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Final Report

June 2015

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Final Report
June 2015

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Authors of the Report:  Contractor name and address

Mr. Richard Allen  EPRD Office for Economic Policy and Development
Mr. Steven O’Connor  Regional Development Ltd.
Dr. Melita Petanovic  Szkolna 36A Street,
Dr. Nicoleta Bitu  25–604 Kielce, Poland

Phone: +48-41-3453271
Fax: +48-41-3452587
E-Mail: eprd@eprd.pl

EPRD internal number: 2014-040

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1. Glossary of abbreviations and acronyms

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<th>Description</th>
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<tbody>
<tr>
<td>ABD</td>
<td>Area-based Development</td>
</tr>
<tr>
<td>BPRI</td>
<td>Best Practices for Roma Integration project</td>
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<tr>
<td>CSO</td>
<td>Civil Society Organisation</td>
</tr>
<tr>
<td>DIS</td>
<td>Decentralised Implementation System</td>
</tr>
<tr>
<td>DG NEAR</td>
<td>Directorate General for Neighbourhood Policy and Enlargement Negotiations</td>
</tr>
<tr>
<td>EC</td>
<td>European Commission</td>
</tr>
<tr>
<td>EIDHR</td>
<td>European Instrument on Democracy and Human Rights</td>
</tr>
<tr>
<td>ERRC</td>
<td>European Roma Rights Centre</td>
</tr>
<tr>
<td>ESF</td>
<td>European Social Fund</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>EUD</td>
<td>European Union Delegation</td>
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<tr>
<td>EUO</td>
<td>European Union Office (KS)</td>
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<tr>
<td>FYROM</td>
<td>Former Yugoslav Republic of Macedonia</td>
</tr>
<tr>
<td>GOHRRNM</td>
<td>Government Office of Human Rights and Rights of National Minorities</td>
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<tr>
<td>HRDOP</td>
<td>Human Resources Development Operational Programme</td>
</tr>
<tr>
<td>IPA</td>
<td>Instrument for Pre-accession Assistance</td>
</tr>
<tr>
<td>IPA I</td>
<td>Instrument for Pre-accession Assistance first round (2007-2013)</td>
</tr>
<tr>
<td>IPA II</td>
<td>Instrument for Pre-accession Assistance second round (2014-2020)</td>
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<tr>
<td>JMC</td>
<td>Joint Monitoring Committee (MK)</td>
</tr>
<tr>
<td>MBP</td>
<td>Multi-Beneficiary Programme</td>
</tr>
<tr>
<td>MCR</td>
<td>Ministry of Communities and Returns (KS)</td>
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<tr>
<td>MELE</td>
<td>Ministry of Economy, Labour and Entrepreneurship (HR)</td>
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<tr>
<td>MIPD</td>
<td>Medium-term Indicative Planning Document</td>
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<tr>
<td>MLSP</td>
<td>Ministry of Labour and Social Policy (MK)</td>
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<tr>
<td>NGO</td>
<td>Non-governmental Organisation</td>
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<tr>
<td>NIPAC</td>
<td>National IPA Coordinator</td>
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<td>NMC</td>
<td>National Minority Council</td>
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<tr>
<td>OGG</td>
<td>Office of Good Governance (KS)</td>
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<tr>
<td>OS</td>
<td>Operating Structure</td>
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<tr>
<td>OSCE</td>
<td>Organisation for Security and Cooperation in Europe</td>
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<tr>
<td>OSF</td>
<td>Open Society Fund</td>
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<td>OSI</td>
<td>Open Society Institute(s)</td>
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<td>PCM</td>
<td>Project Cycle Management</td>
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<tr>
<td>RAE</td>
<td>Roma, Ashkali and Egyptian communities</td>
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<td>RR</td>
<td>Return and Reintegration</td>
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<td>Abbreviations and Country Designations ISO 3166. Note the codes for Kosovo are not assigned by ISO</td>
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<tr>
<td>Albania</td>
<td>AL</td>
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<tr>
<td>Bosnia &amp; Herzegovina</td>
<td>BA</td>
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<td>Croatia</td>
<td>HR</td>
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<tr>
<td>former Yugoslav Republic of Macedonia</td>
<td>MK</td>
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<tr>
<td>Kosovo*</td>
<td>KS</td>
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<tr>
<td>Montenegro</td>
<td>ME</td>
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<tr>
<td>Serbia</td>
<td>RS</td>
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<tr>
<td>Turkey</td>
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* This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence
2. Executive Summary

2.1. Objective of evaluation

Roma people are widely considered one of the largest and most vulnerable ethnic minorities in Europe. The vulnerability of large numbers of Roma people stems from their social exclusion, societal discrimination and extreme poverty.

Roma inclusion is a high priority on the EU’s political agenda and that of Member States. The challenge is faced both within the EU and in the Enlargement countries.

In Enlargement countries, the EU’s Instrument for Pre-accession Assistance (IPA) has been one of the most important sources of financial assistance to help tackle the problems of Roma exclusion.

The Thematic Evaluation on IPA Support to Roma Communities was commissioned by DG ELARG (now DG NEAR) Evaluation Unit to “provide findings and recommendations to assist DG Enlargement [sic] in improving its programming and implementation of IPA II assistance, targeting support to Roma communities in the enlargement countries, based on the lessons learned and good practices in the programming and implementation of IPA I assistance.”

The evaluation covers the eight enlargement countries for IPA I (including Croatia, now a Member State), and the seven years of IPA I programming from 2007 to 2013. This scope includes 80 identified interventions, with a total EU contribution of EUR 216 million. Of this total, some EUR 150 million was thought to be for Roma inclusion. Specific focus on EIDHR and Civil Society Facility funding was not included, although the evaluation did take these into account. Likewise, there were no specific questions on gender in the terms of reference, but again, the evaluation at the inception stage identified gender as a key issue to be taken into account.

There were in total 74 evaluation questions in the ToR under five broad headings, as follows:

- **Quality of intervention** logic, including needs assessment, relevance, design of individual interventions and overall coherence;
- **Performance of assistance**, covering impact, effectiveness, efficiency and sustainability of IPA interventions;
- **Quality of monitoring**, looking at mechanisms in place to assess impact of policies and measures for Roma inclusion, and how lessons learned are being incorporated into future actions;
- **EC Cooperation with external stakeholders** exploring how partners are selected, involved and with what results.
Finally, the ToR asks for the **overall lessons learned and recommendations** for each of the above areas, to be applied to the process of programming and implementation for IPA II funding across the (now seven) enlargement countries.

### 2.2. Methodology

The evaluation was carried out by a team of four between July 2014 and March 2015. All eight countries were visited once between November 2014 and February 2015. Additional interviews were carried out in Budapest and Brussels. A total of 260 people were interviewed in person or by phone.

Of the 80 interventions listed in the evaluation Terms of Reference (ToR), a sample of 25 projects was selected for detailed review according to agreed selection criteria.

Both desk and field research was structured using a set of specially designed research tools to extract the necessary information and provide the basic analysis. During the synthesis phase the team brought the basic information and analysis together, identified the key findings and issues, and developed recommendations.

Findings and recommendations were drafted and tested at a stakeholder workshop in April 2015, which included representatives of 19 government, non-governmental and international organisations. The draft final report was widely circulated, and comments from some 25 organisations were incorporated into the final report where appropriate.

### 2.3. EU policy and funding

The key document on Roma inclusion for enlargement countries is the “EU Framework for National Roma Integration Strategies up to 2020”. Complementing this is a set of good practice guidelines (Vademecum) known as the “10 common basic principles on Roma Inclusion” from 2009.

All Enlargement countries except Turkey had developed national Roma inclusion strategies and all except Turkey and Kosovo had signed up to the Decade of Roma Inclusion 2005-2015.

Around 1% of all IPA I funds was allocated for Roma inclusion. Nearly one quarter of this was allocated for displacement and return projects, nearly 20% on housing, and around 12% each for social inclusion/social services, education and employment. Less than 2% was allocated for anti-discrimination efforts, and less than 1% for specific women/girls or gender projects. There are wide country variations which cannot be accounted for solely by variations in strategic priorities.
2.4. Key findings
2.4.1. Quality of Intervention logic

The MIPD tool was not well adapted to the task of strategic programming. The MIPDs provided very little in terms of setting objectives and priorities for IPA support towards Roma. This vacuum had direct implications for the consistency and coherence in the programming of Roma assistance. By contrast, the Human Resources Development Operational Programmes (HRDOPs) in the countries with decentralised implementation systems (DIS) provided a much better programming framework. As a result, IPA I Component IV support to Roma had greater focus, corresponded to clearer long term priorities and offered a longer term perspective for planning and implementing Roma-specific support.

In some countries there was a perceived shift in programming from IPA 2012/2013 onwards – primarily in Serbia, Bosnia Herzegovina and Albania. This was characterised by more IPA funding for Roma, with a more strategic focus and better sequencing. This is partly due to the Roma Seminars, Progress Reports and the more explicit link between accession prospects and the need to address Roma human rights.

The prioritisation of IPA funding should reside with the national government bodies charged with overseeing the delivery of the national Roma strategies. In practice, however, they often lacked the capacity and political clout to play a proactive role in IPA programming.

Three common weaknesses were identified in project designs. These were an absence of robust needs analyses, inadequate intervention logic and loosely defined indicators of achievement. The project design process does not sufficiently involve either Roma civil society or project final beneficiaries. Gender issues are rarely addressed in any substantial way in the programming.

Statistics on Roma in IPA countries are unreliable and present major challenges for programming, particularly in assessing the scale of the need to be addressed.

The new programming approach for IPA II offers significant opportunities for improved programming for Roma inclusion. More evidence, time and resources are needed for the needs assessment, programming and project design processes. In particular, consultation with civil society organisations and representatives of Roma communities needs to be more substantial and thoughtful, moving towards greater involvement of Roma communities in design.
Effective guidance is available in the form of the “10 Common Basic Principles”, although these need more detailed elaboration to apply in practice. Smaller countries’ policy capacity is weak, and needs additional support to be able to link IPA support to effective policy implementation.

2.4.2. Performance of Assistance

Efficiency

Most projects were completed to budget, either on time or with small no-cost extensions. The major factor affecting efficiency was the difficulties of land allocation for housing projects by municipal authorities.

Roma organisations had a very limited role in the implementation of IPA projects.

Effectiveness

Credible assessment of project effectiveness has proven difficult for this evaluation. This is because of poor design of indicators and means of verification, together with scarce project level evaluation.

Housing projects generally achieved their objectives in terms of providing new or improved housing, but there have been difficulties in providing sustainable livelihoods from associated activities.

Employment projects have not achieved any notable successes. However, there are several employment projects under way and it remains to be seen whether these can achieve more success.

The social inclusion projects sampled are varied, and have quite different conclusions. The area-based modality provides a useful platform for addressing multiple concerns that are all related and mutually supporting.

Education has achieved desired institutional changes where there were clear links between national policy and IPA support. Evidence for improved educational attainment is piecemeal and anecdotal – but points strongly in the right direction. The role of the Roma Education Fund must be recognised as a force for positive policy models and practice.

Displacement projects were primarily for those displaced from Kosovo after the 1999 conflict. These projects were not designed specifically for Roma, but for all DPs, so there were no Roma-specific activities, objectives or indicators. Specifically for the Roma
population, sustainability is highly questionable and there are concerns that housing projects creating (or re-creating) segregated communities.

**Impact**

**Housing** projects are expensive and relatively insignificant interventions compared to the scale of the needs. Alternative, policy level interventions, are needed if there is to be a substantial impact on the situation of Roma housing.

The **employment** projects have so far not achieved any discernible impact on Roma or wider communities. There have been no achievements in terms of institutional change or learning, and the success record at enabling Roma individuals to improve livelihoods either through self-employment or formal employment is very limited.

The one **social inclusion** project in the sample for which we can draw conclusions about impact is the Albania “Supporting Social Inclusion of Roma and Egyptian communities” example. This project is likely to achieve an impact on the target communities because of its focus on a limited geographic area and its multi-sectoral approach.

**Education** projects in Serbia are likely to have substantial impact over time. Education interventions in other countries have not been so successful at becoming institutionalised, and therefore their impact is likely to be limited.

Sustainable **return** to Kosovo have been questionable but hard to assess. The biggest challenge is because projects are not able to secure the necessary social and economic conditions for a sustainable return. Support for displaced people in their place of displacement is perhaps more successful than assisting returns, depending on government policies towards integration. However, the volume of assistance for housing, employment and livelihoods is modest compared to the needs, and there are few systematic and reliable evaluations on impact of assistance.

Analyses of outputs and impact are rarely segregated by gender and age, and so any differential impact of assistance for the displaced Roma on women, men, boys and girls is not known. The assessment of the overall impact of IPA support is also hampered by the absence of reliable time-series data on the situation in Roma communities. This is the case at the project level, at municipality or county level, and at national levels.

**Sustainability**

**Social housing** models are rarely sustainable for those with no source of income other than social security benefits, and do not have adequate legal frameworks. Alternative models,
such as ‘village housing’ and legalisation and improvement of existing settlements, have potential but need more time to prove sustainability and impact.

Sustainability of employment interventions is very low. Interventions focused on individuals not the environment in which the individuals lived (social attitudes, discrimination, economic development) so there were no social or systemic reforms to be sustained.

By contrasts, the social inclusion interventions focused on systemic reform and longer term engagement with social development, hence the likelihood that they will have a long term beneficial effect.

Where education projects focused on systemic reform – mainly Serbia – they have been sustainably incorporated into education institutions. Short term grant-funded interventions and projects that do not have the full support of ministries of education are unlikely to be sustainable.

The return projects are unlikely to be sustainable. Partly this is because the context is economically poor and still discriminatory against minorities. Partly this is also because important factors were overlooked: houses built without thermal insulation, in inappropriate and polluted locations, insufficient support for livelihoods and for the receiving communities. Support for displaced Roma in their places of displacement – mainly in Montenegro and Serbia – did tackle some key aspects that are likely to have a sustainable impact – such as their civil documentation. There is insufficient evidence to assess the sustainability of the housing and income generation components.

Overall, the key lesson learned was that project design determines sustainability. In practice, this means investing more time and effort at the design stage – including greater and more meaningful participation of Roma communities – to truly understand the problems and the way in which potential solutions might work, in order to maximise benefits and sustainability later. Governments and their policies have a decisive factor in whether interventions are sustainable.

2.4.3. Quality of Monitoring

Monitoring at country, programme and project level is very poor. At country level, there are some efforts to provide indicators and data on the situation of Roma communities, but there is an almost complete lack of comparable information over time to show changes. This is critical data necessary to demonstrate whether policy and programmes are having the desired impact.
Reporting for the Roma Decade – both government and civil society shadow reporting – was helpful in identifying activities and policy changes, but not in demonstrating whether there were actual changes to Roma living standards.

MIPDs, as noted above, were not well suited to the task of strategic programming, and this included a total absence of appropriate indicators as far as Roma inclusion was concerned. The IPA I Operational Programmes were better, but because there was little Roma focus, there were no appropriate indicators. Programme monitoring mechanisms focused on activities rather than impacts. At project level, again, monitoring focused on project implementation, mostly through the ROM mechanism. Project achievements in terms of impacts were rarely reported.

The four goals set by the EU Framework on Roma Inclusion Strategies provides a simple minimum requirement for monitoring systems, and should be the basis for future work to ensure that the necessary data is captured.

2.4.4. EC Cooperation with External Stakeholders

Relations between the EC and international organisations is generally positive and constructive. In cases where international organisations implement IPA funded projects there are concerns that they are substituting for national expertise and capacities, and not doing enough to support development of these capacities. Where there are direct grants to international organisations there is insufficient transparency and accountability.

With national governments, the EC and delegations/offices have good relations. Small countries have insufficient capacity in the field of Roma inclusion to play a strong role in strategy and programme design.

Roma civil society organisations are not sufficiently involved in programming, implementation and monitoring of IPA assistance. Sector approaches are diluting attention on specifically Roma issues (which cross sectors) and are undermining the potential for coherent programming and donor coordination.

More needs to be done to promote the participation of Roma civil society organisations in policy formulation, programming, implementation, monitoring and evaluation. In particular, there needs to be investment in the capacities of Roma civil society organisations to build their sustainable capacities to provide a voice and accountability role at both local and national levels. Local level governments need to be more involved, especially given the key role that they have to play in implementing the majority of measures.
2.5. Recommendations

Based on the findings and conclusions of the evaluation, the evaluation team have identified the following strategic priorities necessary for the IPA II funds to perform better than those of IPA I in terms of promoting Roma inclusion:

- **Political commitment** – both the European Commission and the accession countries must demonstrate through rhetoric, financial allocations and action that they are determined to tackle the specific problems faced by Roma communities throughout the enlargement countries.

- **Monitoring** – both the European Commission and the accession countries must monitor progress towards achieving the goals set in the EU Framework for Roma integration.

- **Civil Society** – a strong, independent and sustainable civil society with effective advocacy capacities is essential for maintaining the momentum of reform for improvement of institutions and society necessary for greater Roma inclusion and equal citizenship.

- **Gender** – the problems faced by Roma women and men, girls and boys, are not identical; policies, solutions and monitoring must take account not just exclusion on the basis of ethnicity, but also issues faced because of gender and age. These dimensions must be reflected also in monitoring data.

These strategic priorities are important to bear in mind when considering the report’s recommendations.

**Recommendation 1:** The European Commission should formally remind accession countries of the obligations of future member states to comply with the **EU Framework for Roma integration and its four measurable goals.** The EC should request accession countries to ensure that they have the monitoring mechanisms in place to assess progress annually against these four goals. (see 6.1)

**Recommendation 2:** Each EU Delegation/Office should ensure that there is a designated and named **Roma Focal Point.** This person would be the key link between political and operational aspects of the EU’s work to support Roma inclusion, and ensure coherence of IPA II strategies with national strategies for Roma inclusion. (see 6.2)

**Recommendation 3:** The European Commission, in cooperation with the enlargement countries, should prepare an internal working document (‘IPA II Roma strategy’) for each enlargement country which sets out how the EC will use IPA II support over the period 2014-
2025 to assist the countries to achieve their Roma inclusion goals as defined in the national strategies for Roma inclusion. (see 6.3)

**Recommendation 4:** The European Commission is urged to ensure that there is an identified gender focal point in each delegation/office. The EC is also recommended to urge enlargement governments to identify gender focal points in the National IPA Committee (NIPAC), if they do not already exist. The EU Delegation/Office focal point on gender should then work closely with the NIPAC gender focal point in order to ensure improved quality of design, implementation, monitoring and evaluation from a gender perspective throughout the IPA II cycle. (see 6.4)

**Recommendation 5:** IPA II should support the one or more initiatives to strengthen policy capacities in the enlargement region. Initiatives need to be longer term, rooted in local experience and with strong mechanisms to feed back policy findings and recommendations to practitioners in government and civil society. Multi-beneficiary funding would be well suited for this purpose. Roma individuals and civil society organisations should be involved as far as possible, and collaborative links made between practitioners in civil society and government and between countries. (see 6.5)

**Recommendation 6:** Strengthen quality assurance of programme design. All draft programmes and action designs need to be reviewed by appropriately experienced and qualified people to ensure compliance with the 10 Common Principles, and to provide input based on relevant evidence from policy and practice. The European Commission should develop procedures to ensure that this happens. (see 6.6)

**Recommendation 7:** The European Commission, for each of the enlargement countries, should set out a strategic approach to developing the capacities of civil society in support of Roma inclusion. The goals of these strategies should emphasise i) the role of civil society in advocacy and accountability, ii) Sustainability of civil society organisations, and iii) the role of civil society in service delivery and project implementation. (see 6.7)

**Recommendation 8:** Programming for IPA II actions should strongly consider medium to long term actions focusing on integrated actions in local areas with relatively high Roma populations. Roma populations tend to be geographically concentrated, so lend themselves to this kind of area-based (or geographically focused) interventions. (see 6.8)

**Recommendation 9:** The European Commission should support the enlargement countries to develop and operationalise appropriate monitoring systems which will adequately capture information to monitor the achievement of each of the goals set out in the EU Framework for Roma Integration. (see 6.9)
**Recommendation 10:** IPA II interventions for Roma inclusion should be **routinely evaluated** – both at mid-term and ex-post. (See 6.10)

**Recommendation 11:** The European Commission should consider the following areas as of particular priority and suitability for **multi-beneficiary** support: i) Regional policy development and research, ii) Support for Roma civil society, networks and partnerships; iii) Support for national statistical and monitoring systems. (see 6.11)
3. Introduction

3.1. Background and Context of the Evaluation

Roma people are widely considered one of the largest and most vulnerable ethnic minorities in Europe. The vulnerability of large numbers of Roma people stems from their social exclusion, societal discrimination and extreme poverty.

Roma inclusion is a high priority on the EU’s political agenda and that of Member States. The challenge is faced both within the EU and in the Enlargement countries.

In Enlargement countries, the EU’s Instrument for Pre-accession Assistance (IPA) has been one of the most important sources of financial assistance to help tackle the problems of Roma exclusion.

The IPA instrument began in 2007 and DG NEAR estimated that since then around EUR 150 million of assistance has been programmed with the aim of improving the situation of Roma people in the eight enlargement countries and territories: Albania, Bosnia Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Kosovo, Montenegro, Serbia and Turkey.

EU financial support for potential EU members is continuing during the budget period 2014-2020 with a new instrument for pre-accession assistance known as IPA II. DG NEAR intends that IPA funding for Roma integration during this period will shift in focus from policy and institution building to ‘projects directly making an impact on the lives of individual Roma persons’.

3.2. Purpose of evaluation

The Thematic Evaluation on IPA Support to Roma Communities was commissioned by DG ELARG (now DG NEAR) Evaluation Unit to assess the effectiveness of IPA support to date, and to make recommendations for future assistance. Given the importance of the theme across EU members and accession states alike, it is of vital concern that the future programming and implementation of IPA funds is as effective as possible in supporting the goals of improving the situation of Roma people. This evaluation aims to make an important contribution to the body of knowledge supporting those responsible for programming and implementing IPA funds for Roma inclusion.

Specifically, “the primary objective of the evaluation is to provide findings and recommendations to assist DG Enlargement in improving its programming and implementation of IPA II assistance, targeting support to Roma communities in the
enlargement countries, based on the lessons learned and good practices in the programming and implementation of IPA I assistance.”

The evaluation aimed to assess the:

- Quality of the IPA intervention logic taken by ELARG since 2007, consistency with the existing ROMA strategies and its effectiveness (e.g. implementation of the Roma strategic policy objectives, clearly distinguishing between the national/central government level; the regional/local level and the EU level (joint conclusions of Roma seminars) and its translation as objectives into the IPA I programming framework),

- Performance (efficiency, effectiveness, coherence, impact, sustainability and EU value added) of assistance financed through IPA 2007-2013 national and regional programmes, targeting support to Roma both at programming and at implementation level, looking at good/bad practices in terms of operation (size of projects, implementation modality, flexibility) as well as in terms of content (relevance of interventions, correctness of intervention, etc.);

- Quality of monitoring systems in place in terms of used indicators, monitoring mechanisms of results, links with the evaluation function;

- DG Enlargement/EU Delegation cooperation with external stakeholders, supporting Roma inclusion, identifying possibilities of cooperation, best practices, taken into account/involved important Roma actors at central and local level with special attention to international organisations and CSOs.

3.3. Purpose of the report

This report sets out the findings, conclusions and recommendations from the evaluation research. The scope of the evaluation is wide: seven years’ programming, around 80 projects, eight countries plus multi-beneficiary programmes, and 74 evaluation questions. Therefore the report is substantial. We have divided it into two parts. The first part contains the overall findings, conclusions and recommendations. These are drawn from the second part, a detailed review of IPA support for Roma inclusion in each of the enlargement countries.

As far as possible, both the overall section and the country sections respond to the evaluation questions. The evaluation questions in the Terms of Reference were re-organised at the inception stage to make them more systematic and coherent. The table of evaluation questions and the structure of questions followed by this evaluation report are listed in Annex 5.
3.4. Evaluation Questions

The evaluation questions were grouped into five broad areas, and this report follows that structure.

1. **Quality of Intervention logic** covers the process of designing IPA interventions, from assessment of needs, development of strategic approaches to design of individual projects and their overall coherence. It includes reference to the involvement of stakeholders, the relevance to country context, national strategies and institutions.

2. **Performance of Assistance** covers the impact, effectiveness, efficiency and sustainability of IPA interventions. It also looks at institutional arrangements for implementation, and the added value of specifically EU funded interventions.

3. **Quality of Monitoring** looks at the extent to which there are mechanisms in place and working to assess the impact of policies and measures for Roma inclusion. It also looks at who is involved in monitoring, and the extent to which lessons learned are being incorporated into future actions.

4. **EC Cooperation with External Stakeholders** explores the way in which the EU selects partners at international, national and local levels, and the way in which it works with these partners.

5. Finally, the terms of reference asks for the overall **Lessons Learned** and **Recommendations** for each of the above areas, to be applied to the process of programming and implementation for IPA II funding across the (now seven) enlargement countries.

### Summary and Structure of Evaluation Questions

1. **Intervention Logic**: Are the IPA programmes designed as an adequate and appropriate response to the challenges of Roma inclusion?
   
   1.1 Is analysis of problems adequate?
   
   1.2 To what extent are stakeholders involved in problem analysis and programme design? Is this involvement effective?
   
   1.3 Are programmes selected and prioritised according to the beneficiaries’ needs and the complementary strengths of EU assistance?

2. **Performance**: To what extent do the programmes successfully achieve their goals?
   
   2.1 What have been the results (outputs) achieved by programmes so far?
   
   2.2 How effective were the programmes in achieving their objectives (how likely will unfinished programmes achieve their objectives)?
   
   2.3 How efficiently were the programmes delivered? Were there more cost efficient alternatives?
   
   2.4 What impact did (will) programmes have on the target communities?
2.5 To what extent are the programmes’ impacts sustainable?

2.6 What is the added value provided by the interventions being specifically supported by the EU?

2.7 How effective were the institutional arrangements for implementation?

2.8 How coherent was the assistance?

3 Monitoring: Do monitoring systems and applied indicators ensure adequate information for assessing progress, oversight of programme implementation and making future policy/programme decisions?

3.1 National level impact monitoring

3.2 IPA programme level monitoring

3.3 IPA project level monitoring

4 Cooperation: How effective is EU cooperation with external stakeholders at international, national and local levels?

5 Recommendations: What future action can/should the EU consider to improve the effectiveness of its support for Roma integration?

5.1 What are the lessons learned from IPA I?

5.2 How can DG NEAR, Delegations and Beneficiaries improve programming of EU assistance for Roma integration for IPA II?

5.3 What can DG NEAR, Delegations and Beneficiaries do in terms of cooperation with other organisations to improve the effectiveness of overall efforts for Roma integration?

5.4 How can DG NEAR, Delegations and Beneficiaries improve effectiveness of programmes implemented under IPA II for Roma integration?

5.5 How can DG NEAR, Delegations and Beneficiaries improve the monitoring of projects, programmes and strategies, and improve the use of monitoring information for policy and programme decisions?

5.6 What policy measures and management modes should DG NEAR, Delegations and Beneficiaries consider regarding support for Roma inclusion?

3.5. Methodology

The evaluation was carried out by a team of four – two senior and two junior experts – and included 210 person-days’ work between July 2014 and March 2015. The work was divided into four phases: inception, desk research, field research and synthesis. Field work was conducted between November 2014 and February 2015.

Both desk and field research was structured using a set of research tools to extract the necessary information and provide the basic analysis. The synthesis phase brought the basic
information and analysis together, identified the key findings and issues, and developed recommendations.

For the first theme of the evaluation questions – intervention logic – all key programming documents (MIPDs, Operational Programmes, et al.) were reviewed, plus all project fiches available. This was structured by country, plus a separate unit of work for the Multi-beneficiary programme and TAIEX. A comprehensive spreadsheet of all interventions was prepared and this was used as the basis for the statistical analyses presented in this report.

The terms of reference provided a list of 80 interventions (see table below), which was used as the basis for the second evaluation theme, performance of assistance.

<table>
<thead>
<tr>
<th>Country</th>
<th>Number of projects/ interventions</th>
<th>Total EU contribution (EUR)</th>
<th>Estimated contribution to Roma inclusion (EUR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>5</td>
<td>8,250,432</td>
<td>5,150,432</td>
</tr>
<tr>
<td>BA</td>
<td>6</td>
<td>9,599,500</td>
<td>5,909,500</td>
</tr>
<tr>
<td>HR</td>
<td>2 TAIB, 6 comp IV</td>
<td>7,142,312</td>
<td>7,142,312</td>
</tr>
<tr>
<td>KS</td>
<td>11</td>
<td>33,930,000</td>
<td>18,480,000</td>
</tr>
<tr>
<td>ME</td>
<td>5</td>
<td>7,250,000</td>
<td>5,673,000</td>
</tr>
<tr>
<td>MK</td>
<td>6 TAIB, 9 comp IV</td>
<td>15,453,958</td>
<td>7,830,396</td>
</tr>
<tr>
<td>RS</td>
<td>15</td>
<td>99,800,000</td>
<td>68,025,000</td>
</tr>
<tr>
<td>TR</td>
<td>2 TAIB, 3 comp IV</td>
<td>21,703,485</td>
<td>18,453,640</td>
</tr>
<tr>
<td>MBP</td>
<td>4</td>
<td>12,715,000</td>
<td>12,715,000</td>
</tr>
<tr>
<td>TAIEX</td>
<td>6</td>
<td>164,436</td>
<td>164,436</td>
</tr>
<tr>
<td>TOTALS</td>
<td>80</td>
<td>216,009,122</td>
<td>149,543,716</td>
</tr>
</tbody>
</table>

Given the time constraints, it was not possible to review all 80 projects using both desk and field research methods. Consequently, a sample of 25 projects was selected for in-depth review. The sample was selected so that it would represent a range of types, as follows:

- **Implementation status** of intervention: ongoing, completed
- **Type of intervention**: Institution-Building, Technical Assistance, Investments, Grant Schemes
- **Implementation modality**: Centralised, decentralised (D)
- **Sector**: Housing, employment, education, health, documentation, other;
- **Focus of the intervention**: Roma exclusive/specific, Roma explicit but not exclusive, Roma implicit/inclusive (RI)
- **Location**: Capital city, regional, both
The projects selected for in-depth research, together with the selection criteria, are presented in Annex 1.

During the course of the research, there were two key variations identified that were important factors for the validity of the findings. First, the project list provided in the terms of reference was not a comprehensive representation of all IPA funded interventions for Roma inclusion. In addition to those listed, there were additional projects from IPA 2013 which had not been identified when the terms of reference was prepared, plus Cross-Border Cooperation projects and projects funded through Civil Society Facility grant schemes. In some countries, the EIDHR instrument provided funding for civil society organisations for some Roma related interventions. These additional projects are not systematically assessed for this evaluation, but are taken into account for the countries where they were an important complement to the core IPA funded interventions listed in the ToR.

Field research was conducted in all eight IPA countries, as follows:

<table>
<thead>
<tr>
<th>Location</th>
<th>Month of Field Mission</th>
<th>No. of days</th>
<th>Team members¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albania</td>
<td>November 2014</td>
<td>4</td>
<td>RA, MP</td>
</tr>
<tr>
<td>Bosnia and Herzegovina</td>
<td>December 2014</td>
<td>5</td>
<td>RA, MP</td>
</tr>
<tr>
<td>Croatia</td>
<td>December 2014</td>
<td>3</td>
<td>SOC, NB</td>
</tr>
<tr>
<td>FYR Macedonia</td>
<td>January 2015</td>
<td>4</td>
<td>SOC, MP</td>
</tr>
<tr>
<td>Kosovo</td>
<td>January 2015</td>
<td>4</td>
<td>RA, SOC</td>
</tr>
<tr>
<td>Serbia</td>
<td>January 2015</td>
<td>5</td>
<td>RA, NB</td>
</tr>
<tr>
<td>Montenegro</td>
<td>February 2015</td>
<td>2</td>
<td>NB, MP</td>
</tr>
<tr>
<td>Turkey</td>
<td>February 2015</td>
<td>4</td>
<td>SOC, NB</td>
</tr>
<tr>
<td>Brussels</td>
<td>February 2015</td>
<td>2</td>
<td>RA, SOC</td>
</tr>
<tr>
<td>Budapest</td>
<td>March 2015</td>
<td>1</td>
<td>RA</td>
</tr>
</tbody>
</table>

In total, the field missions met with 260 interviewees, took place over 34 days, and required 67 person days, not including preparation and note-writing.

A full list of interviewees is presented in Annex 7.

¹ RA Richard Allen; NB Nicoleta Bitu; MP Melita Petanovic; SOC Steven O’Connor;
The synthesis phase consisted of the following steps:

- Desk analysis and compilation of findings, plus additional research & telephone calls as necessary
- 2-day evaluation team synthesis workshop to review all findings, and prepare tentative conclusions and recommendations
- Consolidation of findings and preparation of initial documents
- 1 day workshop in Brussels to present tentative findings and recommendations to a wider group of 34 stakeholders representing 19 different organisations – governmental, non-governmental and international.
- Preparation of draft report for comments.

The draft report was circulated widely to governments, non-governmental and international organisations. Some 25 organisations provided comments, and these were carefully reviewed and incorporated where appropriate into the final report.
4. Response to the Evaluation Questions

4.1. Overall Findings

This section presents the overall context in which the IPA programming for Roma inclusion took place, and provides a meta-analysis of the IPA projects under review.

4.1.1. The policy context for Roma Inclusion

The background context for developing IPA funded interventions for Roma inclusion has evolved significantly over the time period under review – 2007-2013. At the start of the period, the Roma Decade (2005-2015) was under way, but not all IPA countries/territories were members from the start. By 2010, all except Kosovo and Turkey had signed up. The Decade provided some guidance on priorities: employment, education, health, and housing are at the top of the list, plus the ‘core issues’ of poverty, discrimination, and gender mainstreaming.

Albania developed the region’s first national strategy for Roma inclusion in 2003. Others followed, and by 2012 all IPA countries/territories except Turkey had Roma inclusion strategies. Most strategies were accompanied by more detailed action plans which identified responsibilities and indicators too.

Within the EU, there was concern that policies and actions aiming for Roma inclusion were not having the necessary impact. In response, the 10 Common Basic Principles on Roma Inclusion were adopted in 2009 with the status of guidance for the Commission and Member States². These provide practical and widely agreed guidelines that are particularly helpful for the design of policies, programmes and projects for Roma inclusion, and are relevant for IPA programming.

The EU Roma Framework³ was adopted in 2011 and requires EU Member States to develop a more strategic approach to Roma inclusion, and to pursue four main objectives:

² On 8 June 2009 the Council of Ministers in charge of Social Affairs annexed the Principles to their conclusions and invited Member States and the Commission to take them into account.
³ “An EU Framework for National Roma Integration Strategies up to 2020”
- **Access to education:** Ensure that all Roma children complete at least primary school

- **Access to employment:** Cut the employment gap between Roma and the rest of the population

- **Access to healthcare:** Reduce the gap in health status between the Roma and the rest of the population

- **Access to housing and essential services:** Close the gap between the share of Roma with access to housing and to public utilities (such as water, electricity and gas) and that of the rest of the population.

While the Framework applies primarily to Member States, it is argued that Enlargement Countries should also aspire to comply with the Framework as though it were part of the *acquis*. Indeed, the Framework commits the Commission to assisting Enlargement Countries as follows.

“The Commission is committed to help, at regional and national level, the efforts of these countries to improve the social and economic inclusion of Roma through:

- Improving the delivery of support under the Instrument on Pre-Accession Assistance towards a strategic and results oriented national and multi-beneficiary programming with a focus on a sector-wide approach for social development. The Commission is currently implementing or planning projects with a total value of more than €50 million which could also exclusively or partly benefit the Roma communities.

- Strengthening the involvement of civil society by encouraging institutionalised dialogues with Roma representatives to become involved and take responsibility for policy formulation, implementation and monitoring on regional, national and local level.

- Close monitoring of the progress made by each country regarding the economic and social situation of Roma and annual presentation of its conclusions in the enlargement Progress Reports.”

The EU legal framework also has key documents on anti-discrimination and gender equality which are also key parts of the acquis communautaire for prospective member states. These are also important instruments in the process of Roma inclusion.

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4 An EU Framework for National Roma Integration Strategies up to 2020, p12
Through this combination of initiatives, guidance and legislation, we have a comprehensive policy context that includes specific goals and mechanisms for achieving the goals – Roma inclusion strategies and the 10 Common Principles among them. A key question for this evaluation is therefore the extent to which IPA funding was able to support the realisation of these goals and mechanisms in the Enlargement Countries.

A key instrument that the Commission introduced for Enlargement countries are the EU Roma inclusion Seminars. These were organised in all countries bar Turkey in 2011, and were followed up in 2013 or 2014. These seminars provided a forum for government and civil society to come together under the facilitation of the EU and to discuss and agree priorities for Roma inclusion. These seminars varied in usefulness. In some countries, interlocutors believed they were valuable and had had a strong, positive impact on IPA programming as well as the cause of Roma inclusion more broadly. In other countries, they were perceived as less useful. The evaluation team concluded that the Seminars and the monitoring and follow up are very useful mechanisms provided they are well organised, well communicated and where substantial preparatory work has been done. Effectiveness can be enhanced by using the Seminars also as a regular forum for setting agreed targets and providing feedback on progress every one or two years. Seminars can also be used to share experience, update practitioners on the latest developments in policy and practice and, crucially, to generate a greater shared understanding of both challenges and effective solutions between policy makers, practitioners and Roma communities.

By early 2015, the Enlargement Countries, this time including Turkey, were developing or had developed revised Roma inclusion strategies. A plan to continue some aspects of the Roma Decade was in place, and had agreement from the EU to provide financial support through a mechanism to be hosted by the Regional Cooperation Council in Sarajevo.

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The 10 Common Basic Principles on Roma Inclusion (2009)
1. Constructive, pragmatic and non-discriminatory policies
2. Explicit but not exclusive targeting
3. Inter-cultural approach
4. Aiming for the mainstream
5. Awareness of the gender dimension
6. Transfer of evidence-based policies
7. Use of European Union instruments
8. Involvement of regional and local authorities
9. Involvement of civil society
10. Active participation of the Roma

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5 COUNCIL DIRECTIVE 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin
6 COUNCIL DIRECTIVE 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services
4.1.2. Guidance for IPA programming

IPA I programming was – for those countries with centralised implementation managed by the EU Delegations – primarily through the MIPDs (the ‘Multi-annual Indicative Planning Documents’). There were three of these documents for each country covering the timeframes: 2007-2009, 2009-2011, and 2011-2013. For each year of IPA I, delegations and Enlargement Countries agreed an annual programme. For most of the period, this annual programme consisted of a list of projects to be financed through that year’s IPA funding allocation. See section 4.3.2 for a more detailed discussion of MIPDs.

