problem is put on the Roma population itself, without attending to the problem’s structural and causal aspects.

In contrast, the recommendations of the EURSF are for actions which focus on centres of education and the education system as key agents in the promotion and guarantee of educational success for Roma students. Among these recommendations, we would highlight the following:³²

1. Measures to promote school campaigns and activities to raise multicultural awareness;
2. Measures to promote knowledge of the cultures, language and history of the Roma population, including the commemoration of the Roma Holocaust and the dissemination of information about processes of reconciliation in wider society. These could be carried out, among other means, through activities such as providing appropriate training to teachers and designing appropriate curricula, given that awareness-raising is essential for reducing prejudices and antigypsyism, which are important causes of discrimination;
3. Measures to foster positive narratives about the Roma population and create Roma role models, along with improving the understanding of the difficulties faced by Roma. This could be achieved through support for inter-community meetings and intercultural learning.

In conclusion, we observe that the NRSF reflects the lack of operational specificity of the EURSF, thereby unconsciously favouring the creation of an operational vacuum for the strategy – even though, structurally speaking, it is perfectly aligned.

³¹ Recommendation of the Council of the European Union of 12 March 2021: [Council Recommendations of 12 March 2021 on Roma equality, inclusion and participation](#)

³² These recommendations relate to sections f), h) and g) of the Horizontal objectives: Equality, inclusion and participation of the Council Recommendation of 12 March 2021 (2021/C 93/01)

CONCLUSIONS AND RECOMMENDATIONS

The main strength of the NRSF in Spain is its inclusion of the fight against antigypsyism as a cross-cutting issue, representing an advance on the NRIS. However, we observe shortcomings related to the commitment implicit in the EURSF to the creation of indicators which can provide the data necessary for the design of effective public policies, as well as the funding and monitoring of the achievement of objectives set out in it. The significant delay in drafting the first Operational Plan presents an obvious difficulty, given that it will not be approved before September or October 2022. This will be almost a year after the approval of the NRSF, and 22 months after it nominally came into force.

Recommendations to national, regional and local authorities

1. Create an independent technical office for the CEPG.

This independent technical office should work to make the council more visible, active and efficient, fostering broader and closer collaboration between the AGE and RCS, especially in terms of consultancy and the participation of the Roma organisations which belong to it, and occasionally of other organisations. For this purpose, the CEPG must be provided with an independent budget to allow the technical office, its plan of work, and its activities to be run autonomously.

2. Promote the inclusion of the history and culture of the Roma in compulsory education curricula in all the CCAA of Spain.

Following the approval of the Royal Decree related to the content of the primary education curriculum – which includes the history and culture of the Roma – some reference material has already been developed with the participation of Roma and other organisations. It is now time to begin using these materials across Spain, based on an agreement adopted at the Education Sector Conference,³³ and with the commitment and involvement of the Spanish Autonomous Regions.

3. Establish urgent measures aimed at Roma in the field of employment, including street trading as a strategic economic sector.

These measures should cover access both to employment and to vocational training so that by 2030 indicators on employment, job insecurity, and NEETs among Roma are comparable to average figures for the general population.

4. Ensure access to financial and social welfare assistance for the Roma population, such as the Minimum Living Income and other minimum income schemes.

It is necessary to overcome bureaucratic hurdles and establish concrete measures to improve access to the guaranteed income system, thereby driving forward processes of social, economic, and labour market inclusion for Roma.

5. Facilitate access to healthcare services for Roma who have immigrated from other countries.

To achieve this, it is necessary to establish concrete measures, mainly related to obtaining a health card, as well as working with RCS to offer intermediation at reception sites for Roma arriving from other countries.

6. Create indicators which will provide data on residential concentration as another form of residential segregation.

³³ Space for coordination through periodic meetings between the AGE and the CCAA in various Spanish public policy fields, including education.

The NRSF indicates that the level of residential segregation of the Roma population is 2.9%. However, the consulted RCS members and other indicators such as school segregation suggest that this figure does not remotely reflect the real situation in the 'ghetto neighbourhoods' that are populated by Roma and migrants which exist in most cities in Spain. The Spanish government and regions must commit to gathering data broken down by ethnic origin, to be obtained voluntarily and with guarantees of anonymity, in order to generate a picture which more closely reflects reality.

7. Agree a multi-level emergency plan for fighting Roma child poverty.

When the situation is as serious as that indicated by the figures on Roma child poverty presented in this report, a combination of mainstream and targeted policies is required, following the European guidance on policies of inclusion aimed at the Roma population.³⁴ However, this guidance is not currently being followed in this area. The emergency plan should establish, among other things, mechanisms which take account of extended Roma family networks as spaces in which difficult family situations can be resolved, these situations doubtless stemming from extreme poverty. In this way, it will be possible to avoid arbitrary suspensions of custody for Roma families, these actions currently occurring despite requests from family members to explore the resolution of difficulties within these family networks.

