

POSITION PAPER

How the future 2021-2017 European Social Fund Plus (ESF+) can better contribute to Roma inclusion and equality

November 2018

Launched in 2007, [EURoma \(European Network on Roma inclusion under ESI Funds\)](#) brings together public authorities responsible for Roma policies and those responsible for ESI Funds from fifteen European Union (EU) Member States as well as the European Commission. It aims to improve (through mutual learning, generation of knowledge and awareness-raising activities) the use of ESI Funds for the promotion of social inclusion, equal opportunities and fight against discrimination of the Roma community across the EU.

EURoma welcomes and acknowledges progress made in the European Commission's proposal, which opens up new opportunities for advancing on Roma equality across the EU after 2020. We appreciate the proposed role for ESF+, with a combined system of direct and indirect management, to ensure high levels of employment, education and training, health, social inclusion and active participation in society. And particularly the series of very important challenges underlined, one of them being the '*social exclusion of marginalised groups including Roma and migrants*'. In this regard, we are extremely satisfied with the explicit mention to Roma under one of the Specific Objectives of the Regulation proposal (*Article 4*): '(viii) *promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma*'.

This means a straightforward acknowledgement of the need for ESF+ to specifically address the unequal situation that Roma face across the EU, giving continuation to the introduction of the specific Investment Priority (I.P.) 9.2. on the 'Socio-economic integration of marginalised communities such as the Roma' in the 2014-2020 European Structural and Investment Funds (ESI Funds) Regulations. The maintenance of the specific focus on Roma inclusion for the next programming period reflects the need to reinforce the efforts due to limited progress in the reduction of the equality gaps between Roma and non-Roma in EU Member states.

While the specific mention to Roma within the future ESF+ Regulation is certainly a necessary requisite for increasing efforts in tackling the inequality suffered by Roma, there are also other important elements that would enable investments through ESF+ to make significant steps towards social change, real equality and non-discrimination of Roma in the EU. In this regard, EURoma also acknowledges the positive progress in

relation to increasing the alignment of ESF+ and all EU Funds with the European Semester and the European Pillar of Social rights. Another relevant step forward is the establishment of Enabling Conditions, understood as a continuous process, having to be fulfilled during the whole programming period. This will certainly allow for a better focus and impact of the funds at national level, going beyond a light requisite for Member States acceding funds but rather a permanent requirement for consistency between policy and financial instruments. In this sense we welcome the provision to strengthen the ESF+ alignment with the European Semester –being the Country Specific Recommendations (CSR) a key tool for guiding ESF+ investments.

Despite these very important elements for progress within the ESF+ Regulation proposal, there are other aspects that we consider should be improved in order to make the ESF+ a more powerful instrument for achieving equality, social inclusion and non-discrimination of Roma across the EU.

EURoma proposes the following improvements within ESF+ Regulation proposal:

- EU Funds need to be fully aligned with European Semester and the European Pillar of Social Rights, with national mainstream policies and legislation and also with National Roma Integration Strategies. Connection and coherence of funding priorities and actions with EU and national policy frameworks are a necessary step to achieve greater impact on social inclusion and non-discrimination of Roma. In order to assure the strengthened alignment of ESF+ with the European Semester, EC clarification of questions arising during the implementation phase to Member States should be facilitated.
- ESF+ should concentrate and intensify large-scale/long-term support investments in order to assure equality, inclusion and non-discrimination. The seven-year period of the EU funding framework should trigger ambitious long-term investments at national/regional level as a requisite for prompting policies aiming to achieve social change, particularly for the case of Roma. Disruption of key investments and short-term approaches within next ESF+ programming period should be avoided.
- ESF+ should also explicitly target EU Mobile Roma Citizens, a particularly disadvantaged social group in many Member States, paying special attention to the situation of children. The explicit reference to Roma under one of the Specific Objectives of the Regulation *proposal (Article 4)*: “(viii) *promoting socio-economic integration of third country nationals and of marginalised communities such as the Roma*”, should make also a specific mention to “EU Mobile Roma Citizens” as targets of ESF+ investments. Otherwise, there is a risk that national investments may disregard non-national Roma (EU citizens), reaching only national Roma.
- Roma need to be explicitly targeted and also mainstreamed through all ESF+ investments. While the Regulation proposal acknowledges the need to set up a “*range of policies targeting the most disadvantaged people... such as Roma*”, Roma also need to be considered within mainstream approaches related to social inclusion, be those sectorial policies or funding opportunities, etc...

In order to set the conditions for this to happen, such a statement should be included within the Regulations. A clear example refers to one of the thematic concentrations:

- The 10% ESF+ thematic concentration to support youth employment in the context of the Youth Guarantee needs to ensure young Roma are included. Since Roma are overrepresented among the NEETS, ESF+ interventions focusing on improving employment opportunities for them necessarily need to tackle this group.
- The integrated approach needs to be facilitated to become a reality. The Regulation of ESF+ proposal advances in the promotion of the integrated approach by including a range of thematic priorities (employment, education, tackling poverty and social inclusion, health, food and material deprivation in cases of extreme poverty...). However, the architecture in different fund strands does not seem to contribute to the implementation of an integrated approach on the ground (e.g. through Operational Programmes allowing for a real integrated approach in a given locality). The management of different strands and/or with other funds appears to be a complex process which would need to be eased so that a combination of actions can be jointly developed, overcoming a mere multi-sectorial framework or umbrella package. This should include similar rules, timings, eligibility criteria, etc.
- Greater coherence, synergies and complementarity between EU Funds. The expected complementarities with other funds can also contribute to facilitating, for example, the so much needed integrated approach for Roma inclusion (mainly with ERDF in relation to housing), but also the access to Roma youngsters to the digital world and to gaining new skills and increase the quality of their education and training (mainly with Erasmus and with Digital Europe Programme). Multi-fund programmes will still be in place and it is foreseen that common rules (Common Provision Regulations)ⁱ will ensure the compatibility between them (ERDF and ESF+, for example). Their management should be improved to make them accessible and effective.
- Increase the relevance of investments to combat discrimination. While discrimination on different basis, including ethnic origin, is mentioned several times throughout the Regulation proposals, and particularly in *Article 6 (Equality between men and women and equal opportunities, and non-discrimination)*, where it specifically encourages to “support specific targeted actions”, we believe further emphasis on the operational part of such horizontal criteria will be operated should be given. Unless the Regulations specifically lay down the requirement to establish specific measures (and eligible actions such as those related to the support of victims, litigation etc...) and indicators to measure advancements regarding horizontal criteria, the impact will be very limited.
- Reinforced link between all EU funding and fundamental rights and overall with international binding recommendationsⁱⁱ, as a well as for the UN 2030 Agenda for Sustainable Development. While in the ESF+ proposal there is an expressed request for consistency between ESF+ and the Charter of Fundamental Rights of the European Union, this essential approach should be further reinforced by linking rights with policies and overall EU funding, beyond ESF+. Fundamental rights are not only ESF+ concern. They should be considered as the baseline for ALL EU funds

interventions. This would be an important step towards better tackling Roma inequality.

- Increase to 30% of the ESF+ earmarked for social inclusion and tackling poverty . ESF+ should concentrate its investments on those that suffer greater inequalities, concentrating in active policies to reduce inequality gaps, particularly focusing on breaking the intergenerational transmission of poverty cycle. Furthermore, the Regulation should clarify the concept of social inclusion, thus assuring the concentration of funds on the most vulnerable and excluded persons.
- Focusing thematic innovation/innovative actions on policy priorities and specific disadvantaged groups, such as Roma, both “national” and EU Mobile Roma. Investments on innovation should be guided and consistent with thematic priorities established in the ESF+ Regulation. Searching for innovative solutions to deeply-rooted exclusion and discrimination should be a core concern of innovative actions within ESF+. Although the current Regulation proposal opens up interesting opportunities for searching for positive solutions for social inclusion, an explicit mention to the need to focus on particularly disadvantaged groups such as Roma should be included as a way to ensure they are not excluded.
- Clearer emphasis on the need to establish mechanisms to scale up and give continuity to proven-positive innovative initiatives. Further indications in this regard should be included to assure the scaling up of practices that prove to be efficient, since otherwise opportunities may be lost despite positive intentions. This is of particular interest for complex cases referred to social inclusion and discrimination measures.
- Activation of transnational cooperation as a key tool for social innovation. Although transnational cooperation is widely conceived under the Employment and Social Innovation Strand “*to accelerate the transfer of, and to facilitate the scaling of, innovative solutions, in particular for the areas of employment, skills and social inclusion, across Europe*”, further emphasis should be given to its mandatory component (“shall”) and its focus on the most disadvantaged groups such as Roma, both from the direct and indirect ESF+ management. Promotion of active transnational cooperation (both multilateral or bilateral) on Roma issues should be foreseen as an effective way to advance in social cohesion, both providing the adequate conditions to allow for active transfer of existing positive practices to other EU contexts and for establishing cooperation mechanisms between countries of origin and destination of EU Mobile Roma to jointly find solutions and improve their living conditions.
- Increased coherence between ESF+ core priorities and indicators. A revision of the Regulation proposed indicators should be done as an exercise to better match main ESF+ priorities and expected results and outcomes. The existence of specific Roma related indicators is essential to measure progress of that priority, as well as of the specificity of EU Mobile Roma.
- Advancement in the effective implementation of the partnership principle throughout the ESF+ programming period. While some progress in the implementation of the partnership principle was achieved during the current programming period, future Regulation should emphasize the

functioning of partnership structures throughout the programming period. The partnership principle should be considered as a continuous process (that adds value to the implementation of funds on the ground) and not only as an initial requisite for accessing the funds.

- While keeping the subsidiarity principle, the role of the European Commission should be enhanced, having a more proactive role towards Member States in making the possibilities offered by the Regulations a reality on the ground. On top of providing technical assistance to Member States in using combination of funds in the easiest and most efficient way, the EC supervisory role should also focus on assuring the values underlying the Regulations are respected and fulfilled (e.g. EU funding not used for creating spatial segregation, educational segregating practices...).

And a final comment outside the ESF + Regulation, focused on the ERDF Regulation proposal:

The specific objective for the ERDF and the Cohesion Fund “*increasing the socioeconomic integration of marginalised communities... through integrated measures including housing and social services*” should explicitly mention Roma communities, since they are considered to be one of the most marginalised and socially excluded groups across the EU. The acknowledgement by the ESF+ of the worrying situation suffered by Roma across the EU should be reflected also in the other EU Funds, notably ERDF, as an exercise of coherence between EU financial instruments.

ⁱ Proposal for Common Provisions Regulation: https://ec.europa.eu/commission/sites/betapolitical/files/budget-may2018-common-provisions_en.pdf

ⁱⁱ Such as economic and social rights (UN Committee of Economic, Social and Cultural Rights -CESCR-) or children’s rights (UN Committee on the Rights of the Child, UN Convention Rights of the Child -CRC-) among others.