4.1.3. Guidance from national institutions

As noted above, all countries except Turkey had Roma inclusion strategies by 2010. All countries also had national Roma coordinators – focal points in a government ministry or agency with responsibility for coordinating the implementation of the strategies. These Coordinators varied in effectiveness both between countries and over the period under review. It is apparent that when these Coordinators were established their position, influence and budget were greater than later in the period. As political interest declined – perhaps because the focus of attention on the Decade was also declining – these Coordinators lost status within government, were not adequately staffed and did not have adequate budgets.

The weak resources of the coordinating bodies for the Roma strategies has meant that implementation of measures depends largely on the level of commitment and capability within individual line ministries.

In the countries with larger public administrations – primarily Serbia – we see greater specialisation in national institutions. Therefore within the NIPACs, in key Ministries as well as the leading Ministry or agency for human rights (where the Roma coordinator is usually located) there are individuals with a greater knowledge and capability for Roma policies. In Serbia, for example, there is a central coordinating policy unit known as SIPRU (Social Inclusion and Poverty Reduction Unit) which has a specialist in Roma policy, the Ministry of Human and Minority Rights’ Roma unit, a person in the NIPAC (Serbia EU Integration Office (SEIO)) with at least part of her job focusing on Roma programming, and Roma policy specialists in the Ministries of Education and Health. **This greater national policy capacity is a key factor in the effectiveness and sustainability of IPA supported interventions.**
4.2. Overview of IPA I funding

Here we present a brief analysis of the IPA I funds allocated for Roma inclusion. This analysis is indicative; it is very difficult to give more than an indication of financial allocation to Roma for those projects which either not Roma specific or Roma explicit but not exclusive.

For example, the refugee/IDP projects in Serbia and Kosovo are targeted at displaced people or returnees. Around 20% of those displaced by the 1999 conflict and still in need of assistance are Roma. However, ethnically disaggregated data is not kept systematically by project implementers. We reviewed 14 final reports of refugee/IDP interventions and found that Roma were not mentioned in 4 reports; of the others, the percentage of Roma beneficiaries varied from 2% to 16% in both housing and income generation activities.

There are also a number of projects which were not included in the list for the evaluation Terms of Reference, which did have a Roma component. Some of these – where the evaluators have managed to obtain additional information – have been included into the

![EU Contribution allocated to actions for Roma (EUR)](image)

*Figure 1 – IPA I contribution for Roma inclusion*

7 The estimate from DG NEAR was 50% of refugee projects went to Roma. We believe, on reviewing a sample of project final reports, that this is a significant over-estimate. A more likely figure is at most 15-20%. For the statistics presented in these graphs, we have worked on the more generous 20% figure. If we classify Return projects as targeting refugees, we can say that about 23% of IPA goes on Roma (see the chart on the next page)
analysis. There may be others that are not included.

In addition to IPA country level funds, there are IPA multi-beneficiary funds and instruments such as the European Instrument for Democracy and Human Rights (EIDHR). Multi-beneficiary funds are dealt with in a separate section. EIDHR funding for Roma related projects was identified where it plays a significant part in the IPA funding mix for Roma integration, but not analysed in detail.

Nevertheless, the figures for IPA at country level give a rough overall picture of how funding for Roma inclusion has been allocated.

Serbia has so far received by far the highest allocation of funds for Roma inclusion of all IPA countries, both in absolute terms, and as a share of total IPA funds.

Serbia, together with Montenegro and Kosovo are highest in terms of the percentage of total IPA funds allocated to Roma inclusion. This is mainly due to the allocations of funding for displacement and return; nearly 20% of the displaced from Kosovo in 1999/2000 and still in need are Roma. Most are living in Serbia proper, and durable solutions for this population are perceived as either local integration or return to Kosovo. Another reason for the higher value in Serbia is the 2013 planned programme on social inclusion of which more than EUR 20 million will be for Roma inclusion – the largest single Roma focused intervention in the IPA I period.

If, however, we look at the funds allocation in proportion to the population, we see a slightly different picture. The highest allocation of IPA funds for Roma per Roma person went to Kosovo – mainly for displacement. The highest figures – Kosovo, Montenegro, Croatia – are a product of two factors – the provision of housing assistance combined with a relatively
small Roma population. Housing solutions are in general expensive (around EUR 20,000 per household), and where populations are small, we see inevitably high levels of funding per individual. Housing projects, however, target only a small number within the country, so allocations and benefits are not evenly distributed.

In Turkey, by contrast, partly because of the relative size of the Roma population, IPA funding for Roma inclusion is negligible. The reasons for these variations are explored in the next section, 4.3 Quality of Intervention Logic.

The next chart, Figure 4, shows the dominant themes of the IPA funding. We see that the highest expenditure – more than a quarter – was for the consequences of displacement, although the displaced Roma population is very small by comparison with the total Roma population of the region. In part this reflects their greater needs, but it is also a consequence of the very high spending on displacement relative to other social inclusion, employment, and ‘softer’ reforms overall. Within the displacement measures, the majority of funds were spent on housing and ‘income generation’ or self-reliance measures. A small proportion went to legal aid, including support for civil documentation.
Finally, if we look at the change in funding over the IPA I period for the countries under centralised management, we see two distinct trends (Figure 5). The peaks for 2008/2009 are mainly due to funds for displacement, after which we see a growth in non-displacement related funding – for a mix of employment, social inclusion, and predominantly housing projects. The peak of 2013 is connected to the presence of large housing projects in Serbia and Bosnia & Herzegovina.

Figure 4 - Allocation of IPA funds by theme

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8 Turkey, Croatia and former Yugoslav Republic of Macedonia are not represented here because the sectoral and multi-year allocation of funds does not allow for easy breakdown of funds allocated by year.
IPA I funding allocations for Roma by year (centralised management only)

Figure 5 - IPA funding allocations for Roma per year
4.3. Quality of Intervention Logic

EQ 1. Are the IPA programmes designed as an adequate and appropriate response to the challenges of Roma inclusion?

EQ 1.1 Is analysis of problems adequate?

EQ 1.3 Are programmes selected and prioritised according to the beneficiaries’ needs and the complementary strengths of EU assistance?

IPA assistance is structured at essentially 3 levels – EC policy/strategy for the IPA countries, national programme level and project level. In additional, a regional dimension to IPA is covered by the Multi-Beneficiary Programme.

4.3.1. Strategic Framework

The Strategic Framework for Programming of IPA targeting Roma inclusion is outlined in a number of EC documents. At policy level, the European Partnerships and Enlargement Strategy Papers identify EC policy objectives for the candidate and potential candidate countries, with Roma issues featuring in these documents (particularly the latter) throughout the period of IPA support under evaluation. These set the overall priorities, within which Roma specific measures are not explicitly identified. They do, however, set the policy context within which IPA programming for Roma can take place. The EC’s annual IPA country Progress Reports provide assessments of performance across acquis chapters and also identify priorities in need addressing, with Roma frequently mentioned. Whilst often providing more detailed information on issues affecting Roma, the Project Reports do not serve as the foundation for IPA programming, although issues raised in them can be subsequently incorporated into IPA programmes. Thus the existing EC strategic documents give a political mandate and policy context for IPA Roma assistance.

As mentioned in section 4.1.1, the EU Roma Framework of April 2011 and the EC’s 10 Common Basic Principles on Roma Inclusion adopted in 2009 set a sound starting point for the programming of EU assistance (both pre- and post-accession) targeting Roma.

Evidence on the ground suggests that as yet, these two important documents have not been applied when programming IPA assistance for Roma to any notable extent. This can be attributed to a couple of factors. First, these strategies emerged relative late in the programming period. Secondly, they are primarily targeted at EU member states and as such are not perceived as relating to IPA (even though the Roma Framework makes explicit reference to Roma in enlargement countries). Nevertheless, the integration of their main
tenets into programming for the later rounds of IPA I assistance (from 2010 onwards for the Basic Principles and in the 2012 and 2013 annual programmes for both) would have been feasible. Under IPA II there seems little reason for these standards not to be mandatory for any intervention that may affect Roma, either explicitly or even just potentially.

The IPA countries’ national action plans for the Roma Decade and the national Roma strategies represent the strategic national frameworks for addressing the challenges for Roma inclusion. The four priorities of the Roma Framework are covered by every national strategy, providing a strong link between EU and national policy.

Since there is clear relationship between EU strategic priorities and national Roma strategies, it would be logical to assume that IPA support links to EU strategy on Roma inclusion, and directly supports measures identified in national Roma strategies and their associated action plans. However, this evaluation has found that, whilst IPA national programmes have supported areas covered by these national Roma strategies, explicit linkages between IPA and national programming efforts are surprisingly limited. This is due primarily to the weaknesses in the main IPA programming documents, the Multi-Annual Indicative Planning Documents (MIPD). This issue will be discussed in the next section.

4.3.2. IPA Programming at National Level

MIPDs are the principal strategic programming document for IPA assistance in the programming period 2007-2013. They exist for all IPA countries and also for the Multi-Beneficiary Programme (MBP). These have three 3-year programming perspectives (2007-9, 2009-2011, and 2011-13). MIPDs make reference to support provided under all IPA components. In those countries with decentralised management (Croatia, Turkey and former Yugoslav Republic of Macedonia), funds for Roma have also been programmed under IPA Component IV – Human Resources Development. The programming document for this is the Operational Programme (HRDOP) which, unlike the MIPD, has one or two programming perspectives depending on each country. There are no specific national IPA Roma programmes, as result of which all related support is programmed under the MIPD and/or the HRDOP.

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9 Turkey did not participate in the *Roma Decade*
10 IPA 2007-2013 has 5 components. I) Technical Assistance and Institution-Building (TAIB); II) Cross-Border Cooperation (CBC); III) Regional Development; IV) Human Resource Development; V) Rural Development. All IPA countries have components I & II.
11 Croatia had two HRDOPs (2007-11, 2012-13); Turkey and former Yugoslav Republic of Macedonia have one each for the period 2007-13.
The relationship between the MIPD and HRDOP in terms of programming priorities is not fully clear. The MIPD identifies programming priorities for all IPA assistance for its 3 year duration, including Component IV. This is in spite of the fact that the HRDOP’s objectives and priorities set were in 2007 and not subject to revisions to reflect new MIPD priorities. In practice, the MIPDs usually set the priorities for assistance under Component I, while making references to priorities and expected results to be delivered by the HRDOP (which remain largely constant). The HRDOPs themselves provide considerably more detail, and contain a more comprehensive analysis of problems and description of objectives/measures (see below). In principle, there seems little potential for priorities identified under later MIPDs to be integrated into the HRDOP, even though the latter is formally subordinate to the former. Interviews suggested that in fact the MIPD merely reflects the state of play of the HRDOP and doesn’t influence its strategic focus. Also, it seems that changes can be made to the HRDOP depending on circumstances. For example any important new priority (such as the Turkish government’s agreement to use IPA HRDOP funds from 2011 onwards for supporting Roma) can be included into the programming documents as needed.

An analysis of the MIPDs for each country shows that they provide very little in terms of setting objectives and priorities for IPA support towards Roma. References to needs of Roma are frequent although these seldom go into any great detail. There are no examples of MIPDs explicitly identifying a set of Roma-specific areas to be targeted by IPA assistance, or indeed linking IPA assistance to national Roma strategy priorities. MIPDs make no reference to the Roma Framework or Common Principles as starting points in programming assistance. The overall impression of MIPDs is that – in relation to Roma – they are empty in terms of content and as such there is no programme-level support for Roma.

This vacuum has direct implications for the consistency and coherence in the programming of Roma assistance, particularly for those countries without IPA Component IV. The MIPDs have no programme level objectives for IPA Roma support, nor are there any indicators to assess any effects or impacts from IPA support. IPA support is instead delivered through a
series of individual project interventions, programmed annually, with no direct reference to programme level priorities (as there are none). Ideally, this gap would be addressed by the preparation of country level working papers that show explicitly how IPA funds are supporting the implementation of the national Roma Inclusion Strategies. Such papers should complement MIPDs (or their successors, the Sectoral Operational Programmes (SOP)/Sectoral Strategy Papers) and explicitly outline IPA funding priorities for Roma under a given financing period based on a thorough needs analysis and stakeholder consultation, and provide indicators for monitoring impact. However, current IPA programming documents do not have provisions for such Roma IPA working papers and it is questionable whether their incorporation into SOPs would, at this stage, be feasible.

In the absence of a clear strategic or programme objectives, support to Roma in IPA countries exhibit characteristics such as: skewing of funding allocations towards certain sectors (varying from country to country); lack of sequencing of interventions, leading to funding of one-off projects with no clear follow-up and an absence of synergies either identified or exploited. Also, alignment of IPA support with national policy on Roma is not secured as might be expected. Ideally one would expect IPA interventions explicitly complementing national efforts to address Roma-specific issues. This would be expressed in the programming documents (either in the MIPDs or sector/project fiches). However, there are not the sorts of systematic linkages between national and IPA priorities (where they exist) to be found in the MIPDs. Therefore linkages exist only at project level, which under TAIB, are often haphazard.

By contrast to the MIPDs, the HRDOPs provide a much better programming framework. Aside from containing a more thorough problem analysis, they also have a much stronger intervention logic than MIPDs (at programme, priority axis and measure levels) supported by relevant (if not always SMART\(^\text{12}\)) indicators. Roma are included as a target group under the priority axes but are not the subject of any specific detailed needs analysis (which is a weakness). Individual ‘operations’ (projects or interventions) funded from the HRDOPs must fall within the priorities of the HRDOP and should contribute to the achievement of one of its objectives (at measure/priority axis level). This significantly reduces the risk of IPA funding projects that fall outside agreed programming priorities. They also have output and result indicators that link directly to those at measure level. Finally, the longer programming perspective allows for better sequencing of interventions. As a result, IPA I Component IV support to Roma has greater focus, corresponds to clear long term priorities and offers

\(^{12}\) SMART – Specific, Measurable, Attainable, Relevant, Time-bound
programmers a longer term perspective for planning and implementing Roma-specific support.

Despite the benefits offered by the HRDOP’s more strategic framework, evidence from the evaluation sample suggests that IPA Component IV support tend to have the character of individual interventions, and that the benefits of a more focused, potentially holistic approach to addressing Roma problems with logical sequencing are not exploited to any great extent. This can be attributed both to a lack of capacity within the bodies charged with programming to grasp the conceptual challenges posed by such a programming approach as well as institutional resistance to put such a holistic approach into practice.

Overall, IPA support to Roma is not constituted as a programme as such, but rather a collection of largely disparate projects/actions financed from either IPA components I or IV, with the latter having greater focus thanks to the existence of the HRDOP.

4.3.3. Priorities of IPA Roma Support

IPA programming priorities are only evident through the amount of funding allocated for individual projects from each ‘sector’ or ‘thematic area’ e.g. housing, return, employment, education, civil society etc. Funding allocations are assumed to indicate the relative importance attached by IPA programmers (EC and national authorities) to each thematic area in the respective IPA country: the larger the allocation of funding for individual projects, the greater the importance of the thematic area. Using this approach, it is possible to identify with some reliability the thematic programming priorities of IPA. Error! Reference source not found. on page Error! Bookmark not defined. provides a detailed breakdown of allocated funds across all the thematic areas identified in the evaluation. The largest allocation of funding – 23.3% – went to addressing the return of displaced Roma, followed by housing (19.9%), social services/inclusion (13.5%) education (13.2%), and employment (12.1%).

Displacement and return has the largest percentage of IPA funds, even though it is a target ‘sector’ in only 3 of the IPA countries (KS, MN, and RS). An analysis of national IPA funding allocations shows that Displacement and Return consumes 76% of IPA funding for Roma in Kosovo and 88% in Montenegro. Interestingly, Displacement and Return is not a major priority in any of these countries’ national strategies, nor does it feature as a priority in the EU Roma Framework.

Education and employment, the two areas most referred to during the evaluation missions as priorities for Roma in the region, are in fourth and fifth place respectively. Other issues such as anti-discrimination, gender and civil society have received very limited funds, even
though they feature prominently in most national Roma strategies. One of the key areas of the Roma Framework and national Roma strategies, health, has not featured at all in IPA programming (see below for more on this).

**Not all the IPA funding covered by this evaluation is exclusively focussed on Roma.** Indeed, at least 3 types of intervention were noted. These were:

i) Roma specific interventions, explicitly and exclusively targeting Roma communities;

ii) interventions targeting Roma explicitly but not exclusively (e.g. territorial interventions implemented in areas of high Roma population, education interventions targeting issues primarily but not exclusively affecting Roma children, such as early drop-out); and

iii) interventions that might include Roma as any other citizen (e.g. social security reforms, refugee/returnee support).

For example, an analysis of IPA funding to Kosovo found that of the EUR 33.1 million of IPA funds covered by this evaluation, only EUR 11.76 million (36%) was allocated to measures that fell into the first category i.e. specifically targeting the RAE community. In former Yugoslav Republic of Macedonia, this figure was some 47%. All other funding fell into the latter two categories. Thus the ‘real’ amount of IPA funding for Roma inclusion is substantially less than appears to be the case on first inspection.

As mentioned above, **each country has a different project mix.** Kosovo and Montenegro IPA programmes strongly support Displacement and Return. In other IPA countries, certain sectors dominate e.g. employment in former Yugoslav Republic of Macedonia (58%), Housing in Bosnia and Herzegovina (85%). Serbia has a more balanced structure. The charts below illustrate the varying structure of IPA support towards Roma in selected countries.
Figure 6 - Kosovo funding allocations

Figure 7 - Serbia funding allocations

Figure 8 – fYR Macedonia funding allocations

Figure 9 - BiH funding allocations
Figure 10 - Albania funding allocations

Figure 11 - Croatia funding allocations

Figure 12 - Turkey funding allocations

Figure 13 - Montenegro funding allocations
The factors influencing this mixture of project types are specific to each country. In Kosovo and Montenegro, political considerations related to return of RAE prevail over other Roma needs (despite these other needs being potentially more pressing for Roma in those countries). In former Yugoslav Republic of Macedonia, the principal interlocutor for IPA assistance related to Roma is the Ministry of Labour and Social Policy (MLSP), which in addition to being the body charged with coordinating the national Roma strategy is also the Operating Structure (OS) for the HRDOP there. It was observed that the MLSP sees employment as its key focus and it is therefore unsurprising that IPA support in former Yugoslav Republic of Macedonia reflects this imperative. In Bosnia and Herzegovina, the reasons for a predominance of housing projects is not clear, but seems to have its roots in the complex administrative structure of the country and the prominent position of one Ministry in IPA programming in this sector (see the box above).

Evidence suggests that strong institutions are best placed to lead the prioritisation process for IPA Roma assistance and as a result IPA programmes in these countries reflect the priorities of these institutions. Logically, the prioritisation of IPA funding should reside with those institutions charged with overseeing the delivery of the national Roma strategies. In practice, however, these bodies often lack the capacity or political clout to play a proactive role in IPA programming. One exception was in Serbia, where the national Roma coordination body, the Office of Human and Minority Rights, together with a strong centralised social policy unit, the Social Inclusion and Poverty Reduction Unit (SIPRU) and an effective NIPAC (Serbia EU Integration Office (SEIO)) were able to provide balanced prioritisation and continuity through the IPA programming cycle.

Issues that are considered critical to Roma inclusion and which figure in national Roma strategies – health, gender, anti-discrimination and civil society support – are conspicuous by their virtual absence among the programming priorities for IPA.
Health, one of the four Roma Framework priorities, received very little IPA funding during the period covered by this evaluation. One of the reasons for this appears to stem from the view held among several EC staff involved in programming that this is not an area covered by the *acquis* and therefore not eligible for funding. This is a moot point. Acquis chapter 28 covers public health. Support for Roma health mediators and mobile testing units for Roma in rural areas was provided in Bulgaria and Romania prior to their accession in 2007. Thus limited *acquis* coverage was no barrier to Phare funds targeting health elsewhere. Another factor is the reported peripheral involvement of national health ministries in Roma-related issues in IPA countries. Non-use of IPA funds for health would be understandable if the EC had made a strategic decision to leave this area to other donors (either bilaterals or international organisations like the WHO). However, only in Serbia was this found to be case (SIDA and the World Bank provided substantial support in both grant and loans for investment in the system of *health mediators*, and therefore meant the EU/IPA could focus elsewhere). Elsewhere, there was no evidence to suggest this had happened and this represents a serious oversight.

4.3.4. IPA Programming of Gender Issues

This evaluation committed to examining the extent to which gender issues had been tackled by IPA. It is well recognised that Roma women and girls face particular challenges that require specific and sensitive approaches. MIPDs, project fiches and HRDOPs consistently make references to gender and equal treatment of women. However, these are almost always general statements that are of little use for programming specific actions. This was an endemic problem for interventions covered under IPA I TAIB.

HRDOPs tended to be better in this respect. MIPDs for all three DIS countries provide analyses of gender problems (albeit with little reference to Roma). Only former Yugoslav Republic of Macedonia, however, explicitly targets Roma gender issues under measure 3.2 and funds specific actions to address them. This evaluation looked at one project – employment of Roma women – funded from this measure to understand how effective in practice IPA had been. The evidence suggested that the challenges were far more complex than had been anticipated.

Serbia – Gender issues and programming priorities

The approach taken in Serbia to addressing gender is typical for the whole IPA region. The situation of Roma women in Serbia is, on the whole, very difficult. Early marriage and early childbirth is very frequent, literacy rates are lower, and the reproductive health situation is significantly poorer than for the general population. However, this situation is rarely reflected in programming documents, and there are few gender disaggregated indicators. There were also no projects or actions that had as a primary objective an improvement in the situation of Roma women or girls. Interlocutors describe gender as a cross-cutting issue that should be addressed in every action. However, the absence of gender specific analysis and gender specific indicators in most project and programme fiches suggests that there is much work to be done in this
(see case study 9 from former Yugoslav Republic of Macedonia for more on this). **Overall, gender has been treated as a secondary consideration by IPA programmers; where it has been targeted it has not been successful in delivering planned benefits.**

4.3.5. Civil Society and Anti-Discrimination Programming

**Most civil society support has been channelled through EIDHR, which has not been directly covered by this evaluation.** Funding for Roma through the EIDHR has been primarily through larger grants disbursed centrally or through in-country calls run through EU Delegations (with relatively smaller funding allocations). Feedback reported that these funds, whilst important, tended to favour larger, better organised NGOs which in many cases were not Roma-led (due to their limited capacities). Specific country IPA funding for Roma civil society was in fact a rarity. Involvement of Roma civil society in the programming process is discussed below, whilst more general interaction between the EU and civil society is discussed under section 4.6 EC Cooperation with External Stakeholders.

**Anti-discrimination sits outside the concept of ‘social inclusion’ but is considered critical to achieving it.** Indeed, discrimination affects poor and well-to-do Roma alike. However, with only 1.6% of IPA funding targeting this, it is evidently not viewed with any great importance by IPA programmers. The reasons for this appear to be partly institutional – the government bodies dealing with this issue, where they exist, tend to be less well-placed to access IPA funding than established IPA beneficiaries such as line ministries (see below for more on this). Additionally, stakeholders expressed the view that solutions for addressing this deep-seated problem are thin on the ground, and long-term in character. In other words, it posed too great a challenge for them to tackle, at least on their own and with their limited resources.

4.3.6. Coherence of IPA Programming

**EQ 2.8 How coherent was the assistance?**

Attempting to understand whether there is any implicit coherence in the programme objectives of IPA assistance in those countries without IPA Component IV and associated HRDOPs is difficult. To gain some appreciation of what IPA programme objectives might be, the evaluators examined the overall objectives of the projects supported in each country. Following PCM methodology, these should lead us to higher level (programme) objectives to which the individual project interventions should contribute. It found that only in two countries – Kosovo and Montenegro – was there clear coherence in programme objectives. This should not be a surprise, given the overwhelming focus of IPA funding to the area of return and reintegration (RR) in these countries. Interestingly, in the other main focus of IPA
support in Kosovo, education, the three interventions in the sample each had differing overall objectives indicating much less coherence of programming objectives. In Albania, most of the support for Roma inclusion was delivered by means of competitive grant schemes for which there was no overall programme coherence. Choice of projects depended primarily on applications submitted and overall quality of applications.

This corresponds with the general trend among IPA programme objectives in non-DIS countries, which is one of mixed but generally limited coherence. In those countries with HRDOPs, Roma project objectives clearly link to OP objectives and coherence is much better. This is not, however, always a guarantee of good quality project design or of good project performance, as detailed assessments of projects in the sample illustrate (see Case Study 9 from former Yugoslav Republic of Macedonia as an example).

There was also little evidence of coordinating programming with other EC funding instruments such as Cross-border Cooperation, Western Balkans Investment Framework and EIDHR. The impression gathered from this evaluation was that interventions under these instruments have been designed in isolation (see section 4.3.7 below for more on this issue).

**There was little coherence in programming between IPA components I and IV.** In Croatia, no explicit linkage in programming between IPA I and IV assistance for Roma was noted. IPA I funds under the Government Office for Human Rights and Rights of National Minorities (GOHRRRM) has been used primarily for housing and capacity building for local minority councils and makes no specific reference to IPA IV support to education and employment. The GOHRRRM stated that it has had minimal input into the programming of the HRDOP. The evaluation found some synergies stemming from the two funding strands (e.g. rehabilitation of settlements and educational support), but these were coincidental, not planned. There was limited appreciation within the programming institutions of how harmonising these funds could deliver wider, sustainable benefits, despite the efforts of the GOHRRRM to achieve this. (See case study 5 from Croatia for more on this).

In former **Yugoslav Republic of Macedonia**, programmers understood the possible benefits of mixing the two components. Here, the MLSP intended to use TAIB to strengthen institutions delivering actions funded from HRDOP. Although this made sense, it was undermined by the failure to secure the TAIB-funded technical assistance contract in time and the subsequent loss of IPA funding. Nevertheless, it is hoped that this one setback will not deter programmers from trying such an approach in future. In **Turkey**, Roma have not been included as a target group under Component I, which has led to IPA Roma assistance being delivered exclusively through the prism of social inclusion.
In the case of Croatia, there was little evidence from IPA programming documents or the evaluation sample of projects that IPA funds had been used specifically for piloting models of Roma inclusion for scaling up under **Structural Funds**, to which Croatia now has access. Structural funds have apparently been programmed without the feedback of the main sectoral institutional player (GOHRRNM) being sufficiently taken into account. (See Croatia country assessment for more on this).

### 4.3.7. Mixing of Financing Sources

Mixing of financing both within IPA and between IPA and other financial instruments in theory should ensure complementary funding to address complex Roma-specific challenges and deliver wider benefits, particularly for geographical locations where the interventions take place. Potential for such mixed financing is evident within IPA TAIB (e.g. Return and Reintegration interventions combined with IPA municipal infrastructure funds in Kosovo to upgrade infrastructure in municipalities where Roma have been returned), between IPA I and IV components (strengthening institutions, both national and local, that then receive Component IV funds for social inclusion), between IPA I and II components (e.g. addressing cross-border Roma migration), between IPA and other EC funds such as EIDHR (civil society) or Western Balkans Investment Framework (housing and social infrastructure) and also through joint initiatives with other donors.

Evidence to date shows that this potential has not yet been fully explored. In some cases this has stemmed from lack of awareness of such possibilities; in others it is a result of a ‘silo approach’ to programming i.e. programmers focusing narrowly on specific interventions rather than taking a more holistic view of the problem to be addressed by IPA.

As regards **collaborative programming with other donors in the field**, IPA has not done this in general. The observed practice is for bilateral donors to take note of the areas which IPA is funding and then programme around them to avoid overlap. This is a rational approach given the size of the IPA programme in comparison to other donor budgets. However, it also diminishes the possible synergies that could be achieved from closer cooperation as bilateral donors with comparative advantages (e.g. support for civil society). Where collaboration has taken place, Donor coordination in Serbia

The evaluation found good coordination of IPA and other donor assistance, largely as a result of the expertise within Serbia EU Integration Office (SEIO), and the very useful (if detailed) ‘NAD’ document (Needs Assessment for International Assistance). Donors including the Swedish International Development Agency (SIDA) and the Swiss Cooperation Office/Swiss Agency for Development and Cooperation (SDC) generally refer to the NAD document and the plans of the EU when they decide their project priorities. At a higher level, their strategic priorities are informed by government priorities as well as their own strategic objectives, with less reference to IPA programming. While donor coordination for Roma inclusion is not systematic, it functions reasonably well through a network of individuals and based on the guidance from the NAD.
this is thanks to the work of the NIPAC to raise awareness of donors of IPA programming priorities (see box for an example from Serbia). For the most part, however, collaborations are uncommon, sporadic and not systematic.

Interviews with international organisations carrying out important work in the areas of, for example employment and monitoring (UNDP) or indicators (UNICEF MICS) suggested that they carried out their work irrespective of IPA priorities and that, while cordial, their relationship with the EU was not collaborative. Given the particular weaknesses of IPA in the areas of monitoring and indicators, a closer partnership with these bodies would make sense.

4.3.8. Sequencing of IPA Programming

The quality of the sequencing of projects was found to be again mixed. Many of the projects in the sample were one-off interventions that did not fit in with any previous or future planned assistance. There were several examples of projects that had been programmed to follow on from previous interventions (such as the sequences of refugee/IDP support projects in Serbia, Kosovo and Montenegro, and the social welfare reform projects in Bosnia and Herzegovina). In the case of the refugee return projects the follow-on projects replicated the approach taken from previous interventions and had not been adapted to reflect any lessons learned (despite the existence of a section in the project fiche dedicated to this). This aspect of sequencing was particularly problematic – the lack of a systematic monitoring approach and the timing constraints imposed by the IPA annual programming cycle seriously hampered both the ex-post assessment of projects and also the development of follow-up projects reflecting the successes and failures of their predecessors.

Kosovo and Serbia both have strong evidence of sequencing of assistance. For Kosovo, this is illustrated in the schematic diagram included in the country assessment (see 9.4.3). It shows the linkages between the RRK interventions, and also the relationship between the projects supported under the ‘Education’ umbrella. As can be seen, the RRK is programmed almost annually, but has no specific RAE element (although RAE are among the final beneficiaries). The MRSI 1 & 2 projects (RAE specific) also display elements of sequencing. Whilst this approach offers a clear programming logic, it is questionable whether this sequencing provided enough time for assessing the benefits or shortcomings of preceding interventions and then reflecting them in successive projects. Education interventions also interlink, although only in some limited respects (Roma teaching curricula, Roma learning centres and Roma educational mediators). See Case Study 8 from Kosovo for more on this.

In Serbia, a good example of sequencing is the link between the IPA 2012 TARI/’Ovde smo zajedno” project and a forthcoming IPA 2013 intervention. One component of the 2012
project would prepare urban plans and project documentation for rehabilitation of Roma settlements, and the 2013 intervention would provide funding for infrastructure improvements based on these plans.

4.3.9. Quality of Project Design

Quality of project design was dependent on the bodies responsible for preparing the designs. Usually international organisations were able to develop well-structured designs that met all formal quality criteria. Designs originating from national institutions varied considerably in quality, but tended to be less good than those developed by external actors.

Three common weaknesses were identified in designs, irrespective of their originator. These were an inadequate intervention logic, loosely defined indicators of achievement and absence of robust needs analyses. As regards intervention logic and indicators, under TAIB, project fiches (sometimes called sector fiches depending on the scope of the assistance) tend to be fairly lengthy documents that give a general description of the challenge the intervention aims to address. In some cases, fiches contained a series of individual projects ‘bundled’ into one fiche. This made sense where these projects had shared objectives. However, this was not always the case, with for example, preservation of cultural heritage in Kosovo and closure of IDP camps in Kosovo included in the same programme document without any obvious relationship between the two. Often the intervention logic of the projects was found to be flawed and the projects lacked quality indicators to assess their performance.

Thanks to the HRDOP’s programming framework, the interventions funded under Component IV have generally better intervention logic and indicators (as they have to link into the hierarchy of objectives defined in the HRDOP and use the indicators given therein). Also, the Operation Identification Sheet (OIS) used for projects funded under the HRDOPs are briefer documents that explain the relationship of the project to the OP measure and identify the relevant output and result indicators. Nevertheless, the OIS needs analysis was seen as a weakness (see next paragraph).

Weak quality of the needs analysis was found to be a problem common to both IPA components. With the OIS, this is to some extent understandable, as the main needs analysis is contained in the HRDOP (although it generally lacks anything Roma-specific). Project/sector fiches generally describe the problems rather than analyse them. They state that for example, school dropout is a problem, but do not try to analyse why this is a problem. Therefore it is not clear whether the proposed solutions are designed as an effective response to the real problems.
A more robust assessment based around a thorough problem analysis is considered a prerequisite for developing projects that target Roma needs. Without such assessments, suboptimal performance of IPA has to be expected. Related to this point is the strong tendency of HRDOPs to make extensive use of grant schemes to address problems affecting Roma. Evidence from the field suggests that the complexity of these issues require a more long-term and complex approach from programmers than one-off grants. As such, the validity of this mechanism for Roma support has to be questioned. (See also case study 9 from former Yugoslav Republic of Macedonia).

In some countries there was a perceived shift in programming from IPA 2012/2013 onwards – primarily in Serbia, Bosnia Herzegovina and Albania. This was characterised by more IPA funding for Roma, with a more strategic focus and better sequencing. Interlocutors have attributed this in part to the Roma Seminars delivered by the EC in the period from 2011 onward, which raised Roma issues high on the agenda. The explicit link between accession prospects and the need to address Roma human rights issues also helped to increase prioritisation of measures for Roma support.

**4.3.10. The Role of the EC Roma Seminars in Programming**

**Roma Seminars** were initiated in 2011 with the intention of putting Roma issues at the top of the EC agenda in IPA countries. Seminars were held in all IPA countries except Turkey and feedback suggests they had a positive impact in terms of generating debate on how best to address Roma-specific problems. The extent to which this then translated into the programming of IPA assistance varies from country to country. In Serbia, the 2012 TARI project was programmed directly as a result of Seminar conclusions. In former Yugoslav Republic of Macedonia a series of locally organised seminars were held as follow-up, but stakeholders reported that these had only limited added value and there was no evidence that Seminar conclusions had resulted in IPA programming taking a new direction.

**4.3.11. Statistics as a basis for IPA Programming**

Statistics on Roma in IPA countries are unreliable and present major challenges for programming. Estimates on the total number of the Roma residing in each country are drawn from a variety of sources. National governments have to rely on official census data, in spite of the fact that this is recognised as inadequate. Other agencies such as UNICEF and Open Society Foundations offer their own estimates on Roma population based on surveys and research, while the Council of Europe (CoE) figures are used by the EC for programming purposes. The problem is not simply one of counting people. Issues affecting the statistics include: whether people want to self-identify as Roma (or Ashkali or Egyptian); who is doing the counting and for what purpose – there is a prevalent suspicion of motives for counting...
the number of Roma people; and frequent, often seasonal migration, meaning that numbers are affected depending on the time of year and the state of the economy.

This poses a problem for programmers when assessing the scale of the need to be addressed – for example, is the challenge to put 50,000 Roma into employment, or only 15,000? Is the training of 10 teachers in inclusive education sufficient to meet the need of primary schools, or would 100 more accurately match the actual need?

In Albania, this problem was highlighted during the evaluation mission. The official census identifies 8,301 Roma and 3,368 Egyptians. Recent research by OSF puts the number of Roma (not including Egyptians) at 18,276. NGO estimates go up to 200,000, and the Council of Europe average estimate puts the number of combined Roma and Egyptians at 115,000. This last figure is used for EC programming, despite the Albanian government Roma inclusion strategy being aimed exclusively at Roma, and not Egyptians.

The text box below describes the situation in former Yugoslav Republic of Macedonia. In Turkey, there are no official figures of the number of Roma, although estimates place them at between 2.5 and 5 million. Without solid baseline data on Roma numbers, it is impossible to measure the effectiveness and impact of IPA support with any certainty. Project indicators have no reliable baselines, and this affects IPA TAIB and HRD alike. Without such data it is very difficult to demonstrate that IPA funding for Roma has in fact made any difference at anything other than at a micro level (see sections 4.4.2* on Effectiveness and 4.4.3 on Impact).

On a more positive note, it was observed that, while actual numbers of Roma and their needs are a problem, identifying locations where Roma live is less problematic – locations with greater numbers of Roma recorded in censuses are usually those locations which actually have the greatest concentrations of Roma living there. Thus programming assistance based on geographical location of Roma is feasible. This has happened in Croatia (Međumurje), Bosnia and Herzegovina, Serbia and Albania. In Turkey, an area-based approach to addressing Roma inclusion is being taken using municipalities (see Case Study 12). Experience from other donors (UNDP) and even other EC/IPA
interventions (such as Leader for agricultural funds, and Area-Based Development Approach funded from the IPA MBP) suggest that such an approach offers better potential for developing local-based solutions with stronger ownership from the key stakeholders such as local government, NGOs and the business community.

4.3.12. Stakeholder Involvement in IPA Programming

EQ 1.2 To what extent are stakeholders involved in problem analysis and programme design? Is this involvement effective?

The main stakeholders in the programming of IPA are: Central government institutions such as the national IPA coordination office (NIPAC), Operating Structures of the HRDOP, national agencies responsible for Roma issues, line ministries; local government/municipalities; Civil Society Organisations/NGOs dealing with Roma issues (both Roma and non-Roma led) and official Roma representative bodies such as National Roma Councils.

Central government is closely involved in the IPA programming process. The body involved most directly is the NIPAC as well as the Component IV OS in those countries with this component. NIPAC was observed as having more of a formal coordination role and tended not to be involved in the details of Roma assistance. Most have limited capacities and expertise to play a more proactive role in, for example quality control of the content of the project proposals. The HRDOP OSs have a more direct involvement in both formal and content aspects of the programming processes. In both cases, the main content is developed by the line ministries or government agencies that become the institutional beneficiaries.

The extent to which these ministries/agencies are able to actively participate in the analysis and design of Roma interventions is strongly dependent on their capacities and institutional standing. The example from Serbia illustrates that a combination of engaged institutions and human capacities can have a direct positive influence on the programming of IPA Roma assistance (see below). Turkey also boasts strong institutions involved in programming IPA support targeting Roma, although the level of know-how within these institutions on Roma-specific issues is limited. Elsewhere, those ministries with strong relationships with EU

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**Government Involvement in Programming Roma Assistance – Serbia**

The Government of Serbia has been very involved in the design of IPA interventions. The main institutions – Office for Human and Minority Rights, Serbia EU Integration Office (SEIO), Social Inclusion and Poverty Reduction Unit (SIPRU) all play an active role in shaping the programmes and projects/actions. The SIPRU model consists of a well-resourced and highly skilled team of social policy experts who provide a centralised policy and research service to relevant line ministries, government institutions and local government. This model could be replicated elsewhere in the region with benefits in terms of quality of policy making and programming that might not be obtained if resources are distributed to individual ministries.
Delegation, who are institutionally powerful and/or have a track record of delivering IPA projects feature prominently as users of IPA funds (See also Bosnia and Herzegovina, former Yugoslav Republic of Macedonia and Kosovo Country Assessments).