8. Promote awareness of the history and culture of the Roma throughout society.

For this purpose, sources of public assistance such as financial aid, grants, and research programmes are important forms of support for cultural advancement. Also important is the dissemination of specific information to public communications media.

9. Envision and promote intersectional policies in the NRSF.

Although the NRSF is structurally aligned with the EURSF, a key element to be borne in mind is intersectionality. This issue should receive specific attention, not only to improve the effectiveness of policies but also to show the Roma as a diverse people, facing diverse issues. For this reason, various collectives among the Roma (migrants, disabled people, LGBTI+) should be considered specific 'targets' within the NRSF, as proposed in the EURSF.

Recommendations to European institutions

10. Establish a new European Framework Law against Antigypsyism which includes a requirement for transposition in all EU Member States.

A European framework law is needed to address the structural and institutional phenomenon of antigypsyism in a cohesive, efficient manner. This European framework law must lay foundations, not only in terms of punishment, but also in terms of the fundamental principles required for the establishment of processes of truth and reconciliation. Such processes can then facilitate the creation of policies of reparation and guarantees of non-repetition. The framework law should also enable the processes of legislative change that are required in order for EU Member States (and the regions and municipalities within them) to eliminate public policies and regulations which perpetuate institutional forms of racism against the Roma.

³⁴ See the 'Vademecum. 10 common basic principles for the inclusion of Roma' at: <https://op.europa.eu/en/publication-detail/-/publication/7573706d-e7c4-4ece-ae59-2b361246a7b0>

Recommendations to civil society, other stakeholders, and national, regional and local authorities

11. Establish an alliance at all levels (national, regional and local) between social services and the Roma.

This alliance must be integrative and led by the AGE in cooperation with Autonomous Regional Governments and the Spanish Federation of Municipalities and Provinces (FEMP). It should involve collaboration between the various parties that are involved (administrative bodies, organisations, RCS, mediators, social workers, etc.)

Recommendations to national authorities

12. Support and disseminate independent monitoring initiatives of the NRSF with the participation of academia, experts, and CSOs.

Pre-existing NRSF monitoring initiatives should be supported by the NRCP by complementing their funding and disseminating the reports that are published. Monitoring initiatives that involve academia and independent experts, as well as representatives of the SCG, should be explicitly supported by the Spanish government because of their impartial perspective. A particularly relevant aspect would be support for the continued training of CSOs to evaluate public policies.

REFERENCES

List of interviews

Marugan Zalba, Nicolás.³⁵ Representative of the Ministry of Equality. Online. 16 March 2022.

Navarro Zafra, Juan Carlos. Representative of the Andalusian Regional Government. Online. 18 March 2022.

Vílchez Enríquez, Ramon. Representative of Comprehensive Plan for the Roma in Catalonia. Online. 18 March 2022.

Arza Porrás, Xavier. Health Expert. Online. 21 March 2022.

Ruiz Bautista, María Dolores & Magaña de Larriva, Lourdes. By delegation of the National Roma Contact Point of Spain. Online. 23 March 2022.

Kamira, Mistós, FSG, 16 de Mayo, Ververipen & Kale dor Kayico. Focus group. Online. 5 April 2022.

Gil Luciano, Ana. Representative of the Ministry of Health. Written. 18 April 2022.

Macías Aranda, Fernando. Education Expert. Online. 20 April 2022.

Rabassa Massons, Jordi. Representative of the Roma Municipal Council of Barcelona. Online. 21 April 2022.

Llaquet Baldellou, Purification & Pérez Medina, Juan Carlos. Representatives of the Ministry of Education. Online. 27 April 2022.

Batlle i Bastardas, Joan. Housing Expert. Online. 29 April 2022.

* The representative of the Ministry of Transport, Mobility and Urban Agenda (Housing) refused to be interviewed. The representative of the Ministry of Inclusion, Social Security and Migration (Employment) and the representative of the Basque Government did not respond to our repeated requests.

Key policy documents and reports

- Coalition of organisations Roma Civil Monitor in Spain. [*Civil society monitoring report on implementation of the national Roma integration strategies in Spain: Focusing on structural and horizontal preconditions for successful implementation of the strategy.*](#) Madrid: *Plataforma Khetane*, 2018.
- Coalition of organisations Roma Civil Monitor in Spain. [*Civil society monitoring report on implementation of the national Roma integration strategies in Spain: Assessing the progress in four key policy areas of the strategy.*](#) Madrid: *Plataforma Khetane*, 2018.
- Coalition of organisations Roma Civil Monitor in Spain. [*Civil society monitoring report on implementation of the national Roma integration strategies in Spain: Identifying blind spots in Roma inclusion policy.*](#) Madrid: *Plataforma Khetane*, 2019.