In the absence of clear Roma-specific sectoral or programme level priorities and a lack of Roma-specific expertise in either the NIPACs or EU Delegations/Offices, prioritisation of IPA assistance has been based on criteria such as ‘quality’ (primarily in terms of formal structure, and perceived maturity), implementation capacity (the institutional beneficiary is able to successfully manage the project) and linkage to political or other acquis-related priorities. Proposals that best match these criteria invariably have the best chance of being funded. Any ‘expert input’ into the programming process on the government side would logically come from the agencies with responsibility for Roma strategies – either in terms of the direct submission of project proposals or in the quality assurance of those proposals coming from other government institutions to ensure they are aligned with national strategies and that they ‘make sense’. This evaluation found that, in reality, many of these offices are under-resourced and politically weak. Thus they are much less involved and influential in programming than could be expected. These bodies were found to play either a peripheral role in the programming of assistance (such as in Kosovo) or had received a token allocation to programme, but lacked the capacities or influence to use this funding strategically (Croatia).

Local government presents a paradox for IPA programming. Municipalities and local authorities invariably face the biggest challenges when dealing with Roma as many of the problems experienced by Roma fall within their remit e.g. housing, primary education, social service provision, primary healthcare. They also experience the side-effects of Roma exclusion in terms of social tensions, law & order most acutely. Such concerns may be abstract for central government bodies but are very real for municipalities. As such, local

**Government Involvement in Programming Roma Assistance – Kosovo**

The Office for Good Governance at the Office of the Prime Minister (OGG) is a department within the Government Office of Kosovo. It is in principle the key body dealing with Roma Ashkali and Egyptian (RAE) issues in Kosovo. It is responsible for the coordination and monitoring of the National Strategy for RAE inclusion and is the body competent to advise government on policy measures to be taken in regard to RAE communities (in line with the RAE Strategy/Action Plan). Logically, it should be the principal Kosovo partner for the EU in programming IPA support to RAE. In practice, the OGG lacks staff capacity (in terms of numbers and skills) and the political influence to effectively discharge any of these key roles. The evaluation team noted that the OGG suffered from a lack of credibility in the eyes of other key stakeholders. It was evident that, for whatever reason, the OGG has not been able to effectively influence the direction that IPA support has taken in Kosovo. Instead, this vacuum has been filled by line ministries and international organisations, with the IPA programme reflecting their own agendas rather than those of the OGG or bodies representing RAE. The OGG has been the institutional beneficiary of only 1 IPA intervention and has not received any notable capacity building from IPA despite it sorely needing such support.
government has a very clear stake in addressing these problems effectively and this would make them a logical partner for IPA interventions. This has largely not been the case for a number of reasons. Where it has happened, assistance has usually been directed through international organisations with the municipalities being the final beneficiaries of assistance (via workshops or training) rather than the implementing partner. Only in Turkey has IPA successfully incorporated support targeting Roma via a social inclusion project with municipalities. This is because of the existence of a powerful association of municipalities, which has the capacity and mandate to take on this partner role (see box below and case study 12).

In countries with **National Minority Councils (NMCs)** - (Croatia, Serbia), these institutions are perceived as being legitimate representatives of the Roma minorities. Therefore they are used as a counterpart for consultation by government. This makes formal sense, because they are elected representatives of the minorities. However, because they are also funded by governments (not parliaments) they can be politically dependent on government, and cannot be too critical. Also, the extent to which these bodies provide detailed input into the content of interventions varies (from substantial input in Serbia contrasted with Croatia, where the NMC’s reportedly limited input has also been influenced by its lack of capacity). Ultimately, consultation with NMCs can overshadow consultation with civil society, and exclude more critical voices.

**Civil society stakeholders** have been involved in the programming process, but this has primarily been in a consultative role, with very few examples of Civil Society Organisations (CSO) being an active participant in the development of IPA interventions from the start. More often than not, CSOs have been invited to involved in at a later stage of project preparation and have been given insufficient time or support to provide comments to the proposed interventions. Some countries (e.g.
Serbia) have formalised consultation mechanisms, but at the sector level (e.g. HRD) and not specifically for Roma. In others, CSOs have been invited to comment ad-hoc on project fiches once they have been prepared. This approach gives little opportunity for the design of the project to be fundamentally revised or its original premise to be reconsidered.

The consultation process with civil society is invariably led by the beneficiary governments – either the institutional beneficiaries of the IPA assistance (line ministries/agencies) or the NIPAC. As mentioned earlier, NIPACs tend to take a formalistic approach to programming and lack expertise (and contacts) in Roma issues. Line ministries in IPA countries usually do not have a strong appreciation of the importance of working proactively with civil society and have an ambivalent relationship with it at best. Where they exist, NMCs are used as the ‘official’ rapporteur for programming Roma, although this is potentially problematic (see above). EU Delegations/Offices may have contacts with CSOs but these appear to be informal and it is unclear whether this relationship influences the programming of IPA to any real extent.

CSOs in some countries (e.g. Albania, BiH, Serbia) have been more involved in consultations for other funding mechanisms (such as the CSF and EIDHR) for which they perceive they have a realistic chance of accessing funds, although this was far from being the case across the whole region. IPA is often seen as too remote and not worth investing scarce CSO resources because of the limited benefits perceived to its participation.

A commonly held view is that involving Roma civil society in programming is problematic. No official ‘Roma platforms’ exist with whom programmers could collaborate, Roma CSOs were seen as lacking the capacity to participate properly in any programming processes, and involving them too closely would risk introducing unwanted bias into the design of interventions (especially grant schemes). Furthermore, a more inclusive approach would slow down the programming of IPA, which was seen as a major concern especially in countries with Decentralised Implementation Systems.

There are undoubtedly challenges to bringing such organisations closer to programming IPA, but evidence on the ground suggests that doing so is indeed possible. In former Yugoslav Republic of Macedonia, an alliance of 14 Romani NGOs provided the EC and national authorities with their standpoint on how IPA II could better benefit Roma in their country (without any evident response from the addressees), in Croatia, Roma representatives challenged the prevailing IPA programming approach to Roma housing, offering a de-segregated alternative to the one which legalised Roma ‘settlements’ and then partially upgraded them. In Turkey, Romani CSOs actively contributed to defining the parameters of a major social inclusion grant scheme funded under IPA component IV to which CSOs could apply.
Overall, based on an analysis of programme and project documents, it is clear that the project design process does not sufficiently involve either Roma civil society or project final beneficiaries, with time and resources perceived as the main constraints. But this is a false economy – evidence from elsewhere shows that more investment in design will contribute to better projects/actions, greater ownership of results and stronger sustainability.

The role of International organisations\(^{13}\) in the programming of IPA was not fully clear. As implementers of IPA assistance, their role in programming should logically be minimal. However, the design of interventions funded from the MBP via direct grant awards was conducted by the international organisations themselves (see MBP assessment). In some cases international organisations worked closely with beneficiary institutions (usually line ministries) to develop project proposals that were subsequently funded by IPA. It was clear that in countries where line ministries have weak policy making capacity, international organisations helped fill this gap, and this extended even to helping in formulating requests for external assistance. Also, international organisations have a strong track record on managing EU funds in an efficient manner, making them a preferred partner for the EU Delegations/Offices.

However, the pitfalls of such an intimate involvement are numerous – there is a clear potential for conflict of interest, or at least, there is the risk of international organisations making selective analyses of problems and solutions which match their perceived knowledge and capabilities, rather than actual needs on the ground. Also, the cost effectiveness of using international organisations was questioned by some stakeholders who felt that work of the same quality could be done by local organisations at a fraction of the cost. This close relationship was also observed with international NGOs working mainly in the area of refugees. Despite being subject to a more transparent selection process (restricted open tenders), they still constitute a very small group of organisations who repeatedly receive IPA funds for delivering return and reintegration projects in Montenegro, Kosovo, Serbia and former Yugoslav Republic of Macedonia. These organisations appear to have good relations with both the EC and beneficiary ministries, again with the risk that the projects devised and implemented by them in many cases fall short of meeting their objectives.

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\(^{13}\) These include the UN agencies (UNDP, UNHCR, UNICEF, IOM), Council of Europe, OSCE, World Health Organisation, Open Society Institute/Fund.
In other cases, international organisations that did not see themselves as implementers of EU funds (e.g. UNICEF) played a positive role in supporting national policy and capacity, and without the potential conflicts of interest as outlined above.

4.3.13. IPA Programming in Turkey

IPA Programming in Turkey represents a specific case, unique to IPA countries. Funding has been provided via IPA Component IV (HRD) and the country possesses its own HRDOP backed up by a well-staffed OS and institutional beneficiaries. Roma were not, however, included in as a target group for assistance till 2011 due to political considerations linked to recognition of ethnic and national minorities in the country\(^\text{14}\). Once included in the HRDOP, IPA funding to the value of €M47.83 was programmed in three projects (each of differing character) to support social inclusion efforts, of which €M19.13 worth of funding explicitly targets Roma, using *inter-alia* an area-based approach. Each intervention offers potential as a pilot to understand the benefits of such actions and integrate lessons or scale up impacts under future IPA assistance.

4.3.14. TAIEX

TAIEX is a demand driven facility that has been available to IPA countries throughout the duration of the programme’s existence. Programmers in IPA countries dealing with Roma issues seemed unaware of the opportunities offered by TAIEX, and as a result it has been thus far used only to a very limited extent. There is little doubt that it could be used more extensively to support small-scale interactions between IPA countries and EU member states, and that this could be the starting point for more long-term strategic cooperation, such as twinning projects between EU member state institutions dealing with Roma issues and their IPA country counterparts. For this to happen, a more proactive promotion of TAIEX towards the aforementioned programmers would be needed on the part of both the EC TAIEX team and also the IPA country contact points.

4.3.15. IPA Multi-Beneficiary Programme

The Multi-Beneficiary Programme (MBP) offers considerable potential to deliver assistance that national IPA programmes cannot. Its primary focus is at regional level, and in principle

\(^{14}\) Under the Turkish Constitutional System, the word minority encompasses only groups of persons defined and recognized as such on the basis of multilateral or bilateral instruments to which Turkey is a party. According to these instruments Roma citizens are not identified as minority but efforts to improve their fundamental rights and freedoms are carried out as “protection of socially vulnerable persons”.
can support region-wide as well as horizontal efforts to address Roma inclusion. Thus it can make a useful additional contribution to national efforts and can scale up national approaches across the whole IPA region. In practice, the MBP has struggled to meet this role mainly due to institutional and programming constraints discussed below.

The programming of the MBP shares some similarities to the national IPA programmes, primarily in the form of its main programming document i.e., the three MIPDs. These form the foundation stone of intervention logic of the MBP. They share similar characteristics to their national counterparts i.e. they provide a general basis for programming assistance but lack the focus needed for detailed programming of IPA assistance to Roma at a strategic, supra-national level. Furthermore, unlike national IPA support, the MBP doesn’t benefit from the existence of any EC progress reports to act as a political reference point for any programming. Likewise, no regional ‘Roma strategy’ exists into which it can feed, with even Roma Decade goals being national in character. In the area of Roma support, the MBP MIPDs’ intervention logic is not particular clear, whilst indicators of achievement are sparse and of little practical value when assessing performance. Nevertheless, individual interventions funded from the MBP are in line with Decade goals.

The MIPDs for the period of this evaluation make several references to Roma and their quality varies. The MIPD for 2007-09 explicitly refers to Roma under the chapter on ‘Supporting Civil Society’, ‘Refugee Return’ and ‘Social Inclusion’. However, no specific measures or planned outcomes are mentioned. The 2009-11 MIPD contains no explicit references to Roma and it is unclear why they ceased to be a priority for this programming period. By contrast, the final MIPD, 2011-13 provides a clearer definition of the problems that affect minorities and vulnerable groups and Roma needs are mentioned in general terms. Priorities identified therein were subsequently covered by three interventions funded from the MBP from this programming period.

Although the final (2011-13) MIPD represents an improvement in terms of general content, the MIPDs do not contain any wider vision of how the regional or horizontal dimension of IPA can clearly add value to national IPA Roma interventions. Nor do they state what niche the MBP is aiming to fill that hasn’t or couldn’t be filled by other IPA (and non-IPA) sources. Indeed, in many cases, the MBP projects tended to cover areas that were also the focus of interventions funded from national IPA allocations e.g. education, legislation, documentation/civil registration. In those areas where the regional dimension does provide added value (e.g. creation of regional networks) benefits were reported (see Performance section 4.4). However, these benefits were often weakened due to their lack of linkage to national policy initiatives or the absence of follow up (IPA or other) support to roll out results.
The EC HQ in 2011 attempted to improve the strategic focus of Roma MBP interventions by linking three interventions programmed under the MBP into one wider ‘strategic regional framework’. However, as all three projects were originally conceived and designed as stand-alone interventions, there was only limited potential for synergies to be created ex-post and this fusing caused some difficulties in implementation. Feedback from stakeholders indicates that this retrospective redesign did not prove particularly successful. To ensure complementarity of funding sources and reduce any risk of overlap, the MBP interventions would need to have been closely coordinated with national IPA programmes that were also targeting Roma. Evidence suggests that this didn’t happen to any significant extent. The onus fell on the MBP to take into account individual projects being prepared in-country, which for several reasons (differing programming cycles, amount of work involved) proved difficult to do in practice.

In principle, the programming of individual MBP interventions follows the MBP Programming Guide. In practice, it appears that programming was led by EC HQ primarily in collaboration with the selected project implementer – international organisations to whom a direct grant was awarded. Feedback from stakeholders in IPA countries indicated they had little direct involvement in this process (with the exception of NIPACs, who were consulted on MBP interventions but who mostly lacked any expert capacity to contribute to programming in detail). This also extended to their limited involvement in their implementation, with few of the main institutional stakeholders expressing awareness of, or involvement in MBP project activities.
4.4. Performance of Assistance

EQ 2. To what extent do the programmes successfully achieve their goals?

4.4.1. Results, Efficiency and Institutional Arrangements

EQ 2.1 What have been the results (outputs) achieved by programmes so far?

EQ 2.3 How efficiently were the programmes delivered? Were there more cost efficient alternatives?

EQ 2.7 How effective were the institutional arrangements for implementation?

Efficiency is essentially how well inputs have been transformed into outputs. This encompasses the many aspects of programme implementation and focuses on the management of IPA assistance by both the bodies charged with contracting the assistance (EC HQ, EU Delegations/Offices and in DIS countries, Central Contracting Units), the beneficiaries of IPA assistance and the implementers of IPA interventions (such as international organisations, consultancy firms, NGOs).

A defining characteristic of efficiency is the contracting of IPA support. IPA funds are contracted under three so-called ‘implementation systems’. The first is concentrated centralised management, under the EC HQ, with all contracting formalities handled by the EC in Brussels. The second is de-concentrated centralised management applied to IPA funds managed by the EC via the EU Delegations/Offices in the IPA countries. The third is decentralised implementation – DIS – where IPA funds are managed by accredited national agencies of IPA countries. The table below gives an overview of the different implementation systems as they relate to the assistance covered by this evaluation, the programmes they affect, the bodies charged with their management and the countries in which these systems are used.

<table>
<thead>
<tr>
<th>Implementation System</th>
<th>Programme/IPA component</th>
<th>Implementing Body</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Centralised</td>
<td>MBP</td>
<td>EC HQ</td>
<td>All IPA</td>
</tr>
</tbody>
</table>
This evaluation has confirmed findings from previous evaluations of IPA support i.e. that **centralised IPA management is more efficient than its decentralised counterpart**. The reasons for this are well known – central management arrangements involve fewer institutions in the preparation and contracting of projects, usually with greater staff capacities, than those under DIS. As a result, IPA Roma assistance under centralised management has in general been prepared and contracted more quickly and, as a result is less subject to the risk of delayed implementation or cancellation. To conclude that centralised management of IPA is therefore the way forward would, however, be a mistake. DIS, whilst challenging, is considered an important stepping stone in IPA countries’ progression towards ultimately managing structural funds as EU member states. It has, however, had a notable influence on the efficiency of IPA assistance implemented under IPA component 4.

IPA interventions financed from the MBP and managed centrally by EU HQ encounter few efficiency problems in the preparatory and contracting phase. However, it was noted that the international organisations who implemented these interventions encountered some difficulties after project start-up. For example, differing procedures for recruitment and procurement within organisations such as the OSCE caused delays in the engagement of staff and acquisition of supplies for the BPRI intervention (see MBP assessment for more). Also, projects under this implementation regime generally required non-cost time extensions (from 4 to 12 months), but these were invariably justified and had little real influence on the project performance overall. It is worth noting that all MBP projects examined by this

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15 See, for example the EC’s IPA - interim evaluation and meta-evaluation of IPA assistance issued in 2013
evaluation were implemented by international organisations, who prepared the project design (Description of Action) and were able to quickly agree on the delivery of the project with the EC. The only noticeable efficiency problem with these projects was caused by the EC’s request to link 3 separate interventions into one ‘strategic framework’ which delayed the start-up of BPRI (see Annex 3 on the MBP for more).

IPA Roma assistance delivered in-country without DIS has been delivered via EU Delegations in their capacity as the Contracting Authority. As with Brussels-managed IPA assistance, efficiency is generally good, although it was reported that where project preparation involved local actors (primarily ministries) this process took longer, especially where the actor in question had limited experience. This risk has been counter-balanced to some extent by the programming approach taken (see previous section 4.3) which tends to favour project proposals emanating from institutions with the capacity to both prepare ‘good quality proposals’ and with the capacity to deliver them.

Under DIS in component IV, efficiency problems are commonplace and have been noted in several of the projects selected for in-depth analysis. In Turkey, the grant scheme for social inclusion is unlikely to disburse grants to applicants much before 2016, over a year and a half after the call for proposals were launched. Also, the supplies component of the project for social inclusion at municipal level has been cancelled twice already, disrupting the implementation of the TA component which is partially dependent on the former’s successful contracting (see Turkey Country Assessment and Case Study 12 for more on this).

In former Yugoslav Republic of Macedonia, one of the projects selected for in depth assessment – Support to institutions in implementation of policies relevant to non-majority communities – failed to be contracted due to persistent delays in the preparatory and tendering process. The preparation process for TA support to National Minority Councils in Croatia has been dogged by delays. Difficulties were reported in the tendering of the works contracts of other IPA projects. This is unsurprising, as the Croatian GOHRNM has limited staffing and its main objective is to inter-alia coordinate the national Roma strategy, not have expertise in tendering construction projects. Similarly to Turkey, the IPA IV grant scheme for education of Roma children in Croatia took 2 years from the launch of the Call to the disbursement of grants. More generally, beneficiary institutions not used to DIS find the workload associated with the tendering process extremely challenging.

16 Called the ‘EU Office’ in Kosovo
These problems have their consequences for the overall performance of IPA in these countries – for example in sequencing of assistance, in complicating the implementation of linked interventions and forcing beneficiaries to invest additional, unforeseen resources (if available) to cover the disruptions caused by delays or loss of planned assistance. Where the beneficiary institution has the resources to counteract these negative effects, the impact on project performance can be reduced (for example, the Turkish Union of Municipalities). Where the beneficiaries don’t have such resources readily to hand (e.g. replacement funds at Ministry of Labour in former Yugoslav Republic of Macedonia to cover the loss of IPA funds), then the disruption caused can be significant.

The grant schemes that have been used to support Roma interventions have generally not been efficient. Evidence from this evaluation have shown that where they have been used, they have struggled to disburse funds quickly, with selection procedures typically lasting between one and two years. This then causes the applications to become outdated, makes applicants question the value of participating in such schemes and when grants are finally awarded, invariably requires a substantial re-design of the intervention, further delaying implementation. Grant schemes have been used most commonly under DIS, where the bodies managing the funds (contracting authorities) traditionally struggle to handle the volume of applications. As mentioned in section 4.3, due to these and other factors, it is questionable whether grant schemes are the most suitable instrument for implementing IPA Roma assistance.

A strong-point of IPA assistance is that it generally delivers planned outputs e.g. training materials, strategies, trained people, and reconstructed infrastructure – especially those projects under centralised management. In essence, once contracted, IPA Roma projects are usually completed and deliver their outputs. This is largely down to the efforts of the contractors (international organisations/NGOs, consultancies or in some cases local NGOs) and also the flexibility of the beneficiaries. The role of the contracting authority can be important as well – evidence from ROM and other evaluations corroborate the impressions from this evaluation i.e. that the EU Delegations generally proactively facilitate the delivery of projects and are supportive of any need to adjust the implementation parameters (e.g. time extensions, budget adjustments).
The most noticeable efficiency problem during the delivery of IPA interventions affected housing infrastructure projects – that of land allocation. In Kosovo, the return process for Roma has been seriously complicated by lack of available land upon which to build housing for returnees. Despite efforts from central government, local authorities have effectively resisted pressure to provide municipal land to re-house Roma. Where land has been allocated, it is often unsuitable for habitation, or in the case of Roma Mahala in Mitrovica/a, Roma are housed into a segregated quarter that bears all the hallmarks of a ghetto (see case studies 6 & 7 for more).

In Serbia the “Let’s Build a Home Together” housing project has been dogged by the drawn-out allocation process of land (see case study 10). In Croatia a similar problem was noted: the upgrading of housing infrastructure (a major focus of IPA Roma support) has been predicated upon the legalisation of existing Roma properties (de-facto formalising segregated housing), which has taken several years to achieve.

Another notable characteristic was the limited involvement of Roma organisations in the implementation of IPA projects. Of the projects selected for in-depth evaluation, only one in former Yugoslav Republic of Macedonia and one in Albania featured a Roma organisation as an implementation partner. It was reported that other Roma NGOs in former Yugoslav Republic of Macedonia had benefitted from IPA grants, although it was unclear in which capacity. In any case, greater involvement of Roma organisations in IPA implementation seems to be desirable. If properly structured and supported, it provides the opportunity to improve Roma capacities to develop their own solutions, which in turn strengthens both the relevance of the assistance and also the ownership of any results. It was observed that in Kosovo, Roma mediator programmes and Roma Learning Centres had been run successfully by a Roma NGO for some years. Despite this fact, IPA support to Roma education (including these models) had been channelled through international organisations (OSF, CoE). It was noted that, in addition to the benefits mentioned above, using the Roma organisation would have been significantly more cost-efficient, with its expertise costing a fraction of its international counterparts.
4.4.2. Effectiveness

EQ 2.2 How effective were the programmes [projects] in achieving their objectives (how likely will unfinished programmes achieve their objectives)?

This assessment of effectiveness is based on the projects sampled by the evaluation. The sample was selected to be representative of the diversity of all IPA funded Roma inclusion projects, but, methodologically, we cannot extrapolate the findings from this sample to represent all projects.

Quantifiable assessment of project effectiveness has proven difficult for this evaluation. Typically, project objectives defined in fiches and Descriptions of the Action documents have either been designed in terms of activities or processes (“To contribute to resolving the problems…”) or loosely defined with no measurable indicators and no practical means of verification (“Adequate living conditions and integration of forced migrants…”). This overall poor design quality leads to great difficulties in establishing the extent to which projects achieved their intended objectives.

In this section, we look at the main themes of the projects sampled – housing, displacement, social inclusion, employment and education – and make conclusions on effectiveness for each of these.

<table>
<thead>
<tr>
<th>Country</th>
<th>Year</th>
<th>Title</th>
<th>Total value (M €)</th>
<th>Value M € (allocated to Roma)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BA</td>
<td>IPA 2011</td>
<td>ROMA ACTION - Support of socio-economic inclusion of Roma population through provision of housing and socio-economic measures</td>
<td>2.500</td>
<td>2.500</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2009</td>
<td>IPA 2009 ADDENDUM Livelihood Enhancement for the Most Vulnerable Roma Families in Belgrade (Belvil/Let’s Build a Home Together)</td>
<td>3.600</td>
<td>3.600</td>
</tr>
<tr>
<td>HR</td>
<td>IPA 2012</td>
<td>Support to National Minorities at Local Level: TA for the preparation of documentation for legalisation of Roma houses</td>
<td>1.000</td>
<td>1.000</td>
</tr>
</tbody>
</table>

In housing, projects have in general achieved their objectives in terms of providing new or improved housing conditions for Roma households. Mostly the objectives have been
achieved to the extent planned (e.g. for the housing projects in Bosnia and Herzegovina). A housing project in Serbia (known as ‘Let’s Build a Home Together’ – see case study 10) will not meet the targeted number of homes built because of changes to the required construction specifications during the project, delays in allocation of suitable land by the city, and consequent additional administration costs.

Housing projects have generally defined their objectives in broader terms than provision of housing. For example, the Mitrovica housing project MRSI 2 aimed “To close Leposavić camp and enable the sustainable resettlement of up to 40 RAE families by ensuring economically productive, secure and healthy reintegration to Roma Mahalla or other locations”. While the first part of the objective was achieved – the camp was closed and people were resettled – there are major question marks about the extent to which the second part was achieved.

In particular, there have been great difficulties in providing economic sustainability and livelihoods. Only 25 out of 1,800 residents of the newly created Roma settlement, ‘Roma Mahalla’, are employed (see case study 7). This is also the case for housing projects in Bosnia and Herzegovina, for which the components supporting livelihoods have been relatively small and apparently ineffective.

<table>
<thead>
<tr>
<th>Country</th>
<th>Year</th>
<th>Title</th>
<th>Total value (M €)</th>
<th>M€ for Roma (revised)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MK</td>
<td>IPA component IV 2007-2011</td>
<td>Social inclusion Axis -TA for Strengthening capacities for integration of disadvantaged women in the labour market, with special focus on ethnic minority</td>
<td>0.478</td>
<td>0.239</td>
</tr>
<tr>
<td>MK</td>
<td>IPA component IV 2007-2011</td>
<td>Social inclusion Axis -Supporting Roma women accessing the labour market</td>
<td>0.216</td>
<td>0.216</td>
</tr>
<tr>
<td>TR</td>
<td>Measure 4.1 (Year not specified)</td>
<td>Operation: &quot;Improving Social Integration and Employability of Disadvantaged Persons&quot; (grant call for proposals)</td>
<td>9.000</td>
<td>7.650</td>
</tr>
</tbody>
</table>

Employment projects have rarely achieved any notable successes. The project in the Pelagonia region of former Yugoslav Republic of Macedonia (see case study 9) “Supporting Roma women accessing the labour market” trained up to 70 women for employment. However, only 4 of these 70 were still employed a year after the project completion. The ill-
fated ‘SWIFT’ project in Belgrade, Serbia was closed down and the IPA allocation for the second phase is now being re-programmed by UNOPS. There are several employment projects under way, and it remains to be seen whether these can achieve more success.

<table>
<thead>
<tr>
<th>Country</th>
<th>Year</th>
<th>Title</th>
<th>Total value (M €)</th>
<th>Value M € (allocated to Roma)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>IPA 2011</td>
<td>Supporting Social Inclusion of Roma and Egyptian communities</td>
<td>1.500</td>
<td>1.500</td>
</tr>
<tr>
<td>MK</td>
<td>IPA component IV 2011-2013</td>
<td>Social inclusion Axis 3, Grant Schemes: Fostering Social Inclusion</td>
<td>3.600</td>
<td>1.800</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2008</td>
<td>Social inclusion and poverty reduction among most vulnerable groups (children with disabilities, women in rural areas, Roma)</td>
<td>5.500</td>
<td>0.550</td>
</tr>
<tr>
<td>TR</td>
<td>Measure 4.1 (year not specified)</td>
<td>“Employment and Social Support Services Coordination and Implementation Model for the Integration of Disadvantaged Persons”</td>
<td>0.671</td>
<td>0.571</td>
</tr>
</tbody>
</table>

The Social Inclusion projects sampled are varied, and have quite different conclusions. In Albania, a UNDP supported area-based development project seems to be making good progress towards its purpose (“Improvement of social inclusion of most vulnerable communities (Roma and Egyptians) in Albania”). The area-based modality provides a useful platform for addressing multiple concerns that are all related and mutually supporting. The project links local government development planning with interventions in early-years education, health care, capacity building of local NGOs, and employment. All are relatively small scale, but the degree to which the Roma and Egyptian communities are involved and are learning from the intervention provide some hope for continuing action beyond the life of the project. There are concerns that certain interventions in education and in health care are reinforcing rather than breaking down segregation. Careful monitoring and expert guidance are needed for the project to continue to work towards achieving its objectives.

In Serbia, the selected social inclusion project implemented by UNICEF addressed wider concerns about the child protection system for disabled children (Overall objective: “The project contributes to the objective of improving social inclusion and reducing poverty among the most vulnerable groups in society (children with disabilities, women in rural areas and Roma) through rationalisation and decentralisation of social protection services and
development of community-based alternatives”). While the project did indeed contribute significantly to reform of the protection and welfare system for disabled children, there was no specific Roma component. Roma children were involved only incidentally if they were also disabled – as disabled children rather than as Roma children. Roma components initially envisaged at the fiche stage (employment of Roma women as care workers) were abandoned at the detailed design stage as unfeasible.

Other social inclusion projects in Turkey and former Yugoslav Republic of Macedonia are at early stages of implementation, so effectiveness cannot be assessed.

<table>
<thead>
<tr>
<th>Country</th>
<th>Year</th>
<th>Title</th>
<th>Total value (M €)</th>
<th>Value M € (allocated to Roma)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>IPA 2009</td>
<td>Support Roma children to access an inclusive education as a basic human right and fight against discrimination in education system</td>
<td>0.160</td>
<td>0.160</td>
</tr>
<tr>
<td>KS</td>
<td>IPA 2011</td>
<td>EU/CoE support in the field of education to forced returnees and to Roma, Ashkali and Egyptian communities in Kosovo – ACCESS</td>
<td>1.000</td>
<td>1.000</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2008</td>
<td>Education for All - increasing the availability and quality of education for children from marginalised groups (assisting Roma children to enter the system and to prevent/diminish their drop out from the school)</td>
<td>2.700</td>
<td>2.700</td>
</tr>
<tr>
<td>HR</td>
<td>IPA 2007-2013</td>
<td>Grant scheme “Integration of disadvantaged groups in regular education system”, Lot 2: Support Roma and other national minorities in education and capacity building of educational institutions</td>
<td>1.380</td>
<td>1.380</td>
</tr>
</tbody>
</table>

Education has appeared to achieve some success, at least in terms of desired institutional changes. In Serbia, the Education for All project scaled up an existing initiative of introducing an additional 128 teaching assistants into primary schools, and together established a formal and sustainable mechanism for their recruitment and training (see case study 11). Effectiveness in terms of educational attainment and reduction of drop-out has not been independently verified, but anecdotal reports are promising.

In other countries, interventions in education have shown (with anecdotal evidence only) some improvements in the educational of Roma children. The ‘Help for Children’ model in
Albania (see case study 2) provided holistic support to individual schools, including extra lessons for Roma children and provision of Roma pre-schools.

The work of the Roma Education Fund throughout the region must be recognised as a source of positive policy models and examples of good practice.

‘Learning Centres’ in Kosovo (see case study 8) provided places for additional classes and activities outside of the regular school system, and are mostly only for Roma children. Again, the anecdotal evidence suggests an improvement in educational attainment for those children taking part. However, there are serious concerns about the provision of segregated schooling based on ethnicity rather than educational need, albeit non-formal.

The short duration of grant-funded projects in education (around 2 years) has meant that they cannot provide the needed continuity of support over the duration of a child’s primary education (typically 8 years). They are therefore unlikely to have a major impact on primary school completion and attainment rates unless they find continuing funding from other sources, or their models are adopted by Ministries of Education.

<table>
<thead>
<tr>
<th>Place</th>
<th>Year</th>
<th>Title</th>
<th>Total value (M €)</th>
<th>Value M € (allocated to Roma)</th>
</tr>
</thead>
<tbody>
<tr>
<td>KS</td>
<td>IPA 2008</td>
<td>Return and Reintegration in Kosovo (II)</td>
<td>4.000</td>
<td>0.600</td>
</tr>
<tr>
<td>KS</td>
<td>IPA 2013</td>
<td>1) Closure of third hazardous camp in Northern Kosovo (Leposavic), 2) Return and Reintegration of Kosovo Roma displaced in FYRoM and Montenegro.</td>
<td>3.330</td>
<td>3.330</td>
</tr>
<tr>
<td>ME</td>
<td>IPA 2011</td>
<td>Identifying durable solutions for (I)IDPs and residents of Konik camp</td>
<td>2.500</td>
<td>2.500</td>
</tr>
<tr>
<td>ME</td>
<td>IPA 2012/2013</td>
<td>Support for residents of Konik camp in Podgorica</td>
<td>1.000</td>
<td>1.000</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2010/2011</td>
<td>Support to refugees, IDPs and returnees – important part related to Roma (housing, legal aid)</td>
<td>18.100</td>
<td>3.620</td>
</tr>
</tbody>
</table>

Displacement projects included under this evaluation have been primarily for those people displaced from Kosovo after the 1999 conflict. The majority of these people were displaced
to Serbia, with small populations in former Yugoslav Republic of Macedonia and Montenegro. Of the 210,000 or so displaced by the conflict 12.8% were Roma (around 27,000 individuals). The majority were displaced to other parts of Serbia, while 5,840 went to Montenegro and nearly 4,000 fled to former Yugoslav Republic of Macedonia.

<table>
<thead>
<tr>
<th>Resident in:</th>
<th>No. registered displaced in 2001</th>
<th>Estimates for 2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>RS</td>
<td>19,551</td>
<td>22,000+</td>
</tr>
<tr>
<td>MK</td>
<td>3,934</td>
<td>1,200</td>
</tr>
<tr>
<td>ME</td>
<td>5,840</td>
<td>3,000</td>
</tr>
</tbody>
</table>

The first key point to note here is that most projects for displaced persons in Serbia and Kosovo were not designed specifically for Roma. They were designed for all displaced persons, which in practice meant mostly ethnic Serbs. In the project fiche for the third ‘Return and Reintegration in Kosovo project (known as RRK III) Roma are mentioned only in the final section of the document (6.3 ‘Minorities’). There were no Roma-specific objectives or indicators. Therefore it is hard to make an assessment of their effectiveness regarding support for specifically Roma inclusion.

The final report for RRK II component implemented by the Danish Refugee Council identifies its beneficiaries as “214 Minority (182 Serb and 32 Roma Ashkali Egyptian (RAE)) families”. In other words, 15% of the beneficiary families were from RAE communities.

One Roma and one Egyptian family, both beneficiaries of RRK II, were met as part of this evaluation. They had indeed returned, and were sustaining some kind of a life in Kosovo. They expressed concern about the future: although they now had housing, livelihoods were much more difficult than in their place of displacement. Their living conditions – both in Obilic/Obiliq municipality – were harsh and heavily polluted by the nearby power station. In the case of the Roma family, land on which they had had a house constructed by the project was bought by them in order to qualify for return assistance. The land was heavily water-logged, and access to roads and utilities inadequate. The location was also far from the

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17 Assessment of the Needs of Internally Displaced Persons in Serbia, UNHCR 2011 p9
18 European Roma Rights Centre 2001 see http://www.errc.org/cikk.php?cikk=1283
19 “Estimates put the number of Roma, Askhali and Egyptian refugees from Kosovo in Serbia at 22,000 to 40,000; whilst there are some 3,000 in Montenegro and 1,200 in [former Yugoslav Republic of] Macedonia.” From “Prospects Darken For Kosovo’s Roma Refugees” on Balkan Insight Transitional Justice Programme 25 June 2012 www.balkaninsight.com
town. Construction in this location raises questions about whether international assistance should be used to build houses in places not fit for human habitation.

The municipal authorities were supportive of the return in general, but were concerned that their resources for supporting returnees was very small. The municipal budget for support to returnees was 15,000 EUR over three years (i.e. EUR 5,000 per year). Significant improvements were needed in school capacity, and utility capacity to accommodate the returnees, quite aside from the need to demonstrate to the whole community that the returnees represent an opportunity rather than a burden (see also Case Study 6).

Clearly it is not possible to generalise the whole picture from this very small sample of beneficiaries. However, the sample does raise a number of concerns. First, the houses reconstructed were built to defined standards, but this did not include thermal insulation and facades were left unfinished (see picture below) making heating costs unaffordable\textsuperscript{20}.

\textsuperscript{20} Standards were later revised to include thermal insulation, and we see the new standards being applied in Roma Mahalla, for example.
The suitability of the land for residential use is questionable. And there were major concerns about the financial sustainability of life for these Roma and Egyptian families. Already, one of the three Egyptian families supported by the project had migrated to Germany and the other two were seriously considering the move. The Roma family said that, apart from the housing conditions, they were better off in Belgrade where they had been living before. The Mitrovica MRSI projects supported the creation of a segregated Roma community21 (‘Roma Mahalla’) with poor access to local facilities – in particular, schools – and very few livelihood opportunities (see case study 7).

While objectives may have been met, there are concerns about the quality of the projects and the extent to which they are compliant with the “10 Basic Common Principles”.

Overall, we see that projects with relatively ‘hard’ objectives, such as provision of housing or institutional change are more likely to achieve objectives. Those with the softer objectives like employment that require changes to society and economy are – perhaps obviously – much less likely to achieve their objectives. Partly, this is because the ‘harder’ objectives are more narrowly defined, and project environments are more controlled. However, it is these ‘softer’, more systemic changes that are those most likely to provide longer term sustainable change. Future projects should explore how to achieve systemic change with wider, though harder to achieve impacts rather than focusing on narrow, easily achieved and short term objectives.

This is not to say that interventions should be only at national or regional level. Where interventions have been focused on smaller geographical areas more has been achieved on this softer side by tackling problems systemically and from multiple angles.

In projects with both hard and soft objectives – like many of the housing projects which have socio-economic components – the harder components tend to dominate to the detriment of

21 It is argued by some that the relocation of Roma families to Roma Mahalla is justified because the community existed there prior to 1999. However, the first choice of many families was to remain in north Mitrovica. Only when other options were exhausted did the families agree to relocate to Roma Mahalla. The EU’s 10 Common Basic Principles clearly articulates the view that “promoting the inclusion of the Roma in mainstream society should be the ultimate aim of all policies. Accordingly, all actions should be assessed to see if they risk causing segregation and adapted if necessary”. The relocation of Roma families clearly risks causing segregation. Even if there was a segregated community prior to 1999, this is not in itself a justification for recreating it 12 years later. The evaluators, however, recognise the practical difficulties faced by the challenge of relocation and of finding appropriate land in the north. Even if there were no other practical options, it is important that the EU and local authorities recognise that the community created in Roma Mahalla is de facto segregated, and are prepared to deal with the long term consequences.
the softer components. And it is these softer components that have, as we will see in the next sections, a key role to play in the impact and sustainability of interventions.

4.4.3. Impact

**EQ 2.4 What impact did (will) programmes/projects have on the target communities?**

It was not possible to assess impact of programmes per se, because there were no Roma specific programmes to speak of, and no Roma specific programme level indicators (see section 4.3 for a discussion of this. Instead, in order to assess impact of IPA support for Roma inclusion, this evaluation looks at the impact of the projects sampled for in-depth analysis, and draws conclusions from these studies. Given the wide variation of project impact across the sample selection, this section looks at impact by project theme.

Quantifiable assessment of impact has been hampered by the absence of good quality project level evaluations. Where they exist, we have drawn from them, but on the whole, projects are mostly not evaluated or quality of evaluation is poor.

**Housing projects are expensive and relatively insignificant interventions compared to the scale of the needs.** In Bosnia Herzegovina, for example, an estimated 4,170 housing units are needed for Roma households\(^\text{22}\). The IPA 2013 Roma Action project provided 152 new or improved housing units at a total cost of over EUR 3 million (2.5M EUR EU contribution). The provision therefore of more than four thousand housing units would cost at today’s prices around EUR 80 million, or the equivalent of an additional 26 similar projects.

The impact of the ‘Let’s Build a Home Together’ project in Serbia faces similar issues. Of the 250 families evicted from the Belvil site \(^\text{122}\) will receive some form of housing solution at a total cost of EUR 3.6 million (including socio-economic measures)\(^\text{23}\). Housing needs, however, are much greater than this. Around 2,500 mostly Roma people have been evicted from other sites in Belgrade\(^\text{24}\). There are also around 20,000 Roma IDPs from Kosovo of whom 79% live in poor quality housing conditions\(^\text{25}\), and an estimated 63% of the domicile...
Roma population in poor housing\textsuperscript{26}, or around 20,000 households in need of improved housing.

This perspective suggests that alternatives are needed if there is to be a substantial impact on the situation of Roma housing.

Other elements of housing programmes will also have a wider impact. The relative success in Bosnia Herzegovina at ensuring that Roma housing is not segregated from wider communities contrasts sharply with the efforts in Belgrade and Podgorica, which have resulted in reinforcing segregated Roma communities. The social impact of segregation is well documented, and is a major concern for this evaluation. Housing impact has also been negatively affected by the poor record of success in the socio-economic components.

**Gender considerations in housing are also of concern.** Practice varies from country to country about who signs tenancy agreements for social housing. In Bosnia Herzegovina it is the (usually male) head of household. In Kosovo and Serbia, it is both male and female heads of household (if there are two). The protection that this latter arrangement affords in cases of divorce and domestic violence cannot be underestimated. Small, well-considered changes to project design can make a big impact on the lives of the beneficiaries.

**The employment projects have so far not achieved any discernible impact on Roma or wider communities.** There have been no achievements in terms of institutional change or learning, and the success record at enabling Roma individuals to improve livelihoods either through self-employment or formal employment is very limited. At this stage, it is not possible to assess whether the projects in Turkey and former Yugoslav Republic of Macedonia that are at early stages of implementation, are likely to have more success. This is an evolving field and needs to be closely monitored. We might hypothesise that greater impact in employment might be achieved by combining employment measures with better education for Roma children and adults, and anti-discrimination and positive discrimination measures targeted at potential employers. An encouraging focus on Roma women’s employment in former Yugoslav Republic of Macedonia needs to be coupled with greater consideration for the social context and awareness of cultural restrictions that many women face when it comes to paid work. More focus on learning lessons and incorporating experience into future projects will lead to greater impact.

\textsuperscript{26} Ibid.
The one social inclusion project in the sample for which we can draw conclusions about impact is the Albania “Supporting Social Inclusion of Roma and Egyptian communities” example. This project is likely to achieve an impact on the target communities because of its focus on a limited geographic area and its multi-sectoral approach. A longer term engagement, and in particular the development of communities’ capacities to be actively engaged in their own development, are key to the longer term impact of this project. There are however, concerns that concentrating too much on the Roma and Egyptian communities might have a negative reaction from the majority population, and therefore undermine any gains. Projects such as this need to take a wider perspective and provide benefits for the whole community, not just Roma or Egyptian populations.

The likely sustainability of education projects in Serbia suggest that the impact of these interventions over time will be substantial. Sustainability is the key to impact in education, because the methods and changes introduced have to go beyond enrolment, to changes in teaching methods and ensuring children complete at least primary school. This means that the impact of interventions must last at least eight years for just one generation to benefit fully.

Education interventions in other countries have not been so successful at becoming institutionalised, and therefore their impact is likely to be limited. Competitive civil society grant funded projects are particularly questionable because interventions are short term and rarely linked into education system reforms. They will only achieve impact if the methods and approaches they test or introduce are replicated and incorporated into wider system reform.

Displacement projects have typically aimed at either supporting sustainable return to the place of origin or improving livelihoods and living conditions in the place of displacement. One exception is the projects in Mitrovica (north and south) which aimed to close the poisoned ‘lead camps’ and move the population to safer locations.

In the context of return to Kosovo, sustainable returns have been questionable but hard to assess. Estimates by some international organisations of the ‘success’ of return are put at less than 20% of returnees (both Roma and non-Roma). As well as exclusion from returns assistance because they cannot typically meet the criteria for assistance, such as being able to demonstrate ownership of property, Roma people face greater hardship, discrimination and scarcity of employment prospects on their return. The likelihood of onward migration is high. Returns programmes are failing not because they don’t provide housing, but because they are not able to secure the necessary social and economic conditions for a sustainable return. This must be a factor to take into consideration for the forthcoming support for
return to Kosovo for IDPs in former Yugoslav Republic of Macedonia and Kosovo, supported under the Regional Housing Programme (not part of this evaluation).

The Mitrovica MRSP project will have a significant positive impact in terms of the beneficiaries’ health situation – by dint of their removal from the lead camps. But on the other hand, there are concerns that the longer term consequences of living in segregated housing, poor school attendance and few livelihood opportunities will be harmful.

Support for displacement in Montenegro – the Konik projects – have had some positive impact in reducing segregation in education, but are likely to contribute to greater segregation in housing. It is too early to assess whether the impact of one will outweigh the other.

Support for Roma IDPs in Serbia has had a positive impact in some areas. Key among them is legal aid, which has been able to ensure that substantial numbers have had assistance in becoming ‘legally visible’. The key element here was in introducing provisions in the law for ‘subsequent recognition’ of people who did not have birth registration or identity cards. This procedure has been replicated in other countries in the region. It is very likely that IPA assistance had a role to play in achieving this.

Otherwise, assistance and overall impact on the Roma IDP population in Serbia appears modest. According to the Commissariat for Refugees, there remain 200 Roma IDPs in Collective Centres as of April 2015. And in the last ten years 200 Roma IDP families have received income generation grants, 280 families received construction material packages, 80 families received village houses, 60 families benefited from social housing in protected environment and 50 pre-fabs were provided. For a population of 17 to 20,000 IDP Roma, this is a small contribution to the overall needs.

Analyses of outputs and impact are rarely segregated by gender and age, and so any differential impact of assistance for the displaced Roma on women, men, boys and girls is not known.

At a higher level, it is worth noting that in Kosovo and Montenegro, the main support for Roma, Ashkali and Egyptian populations was through displacement projects. This has

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27 Records are fragmented between projects and locations, and not always disaggregated by ethnicity, so we were not able to get reliable figures. Hundreds, possibly over a thousand.

28 This data applies to support from all donors, not just IPA funds.
effectively ignored the needs of the non-displaced RAE communities, for whom the impact of IPA support was minimal.

Finally, it must be noted that the assessment of the overall impact of IPA support is hampered by the absence of reliable time-series data on the situation in Roma communities. This is the case at the project level, at municipality or county level, and at national levels. The information above is therefore necessarily subjective and based on interpretation of interviews, documents, field visits, and the scraps of data we were able to retrieve.

4.4.4. Sustainability

**EQ 2.5 To what extent are the programmes’ [projects] impacts sustainable?**

For assessing the sustainability of housing interventions we need to distinguish between support for housing that is owned (formally or informally) by Roma households and that which is social housing (typically owned by local governments).

There were no fair and sustainable social housing models identified through this evaluation. All social housing interventions required some degree of contribution to rent and bills by the tenants, and in many cases this was not being paid. Levels of monthly social security benefits are below that of the rent and bills required, so unemployed families have no possibility of living in social housing. In practice, some municipalities were turning a blind eye to rent arrears, with consequences for their long term commitment to the provision of social housing. In others there was a cycle of housing, evictions, living in informal settlements, and possible re-housing, which keeps residents in perpetual poverty. Recognising the problems of sustainability, the City of Belgrade decided to use a model of social housing designed for elderly or disabled people – ‘social housing in a supported environment’. This model legally allows for very low rent and obliges the city to pay for utility bills. However, while this is a positive step it is not a systemic solution: it applies only to project beneficiaries and not other existing or future tenants of social housing; there is no mechanism defined for future beneficiary selection when places become empty, and it relies on the goodwill of the city to pay utility bills. For true sustainability of social housing, there needs to be a model that is linked to social security benefits that can provide a secure home for those without a source of income, and which has clearly defined long term responsibilities and functions of municipalities and central government.
For other housing interventions there are mixed findings and more research is needed. Provision of village houses in Serbia is anecdotally problematic. There are reports that many village houses provided so far are now empty, with the residents having moved on for lack of employment opportunities\textsuperscript{29}. The efforts to legalise and improve existing settlements – particularly those that have existed for many decades – could yield positive results and be sustainable. But these interventions have so far not advanced beyond the drawing board, and so remains to be seen how sustainable will be the improvements to these settlements.

Sustainability of employment interventions is very low. As noted above, effectiveness and impact are low, so there is little basis on which to assess the sustainability of the employment that has been created. Since the interventions tended to focus on the individuals (training, grants, etc.) and not the environment in which the individuals lived (social attitudes, discrimination, economic development) there were no social or systemic reforms to be sustained.

A key point to note in the social inclusion interventions was their focus on systemic reform and longer term engagement with social development. The UNICEF social welfare reform projects in Bosnia Herzegovina and Serbia, while Roma were only a small proportion of the total beneficiary population, did achieve system-wide reform embedded through legal and institutional change. These are likely to be sustainable. The UNDP area-based project in Albania included elements of building civil society and local residents’ capacities for advocacy and self-help. These too are likely to have a long term beneficial effect.

Where education projects focused on systemic reform – mainly Serbia – they will have a sustainable impact on the education of Roma children. The grant-funded interventions in Albania, and the projects supported in Kosovo that did not have true support from the Ministry of Education, are unlikely to have any sustainable impact on the education system. The education provided may have a sustainable impact on the lives of the children involved – good education can inspire and enable – but this is hard to measure.

The return projects in the displacement category are unlikely to be sustainable. Partly this is because of the context in Kosovo which is economically poor, still resistant to accepting returnees, still discriminatory against minorities including Roma, Ashkali and Egyptians. Partly this is also because of the way in which some important details were overlooked:

\textsuperscript{29} UNOPS internal monitoring identified 23% of the village houses empty after one or two years (9 out of 39)
houses built without thermal insulation are more expensive to heat, houses built in inappropriate and polluted locations far from sources of income, insufficient attention paid to livelihoods, and insufficient or inappropriate support to receiving communities did not adequately deal with their negative attitudes.

Support for displaced Roma in their places of displacement – mainly in Montenegro and Serbia – did tackle some key aspects that are likely to have a sustainable impact – such as their civil documentation. There is insufficient evidence to assess the sustainability of the housing and income generation components.

Overall, **the key lesson learned was that project design determines sustainability**. The education interventions that built upon government commitments to reform and solid testing of new models were likely to have a long term impact. Where interventions failed to tackle the real problems – for example, providing housing without considering livelihoods or the prevailing levels of social security benefits – sustainability will always be in doubt.

In practice, this means **investing more time and effort at the design stage** – including greater and more meaningful participation of Roma communities – to truly understand the problems and the way in which potential solutions might work, in order to maximise benefits and sustainability later.

**Sequencing** of interventions can also improve sustainability. Where this has happened, it has worked because of the continuity of those involved in the policy process – in government, in civil society and in EU delegations.

The **intervention instruments also have an impact on sustainability**. Grant mechanisms do not lend themselves to sustainable change. They can be effective at identifying potential and innovative models, but then these need to be systematically evaluated and incorporated (if successful) into national policy level reforms. If grant schemes do not have the appropriate mechanisms to do this, then they will fail in achieving longer term improvements.

Finally, **government policy and will** determines whether reforms are sustained. Governments may be committed to Roma inclusion or just pretending. The EU has a key political role in making the commitment real. The political engagement of the EU is separate from the IPA support. IPA support does not have significant leverage over government policy, but the accession process and membership negotiations do. It is in this context that the EU needs to ensure that appropriate policies to support Roma inclusion are in place and effective. Allied to this is the need for a strong and effective civil society which can monitor the situation on the ground, advocate and support solutions. It is this ‘voice’ from civil
society which will be the long term driving force for Roma inclusion, and it is therefore a key priority for investment to ensure sustainability of IPA expenditures.

4.4.5. EU Value Added

EQ 2.6 What is the added value provided by the interventions being specifically supported by the EU?

This evaluation has noted numerous weaknesses in IPA Roma assistance to date. However, it is important to acknowledge that **EC support for Roma has an important political and psychological value above and beyond the individual project interventions.** Indeed, feedback from stakeholders across the board indicates that the political dimension of EC assistance has a major influence on the IPA country governments to address Roma issues. The importance of Roma in the accession process has increased over the period covered by this evaluation. This is evident in a number of ways; Firstly, Roma issues are more explicitly addressed in the last set of MIPDs with even specific interventions outlined in them. Secondly, Roma issues are given greater prominence in the EC Progress Reports over time. Thirdly, the **EC Roma Seminar cycle has helped move the issue of Roma inclusion up the political agenda.** Whilst it’s debatable whether the Seminars have translated into better targeting of IPA support across the region, stakeholders confirmed their value as a vehicle for focussing political discussions on the ‘hard’ issues of Roma inclusion in a way that had not been done previously. The continuation of the Roma Seminars could be even more closely linked to programming priorities, as well as serving as a monitoring forum for progress against Roma-specific accession priorities.

**There is only limited evidence that EU funds have displaced national funds for Roma.** Whilst difficult to analyse in detail due to only patchy information being available on this, the amounts of money from national budgets to the implementation of national Roma strategies appear to be small in comparison to IPA. Also, it was reported that whilst pledged funds for Roma-specific measures are often at least adequate, in reality these funds are not in fact made available or spent. The table below from Kosovo illustrates this issue well. Here it is evident that while the government has made financial commitments to addressing Roma issues (M€6.6), actual spending falls well short of what was promised (only M€0.38 or 5.7% of the planned amount). In the same period IPA spent €11.76 on Roma specific measures in Kosovo, which is over thirty times more than the amount from national budgets. The only areas where displacement of national funds may have happened is in the areas of Education and Returns/Reintegration, in particular the latter where IPA dominates. In both areas, the scale of the needs there would suggest that both sets of funds would be appropriate. More
generally a stronger linkage between IPA and national funding priorities would eliminate such potential displacement.

<table>
<thead>
<tr>
<th>Sector</th>
<th>Planned budget (€)</th>
<th>Reported Expenditures (€)</th>
<th>% expenditure/planned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education</td>
<td>2,721,774</td>
<td>273,174</td>
<td>10.0%</td>
</tr>
<tr>
<td>Employment/Economic Empowerment</td>
<td>325,000</td>
<td>27,900</td>
<td>8.6%</td>
</tr>
<tr>
<td>Health and Social Welfare</td>
<td>454,084</td>
<td>1,200</td>
<td>0.3%</td>
</tr>
<tr>
<td>Housing/Informal Settlements</td>
<td>2,757,500</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Returns/Reintegration</td>
<td>93,000</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Registration</td>
<td>63,000</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Culture, Media/Information</td>
<td>106,271</td>
<td>75,429</td>
<td>71.0%</td>
</tr>
<tr>
<td>Security, Police &amp; Justice</td>
<td>71,333</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Participation/Representation</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>6,591,962</strong></td>
<td><strong>377,703</strong></td>
<td><strong>5.7%</strong></td>
</tr>
</tbody>
</table>

As mentioned in the Programming section (see 4.3.15), the MBP has had considerable potential for providing added value above and beyond national funding programmes due to its regional and horizontal dimensions. These benefits are outlined in the EC’s 2013 MBP Evaluation. This evaluation has found that, due to the institutional and programming constraints mentioned previously, these benefits have not been realised in the area of Roma support to the extent expected. The need to find a clear niche for the MBP to complement national IPA efforts has not been transformed into a clear programme direction. Where the MBP has supported useful actions such as networking of Roma professionals or regional studies of relevance to all IPA countries these have not been scaled up or rolled out to provide wider benefits across the region. Despite the scepticism that was prevalent among many stakeholders towards the MBP’s value as a separate instrument, the potential it offers for addressing critical issues such as Roma statistics as well as strengthening practitioner networks remain. Harnessing its potential under IPA II should be a priority for IPA programmers.

30 Source: Mid-Term Progress Report on Kosovo’s implementation of the National RAE Action Plan, Kosovo OGG 2012, pg. 18
31 See Chapter 3 of “Interim and Meta Evaluation of IPA Assistance – Evaluation of Multi Beneficiary Programmes” EC/ECORYS 2013
One area that appears to be unexplored thus far by IPA is accessing EU member-state experience in dealing with Roma-related issues. Those member states with significant Roma populations, especially from the 2004 and 2007 enlargements, have accrued a wealth of knowledge and experience (both good and bad) developing policies and institutions to support Roma, all within the context of EU accession. The potential for these countries to share this know-how with IPA countries is therefore enormous. However, this evaluation found only a handful of small-scale examples of direct collaboration between them via TAIEX. Other instruments for facilitating knowledge exchange such as twinning projects between EU Agencies responsible for Roma issues (many of whom share challenges similar to their IPA counterparts) have not emerged. This appears to be due to low awareness among these agencies of such possibilities. In this respect, TAIEX, if targeted proactively, could serve as a useful primer for establishing such contacts and a starting point for more extensive IPA-financed cooperation.
4.5. Quality of Monitoring

**EQ 3 Do monitoring systems and applied indicators ensure adequate information for assessing progress, oversight of programme implementation and making future policy/programme decisions?**

### 4.5.1. National Level Impact Monitoring

Monitoring impact of policies and measures for Roma inclusion has overall been very weak. None of the necessary elements for effective monitoring at this level have been in place. The national strategies for Roma inclusion on the whole do not contain meaningful or realistic indicators, nor baseline data. There have been some attempts to assess implementation, but the absence of meaningful impact indicators meant that these reports generally focused at the activity level. For all countries, collection of regular data disaggregated by ethnicity remains a theoretical possibility rather than a reality.

<table>
<thead>
<tr>
<th>Country</th>
<th>Date</th>
<th>Impact Indicators?</th>
<th>Realistic means of verification?</th>
<th>Baseline data?</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>2003</td>
<td>22</td>
<td>No</td>
<td>No</td>
<td>Action plan contains input, activity and output indicators, no baseline data</td>
</tr>
<tr>
<td>BA</td>
<td>2008</td>
<td>None</td>
<td>No</td>
<td>No</td>
<td>Revised action plans contain input and output indicators, no impact indicators</td>
</tr>
<tr>
<td>HR</td>
<td>2013</td>
<td>Areas for indicators defined</td>
<td>Plans for development</td>
<td>No</td>
<td>New strategy 2013-2020 includes section addressing issues and mechanisms for more effective monitoring, including data gathering on the basis of ethnicity and gender, and specific measures for mapping ‘micro-regions’.</td>
</tr>
<tr>
<td>MK</td>
<td>2004</td>
<td>Some</td>
<td>No</td>
<td>No</td>
<td>Indicators are defined by sector, and vary in quality and feasibility. No realistic assessment of needs for monitoring</td>
</tr>
<tr>
<td>KS</td>
<td>2008</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Action plan contains mixed input, activity and output indicators</td>
</tr>
<tr>
<td>ME</td>
<td>2012</td>
<td>Some</td>
<td>No</td>
<td>No</td>
<td>Strategy has mixed input, activity, output and some impact indicators, but linked to activities not strategic objectives.</td>
</tr>
<tr>
<td>RS</td>
<td>2010</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>‘baseline study’ of 2015 reviewed strategy implementation and highlighted lack of indicators</td>
</tr>
<tr>
<td>TR</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No strategy finalised.</td>
</tr>
</tbody>
</table>
Gender disaggregated indicators rarely appear, except in specific sections of strategies related to gender issues.

The main instruments available for looking at the situation of Roma communities in the enlargement countries is survey data. There are two survey instruments in particular that are replicable and might provide data to assist with monitoring impact. These are the UNICEF Multiple Indicator Cluster Survey, and the UNDP/World Bank/EC Regional Roma Survey of 2011. Both these surveys have relatively large samples of Roma communities, and can provide detailed insights into the situation.

However, the real need for monitoring impact of strategies and IPA support is to have data that can be compared at different points in time. To date, there is only one survey which can do this, the MICS surveys conducted in Serbia in 2010 and 2014 which both had booster samples for Roma communities. There is no other reliable data that can provide reliable comparisons of the situation over time.

The consequence of this is that there is no real way of knowing whether there is any change to the situation of Roma households and communities. For all the efforts invested in developing and implementing the national Roma inclusion strategies and action plans, we cannot know whether they have been effective.

There were efforts made by the Roma Decade to establish a monitoring mechanism. This worked by requesting governments to submit annual reports on the implementation of the Roma inclusion strategies, and ‘shadow’ reports from civil society organisations and independent experts. This was a useful exercise which helped to some extent to maintain political momentum on allocation of budgets and implementation of specific measures.

The EU annual enlargement Progress Reports for each country are cited as one of the most effective monitoring mechanisms. These progress reports attract high level political attention and are widely read. Even the one or two sentences on progress of the Roma inclusion strategies can have an impact on subsequent budget allocations and political commitment.

The biannual EU sponsored Roma Inclusion Seminars are one of the few means for bringing civil society and government together to review progress. Where it has been well done, they have provided a forum for a challenging and constructive debate on progress. There are, however, few other examples of where civil society has been actively engaged in the monitoring of progress and impact for the National Roma Strategies.
The EU Framework for National Roma Strategies provides a clear and simple set of four targets, which, if linked to appropriate indicators and regular data collection tools, would provide an effective means of monitoring progress towards shared EU goals. These targets are:

- **Access to education:** Ensure that all Roma children complete at least primary school
- **Access to employment:** Cut the employment gap between Roma and the rest of the population
- **Access to healthcare:** Reduce the gap in health status between the Roma and the rest of the population
- **Access to housing and essential services:** Close the gap between the share of Roma with access to housing and to public utilities (such as water, electricity and gas) and that of the rest of the population.

Annual monitoring of progress towards these targets linked to reporting in the EU Enlargement Progress Reports could be an effective way of maintaining political engagement and support for Roma inclusion. It would be particularly important to ensure that the monitoring against these targets provides the ability to break down data by location, gender and age.

### 4.5.2. IPA Programme Level Monitoring

In the countries with centralised implementation, the programming documents did not provide any adequate framework for monitoring progress of IPA support specifically for Roma inclusion.

For Decentralised Implementation, the picture is slightly better, but not sufficiently for the realistic monitoring of the impact of IPA programmes on Roma communities. For example, the Yugoslav Republic of Macedonia component IV programme 2007-2013 uses census data from 2002 to identify employment levels by ethnicity. There are, however, data broken down by ethnicity and gender for the education sector. The Serbia IPA 2013 Social Development sector fiche identifies objectives and indicators only in terms of outputs, not impact.32

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32 E.g. Serbia, Sector fiche Social Development IPA 2013 Specific objective 3: To support the implementation of the Strategy for Improvement of the Status of Roma in the Republic of Serbia through the further development
Sectoral and thematic evaluations have provided some useful information on specific issues (e.g. support to refugees, effectiveness of grant schemes, sector evaluations on human resources, etc.); but this is not the systematic programme level monitoring that one would expect.

Sectoral and TAIB monitoring committees exist, but tend to monitor implementation and identify and resolve practical issues in implementation of projects; they are not fora for systematic monitoring of outputs and outcomes.

4.5.3. Project Level Monitoring

Project level monitoring is also disappointing. The main instrument is the Results Oriented Monitoring (ROM) system which is of variable quality – sometimes excellent and sometimes poor. This in turn depends on the quality of the project design and the logical framework. Where project objectives and indicators are well designed and relevant to the needs, they are easier to monitor more meaningfully. There was little evidence of structured monitoring by either national authorities or delegations outside ROM.

Most project monitoring focused (understandably) on inputs, activities and outputs. Rarely do projects have solid impact indicators designed that have a feasible means of verification, a baseline, and mechanisms for monitoring progress during project implementation.

At project level, one of the key issues facing the monitoring of impact is that the impact is often realised at the end, or after the end of the project. There are no mechanisms envisaged for contracting a monitoring study, or an evaluation, after the end of the project.

Some projects which were not specifically Roma focused (e.g. the UNICEF support for social welfare reform in Serbia) did not collect ethnically disaggregated data, and so there was no way of knowing how many Roma people were beneficiaries.

Project level evaluations were conducted in some instances, most during the course of the project implementation. These were contracted by the implementer, and the terms of reference also designed primarily by the implementer.

and realisation of sustainable and inclusive models for resolving housing and improvement of physical infrastructure in selected Roma settlements

Indicators: Technical documents for 20 pilot municipalities prepared under the IPA 2012 Sector fiche for Social Development (measure 5) implemented; In a further 20 pilot municipalities detailed regulation plans and technical documents for the improvement of utilities and housing prepared; Housing and physical infrastructure operations for 20 pilot municipalities prepared under IPA 2012 implemented.
4.6. EC Cooperation with External Stakeholders

EQ 4 How effective is EU cooperation with external stakeholders at international, national and local levels?

4.6.1. International level

European bilateral donors report that they generally work around the EU. They see the EU taking the lead on both policy and funding, and work to complement what it is doing, not duplicate.

There are also many examples in which planning of IPA funds has aimed to complement other donors’ work. For example, in Serbia IPA funds complemented and built upon the work of other donors, notably Swiss and Swedish development agencies.

Other examples of complementarity are to be found in:

- Kosovo – ‘Learning Centres’ were instigated by NGOs and their bilateral donors and subsequently funded by IPA
- Albania – UNDP’s work in area-based development was recognised and supported by IPA funds.

Most International Organisations (e.g. UN agencies, Council of Europe, OSCE, international NGOs) see the EU as a potential or actual funder, so there are cases in which the relationship is somewhat clientelistic. There are exceptions, however. OSCE in Kosovo has a valuable independent monitoring role for displaced/returnees. UNICEF provides an effective advisory service for EU and governments in child protection, education and welfare services. Open Society Foundations and the Roma Education Fund have led the way in solid initiatives to build capacities of Roma civil society organisations and provide innovative reforms in education.

On the whole, relationships are constructive and helpful in terms of cooperation.

When international organisations are also project implementers, additional safeguards are necessary. There are examples of IPA funded projects that are designed, implemented and evaluated by international organisations that are awarded the funds directly, without competition. Examples include one of the four RRK projects and the Access education project in Kosovo, and the ‘Let’s Build a Home Together’ and TARI (“Ovde smo zajedno”) projects in Serbia. There is concern that projects in these circumstances are not necessarily designed in the best interests of beneficiaries; there is a risk of complacency or inertia in
design, or excessive costs allocated to the implementing agency (especially because there is no competition on price). The absence of independently contracted mid-term or final evaluation raises concerns about accountability. Finally, there are transparency concerns – information on contracting is not released in the same way as for competitive contracts, and is not publicly available.

International organisations in some cases substitute for the absence of appropriate capacity in the countries. For example, area-based development is undertaken in Bosnia Herzegovina and Albania by UNDP, whereas in Turkey this is the role of agencies such as the association of municipalities.

4.6.2. Government (national and local)

Relations between the EU and governments is generally positive and constructive. In the context of Roma inclusion, key limiting factors are especially evident in the smaller countries and territories. These include the availability of specialist government personnel with sufficient time and knowledge to dedicate to Roma inclusion issues and the technical expertise necessary outside government in the form of academic, consultancy and civil society expertise.

Primary relationships on policy formulation and implementation between the EU delegation and government were with the national Roma focal points. These are typically located within a Ministry or Office for Human Rights. In the smaller countries, this is usually just one or two people. In some countries a line ministry takes lead responsibility for much of the Roma programming (Albania – Ministry for Social Welfare and Youth; Kosovo – Ministry for Communities and Returns) in cooperation with the Roma focal point. However, this can have the effect of skewing programming towards the themes and responsibilities of the line Ministry. This is especially evident in Kosovo where the majority of Roma projects have been in support of return.

Recent trends towards sector based planning and implementation have made the coordination of policy and programming on specifically Roma issues more difficult. Roma issues are not restricted to one sector, although there is a tendency to see them as primarily ‘social inclusion’ issues and so located in the human resources sectors. However, this is to ignore the fundamental rights and justice aspects of Roma issues. There are few coordination bodies that deal only with Roma issues. At the same time there has been an apparently declining investment in the resources available to Roma focal points, and so cooperation and consultation between EU and governments is increasingly fragmented.
Cooperation with and involvement of local government is much less evident in policy formulation processes. Local governments are involved in implementation where there are specific geographically focused projects (e.g. Albania SSIREP, Kosovo MRSI, Serbia Let’s Build a Home Together). A promising example of good practice is in Turkey, where the Turkish Association of Municipalities is playing a leading role in the implementation of an operation to support employment and social services cooperation in 11 municipalities (See case study 12 for more).

4.6.3. Civil Society

The EU works with civil society for Roma inclusion in the following ways:

- Policy formulation and programming
- Project implementation
- Monitoring
- EU support for civil society development

Processes of policy formulation and programming is generally led by the governments, and in some cases there are formal mechanisms for cooperation. The main tool where the EU takes the lead is in the Roma Inclusion Seminars. These were appreciated by civil society representatives as useful opportunities for highlighting priorities for the Roma communities, and a forum in which their voice can be heard. However, a key issue raised is that the Seminars generally have so far been about identifying problems, and there is little dispute on these. Where more consultation and participation would be appreciated is in the programming process. Here consultation and involvement is seen as superficial and tokenistic rather than substantial33.

The role of Roma civil society organisations in the implementation of IPA assistance has been remarkably slight. There is only one example – in Albania – of a Roma NGO taking the lead in an IPA project. In other examples, where Roma CSOs are involved it is usually as a junior partner with responsibility for community liaison34. There was widespread opinion that Roma NGOs need to be involved in the implementation of measures for Roma inclusion.

33 The Government of Croatia allocated EUR 1 million of IPA funds for a project targeting capacity building of Roma NGOs through the Government Office for Cooperation with NGOs. This is worth noting, but was not part of the project sample for this evaluation; hence we cannot comment on this intervention in more detail.
34 For example: BA: support to the implementation of the Roma strategy IPA 2008; BA Roma Action (housing) IPA 2011;
While there are concerns about capacity, it is highly unlikely that Roma (or any other) NGO will be able to develop capacity for implementing IPA projects without actual experience of implementing IPA projects. Therefore this report argues that Roma NGOs need to be given responsibility for implementation as a means to build capacity.

Roma NGOs were also very keen to play a stronger role in the monitoring of IPA funds – both at the project level and at the overall impact level. Some were concerned that they did not have the appropriate capacities, and were interested in improving their skills in this area. Roma NGOs were actively involved in the shadow monitoring for the Roma Decade, so the skills do exist, and these can be developed. One key concern regarding the potential for Roma NGOs monitoring IPA funding is the transparency of information regarding implementation. There is a critical problem here. Information on IPA project and programme implementation is hard to find, and not systematically organised, if it is even available.

Finally, EU support for Roma civil society development comes from three main sources, and is therefore hard to assess. The three sources are the national Civil Society Facilities (CSF), the regional capacity building project TACSO, and the European Instrument for Democracy and Human Rights. The themes of CSF support vary from year to year, and some are appropriate and available for Roma CSOs. This represents useful funding, but the short term nature of grants and the focus on action and service provision results in limited actions that are not sustainable. The TACSO mechanism was criticised by interlocutors as being only for prominent national NGOs (who anyway are least in need of support), while being inaccessible to those small grassroots organisations that most need development assistance. The importance of building a strong Roma civil society sector with an emphasis on voice and accountability actions has been highlighted elsewhere in this report. The current instruments are not utilised strategically and to maximum effect.

35 See, for example, the Serbia, Evaluation of Grant Contracts Implemented and Financed by IPA and EIDHR, November 2014
36 The example of the TARI project in Serbia suggests that other mechanisms can be more effective in supporting small grassroots Roma CSOs. TARI is supporting 30 grassroots CSOs in 20 municipalities in Serbia with training and advisory support. Only one of these CSOs is in contact with TACSO.
5. Conclusions and Lessons Learned

5.1. Quality of Intervention Logic

Performance of IPA support is highly determined by the quality of programming. Programme and project design is often rushed in order to meet spending deadlines. There needs to be a shift in the balance of priorities away from spending deadlines and towards meeting impact targets.

More evidence, time and resources are needed for the needs assessment, programming and project design processes. In particular, consultation with civil society organisations and representatives of Roma communities needs to be more substantial and thoughtful, moving towards greater involvement of Roma communities in design.

Effective guidance is available in the form of the “10 Common Basic Principles” and the EU Framework for Roma Integration Strategies. Programmes and projects need to be more closely in line with the principles and framework and a quality assurance process may be needed to realise this. More work needs to be done to elaborate the Basic Principles and help policy makers and practitioners articulate and think through what they mean in practice, given the context and current evidence.

Policy capacity in smaller countries is much weaker than in the larger countries. It is not realistic to expect smaller countries to have the degree of specialisation and human resources that is present in the larger ones. Additional support is required to enable the smaller countries to develop the policy capacities to adequate levels. This does not mean employing more people; rather, it means finding alternative and more flexible sources of policy capacity. Stronger regional cooperation, greater use of local and regional consultants, academics and civil society experts; improved generic capacities to define needs and terms of reference for research or policy development projects are all feasible approaches that can make up for the scarcity of specialist knowledge. The model of the Social Inclusion and Poverty Reduction Unit (SIPRU) in Serbia which provides a central resource to all government departments concerned with various social inclusion issues is a useful one, and one that could be replicated. There are also opportunities for regional cooperation in this area – policies tested in one location could provide valuable intelligence for policy formulation elsewhere. Examples of policies being tested include conditional cash transfers for education (AL), social housing models (BA, RS, KS) and mobile teams and other local coordination measures (RS, TR).
The challenges of Roma inclusion are deep seated and require **long term, sustained engagement and coordination between political and operational aspects**. From one side, strong and sustained political support is needed to maintain focus and priority. On the other, this political support needs to translate into practical action. While the arrangements for IPA I programming were superficial and relatively short term, the framework for IPA II provides an enormous opportunity to be more strategic and influential. However, the programming documents so far available for IPA II do not appear to realise this lesson learned. It would be essential that IPA II is seen as a ten-year opportunity to tackle these challenges\(^{37}\). Indicative levels of funding can be assured for each year, and therefore a long term approach, involving testing, learning and scaling up solutions is very feasible. So far this way of thinking is not evident.

The **structure of the programming process inhibits effective learning**. Projects and interventions rarely come to an end and are even more rarely evaluated before the design of subsequent interventions is signed off. In this way mistakes are repeated and lessons learned cannot be incorporated into future actions. More use needs to be made of mid-term evaluations (so-called ‘output to impact evaluations’) to assess relevance and likely impact well in advance of design of subsequent interventions.

At the same time, the EU needs to **foster the learning process within enlargement governments**. This is partially evident in the countries with Decentralised Implementation Systems (DIS), but not in those that still have centralised implementation. In practice, this means building evaluation capacity and making the link back to policy and programming capacities.

**Gender issues are rarely addressed in any substantial way in the programming.** There are few gendered analyses of problems or situations, and almost no objectives, activities or monitoring systems that have gender-specific or gender disaggregated elements. There needs to be a much greater awareness of gender issues throughout the needs assessment and design processes, and an encouragement of enlargement governments to do the same.

\(^{37}\) Seven years of IPA funding 2014–2020 plus an additional 3 years for continuing implementation of actions.
5.2. Performance of Assistance

As noted above, the quality of programme and project design is perhaps the single most influential factor on the performance of IPA funds. This section looks at some of the other factors which also influence overall performance.

Many projects and actions are too short term to realise their full potential. The inflexibility of IPA funds means that follow-up projects rarely continue directly without interruption. Implementation of actions needs to be seen with a more long term perspective, and to have allowances for learning, adjustment and flexibility in implementation.

Roma civil society organisations need to be involved more in both programme design and implementation. From the side of civil society organisations there is concern that they are not sufficiently involved in policy and programming. This can result in inappropriate or ineffective measures. From the other side, there is concern that civil society organisations do not have the appropriate capacities and knowledge to be more involved, and that proper participation takes too much time and money. Only involvement of Roma civil society organisations and the learning that goes with the practice will build appropriate capacities.

In terms of implementation modalities, grant schemes are in themselves not sufficient to tackle the problems of Roma inclusion. They are, in the words of one interlocutor, ‘isolated islands’. If grant schemes are used, they need to be linked to wider monitoring, evaluation learning and policy development approaches, and designed to allow for some longer term continuity and sustainability.

There is widespread concern that sector support will not be the appropriate instrument to tackle Roma exclusion. This is in part because the needs for Roma inclusion bridge sectors – justice and fundamental rights and human resource development in particular – and in part because the appropriate monitoring mechanisms are not in place that are able to reliably identify the impacts of policies and measures on Roma households and communities.

Sustainability of interventions is strongly linked to political commitment and the policy context. Where interventions are sustainable, there is a clearly demonstrated commitment both at senior levels of government and throughout the institutions (e.g. in schools). Unsustainable projects are driven not by national policies but by independent initiatives without political support. It does not mean they are wrong, but it means that more needs to be done to align effective initiatives with the policy vision and budget constraints of government.
Actions at **local level** – even small scale grant schemes – can have a visible and tangible impact. Local level actions targeted at geographical areas must be considered as part of the programming mix, but cannot stand alone without appropriate policy and institutional reform initiatives. Social housing, support to schools, local employment initiatives are all examples of areas in which local action can achieve limited results, but supporting policy will achieve significantly more.

### 5.3. Quality of Monitoring

**Monitoring mechanisms for assessing IPA support to Roma communities are overall weak and poorly functioning.** Monitoring the progress in improvements (or otherwise) of the situation of Roma households and communities is essential. Without effective monitoring, there is no way of knowing whether the combination of political commitment, IPA funding and the policies in place are working.

We see a need to substantially improve the quality and performance of monitoring at all levels. Key issues arising include the need to design indicators with feasibility in mind, not just ‘what would be nice to have’. This includes the cost and the defined responsibilities of individuals or organisations to collect the data. At project level, monitoring (and evaluation) needs to be included as a separate activity. At programme and national levels, monitoring might be better defined as clearly defined projects with a budget and dedicated personnel.

**Gender disaggregation** is another major concern. There are rare cases in which data is gathered with gender and age disaggregation as a routine.

**The four goals set by the EU Framework on Roma Inclusion Strategies provides a simple minimum requirement for monitoring systems, and should be the basis for future work to ensure that the necessary data is captured – whether through regular reporting and statistical systems or surveys.**

Other monitoring mechanisms are also essential. In particular, we need to understand better the links between outputs and the impacts of policy and practical measures. Do Roma mediators contribute to better health outcomes, for example? To answer these questions we need a combination of better evaluation at the project or policy level, and more scrutiny by civil society organisations. For example, measures may be in place, but if the attitudes of officials or teachers still result in the exclusion of Roma individuals, the measures will not work.