³⁵ Interviewed in place of the representative of the CEDRE (equality authority), as the latter had not been involved at any point in the drafting of the NRSF and as this council is administratively dependent on the Ministry of Equality.

- Council of the European Union. *Council Recommendation of 12 March 2021, on equality, inclusion and participation of the Roma population (2021/C 93/01)*. Brussels: Council of the European Union, 2021.
- European Commission. *EU Roma strategic framework for equality, inclusion and participation for 2020–2030*. Brussels: European Commission, 2020.
- Ministerio de Derechos Sociales y Agenda 2030. *Estrategia Nacional para la Igualdad, Inclusión y Participación del Pueblo Gitano 2021-2030*. Madrid: Ministry of Social Rights and 2030 Agenda. Government of Spain, 2021.
- Ministerio de Sanidad, Servicios Sociales e Igualdad. *Estrategia Nacional para la Inclusión Social de la Población Gitana en España 2012-2020*. Madrid: Ministry of Health, Social Services and Equality, 2014.
- Ministerio de Derechos Sociales y Agenda 2030. *Estrategia Nacional para la Inclusión Social de la Población Gitana 2012-2020: Informe de evaluación final Estrategia*. Madrid: Ministry of Social Rights and 2030 Agenda. Government of Spain, 2021.

ANNEX: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Antigypsyism not recognised as a specific problem in national policy frameworks	critical problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Prejudice against Roma	critical problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Hate crimes against Roma	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Hate speech towards and against Roma (online and offline)	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Weak effectiveness of protection from discrimination	critical problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement
Segregation in education, housing, or provision of public services	critical problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Statelessness, missing ID documents	significant problem	irrelevant	absent	Absent
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	critical problem	understood with limitations	present but insufficient	some targets but not relevant
Barriers to <i>de facto</i> exercise of EU right to free movement	minor problem	irrelevant	absent	absent

Education

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Lack of available and accessible pre-school education and ECEC services for Roma	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Lower quality of pre-school education and ECEC services for Roma	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
High drop-out rate before completion of primary education	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Early leaving from secondary education	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Secondary education/vocational training disconnected from labour market needs	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Misplacement of Roma pupils into special education	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Education segregation of Roma pupils	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to second-chance education, adult education, and lifelong learning	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Limited access to and support for online and distance learning if education and training	critical problem	understood with limitations	present but insufficient	adequate but with room for

institutions close, as occurred during the coronavirus pandemic				improvement
Low level of digital skills and competences and limited opportunities for their development among pupils	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Low level of digital skills and competences and limited opportunities for their development among adults	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement

Employment

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor access to or low effectiveness of public employment services	critical problem	Understood but not analysed sufficiently	absent	absent
Youth not in employment, education or training (NEET)	critical problem	Understood but not analysed sufficiently	adequate but with room for improvement,	some targets but not relevant,
Poor access to (re-) training, lifelong learning and skills development	critical problem	Understood but not analysed sufficiently	present but insufficient	some targets but not relevant
Discrimination on the labour market by employers	critical problem	Understood but not analysed sufficiently	present but insufficient	some targets but not relevant
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	minor problems	irrelevant	absent	absent
Primary labour market opportunities substituted by public work	irrelevant	irrelevant	absent	absent
Barriers and disincentives to	significant problem	mentioned but not analysed	present but	some targets but

employment (such as indebtedness, low income from work compared to social income)		sufficiently	insufficient	not relevant
Lack of activation measures, employment support	critical problem	Understood but not analysed sufficiently	present but insufficient	some targets but not relevant

Healthcare

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Exclusion from public health insurance coverage (including those who are stateless, third country nationals, or EU-mobile)	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	minor problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement
Limited access to emergency care	irrelevant	mentioned but not analysed sufficiently	absent	adequate but with room for improvement
Limited access to primary care	minor problem	mentioned but not analysed sufficiently	present but insufficient	adequate but with room for improvement
Limited access to prenatal and postnatal care	minor problem	absent	absent	adequate but with room for improvement
Limited access to health-related information	minor problem	mentioned but not analysed sufficiently	absent	adequate but with room for improvement
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement

Poor access to sexual/reproductive healthcare and family planning services	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Specific barriers to better healthcare of vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Unrecognised historical injustices, such as forced sterilisation	absent	absent	absent	absent
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	minor problem	absent	adequate but with room for improvement	adequate but with room for improvement

Housing, essential services, and environmental justice

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor physical security of housing (ruined or slum housing)	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lack of access to drinking water	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lack of access to sanitation	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lack of access to electricity	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited or absent	significant problem	mentioned but not analysed	present but	some targets but

public waste collection		sufficiently	insufficient	not relevant
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lack of security of tenure (legal titles are not clear and secure)	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lacking or limited access to social housing	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Overcrowding (available space/room for families)	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing-related indebtedness at levels which may cause eviction	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing in segregated settlements/ neighbourhoods	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Housing in informal or illegal settlements/ neighbourhoods	significant problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	some targets but not relevant
Limited or lacking access to public transport	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	some targets but not relevant
Limited or lacking internet access (e.g., public internet access points in deprived areas, areas not covered by broadband internet)	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	some targets but not relevant
Limited or lacking	minor problem	mentioned but not analysed	adequate but with room for	some targets but

access to green spaces		sufficiently	improvement	not relevant
Roma excluded from environmental democracy	minor problem	mentioned but not analysed sufficiently	adequate but with room for improvement	some targets but not relevant

Social protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
High at-risk-of-poverty rate and material and social deprivation	critical problem	identified and analysed sufficiently	adequate but with room for improvement	relevant targets well defined
Income support programmes fail to guarantee an acceptable level of minimum income for every household	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	critical problem	understood with limitations	present but insufficient	some targets but not relevant
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	significant problem	understood with limitations	adequate but with room for improvement	some targets but not relevant
Low flexibility of income support programmes for addressing changing conditions of the household	critical problem	understood with limitations	present but insufficient	some targets but not relevant
Discrimination by agencies managing income-support programmes	significant problem	irrelevant	absent	absent
Risk of municipalities misusing income support to buy votes	minor problem	irrelevant	absent	absent

Social services

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Limited quality, capacity and comprehensiveness of help provided by social services	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Limited access to social services: low awareness of them, low accessibility, (e.g., due to travel costs) or limited availability	critical problem	understood with limitations	present but insufficient	adequate but with room for improvement
Services providers do not actively reach out to those in need	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Discrimination by social service providers	critical problem	irrelevant	absent	absent
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	significant problem	understood with limitations	present but insufficient	some targets but not relevant

Child protection

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Child protection not considered in the NRSF	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Specific vulnerability of Romani children as victims of violence not considered	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

Segregated or discriminatory child-protection services provided to Roma	critical problem	understood with limitations	present but insufficient	some targets but not relevant
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	significant problem	understood with limitations	present but insufficient	some targets but not relevant
Illegal practices of child labour	minor problem	irrelevant	absent	absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	significant problem	understood with limitations	present but insufficient	some targets but not relevant
Persistence of large-scale institutions rather than family-type arrangements	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Early marriages	minor problem	irrelevant	absent	absent
Barriers to children's registration; statelessness	minor problem	irrelevant	absent	absent
Biased treatment of Roma youth by security and law enforcement	critical problem	understood with limitations	present but insufficient	some targets but not relevant
Inadequate child/adolescent participation	critical problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement

Promoting (awareness of) Roma arts, culture, and history

Problems and conditions	Significance:	Identified by strategy:	Measures to address:	Targets defined:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	significant problem	understood with limitations	present but insufficient	some targets but not relevant

Exclusion of Roma communities from national cultural narratives	significant problem	understood with limitations	present but insufficient	some targets but not relevant
Romani history and culture not included in school curricula and textbooks for both Roma and non-Roma students	significant problem	understood with limitations	present but insufficient	some targets but not relevant
Lack of inclusion of Romani language in schools, and development of necessary educational materials and resources for Romani language preservation and teaching	significant problem	understood with limitations	present but insufficient	some targets but not relevant
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalizing dates relevant to Roma history	significant problem	understood with limitations	present but insufficient	some targets but not relevant

HOW TO OBTAIN EU PUBLICATIONS

Free publications:

- one copy:
via EU Bookshop (<http://bookshop.europa.eu>);
- more than one copy or posters/maps:
from the European Union's representations (http://ec.europa.eu/represent_en.htm);
from the delegations in non-EU countries
(http://eeas.europa.eu/delegations/index_en.htm);
by contacting the Europe Direct service (http://europa.eu/europedirect/index_en.htm)
or calling 00 800 6 7 8 9 10 11 (freephone number from anywhere in the EU) (*).

(*). The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you).

Priced publications:

- via EU Bookshop (<http://bookshop.europa.eu>).