Alongside investment in direct action to promote inclusion, there needs to be investment in realising the necessary monitoring mechanisms.
5.4. EC Cooperation with External Stakeholders

Cooperation of the EC with its partners for Roma inclusion is generally conducted in a positive and constructive spirit with substantial good will on all sides.

Partnership between the EC and other organisations is positive and constructive. Sector approaches are diluting attention on Roma issues and undermining the potential for coherent programming and donor coordination.

More needs to be done to promote the participation of Roma civil society organisations in policy formulation, programming, implementation, monitoring and evaluation. In particular, there needs to be investment in the capacities of Roma civil society organisations to build their sustainable capacities to provide a voice and accountability role at both local and national levels.

Local government needs to be more involved, especially given the key role that they have to play in implementing the majority of measures. Finally, support for civil society needs to be more strategic and coherent.

There is concern in some cases at the close operational relationships between EU delegations and international organisations. This concern is particularly acute in the situation where there are direct awards to international organisations for project implementation. The concern is linked to the lack of transparency and external oversight, and the potential for conflicts of interests. These relationships need to be made more transparent, accountable and cost effective.

Where international organisations are operational in managing projects, they substitute for what should be the roles of national organisations. Where international organisations are responsible for implementing a project, they should take serious efforts to build the capacities of national organisations that will be able to take over their operational role.

However, it is also important to note that other international organisations play a broader role in facilitating institutional change through provision of finance, technical support and policy dialogue, such as UNICEF and the World Bank, and which are generally not involved in direct project implementation of EU funded projects. The above noted concerns do not arise in these cases.
6. Recommendations

Based on the findings and conclusions of the evaluation, the evaluation team have identified the following strategic priorities necessary for the IPA II funds to perform better than those of IPA I in terms of promoting Roma inclusion:

- **Political commitment** – both the European Commission and the accession countries must demonstrate through rhetoric, financial allocations and action that they are determined to tackle the specific problems faced by Roma communities throughout the enlargement countries.

- **Monitoring** – both the European Commission and the accession countries must monitor progress towards achieving the goals set in the EU Framework for Roma integration.

- **Civil Society** – a strong, independent and sustainable civil society with effective advocacy capacities is essential for maintaining the momentum of reform for improvement of institutions and society necessary for greater Roma inclusion and equal citizenship.

- **Gender** – the problems faced by Roma women and men, girls and boys, are not identical; policies, solutions and monitoring must take account not just exclusion on the basis of ethnicity, but also issues faced because of gender and age. These dimensions must be reflected also in monitoring data.

These strategic priorities are important to bear in mind when considering the report’s recommendations.

The following sections set out this report’s recommendations. The recommendations are directed at the European Union/European Commission and are expected to in turn have wider impact on the enlargement countries. The evaluation team have identified as priorities those measures that are judged feasible and realistic for the EU to adopt, and which are most likely to have a wider impact.

6.1. Political commitment

The extent to which enlargement countries achieve significant changes to the situation of Roma is significantly influenced by the degree of political commitment for Roma inclusion and equal citizenship. The Roma Inclusion Seminars and direct interventions at senior political levels have helped to increase government attention and budgets to support implementation of the national strategies. The EU could do more in this regard.
**Recommendation 1:**

The European Commission should formally remind accession countries of the obligations of future member states to comply with the EU Framework for Roma integration, and the four measurable goals set out in this framework. The EC should request accession countries to ensure that they have the monitoring mechanisms in place to assess progress annually against these four goals. If necessary, IPA or other funding should be made available to support the countries to develop the mechanisms necessary for monitoring these goals38 (see also the recommendation on Monitoring, section 6.9). The EC should then assess progress against these goals using the information provided by governments and from other sources, and report in the context of the annual accession Progress Reports.

As a demonstration of the European Union’s political commitment to Roma Inclusion, the Commission should indicate a percentage of IPA II funds that are expected to be allocated for support to Roma inclusion actions.

Political commitment could also be strengthened by establishing diplomatic networks of embassies in each country which have an interest in Roma inclusion – ‘a Friends of Roma’ diplomatic initiative, led either by the EU Delegation, or, better, by an interested EU/EEA state.

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.

**6.2. Roma Focal Point**

While most EU Delegations/Offices had a person who was involved in programming for Roma inclusion and project design, there was not always a clear link between the

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38 Data collected whether through regular statistics or specific survey instruments should enable analysis by ethnicity, gender and age.
operational and political dimensions. Since the Roma issue is both political and operational, delegations need to improve coordination between these two aspects.

**Recommendation 2:**

Each EU Delegation/Office should have a designated and named Roma Focal Point. This person would be the key link between political and operational aspects of the EU’s work to support Roma inclusion. Responsibilities could indicatively include:

- Supporting preparations for the bi-annual Roma Seminars
- Inclusion in relevant programming and planning processes to ensure inclusion of considerations for Roma populations\(^{39}\).
- Lead consultations with Roma civil society organisations to provide input to the annual Accession Progress Reports, assist in the steering of programming, and ensure their appropriate engagement in the design of specific actions.
- Working closely with government representatives to provide support and alignment with EU acquis and specifically the EU Framework on Roma Integration, and to ensure engagement of government policy initiatives with Roma civil society where appropriate.

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.

**6.3. Strategy**

The IPA instrument to now has not been used strategically to support national governments’ policies in support of Roma inclusion. The current drafts of the Indicative Country Strategies for IPA II, and the sector strategies produced do not take a systematic and logical perspective for support for Roma inclusion, either in terms of support for the national Roma inclusion strategies or support for countries’ compliance with the EU Framework for Roma Integration. However, the long term perspective provided by the IPA II instrument offers a significant opportunity for systematically and progressively achieving ambitious goals for Roma inclusion.

\(^{39}\) This should not just be the obvious areas of social inclusion, etc, but also exploring, for example, the impact on Roma communities of environmental projects to reduce waste or formalise recycling,
In order to take advantage of the opportunity provided by the IPA II funding, and recognising that most national authorities have some way to go before they can prepare truly strategic sectoral strategies, we propose a ‘bridge’ solution that provides a practical way in which to ensure that IPA II funds are best used for Roma inclusion.

**Recommendation 3:**

The European Commission, in cooperation with the enlargement countries, should prepare an internal working document for each enlargement country which sets out how the EC will support the countries to achieve their Roma inclusion goals as defined in the national strategies for Roma inclusion. This document should include:

- Indicative financial allocations from IPA II for each year 2014-2020
- Other expected or potential EU support available, such as from the Western Balkans Investment Framework for social infrastructure, EIDHR, Multi-beneficiary IPA funds and prospective actions
- Sectoral and/or thematic priorities. EC support is not expected to be comprehensive, but to support in areas where assistance is most needed and EC instruments are the most appropriate
- Reference to the Fundamentals First priorities (Rule of Law, Public Administration Reform, Competitiveness), and how actions to support these areas will also address Roma inclusion issues.
- Prioritisation and sequencing of projects/actions over the planning period. Identification of the priorities for EU assistance (where IPA II or other EU support is the most appropriate way to tackle each priority). Sequencing should include reference to where policies or mechanisms need to be tested and then scaled up; where actions for Roma inclusion are part of a broader sectoral approach.
- Indicators and monitoring – identification of a small number of key indicators (ideally using the EU Framework goals as the base), baseline data, and clearly defined actions to obtain the necessary data (through surveys or national statistics) including the necessary budget allocations;
- Gender – how EC support will help to address the situation of Roma women and girls explicitly, which aspects of exclusion it will address (e.g. in education, employment, rights and entitlements, etc.).
- Links and synergies with relevant regional/multi-beneficiary programmes (e.g. TACSO, Cross Border Cooperation, EIDHR).
Building key policy capacities in government – e.g. Roma policy, inclusive education, health, housing, strategy monitoring, etc. – prioritise and explain how they will be built.

Civil society capacity – how IPA II will support the sustainable development of Roma civil society particularly for voice and accountability actions.

Explain how IPA II assistance will prepare the ground for key EU instruments available for EU Member States that can assist Roma inclusion (e.g. Social Funds, LEADER, etc.); what institutions, capacities, etc. are needed, and how will IPA II assist in developing these. (most appropriate for those countries closer to EU membership – Serbia, MNE).

Addressee and timeframe

For consideration and action by the European Commission. As soon as possible.

6.4. Gender

There was a notable absence of gender analysis, programming and implementation in the IPA I period. The IPA II period must tackle this systematically at all stages of the programming cycle. The recent appointment of a gender focal point in DG NEAR is a welcome start; however, the work of the focal point will be difficult and will not deal with Roma issues only.

Recommendation 4:

The European Commission is urged to identify gender focal points in each delegation/office whose role would indicatively include:

- Being aware and informed of the key gender issues in the country;
- Take a particular interest and involvement in the gender issues facing Roma minorities;
- Being involved in the design process for all programmes and actions to provide a gender perspective and ensure that problem analysis takes into account the different issues and perspectives of women and men, girls and boys.
- Supporting any participation and consultation processes with civil society to ensure that gender perspectives can be properly identified and addressed.
- Ensuring contractors and implementing partners identify gender issues in their projects/actions from the inception stage onwards, and plan and implement appropriate responses.
- Ensure terms of reference for evaluations identify and ask the appropriate questions in respect of gender issues.
- Ensure that the development of monitoring systems at all levels adequately reflects the needs for gender and age disaggregated data.

The EU is also recommended to urge enlargement governments to identify gender focal points in the National IPA Committee (NIPAC), if they do not already exist. The EU Delegation/Office focal point on gender should then work closely with the NIPAC gender focal point in order to ensure improved quality of design, implementation, monitoring and evaluation from a gender perspective throughout the IPA II cycle.

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.

**6.5. Policy Capacities**

Policy capacity for Roma inclusion and wider social inclusion is relatively weak particularly in the smaller enlargement countries. Multi-beneficiary funding offers an opportunity to create a stronger policy environment across governments, civil society, think tanks, universities and other research institutions at a multi-country or regional level. In particular, given the similarities, common languages and shared history of the former Yugoslav countries there are potential benefits to strengthening policy capacities with specialisations that can be accessed by all enlargement countries.

There are also potential benefits to be realised by encouraging sharing of experience, policies and lessons learned between EU Member States and Enlargement Countries.

**Recommendation 5:**

IPA Multi-beneficiary funding should be used to support one (or more) initiatives to strengthen policy capacities in the enlargement region. Initiatives need to be carefully designed and to draw on the lessons learned by IPA I multi-beneficiary projects such as the Best Practices for Roma Inclusion project (BPRI), which failed to achieve its potential mainly because of poorly conceived design and over-ambitious expectations. In other words, the action should be longer term, rooted in local experience and with strong mechanisms to feed back policy findings and recommendations to practitioners in government and civil society. Roma individuals and civil society organisations should be involved as far as possible, and collaborative links made between practitioners in civil society and government and between countries. Such an action (or actions) should draw from policy lessons learned in Member
States, identify gaps and uncertainties in the policy base, and conduct policy experiments and tests to develop new or more effective approaches. Indicative topics for such an initiative include:

- Sustainable models for social housing and links to social security reform
- Conditional cash transfers as measures for supporting educational attainment
- Testing and identification of effective employment measures
- Anti-discrimination in practice – how to successfully change attitudes and behaviours
- Moving from Roma mediators to institutional reform – tackling institutional discrimination throughout a system

Addressee and timeframe

For consideration and action by the European Commission. As soon as possible.

6.6. Quality Assurance and Good Practice

Many of the projects funded by IPA I were not designed or implemented by specialists in Roma policy or projects, but by more generalist NGOs, consultancy firms and International Organisations. This is clearly a pragmatic response to the available resources. Nevertheless, there is a need for greater quality assurance of programme and action design, and oversight during the processes of implementation. Programme development and implementation needs to be compliant with i) the available guidance, in particular the ‘10 Common Basic Principles for Roma Inclusion’ and ii) the latest evidence-based policy and practice research findings. This needs to inform those who are developing and implementing the programmes and actions.

Recommendation 6:

All draft programmes and action designs need to be reviewed by appropriately experienced and qualified people to ensure compliance with the 10 Common Principles, and to provide input based on relevant evidence from policy and practice. The European Commission should develop procedures to ensure that this happens. Options for such a mechanism might include: review by Roma experts in-house in Brussels; review by independent experts either in-country or internationally; review by peers in other EU Delegations/Offices (e.g. by creating a network of Roma Focal Points in EUDs).

Specialists, such as local policy experts, think tanks, NGOs, etc., should be identified who can take an active role in project/action steering committees, review progress, and provide
balanced input to assist in ensuring that actions aimed at Roma inclusion are following the best practice guidance available. They should also play a role in flagging issues that might have unintended negative consequences.

Experts, Roma Focal Points in EU Delegations/Offices and national Roma policy specialists in government and civil society should meet regularly (at least 1 per year) to develop a network of practitioners and share latest research findings. This could be connected to a multi-beneficiary project for policy development (see section 6.11 on recommendations for Multi-beneficiary IPA funding).

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.

**6.7. Civil Society**

Civil society organisations have so far not fulfilled their potential role in any aspect of IPA support for Roma inclusion. The European Commission should establish a long term approach to developing this potential, both by strengthening and improving existing tools, such as the Civil Society Facility, TACSO, and EIDHR, and developing new tools.

**Recommendation 7:**

The European Commission, for each of the enlargement countries, should set out a strategic approach to developing the capacities of civil society in support of Roma inclusion. The goals of these strategies should emphasise:

- The role of civil society in **advocacy and accountability**. CSOs should be strong and independent, able to engage in evidence based research, policy dialogue, holding state and other institutions to account at national and local levels.

- **Sustainability** of civil society organisations. Mechanisms for civil society support should include developing capacities for obtaining funds from multiple sources, not just EU funds. This can include public fundraising, membership, national and international foundations, for example.

- The role of civil society in **service delivery and project implementation**. Roma civil society organisations need to be effective and reliable actors in project management and delivery of services at local and national levels.

To achieve these goals, the European Commission should consider a variety of tools, and ensure that these mechanisms are effectively coordinated.
- Granting instruments such as the Civil Society Facility, EIDHR and other specifically designed granting actions need to take into account the need for building capacities of newly established grass-roots organisations as well as well-established organisations. This means that varying amounts of funds need to be available to meet the needs of different types of organisations. Grants of less than 10,000 EUR should be available for small grass-roots CSOs to complete specific actions. Medium size grants (10 – 90,000) are needed for larger local or national organisations for 1-2 year actions, and larger funds available for longer term actions and re-granting, possibly at the regional level.

- Technical assistance to civil society should not just look at how to apply for EU funds. While this is an important skill, there are many functions that CSOs need to be able to perform, including governance and management, managing service delivery, research for advocacy, public relations and communications, etc. Assistance in these areas can be provided either through mechanisms such as the OSCE-managed TARI project in Serbia, or through networks/alliances of NGOs.

- Given the difficulties of EU Delegations and the European Commission in Brussels managing grant funds for many small amounts, strong consideration should be given to re-granting projects combined with provision of technical assistance – ideally over a medium to long term (4-7 years) specifically for CSOs working for Roma inclusion.

Addressee and timeframe

For consideration and action by the European Commission. As soon as possible.

6.8. Local Impact – Area based integrated interventions

The DG NEAR (then Enlargement) Advisor on Roma Issues in July 2014 announced that “IPA Funding on Roma integration in the period 2014-2020 will shift from supporting policy
development and institution building to projects directly making an impact on the lives of individual Roma persons”\textsuperscript{41}.

The findings of this evaluation suggest that policy development/institution building combined with projects operating at a local level are necessary for making an impact on the lives of individual Roma persons, provided, of course that they are well designed and executed. Local level action without the appropriate supporting policies are less likely to be sustainable\textsuperscript{42}.

**Recommendation 8:**

Programming for IPA II actions should strongly consider **medium to long term actions focusing on integrated actions in local areas with relatively high Roma populations**. Roma populations tend to be geographically concentrated, so lend themselves to this kind of area-based (or geographically focused) interventions. Single sector interventions, such as in housing, do not solve problems that are also linked to livelihoods and access to services. Integrated interventions that can link, for example, housing improvement with access to adult vocational training and access to improved healthcare are more likely to demonstrate sustainable results.

Area-based interventions must also have a visible and positive impact on the wider population, for example by improving infrastructure, school conditions, or health care facilities. This helps to minimise any backlash or resentment against Roma populations.

However, area-based interventions must also be linked to national/higher level policy initiatives. Area based interventions can play a useful part in policy formulation, both as case studies to advocate for policy change, and as test cases for new or draft policies.

Local change takes time. Time is needed to build trust with local institutions, develop appropriate action plans, take the action, learn and develop or improve. Short interventions, such as the two-year TARI project in Serbia, are unlikely to achieve sustainable results without effective (and ideally continuous) follow-up. Area-based projects should have a

\textsuperscript{41} Minutes of the Kick Off Meeting, Specific Contract IPA No 2014/344098 - FWC COM 2011 – Lot 1, 25 July 2014 9:30 – 11.00 hrs meeting with the Reference group

\textsuperscript{42} As examples: the social housing construction in BiH, in which local impact is achieved, but long term sustainability is questionable because of the absence of an appropriate legal and institutional framework. ‘Learning Centres’ in Kosovo are locally established facilities without real support from the Ministry of Education, so are not likely to be sustainable.
minimum time-frame of four years, and local authorities should provide some element of
match-funding to ensure commitment.

Addressee and timeframe

For consideration and action by the European Commission. As soon as possible.

6.9. Monitoring

The experience of monitoring the progress towards greater Roma inclusion during the IPA I
period has been particularly disappointing. The EU Framework for Roma Integration
identifies four goals that are measurable given the right data:

- **Access to education**: Ensure that all Roma children complete at least primary school
- **Access to employment**: Cut the employment gap between Roma and the rest of the
  population
- **Access to healthcare**: Reduce the gap in health status between the Roma and the
  rest of the population
- **Access to housing and essential services**: Close the gap between the share of Roma
  with access to housing and to public utilities (such as water, electricity and gas) and
  that of the rest of the population.

However, there is currently either no adequate data, or there is good survey data for one
time point, but without comparable monitoring over time.

Recommendation 9:

The European Commission should support the enlargement countries to develop and
operationalise appropriate monitoring systems which will adequately capture information to
monitor the achievement of each of these goals.

Ideally, the monitoring systems should be incorporated into existing or planned information
systems (e.g. School data systems should ensure the inclusion of ethnicity of students and
teachers. Health data systems need to capture ethnicity of patients and health workers).

In other areas, such as employment, the ethnicity of respondents needs to be included as
respondent data for Labour Market Surveys, with periodic booster samples if necessary.
As a priority, national monitoring systems should be able to capture the data needed to monitor progress towards the four goals set in the EU Framework for Roma Integration Strategies, disaggregated by gender, age and location.

The EU should support accession countries to i) review their data systems and identify the most appropriate and cost-effective approaches to collecting the necessary data; ii) develop or adjust the data collection and analysis tools necessary; iii) find ways of appropriately reporting on the data at regular (ideally annually) intervals. Support may be needed also at the political level to encourage countries to include the ethnic dimension in their regular monitoring, with reference to considerations of treaties and regulations on human rights and data protection.

Given the similarities of the challenges between the accession countries, there could be benefits to work at a multi-beneficiary level (see recommendation 6.11).

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.

**6.10. Evaluation and Learning**

Many of the Roma inclusion interventions are pilots, or are testing out approaches. There are few conclusively proven, effective and sustainable policies or approaches for Roma inclusion. Therefore, throughout IPA II support for Roma inclusion there must be a greater emphasis on evaluation and learning. In addition, there needs to be a concerted effort to build evaluation capacity of enlargement governments.

**Recommendation 10:**

IPA II interventions for Roma inclusion should be routinely evaluated – both at mid-term and ex-post.

Evaluation should be contracted independently of the implementing agency for two reasons. First, it ensures a proper external perspective and independence from the interests of the implementing agency. Second, it offers opportunities for better ex-post perspectives, where

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the impact and sustainability of a policy or intervention can be better gauged sometime after
the end of a project.

Holding the evaluation budget within the EU Delegations/Offices also enables joint
evaluations of linked interventions (such as local level and policy level interventions). The
European Commission should also consider how it can support the evaluation and learning
capacities of the Enlargement Countries’ governments and relevant institutions in this
thematic area.

Findings of evaluations should be fed back into the policy and programming cycles for both
governments and the European Commission. One forum for this could be the biennial Roma
Inclusion Seminars.

Evaluation and learning could be substantially supported by greater transparency of
project/action information by EU Delegations/Offices and Enlargement Country
governments. It is remarkably difficult to identify and collect routine information about IPA I
project implementation, and improvements would be essential.

_Addressee and timeframe_

For consideration and action by the European Commission. As soon as possible.

_6.11. Multi-beneficiary Funds_

The multi-beneficiary projects for Roma inclusion supported through IPA I have performed
disappointingly. However, there are areas for which multi-beneficiary projects are ideally
suited, and which, with appropriate design changes, could be effective in supporting Roma
inclusion.

_Recommendation 11:_

The European Commission should consider the following areas as of particular priority and
suitability for multi-beneficiary support:

- **Regional policy development and research.** Multi-country policy research can
  usefully identify and evaluate policy initiatives and draw conclusions and
  recommendations applicable to all Enlargement countries. Projects can also draw
  upon the experience in EU Member states and share relevant findings. Results of
  policy research needs to be followed through to the implementation level, which
  means practitioners – programme and action designers and implementation teams
  – should also be involved closely in the research and dissemination. Adequate time
should be given to this task, bearing in mind the time needed for policy initiatives to take effect, for research to be conducted, and for findings to be disseminated to practitioners.

- **Support for Roma civil society, networks and partnerships.** There exist relations between civil society organisations throughout the enlargement region. Building on these relationships, and using networks as a means for building awareness, capacities, sharing best practices, and importantly as an advocacy platform, would be a useful contribution to the Roma civil society development efforts. This support should also be given sufficient time for development, learning and follow through.

- **Support for national statistical and monitoring systems.** Building on the recommendation in section 6.9, multi-beneficiary funding could be a useful tool for providing support to enlargement countries’ systems and instruments for monitoring progress for Roma inclusion. Support can be given to relatively standardised surveys and survey questions that enable meaningful samples of Roma population to be included (building on the work already done by UNICEF (MICS), UNDP and the World Bank, and the Fundamental Rights Agency).

For all of these suggestions, any project should:

- be sufficiently long term, focused on achieving particular results on the ground;
- demonstrate added value of involving more than one country/territory;
- prioritise support to smaller countries/territories that cannot capitalise on economies of scale;
- avoid the over-use of international organisations, and instead focus on building regional/local capacities.

**Addressee and timeframe**

For consideration and action by the European Commission. As soon as possible.
7. ANNEXES
## 8. Annex 1: Projects Selected for in-depth analysis

<table>
<thead>
<tr>
<th>Loc</th>
<th>Year</th>
<th>Title</th>
<th>Value M € (est alloc Roma)</th>
<th>Status</th>
<th>Type - IB/INV/TA/G/Other</th>
<th>Modality</th>
<th>Sector</th>
<th>Focus</th>
</tr>
</thead>
<tbody>
<tr>
<td>AL</td>
<td>IPA 2009</td>
<td>Support Roma children to access an inclusive education as a basic human right and fight against discrimination in education system</td>
<td>0.160</td>
<td>C</td>
<td>G</td>
<td>C</td>
<td>Education</td>
<td>RS</td>
</tr>
<tr>
<td>AL</td>
<td>IPA 2011</td>
<td>Supporting Social Inclusion of Roma and Egyptian communities</td>
<td>1.500</td>
<td>O</td>
<td>G</td>
<td>C</td>
<td>Emp/Other</td>
<td>RS</td>
</tr>
<tr>
<td>BA</td>
<td>IPA 2008</td>
<td>Support to BiH Roma Strategy</td>
<td>0.499</td>
<td>Closed (01/13)</td>
<td>IB/G</td>
<td>C</td>
<td>All</td>
<td>R exclusiv e</td>
</tr>
<tr>
<td>BA</td>
<td>IPA 2011</td>
<td>ROMA ACTION - Support of socio-economic inclusion of Roma population in BiH through provision of housing and socio-economic measures with proactive participation of local authorities and other local stakeholders</td>
<td>2.500</td>
<td>O (till 03/15)</td>
<td>IB/TA</td>
<td>C</td>
<td>Housing</td>
<td>R Exclusiv e</td>
</tr>
<tr>
<td>MK</td>
<td>IPA 2010, TAIB</td>
<td>TA Support to institutions in implementation of policies relevant to non-majority communities</td>
<td>0.243</td>
<td>Not clear</td>
<td>TA/IB</td>
<td>D</td>
<td>All sectors</td>
<td>R Explicit</td>
</tr>
<tr>
<td>MK</td>
<td>IPA compone nt IV 2007-2011</td>
<td>Social inclusion Axis -TA for Strengthening capacities for integration of disadvantages women in the labour market, with special focus on ethnic minority</td>
<td>0.239</td>
<td>C</td>
<td>TA/IB</td>
<td>C</td>
<td>Employmen t/ Documentat ion</td>
<td>RI</td>
</tr>
<tr>
<td>MK</td>
<td>IPA compone nt IV 2007-2011</td>
<td>Social inclusion Axis - Supporting Roma women accessing the labour market</td>
<td>0.216</td>
<td>C</td>
<td>TA</td>
<td>C</td>
<td>Employmen t</td>
<td>RS</td>
</tr>
<tr>
<td>MK</td>
<td>IPA compone nt IV 2011-2013</td>
<td>Social inclusion Axis 3, Grant Schemes: Fostering Social Inclusion</td>
<td>1.800</td>
<td>O</td>
<td>G</td>
<td>C</td>
<td>Emp/other</td>
<td>RI</td>
</tr>
<tr>
<td>KS</td>
<td>IPA 2008</td>
<td>Return and Reintegration in Kosovo (II)</td>
<td>1.000</td>
<td>C</td>
<td>TA</td>
<td>C</td>
<td>Housing/ employ /other</td>
<td>RE</td>
</tr>
<tr>
<td>Loc</td>
<td>Year</td>
<td>Title</td>
<td>Value M € (est alloc Roma)</td>
<td>Status C/O</td>
<td>Type - IB/INV/TA/G/Other</td>
<td>Mod-ality</td>
<td>Sector</td>
<td>Focus</td>
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<tr>
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</tr>
<tr>
<td>KS</td>
<td>IPA 2011</td>
<td>EU/CoE support in the field of education to forced returnees and to Roma, Ashkali and Egyptian communities in Kosovo – ACCESS</td>
<td>1.000</td>
<td>O – Ends mid 2015</td>
<td>TA/INV</td>
<td>C</td>
<td>Edu</td>
<td>RS</td>
</tr>
<tr>
<td>ME</td>
<td>IPA 2011</td>
<td>Identifying durable solutions for (I)DPs and residents of Konik camp</td>
<td>2.500</td>
<td>C (Q3 2012)</td>
<td>Inv/G/TA</td>
<td>C</td>
<td>Housing/education/h health Employ/Other</td>
<td>RS</td>
</tr>
<tr>
<td>ME</td>
<td>IPA 2012/2013</td>
<td>Support for residents of Konik camp in Podgorica</td>
<td>1.000</td>
<td>O Not started</td>
<td>Grant to NGO (TA)</td>
<td>C</td>
<td>Edu/Emp/H health</td>
<td>RS</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2008</td>
<td>Social inclusion and poverty reduction among most vulnerable groups (children with disabilities, women in rural areas, Roma)</td>
<td>2.750</td>
<td>C</td>
<td>IB/TA/GS</td>
<td>C - UNICEF</td>
<td>Other/All</td>
<td>RI</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2008</td>
<td>Education for All - increasing the availability and quality of education for children from marginalised groups (assisting Roma children to enter the system and to prevent/diminish their drop out from the school)</td>
<td>2.700</td>
<td>C</td>
<td>INV/IB</td>
<td>C</td>
<td>Education</td>
<td>RE</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2009</td>
<td>IPA 2009 ADDENDUM Livelihood Enhancement for the Most Vulnerable Roma Families in Belgrade</td>
<td>3.600</td>
<td>C</td>
<td>INV</td>
<td>C</td>
<td>Housing</td>
<td>RS</td>
</tr>
<tr>
<td>RS</td>
<td>IPA 2010/2011</td>
<td>Support to refugees, IDPs and returnees – important part related to Roma (housing, legal aid)</td>
<td>9.050</td>
<td>O</td>
<td>Various</td>
<td>C</td>
<td>All</td>
<td>RI</td>
</tr>
<tr>
<td>HR</td>
<td>IPA 2007-2013</td>
<td>Integration of disadvantaged groups in regular education system”</td>
<td>1.760</td>
<td>C</td>
<td>GS D?</td>
<td>Edu</td>
<td></td>
<td></td>
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<tr>
<td>Loc</td>
<td>Year</td>
<td>Title</td>
<td>Value M € (est alloc Roma)</td>
<td>Status C/O</td>
<td>Type - IB/INV/TA/G/Other</td>
<td>Modality</td>
<td>Sector</td>
<td>Focus</td>
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<tr>
<td>HR</td>
<td>IPA 2008</td>
<td>Improvement of infrastructure in two Roma settlements: Orehovica and Mursko Središče in Međimurje County</td>
<td>1.957</td>
<td>C</td>
<td>INV</td>
<td>D</td>
<td>Housing</td>
<td>RS</td>
</tr>
<tr>
<td>HR</td>
<td>IPA 2012</td>
<td>Support to National Minorities at Local Level: Support to Local Initiatives for Roma Integration</td>
<td>2.040</td>
<td>O</td>
<td>TA/IB</td>
<td>D</td>
<td>Housing</td>
<td>RS</td>
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<tr>
<td>TR</td>
<td>Measure 4.1 (Year not specified)</td>
<td>Operation: &quot;Improving Social Integration and Employability of Disadvantaged Persons&quot;</td>
<td>9.0</td>
<td>O (not started)</td>
<td>GS</td>
<td>D</td>
<td>Employmen t</td>
<td>RE</td>
</tr>
<tr>
<td>TR</td>
<td>Measure 4.1 (year not specified)</td>
<td>&quot;Employment and Social Support Services Coordination and Implementation Model for the Integration of Disadvantaged Persons&quot;</td>
<td>6.0</td>
<td>O (since June 2014)</td>
<td>IB/INV</td>
<td>D</td>
<td>Employmen t/Other</td>
<td>RI</td>
</tr>
<tr>
<td>TR</td>
<td>Measure 4.2</td>
<td>&quot;Promoting Social Inclusion in Densely Roma Populated Areas&quot;</td>
<td>10.13</td>
<td>O</td>
<td>IB/INV</td>
<td>D</td>
<td>Social Inclusion</td>
<td>RS</td>
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<tr>
<td>MB</td>
<td>IPA MB 2010</td>
<td>Regional Initiative for Roma Integration</td>
<td>3.000</td>
<td>C</td>
<td>O</td>
<td>C</td>
<td>Other</td>
<td>RS</td>
</tr>
<tr>
<td>MB</td>
<td>IPA MB</td>
<td>Social inclusion: regional support to the marginalised communities</td>
<td>1.000</td>
<td>C</td>
<td>TA</td>
<td>C</td>
<td>Documentat ion/ Other</td>
<td>RI</td>
</tr>
</tbody>
</table>

9.1. Albania

9.1.1. Overview of IPA Interventions covered by this evaluation

The IPA support for Roma inclusion came from four main interventions. There were two national programme projects, one in 2011 and one in 2012 (subject to in-depth assessment and highlighted in yellow). Other support was in the form of grants; one civil society grant scheme under IPA 2009 and one Civil Society Facility call for proposals in 2012. Other support came from EIDHR, Cross Border Cooperation funds, and a regional civil society grant (one project under each). See the table below for details.

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Project name</th>
<th>Type of Support</th>
<th>Implemented by</th>
<th>Start – End</th>
<th>EU contribution</th>
<th>Indicative allocation for Roma % of total</th>
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</thead>
<tbody>
<tr>
<td>IPA TAIB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Support Roma children to access an inclusive education as a basic human right and fight against discrimination in education system</td>
<td>CSF Grant scheme</td>
<td>Ndihmë për Fëmijët (Help for Children)</td>
<td>Dec 2010 - Oct 2012</td>
<td>159,986</td>
<td>159,986 100</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Civil society actions for the development of disadvantaged communities - Bregu i Lumit Intervention</td>
<td>CSF Grant scheme</td>
<td>Shqotë kombëtare Edukim për Jetën</td>
<td>Dec 2010- Dec 2012</td>
<td>190,457</td>
<td>190,457 100</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Protection and Integration of Street Children in Tirana</td>
<td>CSF Grant scheme</td>
<td>Save the Children-Italy</td>
<td>Dec 2010 - Dec 2012</td>
<td>200,019</td>
<td>200,019 100</td>
</tr>
<tr>
<td>IPA 2011</td>
<td>Supporting social inclusion of Roma and Egyptian Communities</td>
<td>2011 National Programme</td>
<td>UNDP</td>
<td>April 2012 - Sept 2014</td>
<td>1,500,000</td>
<td>1,500,000 100</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Improving local public social services and infrastructures for vulnerable groups in the peri-urban areas of Tirana and Durrës</td>
<td>2012 National Programme</td>
<td></td>
<td>Jun 2014 - Jun 2017</td>
<td>6,200,000</td>
<td>3,100,000 50</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Count Us In’: Ensuring Social Inclusion for Roma and Egyptian Children in Albania</td>
<td>CSF Grant scheme</td>
<td>Save the Children Italia Onlus</td>
<td>Jan 2014- Jan 2016</td>
<td>178,271</td>
<td>178,271 100</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Sustainable Multi-purpose Centre in Tirana Municipality Unit no.7</td>
<td>CSF Grant scheme</td>
<td>ARSIS Albania</td>
<td>Jan 2014- Jan 2016</td>
<td>169,563</td>
<td>169,563 100</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Foster social inclusion of Roma communities in Albania through targeted interventions for vulnerable children</td>
<td>CSF Grant scheme</td>
<td>Amarodrom</td>
<td>Jan 2014- July 2015</td>
<td>191,133</td>
<td>191,133 100</td>
</tr>
<tr>
<td>IPA/CSF Regional Grant Scheme</td>
<td>Partnership Actions: Empowerment of Women, Empowerment Campaign for Roma Women</td>
<td>CSF Regional Grant Scheme</td>
<td>Roma Active Albania</td>
<td>Feb 2012 - Feb 2014</td>
<td>198,752</td>
<td>198,752 100</td>
</tr>
</tbody>
</table>
9.1.2. Overview of Roma in Albania

The size of the Roma and Egyptian population in Albania is heavily contested. The latest official census results identify 8,301 Roma and 3,368 Egyptians. The official Council of Europe average estimate is 115,000 combined Roma and Egyptians. Other estimates from civil society organisations put the number of Roma at up to 200,000.

Perhaps the most authoritative data for the Roma population comes from a survey of settlements conducted by the Open Society Foundation for Albania\(^4\) which concluded that the Roma population at the time of the survey consisted of 18,276 individuals. The survey did not cover the Egyptian population. People with Egyptian heritage, because their mother tongue is Albanian, are not so easily identified and often do not wish to be identified as Egyptian – hence the difficulties of counting. Many Albanian Egyptians do not wish to be grouped together with Roma people. Indeed, the Government’s national Roma strategy addresses only Roma populations and not the Egyptians.

In addition to the categorisation difficulties, there are significant migratory trends among the Roma population – to Greece for seasonal labour, to Western Europe, and within Albania. Therefore counting Roma and Egyptian individuals is a fraught exercise.

The Roma population is not evenly spread throughout Albania, but concentrated in a few main centres – primarily Tirana, Korce, Fier and Elbasan.

Roma and Egyptian populations do not all face the same problems. Egyptians are generally more integrated, although do face problems of discrimination and are considered to be poorer than the majority population. The 2013 EU Progress Report highlighted the problems: “Roma and Egyptian [populations] continue to face very difficult living conditions and frequent discrimination, particularly regarding access to education, social protection, health, employment and housing.” The problem of housing has been exacerbated recently by more frequent evictions from informal settlements; evictions have a knock-on detrimental effect on livelihoods and school attendance.

There is a particular concern relating to Roma children. Illiteracy rates are very high, school attendance is very low, and there are endemic problems of child labour and trafficking. One notable feature that arises from recent surveys is the very high variation in literacy between Roma resident in different locations, from 5 to 90%. In some cases this is attributed to the highly segregated locations of settlements from which few children enrol or attend school.

Albania was one of the first enlargement countries to adopt a Roma strategy, the “National Strategy for Improving Roma Living Conditions” in 2003. This was later accompanied by a National Action for the Decade of Roma Inclusion 2010-2015.

Complementing the Roma strategy was the National Strategy for Development and Integration 2007-2013. This strategy highlighted many of the issues identified in the Roma strategy, and set some ambitious targets for Roma communities. By the end of 2014, there were three new strategic initiatives under preparation: a Strategy on Social Inclusion 2015-2020; a Strategy on Social Protection 2015-2020 and a Roma and Egyptian Inclusion Action Plan. In parallel to these initiatives is the development of a Social Policy Sector Wide Strategy for IPA II.

Until 2011 there were effective donor coordination mechanisms operating, under the coordination of the Directorate for Strategy and Donor Coordination. Within this structure were sector working groups, including a sector working group for Social Affairs. The Directorate had been disbanded, and so the working groups – at the time of the field research in November 2014 – had not been functioning for around three years. Consultation

45 Centre for Economic and Social Studies “Mapping Roma Children in Albania”, Tirana, November 2011 p25
46 E.g. “about 50% of the residences of the Roma community will be rehabilitated”; “incentives to attend primary schools, support for children to learn Albanian, provision of teachers who can speak Roma and adult literacy programmes”; “improving access to public order through recruiting Roma as police officers”.
on specifically Roma issues were led by the Roma Technical Secretariat within the Ministry of Social Affairs. This unit was integrated into a Directorate for Social Inclusion with some loss of specialist expertise, and as a consequence reduced its focus on Roma issues.

At local level, UNDP has been supporting local and regional authorities to develop Roma and Egyptian Community Development Plans. Many of the main responsibilities for services essential for greater Roma integration, such as health, employment and education, remain with central government through deconcentrated offices at regional level. A radical local government reorganisation is expected in 2015.

9.1.3. Intervention Logic and Programming

Design, Prioritisation and Sequencing

IPA funds in Albania are managed centrally by the EU Delegation. The key programming documents are the Medium-term Indicative Planning Documents. These had few priorities or objectives explicitly linked to Roma and Egyptian communities. The MIPD for 2009-2011 highlighted the need to support implementation of the national Roma strategy, and the MIPD for 2011-2013 mentioned the need for social and economic integration. There was therefore very little guidance from the MIPDs for supporting programming for Roma inclusion.

The Roma Inclusion Seminars from 2011 reaffirmed the main priorities in the national strategy (education, employment, housing and health), and added key issues of policy coordination, data collection and involvement of civil society. The second Seminar was held in early 2014, but by November 2014 the notes from the meeting had not been officially approved.

It is worth highlighting that gender was identified as a key priority in the 2003 national strategy, but subsequently did not feature as an objective or priority in any planning document.

There was also little consistency in the MIPD priorities. For example, discrimination is a key issue for accession and is a problem that requires a long term and sustained engagement. It was identified only as a priority in MIPD 2007-2009, but not subsequently. Later, the Progress Report for 2013 expressed its concern about discrimination and identified it as a priority for the coming period.
A new IPA 2013 project, jointly managed with the World Bank, will tackle the social security system. This will likely have an impact on Roma and Egyptian populations since they are disproportionately poor, but was not included in the list of Roma related projects in the Terms of Reference.

We see that in Albania the main focus of IPA expenditure has been on generic social inclusion projects, rather than any specific sectoral intervention. Social infrastructure will become more significant with the implementation of the IPA 2012 project for Tirana and Durres. Nevertheless, funding for Roma inclusion is modest, representing less than 1% of total IPA funds for Albania. It is the second lowest expenditure on Roma per person for the enlargement countries, after Turkey\(^47\).

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\(^47\) Although this calculation is based on the estimated Roma/Egyptian population of 115,000. If we use the 18,000 Roma population figure from Open Society, the investment per person would of course be much greater.
There was no single source of problem analysis for programming of IPA funding. The MIPDs did not contain any in-depth analysis on the situation of Roma and Egyptian populations. The national strategy from 2003 was well out of date by the time IPA funding was being programmed, and the later action plans did not contain problem analysis. The project fiches contain problem analysis linked to and justifying their specific areas of intervention.

Nevertheless, there are many independent sources of information on the problems of Roma and Egyptian communities in Albania, much of it reliable and of high quality.

Priorities highlighted in the Strategy and action plans are primarily education, cultural heritage, employment and social welfare, health and housing. Only 3% of IPA funds were allocated to education specifically, and that was through grant schemes. The 40% spent on social inclusion was multi-faceted and aimed to deal with a range of problems aligned with the Roma strategy priorities, including access to healthcare, education, and employment. Social infrastructure does not feature strongly in the Roma strategy or action plan, yet it accounts for 57% of IPA spending for Roma inclusion. The social infrastructure programme had yet to be fully developed at the time of research, so it was not clear yet how it would assist in improving the situation of Roma communities.

**Stakeholder involvement**

One of the key benefits of the Roma Seminars of 2011 and 2014 according to interlocutors was the opportunity for wide engagement of Roma civil society, government and international organisations in the same discussion.

At government level, there was strong engagement of the government at a time when visa liberalisation negotiations were on the table and one of the key issues was the civil registration of Roma. The 2011 Seminar was seen as a key opportunity for the government to publicly declare its commitments, and then for the EU and others to follow up on those commitments.

Civil society representatives interviewed suggested that there is generally good consultation for setting priorities (for which there is anyway broad agreement and awareness), but not for designing solutions, planning or monitoring. Other interlocutors suggested that Roma civil society in Albania is rather weak and divided, so international organisations fill the gap and claim to speak on behalf of Romani communities and CSOs, but substitute their own views and language.
9.1.4. Performance of Assistance

**Efficiency**

As with the other country studies, the assessment of performance is limited to those projects that were examined in more detail, according to the research methodology. For Albania, these projects were:

- IPA 2009 Support Roma children to access an inclusive education as a basic human right and fight against discrimination in education system, Ndihmë për Fëmijët (Help for Children) Dec 2010 - Oct 2012, EUR 159,986
- IPA 2011 Supporting social inclusion of Roma and Egyptian Communities, UNDP, April 2012 - Sept 2014 EUR 1.5 million

Refer to case studies 1 & 2 for more details on these projects.

Both projects delivered the project activities efficiently. The Help for Children project achieved its stated objectives, and the SSIREC project was mostly on target to do so. However, some additional time would be needed to demonstrate that the employment and livelihood components of the latter project will achieve its objectives.

The EU delegation in Albania used more competitive grant arrangements for its support to Roma than in the other IPA countries. Of the projects supporting Roma, six were funded through grant schemes, specifically a 2009 Civil Society Facility call, and a 2012 Civil Society Facility call. The 2009 call did not specifically aim to support Roma or Egyptian communities; one of the three sectors for support was ‘support to vulnerable people, minorities and poor people’ for which EUR 400,000 was indicatively allocated. Under the 2012 call, EUR 600,000 was allocated for ‘Promoting social and economic inclusion of the Roma minority and Egyptian community’.

The SSIREC project was a direct award to UNDP, so the project was jointly managed by the EUD and UNDP under a framework agreement.

In the case of the Amarodrom project under the 2012 CSF award, it was claimed by interviewees that this was given directly on the intervention of the EUD to ensure that at least one Roma NGO would take the lead in a project implementation.

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Project name</th>
<th>How awarded</th>
<th>Implemented by:</th>
<th>EU contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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</tbody>
</table>
Thematic Evaluation on IPA Support to Roma Communities

June 2015

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Project name</th>
<th>How awarded</th>
<th>Implemented by</th>
<th>EU contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPA 2009</td>
<td>Support Roma children to access an inclusive education as a basic human right and fight against discrimination in education system</td>
<td>Grant – call for proposals</td>
<td>Ndihmë për Fëmijët (Help for Children)</td>
<td>159,986</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Civil society actions for the development of disadvantaged communities - Bregu i Lumit Intervention</td>
<td>Grant – call for proposals</td>
<td>Shqota kombëtare Edukimi për Jetën</td>
<td>190,457</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Protection and Integration of Street Children in Tirana</td>
<td>Grant – call for proposals</td>
<td>Save the Children-Italy</td>
<td>200,019</td>
</tr>
<tr>
<td>IPA 2011</td>
<td>Supporting social inclusion of Roma and Egyptian Communities</td>
<td>Direct award – joint management</td>
<td>UNDP</td>
<td>1,500,000</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Improving local public social services and infrastructures for vulnerable groups in the peri-urban areas of Tirana and Durrës</td>
<td>Not yet awarded</td>
<td></td>
<td>6,200,000</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>’Count Us In’: Ensuring Social Inclusion for Roma and Egyptian Children in Albania</td>
<td>Grant – call for proposals</td>
<td>Save the Children Italia Onlus</td>
<td>178,271</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Sustainable Multi-purpose Centre in Tirana Municipality Unit no.7</td>
<td>Grant – call for proposals</td>
<td>ARSIS Albania</td>
<td>169,563</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Foster social inclusion of Roma communities in Albania through targeted interventions for vulnerable children</td>
<td>Grant – directly awarded</td>
<td>Amarodrom</td>
<td>191,133</td>
</tr>
</tbody>
</table>

Effectiveness

The education intervention was a grant funded and NGO implemented project. It achieved some support for 284 Roma children in seven schools across three cities. They received three months of pre-school and one year of additional classes, helping in enrolment and educational attainment.

The SSIREC project has made a useful contribution to the experience of working with local authorities and Roma communities to bring a shared and common improvement in living conditions. The project is ambitious, and has only a short time to demonstrate very tangible results. It is a project that has bravely tried to innovate – particularly for income generation – and needs to be supported to learn from this experience, and work on follow up activities.

Impact

The impact of the Help for Children project will be mostly in the form of changed attitudes of teachers and schools. The beneficiary children experienced the support for only one academic year in their nine-year primary school careers – so it is hard to be positive that the project will have a long term effect on their school attainment, unless it is followed up with further support. The project approach potentially contributed to reinforcing segregation in education, and this needs to be carefully addressed.

The SSIREC project is likely to achieve its greatest impact if it is successful in building civil society capacities and the partnership between local government and civil society to address
local issues. The forthcoming local government reorganisation is a big question-mark hanging over the longer term impact of this project in this regard. Impact on livelihoods and income generation cannot be predicted at this point – it would be very helpful to have a follow-up evaluation of the project by the end of 2015 to assess this component and see what can be learned. The SSIREC project included a component of support for central government – the Social Inclusion Department in the Ministry for Social Welfare and Youth. The evaluation was not able to assess the impact of the project on this department’s capacities, but would draw the conclusion that this sort of link between local level action and national level policy making is essential, and could potentially provide significant impact if positive local experiences are incorporated into policy and scaled up.

Overall, the contribution to Roma inclusion in Albania is modest, and therefore the achievements are correspondingly modest.

Sustainability

The Help for Children project was clearly not sustainable. This was evident from the meetings held with the school authorities. The model employed of providing supplements to teachers’ income for providing additional classes was clearly not going to be sustainable from the outset, without real commitment from the Ministry of Education to that model. And the project did not have any elements to engage with the Ministry of Education at that level. There was no clear link between any policy direction from government and the local action.

The SSIREC project has elements which are designed to ensure sustainability, but which need to be carefully watched (ideally continued) to see whether this will be the case. They provided support to local CSOs which, if successful, can provide both a sustainable CSO sector, and continuing voice and advocacy on behalf of the Roma and Egyptian communities. Second, they involved local government from the outset, and so could potentially achieve a sustainably improved engagement of local government with Roma and Egyptian communities. Finally, the infrastructure interventions should contribute to a sustained improvement for Roma and Egyptian communities.

9.1.5. Quality of Monitoring

Country level

As for most other IPA countries, the main instrument for monitoring is the Decade Progress Reports. And as for most other countries, these reports are generally focused on inputs and
activities, not outcomes. Likewise, the civil society monitoring reports for the Decade (latest available for 2012) also look at activities, changes to the law, and individual cases, but cannot provide an overview of change in the quality of life.

Long term monitoring of poverty trends are available – for example, the World Bank/Albanian Institute for Statistics series of living standards measurement surveys\(^{48}\) provide insight into overall poverty trends, but not breakdowns by ethnicity. The UNDP/World Bank/EU regional Roma survey from 2011 gives a detailed snapshot of the current situation and the differences between Roma and non-Roma populations, but does not provide insight into trends. The same is the case for a helpful survey by the Open Society research\(^{49}\). Unlike other countries in the region, UNICEF has not recently conducted MICS surveys\(^{50}\).

We therefore have no effective or reliable way of knowing whether the situation for Roma and Egyptian communities in Albania at the national level is improving or worsening, and whether any change can be attributed to IPA support.

*Programme Level*

At programme level, there were no appropriately defined indicators which would set the basis for sensible programme monitoring. The MIPD for 2011-2013 social development sector simply suggests “Possible indicators in this sector could be the adoption/implementation of relevant legislation and/or measures as well as the increased number of services for disadvantaged people. Higher levels of attainment in education and training could serve also to measure the effectiveness of support in this sector”. It is not clear whether these suggestions were translated into actual indicators, or whether there was any monitoring against such indicators.

*Project level*

The UNDP SSIREC project was subject to the usual ROM monitoring regime. The six grant scheme-funded projects were not. For the 2009 Development of Civil Society grant scheme,

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\(^{49}\) Roma Decade and The Situation of Roma Community in Albania 2012, Open Society Foundation for Albania, Tirana 2013

\(^{50}\) MICS surveys for Albania are available for 2000 and 2005 only (http://mics.unicef.org/surveys) and there are no booster samples for Roma settlements
objectives and indicators were set at a high level, without knowing specifically which projects would be funded. The 2012 Civil Society Facility call was not defined in a fiche (at least, not one that is publicly available) so the indicators are not available. The 2012 social infrastructure project had yet to begin at the time of the field research.

The grant scheme approach leaves some gaps in the overall monitoring of project performance. Objectives that are relevant to each granted project cannot be defined at the outset by the nature of the grant scheme, and because there are a relatively large number of smaller projects, monitoring each using the ROM methodology would be costly. The role of the technical assistance provided under the 2009 grant scheme did not extend to formal monitoring of grantees.

<table>
<thead>
<tr>
<th>Year</th>
<th>Project</th>
<th>Overall objective</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| IPA 2009 | Civil Society Facility – Civic Initiatives and Capacity Building        | Level of involvement of Civil Society in the stabilisation and association process and in the socio-economic development of the country increased | - Enhanced Civil Society Organisations' function in the society, their advocacy role in decision making and understanding of EU integration, policies and EU Institutions.  
- Degree of public understanding on the role of CSOs in society, European integration process and objectives |
| IPA 2011 | Supporting social inclusion of Roma and Egyptian Communities           | Social, economic, political, civic and cultural empowerment of minorities in Albania | Positive assessment of progress made by the Government of Albania in the realisation of the rights of minorities                                                                                                                                              |
| IPA 2012 | Improving local public social services and infrastructures for vulnerable groups in the peri-urban areas of Tirana and Durrës | To contribute to the social, economic and civic empowerment of the most vulnerable people in Albania | • Reduction of the level of the poverty in vulnerable groups  
• Increased levels of education and employability in vulnerable groups  
• Reduction of social problems (criminality, domestic violence) in poor neighbourhoods                                                                                                                                 |
| IPA 2012 | Civil Society Facility grant scheme – civic initiatives and capacity building | to encourage the active participation of civil society in policy-making and to foster its role in contributing to and monitoring of the fulfilment of Albania’s obligations under the EU Albania Stabilisation and Association Agreement, including the respect of human rights and fundamental freedoms and the freedom of expression and media freedom | Indicators not available |
Overall, we see that the mechanisms in place for monitoring are insufficient to provide information about changes to the Roma and Egyptian populations. Only the larger IPA funded actions have adequate project level monitoring procedures in place.

9.1.6. EC Cooperation with External Stakeholders

International Organisations/NGOs

Cooperation between the EU and international organisations and international NGOs is mainly solid, supportive and cooperative. Until 2011, they had been coordinated by the Government. Subsequently coordination was less effective, but continues within the context of the sector working group on social inclusion and a steering committee for social welfare reform. These are led by government line ministries, and could work more effectively, according to interlocutors.

National level actors

Cooperation with government in relevant line ministries is mostly positive, though there is frustration at the lack of resources within government. At government level, there was some frustration with the EU and the difficulties they faced in squaring many circles to make the sector wide approach a reality.

Municipalities

The EU delegation has identified the need to involve local levels of government more in the programming and implementation of IPA assistance. The new landscape after the 2015 local government reforms may provide an opportunity to do this.

Civil Society

Roma civil society is perceived from the outside as relatively weak, and dominated by a few major players. However, it is clear that there is a new generation of dynamic young organisations and activists who are challenging the ‘establishment’. EU funds are not appropriate for supporting young and new organisations; if the EU would like a more vibrant civil society in Albania (and elsewhere) it needs to reconceive its support for civil society, and to provide more, smaller grants within a supporting framework of technical assistance and capacity development aimed at the grassroots level. Lessons learned by the SSIREC project could be particularly helpful here.
9.2. Bosnia and Herzegovina

9.2.1. Overview of IPA Interventions covered by this evaluation

There are six main IPA I interventions identified as being support for Roma inclusion in Bosnia and Herzegovina, one of which (IPA 2013) has not yet started implementation (see table below). All are projects rather than programmes. The two IPA 2008 interventions were originally described as two actions within one project fiche. Two interventions (highlighted in yellow) were selected for in-depth assessment.

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Project name</th>
<th>Implement ed by:</th>
<th>Start</th>
<th>End</th>
<th>EU contribution</th>
<th>Indicative allocation for Roma</th>
<th>% of total</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPA 2007</td>
<td>Enhancing the Social Protection and Inclusion System for Children in Bosnia and Herzegovina</td>
<td>UNICEF</td>
<td>12/2008</td>
<td>04/2010</td>
<td>1,300,000</td>
<td>130,000</td>
<td>10%</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Support for Vulnerable Groups in Bosnia and Herzegovina</td>
<td>UNICEF (direct award)</td>
<td>12/2009</td>
<td>12/2010</td>
<td>1,400,000</td>
<td>140,000</td>
<td>10%</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Support to BiH Roma Strategy</td>
<td>CARE</td>
<td>01/2011</td>
<td>01/2013</td>
<td>499,500</td>
<td>499,500</td>
<td>100%</td>
</tr>
<tr>
<td>IPA 2010</td>
<td>Support for Vulnerable Groups in Bosnia and Herzegovina</td>
<td>UNICEF</td>
<td>07/2010</td>
<td>11/2012</td>
<td>1,400,000</td>
<td>140,000</td>
<td>10%</td>
</tr>
<tr>
<td>IPA 2011</td>
<td>Strengthening social protection system at all levels of governance – Component I of III – Roma Action</td>
<td>HILFSWERK AUSTRIA INTERNATIONAL</td>
<td>31/05/2013</td>
<td>31/03/2015</td>
<td>2,500,000</td>
<td>2,500,000</td>
<td>100%</td>
</tr>
<tr>
<td>IPA 2013 (planned)</td>
<td>Support to implementation of Roma Action Plans</td>
<td>Not yet started</td>
<td></td>
<td></td>
<td>2,500,000</td>
<td>2,500,000</td>
<td>100%</td>
</tr>
</tbody>
</table>

9.2.2. Overview of Roma in Bosnia Herzegovina

The Council of Europe average estimate suggests a Roma population of 58,000 Roma in Bosnia and Herzegovina, or around 1.54% of the total population. A survey and registration exercise (Roma Needs Registration (RNR) database) by the Ministry of Human Rights and Refugees estimates a 25-30,000 population of which some 19,500 are in need of some kind of support. Roma NGOs suggest a population of up to 100,000. Results from the 2013 census are still pending at the time of writing this report.

At present, the Bosnia and Herzegovina governments, UN and international organisations rely on the figures in the RNR database as the basis for programming.
The problems faced by the Roma population are well documented and recognised. See, for example, the Special Report on the Status of Roma in Bosnia and Herzegovina, produced by the Institution of Human Rights Ombudsman of Bosnia and Herzegovina, 2013\(^{51}\). In addition to the ‘usual’ problems faced by Roma populations, there are additional challenges faced in Bosnia and Herzegovina because of war displacement and the destruction of traditional settlements. Conversely, we also see less extreme segregation in the locations of many settlements, and, for now, sympathy among the general population for Roma people rather than antagonism. Despite this relatively good picture, both open and hidden prejudice is very common.

The 2013 UNICEF Status of Roma Children and Families report showed that 80 per cent of Roma children live in poverty, compared to 26% of all children in Bosnia and Herzegovina below the absolute poverty line.

At a national level, the policy framework for Roma inclusion is defined by the first Bosnia and Herzegovina national Roma strategy approved by the Council of Ministers in September 2005. This was supplemented by two action plans – one for education, and one for employment, housing and health. These were later revised with assistance from the OSCE and the UN system\(^{52}\).

There are no specific Roma strategies or action plans at the level of the entities or cantons. However, there is an ongoing EIDHR project supporting the creation of local action plans for Roma inclusion in 15 municipalities.

**9.2.3. Intervention Logic and Programming**

Of the six IPA projects funded in BiH, three of the interventions were the three phases of the “Social Protection and Inclusion System” (SPIS) for vulnerable children, implemented by UNICEF. This project worked at both municipal and policy levels to strengthen the support for vulnerable children in education, health and child protection systems. The project targeted 22 municipalities, not all of which have Roma populations. Funding was modest,

\(^{51}\) Report produced with the assistance of the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and the OSCE Mission to Bosnia and Herzegovina and the financial assistance of the European Union, under the Best Practices for Roma Integration project, implemented by the ODIHR.

\(^{52}\) Revised Action Plan of Bosnia and Herzegovina on Roma Educational Needs (2010) (OSCE support) and Revised action plan of Bosnia and Herzegovina for resolving the problems of Roma in areas of employment, housing and health care 2013-2016 (UN system support)
and indicatively Roma children represented 10% of the beneficiaries (although this could be more).

Three projects are targeted at Roma issues specifically. One is the 2008 support to the Bosnia and Herzegovina Roma strategy, implemented by CARE international. This project provided support to establishing the institutional components thought necessary for implementation and monitoring of the Roma strategy and its action plans.

The second is from IPA 2011 the “Strengthening social protection system at all levels of governance – Component I of III – Roma Action” implemented by Hilfswerk Austria. The Social Inclusion project fiche from 2011 had three components, as follows:

- Roma housing and social housing
- Social protection policy and social services provision (focusing on elderly and disabled people)
- Assistance to persons with disabilities including social housing

Component I consisted of a grant, awarded by a competitive process to Hilfswerk Austria, for 2,500,000 EUR. The other two components were not directly relevant to this evaluation since they had no specific Roma components.

A third Roma-specific project is yet to start. The project fiche for the IPA 2013 project is entitled ‘Support to implementation of Roma Action Plans’ and consists of a housing construction and reconstruction component (130 housing units) and associated activities related to livelihoods. A specific link has been made in the project design with previous activities. The Call for Proposals encourages applicants to include into activities Roma mediators that were previously trained through the ‘ROMED’ programme as well as the existing structure of the established Operational Teams, Commission for Selection of Housing Projects, Roma networks and Roma coordinators at local level. The tender for this project was currently under way at the time of preparing this report.

As can be seen from the chart below, of EUR 6.67 million of IPA I funds that has been directly allocated for Roma issues, three quarters will be spent on housing.

53 There are 26 ‘ROMED’ mediators already trained and certified by the Council of Europe, and 41 Roma health mediators and 76 community nurses working on health issues of Roma under Global Fund. The Global Fund project is finishing at the end of 2016 and no budget is yet in place to continue.
Some of the funds allocated for housing will also be used for supporting livelihoods under the IPA 2013 project, although it is not known how much will actually be available (the fiche indicates that 70% will be spent on construction costs). Experience from previous projects suggests that the amounts available for socio-economic measures vary depending on the construction costs, and whether there are additional sources of co-funding such as municipal contributions that ease pressure on the project budget.

**Quality of Intervention Logic**

The MIPDs and project fiches contain very superficial analyses of problems, concentrating on identification of the issues, and not going into any detail on the causes of the problems. For example, the key justification for the housing proposed under IPA 2013 is as follows: “In order to ensure an adequate Roma social inclusion dynamics in Bosnia and Herzegovina, the crucial issue pertains to solving the Roma housing needs, as a pre-condition for access to wide range of social services, including access to employment, education and health protection. In this respect, the main problem regarding the implementation of Roma Action Plans is shortage of funds, due to the shrinking government budget and decreasing donors’ involvement over the last years”.

In other words, according to the fiche, the problem is that there isn’t enough money for housing construction, and suggests that provision of housing will help to address problems
of employment, education and health. There is no mention of the many other causes of poor housing: displacement and dispossession, systematic exclusion from the labour market, institutional discrimination, and chronically low levels of education. There is therefore no compelling case for why provision of housing reconstruction and social housing is the answer to the real problem. Undoubtedly it would help, but there are nowhere for Bosnia and Herzegovina comparative analyses of alternative policies and approaches that could yield greater results and impact on the lives of Roma.

The same fiche says that there are “outstanding financial needs for construction of remaining 4170 Roma housing units”. Given that (re)construction of 130 housing units together with infrastructure and socio-economic components will cost EUR 2.5 million, the remaining 4,040 housing units would cost another EUR 77.7 million to build, or another 31 years of successive EUR 2.5 million IPA projects. It is clear from this rough analysis that the IPA approach will not solve the problem of Roma housing. A different approach is needed if significant numbers of the 4,000 Roma households are to benefit. The programming documentation does not provide any suggestions on how the remaining housing could be funded, what policy changes are needed, or whether alternatives have been considered. It is fair to point out that state government, municipalities and cantons are also contributing to the construction of housing for Roma, but these estimated amounts are far from the totals needed to address all Roma housing needs.

Problem analysis could be much more analytical, and attempt to get to the heart of the issues. In this way, it should uncover some of the root causes of the problems and lead to more sophisticated and appropriate solutions.

As a basis for this evaluation, we are assuming that the needs of Roma communities and households have been properly and comprehensively documented in the national Roma Strategy of 2005, and that the identified priorities (together with the action plans) represent national policy intentions. Therefore, we can compare the projects funded through IPA against these priorities.

The chart above illustrates the allocation of funds to sectors/themes. We see the majority of funds going to housing (75%) with smaller amounts going to child protection and social

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54 Roughly EUR 1.5 million has been allocated from the state government per year and around EUR 500,000 total from municipalities for the IPA 2011 project. A call for proposals in 2014 was announced by MHRR for Roma housing solutions, offering a total of 2.263 million BAM. The money is yet to be distributed.
inclusion, and to institutional changes for implementing the Roma strategy. Human rights, including projects on political participation and anti-discrimination, through the EIDHR instrument comprise 11% of the total.\textsuperscript{55}

We see from this analysis that there are many areas which are not supported by IPA funds. Education, healthcare, and employment are three of the most significant, plus gender issues. Some areas are tackled through the identified projects in a limited way. For example, the three phases of the Social Protection and Inclusion System project worked on inclusive education in the target municipalities and at policy level. It also had a component dealing with civil documentation, as did the IPA 2011 housing project. The housing projects also have (small) components of employment and livelihoods. During an interview, a representative of the EU Delegation stated that Roma employment was the highest priority, but we do not see that reflected in the allocation of IPA funds. Entity level authorities have attempted to address employment issues with some targeted active labour market measures. These are reported not to be successful however, for a variety of reasons.

The European Instrument for Democracy and Human Rights (EIDHR) does provide some complementarity in the areas of civil society, human rights, participation and representation. These areas are crucial, so it is good to see that in Bosnia and Herzegovina there were seven projects financed through EIDHR totalling EUR 762,094 that dealt specifically with Roma issues. This evaluation did not look at these projects in detail, so it cannot comment on their effectiveness or impact.

Prioritisation of IPA funding was clearly on housing, although the justification for this is not clear. From interviews, there is evidence to show that IPA projects emerge not according to the priority of the issue, but according to the competence of units of government, the extent to which they are able to produce convincing project proposals, and the nature of their relationship with the EU Delegation. Since in Bosnia and Herzegovina, IPA projects must be formulated and approved at the state level, there are only a few units of government that can legitimately propose projects and these have limited policy competences. The Ministry of Human Rights and Refugees has a long history of developing housing projects for displaced persons; since it has a key role regarding Roma rights, it is natural that the Ministry should also look at housing for Roma. Other issues, such as education, health and social

\textsuperscript{55} Note that EIDHR funded actions have not been analysed in detail as they were not included in the original evaluation sample
welfare, are competences devolved to the level of entities and cantons, although with some coordination responsibility within the State level Ministry of Civil Affairs.

There are, therefore, in Bosnia and Herzegovina severe restrictions caused by the institutional structures that make it difficult to design IPA actions. IPA projects and programmes need strong policy commitment from government, and we see that the relevant policy capacities are mostly at the entity (and cantonal) levels. Proposals for interventions must be carefully negotiated and agreed with both entities and the state level, and this slows down and compromises the link between policy and IPA programming.

**Stakeholder involvement in problem analysis and programme design**

The state structure of Bosnia and Herzegovina is particularly complex and not given to easy participation. Many of the issues faced by Roma households fall under the competence of entity and cantonal authorities, and so require consultation with up to 13 different governments, plus the relevant municipalities.

**Governments** were well involved in the preparations for the two Roma Seminars (2011 and 2013). Assistance from UNICEF helped both entities prepare for the state level seminars in advance. The seminars were valued as an opportunity for government, international and civil society stakeholders to share views and have an open dialogue. Interviewees also expressed the view that the Seminars aimed to guide programming of IPA assistance.

The **Roma Committee** of the Council of Ministers includes 22 Roma people and representatives of Roma-related institutions. Of all representatives, 8 (36%) are women. Of the 11 representatives of Roma NGOs, four are women.

Although formally the Roma Committee is included in the early stages of programming, there were complaints that Roma proposals and discussion were not sufficiently respected. Others suggested that Roma representatives are not sufficiently active and capable of quality contributions to the programming process.

The main concern from civil society organisations that are not represented on the Roma council are that they are involved only at later stages of programming, if at all.

International organisations are well involved and apparently have some influence on programming. However, it is worth noting that UNICEF and Open Society Foundation both regard education as the highest priority, but this is not seen in the programming mix for IPA I.
9.2.4. Performance of Assistance

As with the other country studies, the assessment of performance is limited to those projects that were examined in more detail, according to the research methodology. For Bosnia and Herzegovina, these projects were:

- IPA 2008 Support to BiH Roma Strategy (CARE International)
- IPA 2011 Strengthening social protection system at all levels of governance (Component I of III) - ROMA ACTION (Hilfswerk Austria).

See case studies 3 & 4 for more details on these projects.

Efficiency

Both projects were implemented through a competitive grant. This mechanism appears to be efficient in terms of the balance between time spent in the contracting process and ensuring competence and value for money. Timeframes were short by design, and there were no substantial delays.

In terms of budget distribution, the majority of the CARE project funds were spent on workshops and training. Of the total budget of 550,000 EUR, 50% was spent on project staff salaries and the salaries of the Roma coordinators (see ‘sustainability’, below). Thirty percent was spent on capacity building activities, trainings and meetings and only 3.5% went to the small grants.

The majority of the Hilfswerk project budget was spent on housing construction. The costs of around 14,000 EUR per housing unit for construction/reconstruction, and 15,000 EUR for social housing units appears modest. The use of NGOs Hilfswerk and its partners ASB and Kali Sara seems to have been a good choice in terms of keeping costs low and meeting project objectives within budget.

Institutional arrangements are worthy of note – they influenced both efficiency and effectiveness. The three direct awards to UNICEF for the SPIS projects provided a long term perspective, continuity and an opportunity to learn and improve. The amounts, however, were small, and therefore the scale of what could be achieved was modest.

The competitive grants for the CARE and Hilfswerk projects seem to have provided competent implementers with reasonable costs, and within a reasonable timeframe.
The CARE project suffered from insufficient government commitment to employing the Roma coordinators over the long term. According to the CARE final report, the short duration of the project was a factor in this, limiting the extent to which true partnerships could be established.

The Hilfswerk project team placed great value on having obtained the commitments of the municipal and cantonal authorities prior to award of the contract to Hilfswerk and its partners. This resulted in strong buy-in and relatively straightforward implementation. Allocation of land was not a big problem (as it has proved in Kosovo and Belgrade). At local level, the project organised Project Implementation Teams in each municipality, involving municipal staff and representatives from local Roma communities.

For both projects, Roma NGOs are junior partners mainly performing the role of community liaison and working directly with Roma communities. It is not clear to what extent they were able to develop their capacities through the project and be in a position to take a more leading role in subsequent projects. The development of Roma NGOs through partnerships ought to be an additional objective for Roma projects.

**Effectiveness**

The CARE project primarily aimed to support implementation of the national action plans for the Roma strategy. The weakness of the project objectives and indicators mean that it is difficult to make a meaningful assessment of the project’s effectiveness. The assumption implicit behind the project is that if the institutional mechanisms are put in place, the action plans are more likely to be implemented. The key elements that are missing are institutional and political willingness, backed up by budget allocations. Without these pre-conditions, whatever institutional arrangements put in place will not succeed in leading to improved conditions for Roma. The small grants component, conversely, demonstrated that some tangible benefits could come from very small amounts of money if it is carefully designed and implemented in consultation and cooperation with local authorities and Roma communities.

The Hilfswerk project objectives relate to access of Roma to housing. Access to housing will have been achieved for the 150 beneficiary households. In terms of overall access of Roma people to housing, there will have been no systemic changes made which will improve the situation for the other 4,000 or so Roma families without adequate housing. From the field visit and the available documentation, it is not possible to provide an assessment of the extent to which access to other services improved for the target 150 families.
Impact

The CARE project contributed to a greater confidence in Roma NGOs and communities to work with local governments, and to a greater willingness on the side of local government to consult with Roma communities. In terms of the institutional arrangements intended to be in place, these did not substantially contribute to any impact for Roma communities.

The Hilfswerk project will make a substantial impact on the lives of the 150 target families. They will have better living conditions. However, this does not necessarily lead to improved status in the medium to long term. Problems of sustainability of social housing (see case study 3 and next section) mean the impact might be short-lived. Sadly, the budget cuts mean the socio-economic components are unlikely to have a major impact on target families’ livelihoods.

Sustainability

For the CARE project, the main mechanisms established (Roma Coordinators) were largely not sustainable, and the mechanisms no longer function.

For the Hilfswerk project to be sustainable, some basic issues need to be addressed. The social security system does not provide sufficient income for non-working families with no other source of income to pay for housing and utilities (quite apart from food). At this level of poverty, children are unlikely to go to school, the health situation will be serious and households in social housing will depend on the goodwill of municipal authorities not to be evicted. The social housing model needs to be revisited and a sustainable model for the very poorest must be found.

Performance summary

The selection mechanisms for implementation have led to some good choices for project implementation. Where projects have not delivered on their potential, a combination of design issues – poor analysis of the situation and inappropriate objectives – together short time frame to build trust and effective partnerships led to disappointing results.

All the experience of providing housing for Roma (as well as for returnees and vulnerable displaced) shows that integrated approaches are the only approaches that work – in other words, combining the provision of housing at the same time as other measures to improve livelihoods, and access to local services. The reallocation of funds from this socio-economic component undermined this approach, and consequently the sustainability of the project.
The housing projects also demonstrate some of the risks of focusing only on Roma communities. Additional housing supply, often in different locations, can add to the strain on infrastructure and services. Sewerage, water, access roads, school capacity, social welfare services, health services, and social security benefits are all affected. Without a wider consideration of these issues, backed by impact assessments, housing projects may turn the initial goodwill of the municipality into resentment from local communities.

Another evident risk is that of providing social housing without an adequate entity or state level legal framework. The project has provided a housing stock for local municipalities, and this will need to be maintained over time. A legal framework needs to govern access and selection of households for accommodation, including consideration of non-Roma poor in need of housing; tenancy rights and conditions for eviction, responsibility and finance for maintenance, among other issues. Building social housing without these legal protections in the medium to long term is risky.

An opportunity for programming is to link the achievements of the UNICEF SPIS project to the construction of housing; the SPIS project addressed inclusion of children in social care, education and health care, but was not operating in all the municipalities in which the Hilfswerk housing project operated. Linking a housing project to an inclusion initiative such as SPIS is more likely to result in improvements – at least to ensure that all children in the new housing complete compulsory schooling.

9.2.5. Quality of Monitoring

Country level

Overall, the quality of monitoring progress at the country level is poor. Statistical data disaggregated by ethnicity is rare, partly because of the sensitivities this creates in the ethnically charged Bosnian politics. Ethnically disaggregated data from the 2013 census are yet to be published, despite publication being scheduled for January 2015.

The Roma Committee of the Council of Ministers has formal responsibility for monitoring progress of the implementation of the Revised Action Plans.

The Government of Bosnia and Herzegovina submits an annual progress report to the Roma Decade Secretariat, and this sets out the activities and budgets spent on Roma inclusion. It does not provide indicators of outcomes. There are some input indicators that are provided over a number of years – for example, the budgets spent on active measures for Roma
employment 2009-2013 – but without associated data on the success rates of these employment measures.

A progress report for implementation of the revised action plan on the educational needs of Roma for school year 2013/14 was published in January 2015. It provides a snapshot of the situation regarding inclusion of Roma in schools and a variety of statistical data. It does not, however, provide comparable data for previous years – and so it is not possible to assess any progress in terms of educational results and outcomes. The Action Plan itself contained 47 indicators, but reporting against these indicators is not done for the progress report.

The 2013-2016 revised National Action Plans (NAPs) for Employment, Housing and Health contained indicators for the following components: 20 for institution building, 37 for employment, 43 housing and 31 health. According to the MHRR, the first report based on these indicators is expected mid-2015 and the Roma Needs Register (RNR database) is being updated with data from centres for social work for this purpose. However, so far no one is systematically reporting against these indicators.

UNICEF conducted a Multiple Indicator Cluster Survey (MICS 4) in 2011-2012 which provides detailed information on the situation of Roma in 62 of the 142 municipalities in Bosnia and Herzegovina (the others have reportedly zero or only one Roma household). There are, however, no previous or subsequent surveys to provide time series data. So the survey provides very helpful information for programme design, but cannot, as a single time point, provide any information on progress.

The UNDP/World Bank regional survey provides 2011 data from Bosnia and Herzegovina with some comparable data from 2004. Most data, however, is not comparable with the earlier survey.

**Programme Level**

At IPA programme level there is only one objective and associated indicator that specifically mentions Roma, in the MIPD 2011-2013 for the Social Development Sector:

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56 There are, however, reflections on why these grants were not successful, and proposals for improvements to future measures.

57 Bosnia and Herzegovina: Roma Survey Multiple Indicator Cluster Survey 2011-2012 Final Report, February 2013, UNICEF Office for Bosnia and Herzegovina
**Objective:** Improve the social protection system at all levels of governance and address the specific needs of vulnerable groups.

**Indicators:**

- Capacities of social service providers strengthened, in particular to apply a needs-based approach for social services;
- Targeted interventions in support of *e.g.* Roma, refugees and internally displaced people, children and youth, women, people with disabilities, or elderly people implemented, in cooperation with civil society organisations.

There were no programme level monitoring mechanisms reported by the delegation and the Directorate for European Integration (DEI)\(^5\). Monitoring takes place at IPA project level, and at country level through the Progress Report mechanism (which does not specifically report on IPA interventions).

**Project level**

For IPA I project implementation progress is reported through the Results Oriented Monitoring system, plus project final reports and evaluations commissioned by the implementers. These evaluations can provide useful learning points, but are also compromised as accountability tools because the terms of reference design and evaluator selection are in the hands of the implementer, not the EUD or government.

**9.2.6. EC Cooperation with External Stakeholders**

*International Organisations/NGOs*

Bosnia and Herzegovina probably has the highest activity level of international organisations and international NGOs in the region. This is a consequence of both the 1990s wars and the difficulties of working with the governmental institutions in the country.

UN agencies (primarily UNICEF) and OSCE, are active in the field of Roma inclusion. International NGOs are active when they have donor funding – these include the implementing agencies for EU funds such as CARE, Hilfswerk, and ASB.

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\(^5\) As reported in correspondence with the DEI and telephone interview with delegation, March 2015
Coordination and cooperation with the EU was seen as positive and constructive. The Roma Seminars were seen by stakeholders as a crucial forum for harmonisation and alignment of donor support for Roma inclusion.

**National level actors**

National and entity level cooperation is complex in Bosnia and Herzegovina, and often varies depending on the topics and projects. Housing projects have been implemented for many years (for displaced persons and returnees, as well as Roma) so the mechanisms for cooperation are rather smooth. Other areas such as education and social protection are more challenging, as policy is made at the entity and cantonal levels.

**Municipalities**

Municipalities have shown themselves to be cooperative and supportive on the whole. There were some implementation difficulties for the housing project, with some municipalities not willing to take part.

**Civil Society**

Roma civil society organisations are active and involved in project implementation as junior partners. The Open Society Foundation has been providing long term capacity building support to around 10 Roma CSOs with some success. There are challenges of consultation and involvement of civil society in the processes of programming, project design, monitoring and evaluation. More EUD time and resources are needed to lift these consultation processes to a satisfactory level.
9.3. Croatia

9.3.1. Overview of IPA interventions covered by this evaluation

Eight project interventions have been included in this evaluation. Details of these are given in the table below. Of these, three projects (highlighted yellow) were selected for an in-depth assessment of IPA performance.

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>Sector – Housing and Infrastructure</th>
<th>IPA Financing Allocation (€M)</th>
<th>Lead beneficiary (if applicable)</th>
<th>Status at time of evaluation mission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvement of infrastructure in two Roma settlements: Orehovica and Mursko Središće in Međimurje County</td>
<td>IPA I (2008)</td>
<td>1,957,233</td>
<td>Government Office for Human Rights and National Minorities</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Support to National Minorities at Local Level: Support to local initiatives for Roma Integration</td>
<td>IPA I (2012)</td>
<td>2.4 of which 1.0 specifically for Roma</td>
<td>Government Office for Human Rights and National Minorities</td>
<td>Under Preparation</td>
</tr>
<tr>
<td>Grant scheme Local partnership for Employment</td>
<td>IPA IV</td>
<td>521,829</td>
<td>N/A</td>
<td>Completed</td>
</tr>
<tr>
<td>Grant Scheme “Women in the Labour Market”</td>
<td>IPA IV</td>
<td>121,539</td>
<td>N/A</td>
<td>Completed</td>
</tr>
<tr>
<td>Grant scheme “Establishing Support in Social Integration and Employment of Disadvantaged and Marginalized Groups II”</td>
<td>IPA IV</td>
<td>84,215</td>
<td>N/A</td>
<td>Completed</td>
</tr>
<tr>
<td>Grant scheme “Establishing Support in Social Inclusion and Employment of Disadvantaged and Marginalized Groups II”</td>
<td>IPA IV</td>
<td>515,522</td>
<td>N/A</td>
<td>Completed</td>
</tr>
<tr>
<td>Grant scheme “Improving Labour Market Access of Disadvantaged Groups”</td>
<td>IPA IV</td>
<td>142,637</td>
<td>N/A</td>
<td>Completed</td>
</tr>
<tr>
<td>“Integration of disadvantaged groups in regular education system”, component ‘Support Roma and other national minorities in education and capacity building of educational institutions’</td>
<td>IPA IV</td>
<td>1,380,000</td>
<td>N/A</td>
<td>Grants ongoing</td>
</tr>
</tbody>
</table>
9.3.2. Overview of Roma in Croatia

The needs of Romani population are reflected in the National Roma Inclusion Strategy (NRIS) 2013 to 2020 adopted in November 2012. This is supported by the Action Plan for the Implementation of the National Roma Inclusion Strategy for the period 2013-2015, adopted in April 2013. This former document provides a comprehensive analysis of Roma needs and the Action Plan outlines a wide range of measures to be undertaken to address these needs. Furthermore, the bodies responsible for implementing these measures are identified as are the funding sources (although not in any detail). The areas of intervention of the NRIS and of the National Action Plan for the Implementation of the Strategy for Roma for 2013 – 2015 are the followings: education, health, housing, employment, discrimination, identity, culture, women and gender equality. Thus the strategic framework for Roma inclusion is in place.

In terms of Roma numbers, the Census in 2011 recorded 16,975 Roma in Croatia (0.40% of total population). At the same time 14,369 (0.34% of total population) persons are registered as having Romani as their mother tongue. As in other countries, the census figure for Roma in Croatia is different than the estimation of international organizations, specialists and Romani leaders. The Council of Europe estimates 35000 Roma in Croatia, whilst the NRIS estimates the number of Roma up to 40,000 persons. Accordingly to feedback provided to the evaluators, more than half of the Romani population is in Međimurje County and the city of Zagreb, with substantial communities in Sijek-Baranja County, Sisak-Moslavina County, as well as in Istria. More generally, reliable data on Roma numbers, needs and locations was recognised by policy makers and implementers alike as being essential for the effective for both the implementation of the NRIS and programming of EU assistance (both IPA and structural funds). It was reported during the evaluation that the gap between Roma and non Roma varies from region to region but the biggest gap is in Međimurje County.

9.3.3. Intervention Logic and Programming

IPA Programming

In the context of this evaluation, Roma in Croatia have been supported under two IPA components (I and IV). The main strategic documents for these instruments are the MIPD and the Human Resources Development Operational Programme (HRDOP).

Of the three MIPDs covering the evaluation period the MIPD 2007-9 makes references to Roma under Political Criteria and under the Component IV of IPA. They are not mentioned as a priority area, however. The MIPD for 2009-11 makes three brief references to Roma and the 2011-13 makes no reference to them whatsoever. In the context of IPA strategy in
Croatia, Roma have not represented an IPA programming priority. Interviews with stakeholders involved in the programming process held during the evaluation have confirmed this. The MIPD, as in other countries, does not provide a sufficient framework for prioritising or measuring IPA assistance.

The HRDOP is an improvement on the MIPD inasmuch as Roma have been included as a target group under Priority Axis 2 – Reinforcing social inclusion and integration of people at a disadvantage of the HRDOP. The HRDOP provides a detailed analysis of target group needs including Roma. However it does not explicitly prioritise Roma (even though they have specific needs) nor does it have indicators relating to them. Neither document makes any reference to the NRIS, its priorities or outlines ways in which IPA funds aim to complement national efforts to address Roma needs.

Thus IPA support has been channelled through a series of individual project interventions, either via grant schemes under HRDOP implemented by the Ministry of Economy, Labour and Entrepreneurship (MELE) as Operating Structure (OS) or Works and TA projects via IPA Component I, managed by the Government Office for Human Rights and Rights of National Minorities (GOHRNM). There appears to be no linkage in the programming of these two strands of funding. As a result, IPA has pursued substantially different objectives that lack any basic coherence. Those Roma-related projects under IPA IV broadly correspond to the objectives of the HRDOP, while the interventions under IPA I have only project-level objectives that do not have any evident linkages to any wider programme objectives, or make reference to IPA IV assistance.
Based on funding allocations, IPA Roma support has targeted housing/infrastructure, employment and education sectors. The chart below shows this distribution, with housing and associated infrastructure consuming 52% of the total allocated amount (some €5.76 million). Education support from the HRDOP Grant scheme “Integration of disadvantaged groups in regular education system, Lot 2: Support Roma and other national minorities in education and capacity building of educational institutions” constituted EUR 1.38 million. However, the evaluation was unable to establish how many Roma-specific projects were funded from this scheme\(^{59}\). One project funding Roma teaching assistants (from the HRDOP Grant scheme “Support Roma and other national minorities in education and capacity building of educational institutions”) and teaching materials was ongoing in Međimurje during the field mission, but due to lack of detailed information on other grantees, a more detailed analysis of the scheme beneficiaries was not possible.

\(^{59}\) The Ministry of Science, Education and Sports provided the following data in the commenting phase of this report: The evaluation established 13 Roma specific projects were granted out of which 12 were funded from this scheme. Majority of projects were implemented in Međimurje region and Osiječko-baranska region.
Of the 8 projects included in the evaluation sample for Croatia, 6 were funded from the HRDOP and 2 from IPA I TAIB. The HRDOP-funded interventions were grant schemes, all but one of which targeted employment, with the other focusing on education. As such they covered priority areas in the NRIS. Within the calls themselves Roma were a target group – however they were not Roma-specific. Thus there was no certainty that Roma would benefit from the grant schemes, and if they did, this would be largely by chance. There was no evidence that these schemes fitted in with any wider strategic consideration of using IPA funds for Roma, or indeed that they were linked specifically to NRIS priorities.

The two IPA I TAIB projects focus on inter alia the upgrading of public infrastructure in the vicinity of Roma settlements. A number of reasons were given to explain why housing (as opposed to other areas) was prioritised for IPA support. These included the existence of the HRDOP to cover employment, education and social inclusion (although as mentioned earlier, there was no certainty that Roma would in fact benefit from HRDOP-funded interventions) as well as separate IPA funds for supporting civil society (hence no IPA Roma civil society programme). Also, the GOHRRNM was well placed to respond to the lack of activities of other stakeholders, and got involved in directly improving infrastructure and the issue of legalisation.

The upgrading of public infrastructure linked to the housing legalisation has been an IPA priority identified by the GOHRRNM, local and regional authorities, but not necessarily by Roma themselves. Discussions with Roma and Roma NGO representatives suggested that whilst housing was a relevant issue, it was not the most important one. Also, the housing model being funded through IPA appeared to be formalising the segregation that had emerged previously, and had not explored other approaches to this area. This was highlighted during the field mission in Međimurje, where Roma leaders suggested an alternative approach to the segregation model based around dispersing Roma from informal settlements into unoccupied housing throughout the region. It was unclear why this alternative had not been taken forward by IPA programmers. These factors raise questions about the robustness of consultation with Roma in planning and executing IPA assistance (see Case Study 5 for more).

The GOHRRNM stated that they had offered a desegregated housing model to Roma in Medimurje in previous years and that it had been rejected by Roma leaders. The same leaders told the evaluators that this was the model they believed was best suited to their needs.
It was noted that in one of the locations visited during the evaluation (Orechovica town), IPA funding from components I (housing infrastructure) and IV (support for Roma teaching assistants) had been delivered at roughly the same time and had had a synergistic effect i.e. the upgraded infrastructure in combination with enhanced teaching methods had improved the attendance and attainment of the local primary schools Roma pupils. This positive development was not, however, thanks to any vision on the part of IPA programmers - the timing of the implementation of the two (complementary) interventions had been coincidental and the teaching project had happened largely thanks to the initiative of the local school headmaster to apply for a HRDOP grant. Thus synergies, whilst present in IPA had not been exploited in any structured way. This highlighted an issue that was commented on by many stakeholders i.e. that programming for IPA took place within individual agencies with limited active collaboration between each other.

The design of the IPA IV grant scheme Grant scheme “Support Roma and other national minorities in education and capacity building of educational institutions” a characteristic typical for IPA grant schemes i.e. funding allocations (€50,000 – 150,000) were appropriate for institutional applicants such as schools but largely unattainable for Roma NGOs. As such, none of the grant beneficiaries of the scheme were Roma NGOs.61 In some cases, Roma NGOs were applicants’ partners who had responsibility to participate in designing and implementing the action, and the costs they incurred were also eligible in the same way as those incurred by the grant beneficiary.

Evidence from the evaluation mission confirmed the impression from document review, that Romani women have been almost absent in the IPA programming process, with no specific references to them in programming documentation and no measures to support them.

9.3.4. Performance of Assistance

This section is based on evidence gathered from the three projects selected for in-depth analysis (see project table in section 9.3.1).

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Efficiency

Both components of IPA in Croatia are implemented under DIS. As such, they share many of the challenges associated with decentralised management. Evidence from the projects selected for in-depth analysis suggests that efficiency was sub-optimal.

For the two IPA I projects, the lead beneficiary, the GOHRRNM, has experienced difficulties in discharging its responsibilities in both the preparatory and implementation stages. Most notably, it has struggled to complete the preparation of project documentation for tendering of works and technical specifications for the contract 2012-01-23-0303 Support to Local Initiatives for Roma Integration (M€1.0) reportedly due to lack of staff capacity. This is understandable as it is a human rights body, not a construction office, although it might have been worth bringing external expertise for such work. Due to this, both IPA I projects under its charge have experienced a lengthy preparatory period.

The efficiency of IPA I project “Improvement of infrastructure in two Roma settlements” was poor. The financing agreement was signed in June 2009, with funds available from then on. Due to the protracted preparation of technical documents, the tender for the works was launched only in December 2010, 18 months later. The works contract was signed in August in 2011, with the works due to finish in December 2013. However, by this date the works were not fully complete, with defects found, and the contract was extended to June 2014. At the time of the evaluation mission in December 2014 the works had been completed but some issues remained unresolved and as a result the project had not been officially closed. There were several factors affecting this poor performance. The selected contractor went into temporary bankruptcy during the implementation of the works. Also the final beneficiaries (Roma in one of the settlements) disrupted implementation of the works due to dissatisfaction with its scope. Overall, it has taken 5 and a half years to (not fully) complete the planned works.

At the time of the evaluation mission, the GOHRRNM was preparing the tender documentation for three components of the IPA I 2012 project Support to National Minorities at Local Level. It was reported that this was also behind schedule, because draft tender documentation was not considered of sufficient quality by the CFCA to facilitate the launch of the tender. This component was considered unlikely to start before 2016. As the

62 The GOHRRNM reported in June 2015 that it had acquired TA for this purpose. Given the problems and delays caused, this might have been brought in sooner.
project design originates from 2011, the project designs have become partly obsolete and have had to be updated. There is also a risk that this will have to be done again, probably in the implementation phase.

**The CFCA as contracting authority for IPA I was efficient in its performance.** The tendering period for Improvement of infrastructure in two Roma settlements took 8 months, which was satisfactory. It also facilitated the extension of the project implementation to allow its completion. This performance is unsurprising given its extensive experience of implementing IPA funds.

The performance of ‘Support Roma and other national minorities in education and capacity building of educational institutions’ was typical for grant schemes implemented under DIS i.e. slow. The call was launched in September 2011 and the grants awarded in September 2013, two years later. The one grantee interviewed for the evaluation stated that they had to substantially update their project’s parameters as the circumstances in which the project was to be implemented had changed in the intervening period. They also expressed concerns over the lack of communication with applicants by the OS. As with the IPA I interventions, evidence clearly suggests that IPA IV support to Roma was highly time-inefficient.

**In terms of delivery of outputs, IPA assistance has been adequate.** *Improvement of infrastructure in two Roma settlements* provided the required infrastructure, albeit not fully to the standard required (due to the large number of defects). Due to its slow preparation, *Support to National Minorities at Local Level* had not delivered any outputs at the time of its evaluation.

Despite the slow selection process, *Support Roma and other national minorities in education and capacity building of educational institutions* ultimately disbursed 42 grants and used up all of its funding allocation. Evidence from the grant project visited as part of the evaluation suggested that the quality of the outputs in terms of educational support for Roma children was high, although this cannot be generalised to all the grant projects supported.

**Effectiveness**

As mentioned under programming, there are no programme level objectives for the MIPD, so assessing both effectiveness and impact of IPA I assistance can only be done at project level. For IPA IV, the existence of the HRDOP makes such an assessment more straightforward.
The project results planned under *Improvement of infrastructure in two Roma settlements* have partially been met. The principal result*63* (also the project purpose) has been met – the physical living conditions of Roma in the two targeted settlements have been substantially improved. The second purpose/result (confused in the intervention logic) “improved cooperation and understanding between municipal authorities and Roma communities in 2 municipalities” was not achieved, mainly as no activities were implemented for this purpose. Interestingly, the project documentation states that this result will appear “As a result of the participatory process of infrastructure development and execution” i.e. automatically. Evidence from the evaluation mission suggested that the project had not been as participative as expected and had in fact generated considerable tension between Roma and local authorities.

Assessing the effectiveness of the HRDOP grant scheme *Support to Roma and other national minorities in education and capacity building of educational institutions* is complicated by lack of ex-post assessments of the scheme and limited resources of the evaluation team to assess the grantees. Based on available evidence, it had definitely delivered one of its results i.e. ‘support actions aiming at improving quality of education of persons at a disadvantage’. This was evidenced from list grants provided and partially confirmed from the grant project visited. The extent to which it had ‘facilitated the social inclusion of persons at a disadvantage in educational institutions’ (the final result/purpose) was not possible to gauge due to the limited amount of information available to the evaluators.

**Impact**

The one completed IPA I intervention has as its overall objective to “enhance and facilitate active and full participation of the Roma national minority in the economic, cultural and social life of Croatian society, while preserving their own identity, culture and tradition.” The indicators of achievement of this are “Increased integration and acceptance of Roma in 2 municipalities” and “Improved living conditions for the Roma population in 2 settlements in Međimurje County”. It is obvious that a project for reconstructing infrastructure in 2 villages is so far from the substance of the objective as to be an abstraction. Therefore the indicators

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*63* This is given in the project monitoring report as ‘To improve environmental and general living conditions through access and utilisation of new or improved utilities/roads by Roma communities in 2 settlements in Međimurje County.’
of achievement are largely irrelevant, even if the second one has been mostly met.64 Thus the impact of the assistance is highly localised (only in the 2 locations) and probably unsustainable in the long-term (see Sustainability section, below). As regards the HRDOP grant scheme, impact cannot be assessed in any detail due to the very small sample selected (1 project of 42).

The IPA assistance for Roma would have had a much greater impact as a preparatory tool for structural fund measures explicitly but not exclusively targeting Roma. Discussions with programmers indicated that the interventions under IPA TAIB I were not conceived with this purpose in mind. Project documentation makes no reference to structural funds, even though Support to National Minorities at Local Level is still under preparation and will be implemented in parallel with structural fund interventions. The GOHRRNM stated that it had not been able to feed in its own insights into Roma-specific interventions to the extent it felt was needed.

It was reported that the HRDOP grant schemes played a key learning role in the preparation of the ESF OP for Croatia.65 The OP makes extensive reference to Roma as a target group and also under Priority Axis 2 (Social Inclusion) recognises that “[Roma require] a multidimensional integrated approach to address their needs. It should be based on national poverty mapping and should include integrated regeneration interventions financed complementary through both ESF and ERDF.”66 This statement suggests an understanding of the complex nature of addressing Roma needs, although it is not clear whether this stems from the OS’s previous experience with IPA.

The example of the unplanned synergies that emerged in Orechovica thanks to the combination of IPA I funds for infrastructure and the IPA IV grant for educational support for Roma pupils are instructional in this regard. It offers an example of how programmers under structural funds could generate real local impact through integrated, area-based interventions, which could be rolled out throughout the region (see case study 5).

64 It is debatable whether better infrastructure alone constitutes ‘improved living conditions’, but merely improved physical conditions. It can be argued that living conditions also include concepts of improved job prospects, education, health etc. which this project doesn’t address. Also, without improved economic and educational prospects, the Roma living in the settlements will be unable to afford its upkeep and this will lead to its gradual deterioration.

65 OP Effective Human Resources http://www.uzuvrh.hr/userfiles/file/FINAL%20OP%20EHR.PDF

66 Ibid, p. 83
Sustainability

Sustainability of the two completed interventions covered in this evaluation are poor. There is a clear weakness in the sustainability of the housing/infrastructure model supported under Improvement of infrastructure in two Roma settlements. Maintenance of the roads, sewerage and electricity infrastructure should, in principle be assured by the relevant authorities. However, it is doubtful whether many of the Roma in these settlements will be in a position to pay for these enhanced services (increased water/sewerage bills, electricity bills) when in several reported cases they had previously paid little or nothing. Already illegal use of the electricity supply was in evidence in late 2014, with the obvious risk that the electricity company would cut off supply if such practices continued. Failure to pay for water services is likely to have similar consequences. Given the lack of ownership of the infrastructure among at least some Roma living in these settlements, this seems a likely scenario. Discussions with the GOHRRNM and regional authority showed that they had no ready solution for this problem.

The main risk to the sustainability of results of grant schemes for Roma education is what happens to the services that were delivered thanks to the grant funding once the funds have been spent. As the education of Roma children is a long term, multi-generational challenge, it is hardly suited to a one-off 18 month long grant such as the one witnessed by the evaluation team. The evidently successful educational project delivered to the group of Romany children in the Orechovica primary school came to an end in March 2015 with no immediate prospect of its continuation (no follow-on funding had been put in place so the project would finish and the school would have to wait for another grant scheme to start and then apply for additional funds – with no certainty of success). This represents not only an unsustainable funding model for Roma education, but also a tragedy for the Roma children whose educational (and by extension life) prospects had been undermined by this short-sighted approach.

9.3.5. Quality of Monitoring

The monitoring of the assistance under IPA I is satisfactory, inasmuch as it follows standard DIS procedures and at project level provides structured, detailed feedback on project performance. Both IPA I interventions in the evaluation sample have been monitored at sectoral level via the SMSC forum. The GOHRRNM as the main beneficiary institution has provided detailed six-monthly monitoring reports for each project with comprehensive information on project implementation as well as factors influencing sustainability, coordination with other initiatives. It was not clear the extent to which this information has been taken forward by the SMSC and integrated into the design of future IPA interventions.
However, stakeholders interviewed for this evaluation indicated that there was no formalised linking of IPA I monitoring into structural fund programming, reducing the potential for lessons learned to be integrated into ESF or ERDF-funded measures targeting Roma. IPA IV monitoring also follows standard procedures, although beyond this, the evaluators could not judge how effective it was due to resource constraints.

9.3.6. Partnerships and Stakeholders

The key partnership between the EC and Croatian Government is through the GOHRRNM. It coordinates and monitors the NRIS and is the Roma national focal point. It comprises a small number of dedicated staff well versed in the issues of Roma inclusion. However, as with other national agencies responsible for Roma issues in the region, it is politically and institutionally isolated, with little power to effectively influence line ministries on Roma-specific measures (as contained in the NRIS). Also, as noted under Efficiency, the GOHRRNM has historically experienced difficulties in dealing with the rigours of preparing and implementing IPA assistance. Given that the GOHRRNM would undoubtedly benefit from some capacity building assistance from IPA I, it is surprising that it has not made use of some institution-building funding to this effect.

Involvement with Roma civil society lacks structure. There appears to be no mechanism of consultation at national level on programming the IPA with Roma organisations, but rather ad-hoc consultations at regional administration with minority self-governments and occasionally with Romani NGOs. Whilst project documentation makes numerous references to participation of Roma and Romani NGOs in planning and delivery of IPA, evidence from the evaluation mission suggests that this process is at best consultative, rather than participative.

The National Roma Council role in IPA programming, implementation or monitoring is not clear. It was evidently consulted on the IPA I interventions, but feedback from members of the Council suggested that this was a formal process which could have been more participatory. The representative of the national level council is also a MP. The system of self-governments for minorities have created segregated consultative bodies of Roma but their involvement in IPA assistance appears minimal.

As regards international organisations, UNDP and the Roma Education Fund have both been active in Croatia in the area of Roma inclusion. Their interaction with IPA assistance was reported to be also minimal, although cordial relations were reported between them and the GOHRRNM.
9.4. Kosovo

9.4.1. Overview of IPA interventions covered by this evaluation

Twelve project interventions have been examined under this evaluation. Details of these are given in the table below. Of these, four projects (highlighted yellow) were selected for an in-depth assessment of IPA performance.

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>IPA Financing Year</th>
<th>IPA Financing Allocation (€M)</th>
<th>Lead beneficiary</th>
<th>Status at time of evaluation mission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Return and Reintegration in Kosovo Phase 1 (incl. MRSI 1)/RRK 1</td>
<td>2007</td>
<td>8.3</td>
<td>Ministry of Communities and Return</td>
<td>Completed</td>
</tr>
<tr>
<td>Return and Reintegration in Kosovo Phase 2/RRK 2</td>
<td>2008</td>
<td>4.0</td>
<td>Ministry of Communities and Return</td>
<td>Completed</td>
</tr>
<tr>
<td>Return and Reintegration in Kosovo Phase 3/RRK 3</td>
<td>2010</td>
<td>4.0</td>
<td>Ministry of Communities and Return</td>
<td>Completed</td>
</tr>
<tr>
<td>Return and Reintegration in Kosovo Phase 4/RRK4</td>
<td>2012</td>
<td>4.0</td>
<td>Ministry of Communities and Return</td>
<td>Under implementation</td>
</tr>
<tr>
<td>Mitrovicë/a RAE Support Initiative 2 (MRSI2)</td>
<td>2013</td>
<td>1.53</td>
<td>Ministry of Communities and Return, Municipality of Mitrovicë/a</td>
<td>Under implementation</td>
</tr>
<tr>
<td>Return and Reintegration of displaced Roma, Ashkali and Egyptian minority communities returning from FYROM and Montenegro to Kosovo/Return of Minority Communities</td>
<td>2013</td>
<td>1.8</td>
<td>Ministry of Communities and Return</td>
<td>Under implementation</td>
</tr>
<tr>
<td>Sector – Employment (linked to Returns &amp; Re-integration)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Stabilisation Programme Phase 1/CSP 1</td>
<td>2009</td>
<td>2.135</td>
<td>Ministry of Communities and</td>
<td>Completed</td>
</tr>
</tbody>
</table>

67 Under UNSCR 1244
9.4.2. Overview of Roma Communities in Kosovo

There are three officially recognised communities of Roma in Kosovo – these are Roma (speaking primarily Romani and Serbian), Ashkali and Egyptians (speaking Albanian). Their total numbers are currently estimated at 35,000, although this figure is subject to frequent fluctuations due to their inward and outward migration. Their locations are mainly urban, although there is no concrete data on this.

A large percentage of the Roma, Ashkali and Egyptians (RAE) fled Kosovo during the 1998 conflict to both neighbouring countries and Western Europe. Roma were also internally displaced to refugee camps in Serb-controlled North Mitrovica/a. These RAE have been returning in waves to the country since then. The percentage of refugees and IDPs as part of the total RAE population is not known. Estimates vary between 50% and almost 100%.

9.4.3. Intervention Logic and Programming

Intervention logic of IPA support to RAE communities on the EU side is determined at four levels in Kosovo. The first level – political – is framed by the annual EC Progress Reports. The
second – programme level – is covered by the MIPD. The third is project level, covered by the project fiches. Some project fiches contain several ‘activities’ which de-facto constitute stand-alone projects, and as such these fiches could be considered as sectoral in character.

When assessing the extent to which these documents constitute a clear intervention logic in relation to IPA RAE support, it was found that in practice the relationship between the levels was rather weak. The Progress Reports contained no clear objectives for EC support for RAE. Although being the only programme-level document for IPA, the MIPDs do not systematically link to issues in the EC Progress Reports (i.e. by targeting funding towards priorities identified by them in previous years). Indeed, for Kosovo only the most general objectives are stated, and not every MIPD refers to RAE. All project fiches make reference to MIPDs albeit in general terms. However, the linkage between the higher level (overall) objectives in the fiches and objectives stated in the MIPD (which should logically correspond to one another) is largely absent.

The only ‘programme level objectives’ to speak of can be found in the wider/overall objectives of the individual project fiches. These give broader indications of the expected changes at national level that IPA support might deliver (see Effectiveness and Impact under the Performance section 9.4.4).

The fiches usually contain specific references to Kosovo national programme objectives as stated by the government’s European Partnership Action Plans (EPAP), which may or may not have some linkage to MIPD programming objectives. However, EPAPs’ relationship to the IPA interventions is not defined in any programming documents and as such they cannot be considered as constituting part of the programme intervention logic.

Above these country-specific objectives, there exists the EU Framework for National Roma Integration Strategies up to 2020, which serves as a ‘meta-level’ for any IPA intervention logic. IPA assistance very broadly aligns with its general principles. However, in specific terms it is undermined by the strong skewing of IPA support towards one sector at the expense of others of equal importance. Also, much of the IPA assistance for RAE in Kosovo covered by this evaluation was programmed prior to the EC Framework’s adoption.

68 (COM(2011) 173)
Thus there is no explicit intervention logic that cascades down from EC policy objectives to individual interventions funded from IPA annual national programme allocations.

**Selection and prioritisation of assistance**

The MIPDs for Kosovo do not explicitly prioritise any specific area or sector. Indeed, they make few specific references to the problems of RAE and doesn’t present any specific analyses. However, in terms of sequencing of programming and volume of funding, IPA has a clear priority, that of ‘return and reintegration’ (RR). It has received funds from each IPA programme year and overall represents three quarters of IPA funding earmarked for RAE. This has reflected the political imperative to return or resettle all those RAE who were displaced during the Kosovo war in 1998-9. It is questionable whether the year-on-year programming of interventions in this sector provides enough time for analysis of successes or failures of the preceding year’s projects.

As regards sequencing of IPA funds for RR those RAE that were displaced internally in the camps in North Kosovo have been explicitly targeted by two IPA interventions (MRSI 1 & 2). In other cases RAE have been included as a target group in the RRK projects and, less explicitly, the Communities Stabilisation Programme (CSP). Only the 2013 intervention targeting RAE returns from FYROM and MNE is explicitly RAE. Otherwise RAE are subsumed within other returnees i.e. Serbs. Aside from RR, education has been featured in three programme years (2007, 2009 & 2011), one of which encompassed culture and media as well. Linkages between the areas covered by them and their objectives are not as strong as could be expected.

Employment has been covered within the CSP to the value of some M€ 0.676 (6% of total IPA allocation for RAE). Other key priority areas in the GoK RAE Strategy such as health & social, gender, political participation are not covered by IPA to any notable extent and it is not clear what the rationale behind their omission was. See the Diagram in attachment 1 for the reconstructed sequencing of IPA assistance.

Of the IPA interventions included in the scope of the evaluation (some M€33), 36% has been allocated to measures explicitly targeting RAE (11.76M€). Of this amount, RR has consumed 76% of the allocation. Education has been the next priority (Inc. culture and media) and has received 18%. The chart below illustrates this in detail. Other issues such as documentation are covered within the RR interventions i.e. they are explicitly for RAE returnees. Those RAE not involved in the RR programme have not benefitted from IPA assistance in these areas.
Nearly all IPA funding\(^69\) has been used on the delivery of action on behalf of the Kosovo institutional beneficiaries. RR interventions primarily provide housing for returnees (works). These are supplemented by some TA support for the beneficiary institutions (MCR and municipalities) as well as training for returnees and supplies in the form of equipment for returnees to start a business. There was a marked absence of IPA targeting policy development or institution building, despite extensive evidence to indicate weaknesses in both these areas. This was explained as being partly due to the absence of prioritisation at programme (MIPD) level and partly a result of the programming process for IPA, where the best quality project proposals are most likely to receive funding. For example, as the MCR is an experienced beneficiary of IPA funds and has a model (RRK) considered to be effective by the EU, this is much better positioned than the OGG or some line ministries dealing with RAE issues, which are institutionally weak but whose needs are at least as great.

\(^69\) The only project in the sample with a policy element is the ‘ACCESS’ intervention which has 1 component ‘review of policy and support to legislative changes’.
The engagement in the programming process of the other key institutional beneficiary of IPA, the Ministry of Education, Science and Technology (MEST), was reported as ‘consultative’. It evidently does not yet play a leading role in the programming process for RAE interventions – this is done by other parties – primarily NIPAC. This has led to a situation that some key results of IPA funding in the education field are not aligned with MEST policy and are unsustainable (see case study 8).

A final point is the noted absence of programming IPA funds from different ‘sectors’ to bring wider benefits to RAE and non-RAE alike in the host communities under RR. This is despite existence of potentially complementary IPA funds such as small scale infrastructure funds, WBIF for social infrastructure which are managed by other ministries (e.g. for local government administration). Thus the building of housing for RAE returnees in a municipality with poor infrastructure should be linked to wider infrastructure upgrades for the whole municipality using other IPA funding sources during the programming process.

**Stakeholder Involvement**

**RAE Communities**

No clear picture on involvement of RAE communities in programming exists. The strong impression is that they are not systemically consulted on IPA assistance – rather it depends on the individual institutions requesting IPA assistance and these have no formal procedures or forums to facilitate RAE consultation or participation. For education interventions, it was reported that RAE are consulted with the MEST only once an intervention has been prepared and approved for funding. For Return, the Kosovo authorities appear to rely on international organisations dealing with the delivery of the EC-funded interventions for consultation. The EC relies on the Kosovan institutions to consult with RAE communities so has no direct connection with them. Feedback from municipalities and RAE NGOs consulted in this evaluation indicates that they are not aware of, or involved in the programming process to any notable extent.70

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70 The EC stated that in both MRSI 1 and MRSI 2 projects, RAE community leaders and community members have been fully involved in all phases of programming and implementation. The evaluators were unable to verify this.
IPA and International Organisations

All the assistance covered by this evaluation has been delivered by either international organisations or international NGOs (see Performance). There is also substantial anecdotal evidence from this mission to suggest that these bodies, especially the international organisations, provide inputs into the programming process, in terms of identifying priority areas to beneficiary ministries (such as MCR or MEST) who then request assistance from IPA to address them. This is to some extent understandable given the weak policy and programming capacities of many state bodies. However it also makes the programming of IPA assistance closer to agencies that have a direct benefit from it. It also fuels unfortunate situations such as the one in education where externally driven policy initiatives have been funded from IPA but which in several cases do not correspond with national priorities, undermining their sustainability.

RAE Strategy and its Action Plan

The RAE Strategy covers 11 priority areas\(^71\) and stipulates a range of measures to be conducted for each sector. However, the RAE Strategy contains no objectives at sector level. These are instead stipulated in the Action Plan (AP) that elaborates the RAE Strategy and which in addition to sectoral goals and objectives states: specific actions; indicators; timelines and; financial resources required. In total it has some 330 individual actions. It is generally agreed that this is too many. The Action Plan was revised in 2014 in an attempt to improve its focus on the main priorities for the last two years of the RAE Strategy.

The RAE Strategy and Action Plan outline strategies and measures for governmental institutions. The strategy resides at the Office of the Prime-Minister, specifically the Office for Good Governance (OGG). Two bodies were created to oversee the implementation of the RAE Strategy and its Action Plan. The first is the Action Plan Technical Working Group (APTWG) which is conceived as the operational forum through which the strategy will be delivered. The delivery of RAE Strategy Action Plan is supervised by the ‘Inter-Institutional Steering Committee’ (IISC), a political body with a mandate to ensure that the RAE Strategy is being implemented as planned. Its members are Ministers of relevant ministries plus a representative of the RAE communities, Ombudsman, a member of the Communities’

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\(^71\) Anti-discrimination (inc. access to Justice); Education; Employment & economic empowerment; Health and social issues; Housing & Informal Settlements; Return and Reintegration; Registration & Documents; Gender issues; Culture, Media, Information; Political Participation/Representation; Security (Policing)
Consultative Council (CCC), and the Head of the OGG. The IISC has been chaired by the Minister for EU Integration. Separate to these 2 bodies, the CCC has a mandate to advise the Prime Minister directly on issues of relevance to minority communities in Kosovo. RAE communities have representatives on this. The Office for Community Affairs has a similar mandate linked to implementation of legal framework for communities. Line ministries are charged with implementing the provisions of the Action Plan that fall within their competences. Their performance is monitored by the OGG/APTWG.

This structure in principle ensures a political and operational framework for the delivery of the RAE Strategy. In practice, it has not functioned as anticipated. Both the main bodies did not become operational till late 2010. A 2012 OSCE report on progress in the implementation of the RAE Strategy found a “lack of full political engagement, insufficient allocation of resources and lack of adequate communication between central and local level institutions” were undermining any substantive progress in meeting the provisions of the Action Plan. Since then, the APTWG was reported as meeting only sporadically while the IISC has not been convened since the replacement of the Minister for EU Integration in mid-2014. Evidence suggests only limited improvements had been made since 2012 – The EC progress report from 2013 found that “Implementation of the strategy and action plan remains weak and inconsistent“. Feedback from the evaluation mission confirmed this to still be the case, and also that the limited capacities of the OGG are an impediment to the Action Plan’s effective implementation.

IPA and RAE Strategy

IPA funds coincide with several of the RAE Strategy priorities. However, the MIPDs do not explicitly link IPA support to national strategic policy goals outlined in the RAE Strategy/Action Plan. Only 1 IPA intervention supported explicitly the implementation of the RAE strategy in the areas of education, media and culture. The heavy bias in IPA funding towards RR projects has evidently been at the expense of other key areas of the RAE Strategy. Employment was universally reported as the main concern of adult RAE, yet IPA covers this only indirectly within the context of the CSP initiative. Other issues such as health and anti-discrimination have not been addressed by IPA as distinct priority areas. In the case of health, it was subsumed within RR projects as merely as a component.
9.4.4. Performance of Assistance

Efficiency

Implementation of IPA funding is centralised. This makes the programming and contracting process much quicker than in countries with decentralised implementation (DIS). Consequently, the efficiency of the assistance is in this respect good.

Those projects with international organisations (UNHCR, CoE, KFOS) have been financed via direct agreements. The usual justification for these organisations’ selection is that they offer expertise or capacities above and beyond what would be available from other (commercial) entities. Whether this is in fact the case is often disputable e.g. educational projects can be delivered by a range of organisations both international and national, non-governmental, supra-governmental and also commercial. As regards the involvement of international NGOs in the delivery of assistance (primarily for RR projects), their selection by restricted tender bears the hallmarks of a ‘closed shop’, with the same small number of organisations regularly winning tenders and delivering projects that, as will be shown later, often contain substantial flaws.

These . At the very least, there is some potential for improving cost efficiency and effectiveness by using open international tenders where the case for using either of these two approaches are not manifestly proven.

Nevertheless, this approach provides clear efficiency benefits – funding is allocated quickly to these contractors, who in turn are usually able to promptly mobilise their expertise. These international organisations/NGOs have local offices and staff who are invariably experienced in delivering assistance for the EU or other donors. Thus problems with adherence to procedures, reporting and financial management are rare.

A downside to this is the lack of active involvement of national and local actors in implementation. As these projects are doing the work that the MCR, MEST or municipalities cannot do themselves, IPA is essentially financing the outsourcing of core government services. Although the TA elements of the assistance provide some capacity building, the evaluation mission noted that this support was inadequate in comparison to the challenges faced. Thus a certain dependency culture is detectable, especially within the RR sector, on both international organisations to deliver RR-related actions and also on IPA and other donor funding to finance them.
A strong point of IPA assistance to date has been in terms of delivering planned outputs. Under the RR sector interventions, the following was delivered: Under project MRSI1 a total of 375 individuals were resettled. Under RRK2, 32 RAE families (200 people) were relocated and given new housing. 7 families were unable to be relocated due to lack of land and are still awaiting rehousing. Under RRK 3 (according to IoM figures), 139 RAE community members were returned (28% of total). Under CSP1, 22.5% of funds were allocated to RAE community members, with 384 benefitting from training and active employment measures. Under MRSI 2, all the remaining families from the IDP camps have been moved to alternative housing, while under Return of Minority Communities 45 RAE families (240 people) were expected to have been returned to Kosovo by the end of 2014 and moved into housing constructed by the project.  

Under Support to Educational Reforms one component developed a Romani language curriculum for schools. This is being taken forward by the ACCESS project as well as possible (in the absence of teachers able to teach Romani language in schools).

Specific numbers of RAE supported under Support to the Implementation of the [National] RAE Strategy are given in the project final summary report. In the 6 learning centres established, “The total number of direct beneficiaries in six centres was 2,181, and 2,000 school packages were distributed to children attending compulsory education”. Under the scholarship programme, 200 secondary students were awarded scholarships, among them 69 female, as well as 20 tertiary students, among them 9 female. Under the Media sub-component, 45 RAE youth were training in various aspects of journalism and they have produced three TV and three radio documentaries. Numerous articles have been written by young RAE journalists and published in local print and electronic media. 5 of the media training beneficiaries have been employed for one year in BIRN media outlets where they have worked as journalists or technical staff.

All these figures are broadly in line with indicators given in project documentation.

Effectiveness

Understanding the extent to which the assistance at IPA programme has been effective in terms of meeting planned purposes is complicated by the programme’s weak intervention

72 Figures taken from various project final and/or interim reports
logic, the lack of SMART indicators and absence supporting baseline figures on RAE. As such, no quantitative changes can be measured objectively. Also, there are no programme level objectives to speak of. Only those overall and specific objectives in project fiches exist, which under PCM methodology, should correspond to higher level (programme) objectives. However, these objectives are often confusing or inconsistent, with some overall objectives more closely corresponding to ‘purpose’ level objectives and project documentation providing differing objectives. Due to these factors, effectiveness has been assessed allegorically against those objectives that best reflects the understood purpose of the interventions – these are generally the Specific Objectives given in project fiches.

**Overall Assessment of Effectiveness**

The evaluation found that the RR model provides for the (largely) effective transfer of RAE to new locations in Kosovo, but fails to effectively address their reintegration thereafter. Despite this, the main institutional beneficiary (MCR) expressed its satisfaction with this model, and other key parties involved (EUO, international organisations) have a largely uncritical stance towards it. Calculations are that 75% of IPA funding for RAE has been channelled through RR and it benefitting no more than 10% of the RAE population (some 3000 RAE have benefited from RR). Cost effectiveness of RR has to be therefore questioned.

The Education sector support produces useful results in terms of pilot approaches but is seriously undermined by lack of linkage to national policy in the area, which compromises their wider benefits and sustainability. Employment interventions via the CSP model appear to be inadequate for addressing the problems facing adult RAE successfully creating sustainable livelihoods. Below the specific objectives of the assistance is assessed by sector.

**Assessment of Performance against Specific Project Objectives**

“Sustainable return of IDPs and refugees through an increased involvement of central and municipal state and non-state actors (in selected municipalities) – RRK interventions”

The RR interventions have involved central, municipal and non-state actors (primarily international organisations/NGOs contracted to deliver IPA assistance). They have also

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73 For example, under ACCESS, the project fiche states two different overall objectives, the Direct Agreement has a different objective to the those in the fiche and the CoE project fact sheet offers a further overall objective.
physically re-located approximately 900 RAE back to Kosovo from various locations outside the country.

This does not appear to have guaranteed the return and reintegration process to be a sustainable one, however. Due to the questionable logic of the RR approach used and the numerous implementation weaknesses found in the projects evaluated (see case studies 6 & 7 from Obiliq/c and Mitrovice/a) Roma, once returned to Kosovo, are evidently not staying to re-integrate. The unsuitable physical, social and economic conditions into which they are expected to integrate often compel RAE returnees to depart Kosovo again and seek asylum in EU countries. Anecdotal evidence is that some 30% of RAE in Kosovo have left the country in the last 18 months, with the departures continuing. Thus this RR model appears to be unsustainable and this objective has not been achieved.

"Facilitate peaceful and sustainable resettlement and reintegration of RAE families which would subsequently contribute to the closure of Ostorode and Cesmin Lug camps in North Mitrovica" (MRSI 1/2)

This objective has been largely achieved. RAE have been moved out of the refugee camps and they have been closed down. Several of the RAE families have been relocated to Roma Mahala in S. Mitrovica and other locations. However, as elsewhere, problems in finding available land is hindering this process for RAE families that are to be relocated outside of the Roma Mahala.

Roma Mahala is now on the way to becoming a fully segregated Roma ghetto with good amenities that will, in all likelihood, deteriorate over time due to several factors. These are a dependency on limited municipal budget and goodwill, declining International NGO support now that camps are closed, no sustainable social housing model, high unemployment, low local rent, tax incomes, and divided responsibility between north and south Mitrovica in areas such as education. It is unlikely that RAE will be successfully and sustainably reintegrated for the reasons mentioned in the paragraph above (see also case study 7).

"To create income generating and employment opportunities among ethnic minority communities in Kosovo, thereby creating sustainable livelihoods and improved socio-economic conditions" (CSP 1/2)

This objective encompasses not only RAE but other minority communities e.g. Serbs, who were the main target group. These projects weren’t evaluated in detail. Evidence suggests that employment and wider economic development are crucial for RAE families to find a future in Kosovo and the very limited funding devoted towards this area is insufficient. A
broader and more complex approach would be needed to create the socio economic conditions for sustainable RAE returns.

“Support primary, secondary and higher education reforms in Kosovo conducive to intercultural awareness and understanding and further facilitate the integration of Kosovo into the Bologna Process”

The development of a curriculum for teaching Romani language was the only element of this intervention and was not rolled out under it.

“Support the Kosovo Government in developing democratic and multi-ethnic society by implementing the RAE Strategy and its Action Plan” (SIMRAES)

The project implemented some actions in the areas of education, culture and media. Some benefits were reported. However, upon its completion, there was little evidence that these benefits were taken forward by the main institutional beneficiaries, the OGG and MEST. This suggests that these benefits are unlikely to be sustainable.

A central focus was on establishing 6 learning centres for RAE children. These centres remain operational but are dependent on donor funding. MEST is yet to commit itself to supporting them from state budgets. A total of 49 learning centres exist, run by NGOs. Without formal accreditation by MEST (and learning centres’ inclusion in MEST policy objectives) they will remain outside the state education system. Roma mediators were also supported. This model, whilst widely praised by NGOs and donors as an effective tool for RAE education does not enjoy the support of MEST (see case study 8 for more on this). Media training was reported as being beneficial, although was short-term and reportedly not followed through by the OGG (due to lack of funds/powers).

“Ensure greater social cohesion and confidence between communities by supporting the integration of RAE in Kosovo, with special focus on education” (ACCESS)

This objective will only be achieved if the results of the project are integrated into MEST policy and resourced accordingly. Currently prospects for this are not promising. Key tenets of the project results are built around pilot municipalities – these lack resources to implement the results once the project is complete. Also the pilots need to be rolled out country-wide. However, MEST currently lacks the resources to do it and has an ambiguous stance about central elements of the approach (Roma mediators). The Roma language component cannot be delivered to schools as there are not enough teachers of Roma language available to do this. Overall there is a risk that once the project finishes, its
benefits will not be sustained unless more donor funds are found to sustain them or roll them out.

**Impact**

Available documentary evidence and feedback from the evaluation mission indicate that impact of IPA assistance for RAE is unlikely to substantial. The low effectiveness of the individual interventions (see above) has an inevitable knock-on effect in terms of delivering wider benefits for RAE and non-RAE alike.

The Mid-Term Review (MTR) of the RAE Strategy AP by the GGO provides an assessment of progress made in addressing RAE needs to the end of 2012. However, only three quarters of measures were measured (due to reported lack of institutional capacity and absence of baseline figures) and the MTR doesn’t give an assessment of whether these activities led to the changes that were anticipated in the RAE Strategy.

An OSCE assessment of the performance of the RAE Strategy, issued in both 2011 & 2012, found that there was evidence of modest progress in the areas of return, regularization of informal settlements, culture and education. However, there were no significant developments in the areas of employment and economic empowerment, participation and representation, or in security, police service and justice. The lack of progress at that point was attributed to continuing problems of political will and under-engagement of high-level bodies, ministries and municipalities towards supporting RAE integration. Evidence from this evaluation broadly corresponds with these findings.

There is very little hard evidence to suggest from the evaluation sample to show that IPA has had any direct impact at a programme/country level and thus contributed to any of the changes mentioned in independent reports. Micro impacts in areas of education are noted – improved RAE child participation in schools where IPA-funded pilots are reported and some 3000 RAE children have benefitted from having better trained teachers, the support of learning centres and educational mediators for the duration of the IPA funded interventions. However, Roma children’s education is complicated by language issues (Roma speak Serbian generally) and use of parallel Serbian schools in mixed municipalities. There is currently no consensus on how to address this serious problem.

The RAE that have been rehoused from the lead-poisoned Leposaviq/c and Osterode IDP camps no longer face such serious risks to their health. This can be considered a positive impact. Also, the RAE that have been returned to Kosovo under the RR programme may have been given (potentially) better housing than they had previously, although the evaluation
mission found this to be debatable. However this does not seem to have made any noticeable difference at a macro level to the wellbeing of the RAE overall or the municipalities where they are located. Otherwise, \textit{wider benefits are not apparent from the evaluation sample}.

Of more concern are the many unplanned negative impacts to which IPA support may directly or indirectly contribute. These relate mainly to the RR programme and include: the Ghettoisation of RAE via the RR programme (Roma Mahala); Deepening of RAE poverty by relocating RAE families to areas that are already economically depressed; This also has wider negative social and economic impacts on the locations where RAE are relocated - RAE have little or no capital to contribute and are thus dependent on external assistance to survive as they have little or no formal income. This increases the pressure on already limited local services and creates greater problems for the host Municipalities which have limited capacity or resources to handle these problems. Finally, non-RAE resent the arrival of RAE, which increases the potential for social unrest in these locations.

\textit{Sustainability}

Based on information available to this evaluation, sustainability of IPA support for RAE does not appear to be particularly strong. The reasons behind this assessment are as follows:

Firstly, the programming approach does not seem to take into account the complexity of the challenge of RAE inclusion. Due to the lack of a clear programme strategy/objectives IPA is programmed either based on political imperative (RR) or on a project-by-project basis. There is a lack of comprehensive situational analysis and programme/project design needed to develop robust and sophisticated interventions capable of addressing the multi-dimensional problems facing RAE in Kosovo. The limited involvement of RAE in this process of design weakens IPA support further, and reduces ownership of its results by its final beneficiaries. Finally, IPA has not been consistently and explicitly linked to national policy/ measures built around the RAE Strategy. Overall the programming approach is not conducive to creating a sustainable set of interventions for RAE.

The limited capacities of Kosovan institutions and the prominent role of international organisations and NGOs in implementation (as well as programming) assistance has also had implications for sustainability, in both the RR and education sectors (see below). IPA has instead focussed on implementing projects (though outsourcing to IO/NGOs) rather than building capacities at central/local level and facilitating the delivery of longer term interventions through these bodies.
The reported lack of capacity/funds/political will to address RAE issues on the Kosovo side makes it even less likely that the outcomes of IPA funded interventions that have been designed and implemented without adequate local involvement/commitment will be taken forward once completed.

Only a more balanced programming mix, reflecting RAE needs on the ground, using more sophisticated (integrated and area-based) approaches, linked directly to RAE Strategy priorities and with clear institutional buy-in is likely to deliver more sustainable results.

**Sustainability of Support for Education**

In the education sector, some elements of the assistance may be sustained at micro level (due to the efforts of NGOs, individual municipalities or other donors) but to be sustained at a national level they will need to be financed from state/municipal budgets and rolled out nation-wide. This will require funding, capacity to coordinate and political commitment, none of which are currently present. 3 Key elements of IPA assistance in the area of education are particularly at risk:

- The Roma curriculum developed under IPA cannot be introduced until there are enough teachers to teach it and then agreement to implement it from MEST.
- Roma educational mediators won’t be sustainable until MEST accepts them as a pedagogical profession which seems unlikely at present. Mediators will therefore be dependent on external funding for their existence until such time as MEST changes its position.
- Learning centres are funded from IPA and other sources. Like Roma mediators, the centres are not part of the government education structure. MEST is supportive of the work of the 6 centres established by KFOS and funded from IPA inasmuch as it considers their work to be of a good quality. However, their funding from national budgets will not happen before they are accredited as ‘state educational facilities’. There is no prospect at the moment for such an accreditation process to take place.

**Sustainability of IPA support for RR**

Based on evidence to hand, the current RR approach is unsustainable. The model is effective in returning RAE to Kosovo. However, whilst returns are ongoing, the reintegration efforts seem to be undermined by several factors. First among these is the general economic situation in Kosovo and the local economic climate in many of those municipalities where RAE have been resettled. This offers little opportunity for adults to become economically active and live a decent life upon return. The problem of an absence of work for adults to
generate income to support their families is exacerbated by the lack of a functional welfare net for RAE returnees. Social security payments are around €50 a month, while advice and guidance services exist only while the IPA are running. After that, the social service provision falls to municipalities or government offices that appear to lack the capacities to meet the complex needs of the RAE (from job seeking advice for adults to psychological counselling for RAE children deeply traumatised by the experience of return).

A further factor, observed during this evaluation, is the physical location where RAE are returned to (due to problems primarily with land allocation to returnees), which in some cases is unfit for habitation. Also, the hostility of host communities towards RAE returnees was reported as undermining confidence among RAE in chances of re-integration. Finally, the existence of a well organised network of people traffickers facilitates the (affordable) migration of Kosovan (and Albanian/Macedonian) RAE out of Kosovo and into the EU.

As a result of the above factors, RAE are reported to be leaving Kosovo at an alarming pace (estimates placed the numbers of RAE having left Kosovo since the start of 2014 as 30% of the total population). They claim asylum in the EU but have little chance of gaining it. They then return to Kosovo having left the homes provided to them through IPA (which they have either illegally sold or have in the meantime been repossessed by the municipalities), invariably in a worse situation than they were in when they left. This problem will ultimately have to be dealt with by municipalities, who as noted elsewhere, usually lack the resources to address the complex social and economic problems RAE face.

A final point that underpins the sustainability of IPA support to RR is the ethical dimension of the current approach. Evidence from the field visits for this evaluation indicate that the RAE are either being settled into segregated locations (Roma Mahala) or areas that are unsuitable for habitation (Obiliq/c). In neither case does this approach meet the basic EC guidelines for support to Roma communities.

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74 It was reported by the EUO that most of RAE beneficiaries returned from camps still receive social assistance from Government of Serbia in north Mitrovic which is approx. EUR 300 per family,
9.4.5. Quality of Monitoring

There is no specific IPA programme level monitoring for RAE assistance. The Joint Monitoring Committee (JMC) for IPA is the highest level monitoring forum but does not go into detail to influence directly the RAE programme unless there are major issues/problems that need addressing. Technical level monitoring of RAE issues would be Stabilisation Association Process Dialogue (SAPD) that takes place once a year. The discussion is organised around specific sectors/areas and the minority communities/RAE issues are part of the Justice, Freedom and Security (JFS) SAPD. RAE issues are discussed in some detail but these discussions do not appear to serve as a basis for monitoring the performance of IPA interventions or planning for future assistance. Both forums meet annually.

As elsewhere in IPA countries, project level monitoring is conducted by ROM, which is an adequate tool for operational monitoring but little more. The EUO has its own internal monitoring processes that involve regular reporting on project performance.

In theory the mechanisms that exist on the Kosovo side to monitor the implementation of the RAE Strategy are sufficient and could be used to assess IPA contributions to the achievement of its objectives. The action plan is the framework to monitor performance, whilst the main forum for supervising its implementation is the IISC. However, feedback from stakeholders suggests that in practice it doesn’t function well, due to several factors. These include the under-performing monitoring forums (political and administrative) which were reported to meet only sporadically due to limited interest at political level; no adequate baselines to report against; lack of capacities within OGG and line ministries to collect data.; Lack of capacity within municipalities to participate in monitoring, and; no engagement of RAE NGOs in the process.

The inadequacy of this mechanism is illustrated by the Mid-Term Review (MTR) of the RAE Strategy Action Plan published by the GGO, which provides an assessment of progress made to the end of 2012. It reports progress on 72% of the Action Plan’s 388 indicators. The remaining indicators were not monitored. The MTR offers reporting on what activities have been carried out across 75% of the planned actions (the remainder were not subject to any assessment). Due to the absence of baseline figures, the MTR cannot give an assessment of whether these activities led to the changes that were anticipated in the RAE Strategy.

It is clear that the existing arrangements for monitoring and evaluation don’t serve their purpose of adequately informing programmers, policy makers and implementers of the performance of IPA RAE interventions. The EUD needs to get closer to the interventions and
not rely on feedback from ROM (which is of variable quality) and international organisations implementing IPA projects (with subjective views on their project’s performance).

IPA interventions in the sector delivered by international organisations were evaluated by third parties as part of the grant agreement. There is some doubt as to whether this model ensures the necessary impartiality required. Evidence suggests that evaluations done to date have not identified some of the more evident shortcomings in the projects, and indeed the overall IPA programme approach.

### 9.4.6. Partnerships and Stakeholders

*International Organisation/NGOs and their relationships with Beneficiary institutions*

As noted elsewhere, the relationship between the EUO, International organisations and NGOs and the government bodies involved in RAE IPA programming and implementation is very close.

International organisations appear to have a say in the programming of IPA interventions. Feedback from stakeholders indicates that where needs analyses are done by relevant government institutions, often they are assisted by the international organisation(s) active in the sector. This arrangement, while convenient for all parties (government often lacks capacity to do this work, EUO needs mature project proposals for financing and IO/NGOs have the ability to prepare such projects quickly) creates several problems such as lack of transparency in programming, limited ownership of projects and programme approaches that may not in fact be effective.

As noted elsewhere, IPA beneficiary institutions are largely dependent on external agencies to deliver assistance that will meet their strategic goals. Examples of this phenomenon abound: The MCR outsources delivery of IPA projects to international organisations such as the UNHCR or international NGOs such as the Danish Refugee Council and Mercy Corps. The Ministry of Education Science and Technology (MEST) has relied on KFOS and the Council of Europe for delivery of RAE education interventions. The OGG has relied on the OSCE and KFOS in preparing the RAE Strategy and Action Plan. The OGG is the key institution for RAE issues in Kosovo and the body through which all IPA funding should theoretically pass. In practice, however, it is reported to be institutionally isolated, politically weak and under-resourced to deliver on its mandate.

In the absence of these international organisations acting as their proxies, it is unclear if the Kosovan beneficiary institutions would have the capacity and resources to effectively meet
their strategic goals. This arrangement has created a dependency culture which is not conducive to building indigenous capacities in policy/programme development or delivery.

**National IPA Coordinator at the Ministry for EU Integration**

Programming is under the Aegis of the EC in coordination with NIPAC office. It provides feedback to the EUO in terms of specific goals of IPA assistance at programme level. For sector-level interventions, goals or objectives are defined by the EC in consultation with the beneficiaries, and often with the help of external agencies. NIPAC processes the project proposals but appears to provide little input into the focus of the intervention or its content, even though it is well placed to do so. Also, the NIPAC was till mid-2014 the chair of the IISC of the RAE Strategy, but since recent elections, it has not continued in this function. Thus NIPAC plays a potentially important role in both programming and monitoring RAE assistance but currently doesn’t engage at this level.

**Municipalities**

Local government in Kosovo is carried out by municipalities. All municipalities are responsible for the delivery of a wide range of services of direct relevance to RAE communities – most importantly, pre-primary, primary and secondary education, primary healthcare, family and social welfare services, land use and housing, economic development, public services and utilities including infrastructure, cultural activities. In addition, some ‘delegated municipalities’ have additional powers conferred on them by the government.

In addition to key elements of the national RAE Strategy, municipalities are also required to have their own RAE strategies which cover and allocate funding to their delivery. They also are required to have an office for communities responsible *inter alia* for the delivery of the strategy. In practice, municipalities are limited in their ability to deliver these strategies, due to a lack of staff capacity, funding resources and in some cases institutional resistance.

As such they represent a potentially key interlocutor for the design and delivery of IPA interventions. The evaluation found, however, that *municipalities do not play any significant role in either the programming or delivery of IPA interventions* and have been involved only as ‘final beneficiaries’ of training or strategies related to returnees.

**Other donors**

Several bilateral donors are active in Kosovo. In practice they programme around IPA as it represents the biggest external funding sources in the country. Donor coordination
mechanisms exist to formally moderate these relationships and these are reportedly adequate. NIPAC plays the main coordination role within the GoK, in conjunction with line ministries. Its aid management platform is available to donors online and updated quarterly. The EUO also liaises directly with bilateral donors and international organisations as part of the annual IPA programming cycle.

No direct overlaps in funding were noted during the evaluation. However, potential synergies between the IPA funds under evaluation and other sources of funds (IPA and other) don’t seem to have been maximised e.g. using IPA funds for Return in combination with investments into local municipal infrastructure. This suggests a passive rather than proactive approach to coordination of funding.

Roma CSOs

As noted in Section 9.4.3, it appears that RAE NGOs are not systemically consulted on programming IPA assistance, nor have they been closely involved in the delivery of IPA assistance except as ‘sub-contractors’ to IOs such as in IPA educational initiatives. Several are active in the fields of education, most notably ‘Balkan Sunflowers’ who coordinate the work of learning centres and school mediators. However, it has not been involved directly in the delivery of IPA support in these areas, despite its capacity and experience and the obvious cost-effectiveness of working with such a body as opposed to an international organisation such as the Council of Europe.
Schematic diagram of Sequencing of IPA support to Roma, Ashkali and Egyptian Communities in Kosovo

Return and Re-Integration/Community Stabilisation

- IPA 2007: Return, Reintegration and Cultural Heritage in Kosovo (Component I – RRK I [no explicit RAE focus])
  - Component II (MRSI 1) specifically targets RAE

- IPA 2008: Return, Reintegration in Kosovo II (RRK II)
  - No specific RAE element but includes RAE

- IPA 2009: Support to Communities Sector Fiche (Non-RAE element)
  - Communities Stabilisation Programme I
  - Confidence Building Measures in Kosovo

- IPA 2010: RRK III [no specific RAE element]

- IPA 2011: Provision of social services to vulnerable groups and Support to Minority Communities in Kosovo
  - Includes Communities Stabilisation Programme I
  - No Explicit RAE element

- IPA 2012: Return, Reintegration in Kosovo IV (RRK IV)
  - No specific RAE element

- IPA 2013: Return and Reintegration of Minority Communities
  - Explicitly RAE with two elements:
    - MRSI 2
    - Return of RAE from FRYOM & MNE

Education (including Culture and Media)

- Support to Educational Reforms in Kosovo
  - (1 component targets RAE education and links to IPA 2011 ACCESS)

- Support to Communities Sector Fiche (RAE element)
  - Support to implementation of RAE Strategy (Education, Media, Culture)

- EU/CoE Support in the field of Education to forced returnees and to Roma, Ashkali and Egyptian communities in Kosovo” (ACCESS)

- IPA 2014 – Implementation of RAE Strategy II (under preparation)
  - Unclear whether focus will be in education or another area
### 9.5. Former Yugoslav Republic of Macedonia

#### 9.5.1. Overview of IPA interventions covered by this evaluation

Fifteen project interventions have been examined under this evaluation. Details of these are given in the table below. Of these, 4 projects (highlighted yellow) were selected for an in-depth assessment of IPA performance.

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>IPA Financing Year</th>
<th>IPA Financing Allocation (€M)</th>
<th>Lead beneficiary</th>
<th>Status at time of evaluation</th>
</tr>
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<tbody>
<tr>
<td><strong>Sector – Employment</strong></td>
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<tr>
<td>TA for social inclusion and inclusive labour market</td>
<td>HRD 2007-2011</td>
<td>€ 1.462</td>
<td>Ministry of Labour and Social Policy</td>
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<td>TA for integration of disadvantaged women in the labour market</td>
<td>HRD 2007-2011</td>
<td>€ 0.477</td>
<td>Ministry of Labour and Social Policy</td>
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<tr>
<td>Grant - Conflict-affected minority women</td>
<td>HRD 2007-2011</td>
<td>€ 0.248</td>
<td>Ministry of Labour and Social Policy</td>
<td>Completed</td>
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<tr>
<td>Employability of women in minority communities</td>
<td>HRD 2007-2011</td>
<td>€ 0.272</td>
<td>Ministry of Labour and Social Policy</td>
<td>Completed</td>
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<td>Carrier pathway – Ethnic minority women in Eastern Region</td>
<td>HRD 2007-2011</td>
<td>€ 0.223</td>
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<td>Access to labour market for Roma women</td>
<td>HRD 2007-2011</td>
<td>€ 0.216</td>
<td>Ministry of Labour and Social Policy</td>
<td>Completed</td>
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<td>Grant scheme - Fostering social inclusion</td>
<td>HRD 2011-2013</td>
<td>€ 3.6</td>
<td>Ministry of Labour and Social Policy</td>
<td>Under evaluation</td>
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<td>Grant scheme – Inclusion of Roma into labour market</td>
<td>HRD 2011-2013</td>
<td>€ 1.0</td>
<td>Ministry of Labour and Social Policy</td>
<td>Under evaluation</td>
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<td><strong>Sector – TA to institutions</strong></td>
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<tr>
<td>TA for implementation of the Roma Strategy</td>
<td>TAIB 2008</td>
<td>€ 0.6</td>
<td>Ministry of Labour and Social Policy</td>
<td>Completed</td>
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<td><strong>TA to institutions implementing policies relevant to non-majority communities</strong></td>
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<tr>
<td>Grant – Inclusion of dropout Roma children (Grant scheme – Active civil society = € 1.5)</td>
<td>TAIB 2009</td>
<td>€ 0.135</td>
<td>General Secretariat / Sector for policy analysis and coordination/Unit for cooperation with NGOs</td>
<td>Completed</td>
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<tr>
<td>Twinning – Integration of ethnic communities into</td>
<td>HRD 2011-2013</td>
<td>€ 1.085</td>
<td>Directorate for Development and Promotion of Education in</td>
<td>Completed</td>
</tr>
<tr>
<td>Title/Short Title</td>
<td>IPA Financing Year</td>
<td>IPA Financing Allocation (€M)</td>
<td>Lead beneficiary</td>
<td>Status at time of evaluation mission</td>
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<td>education</td>
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<td>the Languages of Ethnic Communities</td>
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<tr>
<td>Sector – Civil society</td>
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<tr>
<td>Grant - Support to Committees for Inter-community Relations</td>
<td>TAIB 2008</td>
<td>€ 0.059</td>
<td>General Secretariat / Sector for policy analysis and coordination/Unit for cooperation with NGOs</td>
<td>Completed</td>
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<tr>
<td>(Grant scheme – Civil sector in decision making and social services = € 1,2)</td>
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<tr>
<td>Sector - Returns and reintegration</td>
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<tr>
<td>Local integration of refugees, IDPs and minority groups</td>
<td>TAIB 2011</td>
<td>€ 2.962</td>
<td>Ministry of Labour and Social Policy</td>
<td>Under preparation</td>
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<td>Sector – Anti-discrimination</td>
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<td>Twinning - Anti-discrimination</td>
<td>TAIB 2012</td>
<td>€ 1.2</td>
<td>Ministry of Justice</td>
<td>Under preparation</td>
</tr>
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**9.5.2. Overview of Roma in former Yugoslav Republic of Macedonia**

According the latest available Census figures from 2002, former Yugoslav Republic of Macedonia has 53,879 Roma (2.66%) and 3,713 (0.18%) of Egyptians (-Albanian-speaking Romanies). Other estimates put these figures much higher – the European Roma Rights Centre claims 150,000 Roma reside in former Yugoslav Republic of Macedonia while the needs assessment study of the Roma Education Fund from 2004 put the figure at some 260,000. The Council of Europe estimate of 2012 is 197,000

However, the National Roma Strategies (both old and current) have used the 2002 Census figure of 2.7% Roma & Egyptians living in former Yugoslav Republic of Macedonia indicating no change for over a decade. Also, none of these figures take into account the reported rapid migration of Roma out of former Yugoslav Republic of Macedonia that has been ongoing since late 2013.
9.5.3. Programming and intervention Logic

Design, Prioritisation and Sequencing

Intervention logic of IPA in former Yugoslav Republic of Macedonia is set by the three Multi-annual Indicative Planning Documents (MIPD) for the period 2007 – 2013 and the Human Resources Development Operational Programme (HRDOP). In common with MIPDs in other IPA countries, these are general in character, lack clearly defined objectives for sectors, and usually mention Roma as a part of other minority, disadvantage and vulnerable groups without mentioning any of their specific needs. Each of the MIPDs takes reference of the National Roma Integration Strategy (RIS) in general (not mentioning any of its priorities specifically) and mentions as one of the indicators the continuous implementation of the Roma Strategy. As such the MIPDs do not present any sort of intervention logic that could be used for programming, monitoring or evaluating IPA assistance to Roma. This weak intervention logic and absence of programme level objectives for component I of IPA (TAIB) has meant that those interventions funded from this component tend to represent ‘stand-alone’ projects that to varying degrees correspond with priorities of the RIS but which taken as a whole, do not constitute a coherent strategic approach to addressing Roma needs.

IPA Component IV Human Resources Development Operational Programme (HRDOP) contains a more robust intervention logic based around one strategic and several specific objectives, linked to priority axes (PA) and measures that outline the approach to be taken to address the specific problems affecting Roma. Roma are targeted explicitly by PA 2 and 3, and specifically under Measures 2.2 (Enabling access to Quality Education for Ethnic Communities) and 3.2 (Integration of Ethnic Communities). The (result level) indicators given for the PAs are expressed percentages and in many cases loosely defined so of only limited use in assessing effectiveness. No indicators are given for the specific objectives or the strategic objectives. The validity of the indicators is weakened by the absence of sound baseline figures for Roma numbers, needs and locations (see also section 9.5.2). The OPHRD identifies its consistency of objectives with the main strategic documents in the area of HRD i.e. are the National Development Plan, MIPD, National strategies for Education & Employment. The RIS is not included in these documents, although it is referred to in the HRDOP elsewhere.

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75 HRDOP p.54
The individual interventions funded under IPA component IV therefore link more clearly to strategic priorities as defined in the HRDOP. There are however, some evident weaknesses in the coherence of the programming approach to Roma (see next section below).

_Prioritisation and Sequencing_

The IPA programme for the period 2007-2013 (IPA TAIB and IPA Comp IV) lacks an overarching strategic aim for support to Roma. Since MIPD 2007-2009, the principal focus has been on employment, education and social inclusion. Roma has always been specifically mentioned. However, no specific measures or priorities are outlined.

Component 1 has always been focusing support to Roma Strategy implementation at central level, while Component 4 focused inclusive labour market in the first place and inclusive education and social inclusion of ethnic communities in the second. It also has a stronger community/regional focus, involving municipalities, as well as international and Roma NGOs and Roma communities.

Employment appears as a priority since out of total 15 IPA projects (RI+RS) implemented and planned, 8 are targeting employment. There are only 2 in education sector, 2 targeting TA for Roma Strategy implementation, 1 on anti-discrimination, 1 on housing and 1 targeting civil society.

_Priorities as reflected in funding allocations_

Out of interventions included in the scope of the evaluation (some M€ 15) around 47% was intended for Roma. However, Roma potentially benefited from only 18% of those allocated total funds through Roma inclusive (RI) and Roma specific (RS) interventions implemented so far (employment 9%, education 4%, TA for RIS 4% and civil society support less than 1%)\(^76\). These percentages are estimations as figures attributed to Roma in the Roma inclusive projects are apparently only an approximation and there is no solid evidence that Roma indeed benefited to the planned extent\(^77\). A more direct benefit for the Roma population is attributed to Roma specific projects, which so far represent only about 6% of total IPA allocation included in this evaluation (4% TA for RIS, 1% Employment, 1% Education). This percentage will be increased to 13% once the grant scheme specifically targeting Roma population employment is implemented (currently it is still under evaluation).

\(^76\) Based on figures provided in the ToR for Thematic evaluation on IPA support to Roma communities

\(^77\) See the list of projects targeting Roma supplied by EUD on January 27, 2015
IPA funding allocations for Roma (RI+RS project implemented and intended) by thematic area show significant bias towards employment area (58%), followed by discrimination (17%), education (9%), TA for institutions implementing RIS (8%), housing for refugees, IDPs and ethnic minorities (7%) and civil society support (1%). The chart below illustrates this in detail.

![MK: IPA Funding allocations to Roma by thematic area (%)](image)

**Figure 18 - MK: IPA Funding Allocations**

However, the picture is different when only RS projects are observed. So far the TA took 61% of total RS funds utilised and would have been 86% if the second TA project was not cancelled in 2014. Actually utilised RS funds for employment are only 19% so far, with a perspective to get increased to 60% during this year (finds from the overall IPA allocation). Education so far received only 14% of RS funds and there is no specific allocation pending for the next period. (See the chart below)

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78 Unreliable figure since project is still under preparation; According to IPA 2012 fiche there is no specific allocation for Roma but they are mentioned as one of the most discriminated groups
Other key priority areas from the RIS such as gender, discrimination, political participation have not received any IPA funding. There is a prospect that discrimination will receive some attention through IPA 2012 Justice and Home Affairs (see footnote 4).

So far mainly TA (larger amounts targeted for Roma – € 600,000) and some grant schemes were used (much smaller amounts targeted for Roma – € 59,538; 135,708; 183,597).

Among the 15 projects in the evaluation sample, 9 have been funded from IPA Component IV. Of these, 5 have a specific focus on employment of ethnic minority (including Roma) women. The HRDOP identifies Roma women as a relevant target group but there is not sufficient justification to explain why these interventions have been selected for such substantial support, given the wide range of other options available (housing, education, health, etc). A field visit to one of these projects illustrated that problem of employment of Roma women is a complex one which requires a more sophisticated, multi-faceted approach than the one taken so far (one-off funding allocations via grant schemes). Indeed, grant schemes were perceived by many stakeholders as accessible only for large organisations such as international NGOs. These had the capacity to apply for funds via the complex procedures and use larger budgets. For most former Yugoslav Republic of Macedonian organisations, especially Roma ones, these schemes had thus far proved very difficult to access.
Sequencing of programming and complementarities of IPA funds

There is no consistent sequencing defined in the MIPD (See Annex 1 to this assessment). Most programme fiches provide a sequencing logic, especially in relation to IPA TAIB and IPA HRD components. However, this planned sequencing has been partly undermined by efficiency problems, most notably the failure to tender the TAIB 2010 intervention “Support to institutions in implementation of policies relevant to non-majority communities” to which several other IPA projects were linked. Complementarities between IPA components I & IV were defined in the MOP HRD 2007-2013. Due to different sequencing of contracting of Comp 1 and 4 and problems in tendering mentioned above, those complementarities were not fully realised. Whilst no explicit links/complementarities with EIDHR were stated in programming documents, no obvious overlapping was noted.

Stakeholder involvement

There is little evidence of systematic involvement of Roma NGOs in the IPA programming process, although both EU Delegation (EUD) and Ministry for Labour and Social Policy (MLSP) evidently have contacts with a number of them and reportedly consult with them on particular interventions. As stated in the HRDOP, the relevant civil society organisations were consulted during so-called “hearing process” following finalisation of the draft version of the HRDOP and their views have been duly incorporated in the final document. However, this consultation, whilst useful, doesn’t ensure that Roma NGOs participate in the programming of IPA measures from their very conception through to their implementation.

It was clear to the evaluators that Roma NGOs are well capable of playing such a role in IPA programming. As well as the numerous detailed discussions held by the evaluators during the mission on IPA, the evaluators were presented with a copy of a communique from 14 former Yugoslav Republic of Macedonian Roma NGOs issued in April 2013 to the EU Delegation and relevant national bodies identifying key points that IPA II should take into account in its design. Surprisingly, there was no sign that either the EU or national authorities had taken forward these proposals, or indeed even responded to the communique.
National Roma Policy Framework and IPA

The necessary policy frameworks for Roma inclusion are largely in place. The most important among these is the 2004 Roma Inclusion Strategy (RIS), which was updated in 2014. According to available information, the Roma Action Plans (RAP) for Education, Employment, Housing and Health have yet to be changed.79

The linkages between the RIS and IPA targeted interventions are clear inasmuch as the latter generally fall within the priorities of the former. However, there is no explicit linkage at programme or even sectoral level between IPA assistance and the RIS priorities. This applies for both TAIB and HRDOP.

The MLSP coordinates implementation of the RIS with responsibility for implementation falling to the line ministries responsible for the respective sectors. It was widely reported that progress in the implementation of the RIS was significantly less than could be expected across most sectors.

Annex 2 to this Country Assessment illustrates the institutional arrangements in former Yugoslav Republic of Macedonia for implementation of the RIS. Aside from coordinating the RIS, the MLSP is also responsible for the programming, implementing and monitoring of OP HRD (IPA Component IV). This may explain the focus of funding towards labour market/employment related projects in IPA.

Education has received some IPA funding (9% of total funding for Roma) towards problems such as addressing dropout rates of Roma children and training of educational staff and Roma mediators. Scholarships, Roma mediators in schools, transportation costs for Roma children and other activities related to Roma education were came from other funding sources (e.g. REF, OSF).

Several key areas in education have not been addressed to any substantial degree by IPA, despite their urgency. These are; still inadequate preschool education for Roma children; Segregated schools and classes which remain a problem although its scale is disputed; lack of out-of-school classes or facilities (such as learning centres); children in so called “special”

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79 The main focuses of the revised RIS for 2014 – 2020 are: Improving employment conditions and opportunities for Roma community, thus improving their integration in former Yugoslav Republic of Macedonia; Increasing education level of the Roma community; Decreasing the gap in housing between Roma and non-Roma communities; Continuous improvement of the health status of Roma community in the former Yugoslav Republic of Macedonia; Development and promotion of the Roma culture, language and tradition.
Finally, adult education remains inaccessible for vulnerable and marginalised due to costs and other factors. Other donors have been especially active in this area (especially OSF and REF) and it is not clear how effectively IPA and these funds have complemented one another.

IPA funding has not been used in the health sector. Two reasons were given for this – firstly that IPA doesn’t cover health as it isn’t part of the Acquis and secondly that the Ministry of Health is already taking care of Roma population and so far do not require any IPA support for their programmes; Roma are indeed mostly covered with health insurance (except those without documents) as any other citizen; still there are problems in other segments e.g. according to UNDP/WB/EU survey more than two thirds of Roma cannot afford participation for medication.  

Since 2008 the Minister without Portfolio (Minister is ethnic Roma + four members of cabinet) has been the National Coordinator of the Roma Decade. The Minister influenced the development of structures inside relevant line ministries supporting the implementation and updating of the Roma Strategy. The Minister with his cabinet coordinates with the Ministry of Labour and Social Policy and prepares reports for the Government sessions. It was reported that this coordination needs to be further improved and that the Minister's involvement in programming of IPA was limited. Indeed, during the evaluation mission it was evident that the Minister's priorities (culture, housing and education) diverge notably from those of the MLSP and other institutions (social inclusion, employment, education).

Municipal authorities have the greatest responsibility when it comes to changing of living conditions and employment of Roma. However, till now they have not been institutional beneficiaries of IPA support, rather they have been occasional participants in projects funded from IPA grants. Therefore a proper mechanism needs to be found to involve them more closely in the design and delivery of interventions with IPA funding.

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80 Ministry of Health so far implemented one project related to NAP measures, which established a network of 16 Roma health mediators. At present only 8 are still remain active as the mediators’ employment status was never solved in a satisfactory manner.
9.5.4. Performance of Assistance

Efficiency

While TAIB 2007 and 2008 were under centralised management, since 2009 both TAIB and Component IV came under decentralised implementation (DIS). The sample projects indicate that this did not improve efficiency or shorten the time between programming and contracting, which sometimes takes 2-3 years. This is due to low absorption capacities and weak inter-departmental and inter-institutional coordination. For example, an important TAIB intervention “Support to institutions in implementation of policies relevant to non-majority communities” had to be cancelled at the end of 2014 due to lack of time to contract it (despite having 3 years for this). This was due in part to a failure of the beneficiary institutions to meet a key project conditionality.

The grant scheme “Fostering social inclusion” also selected for the sample from IPA Comp IV is still in the tendering process although it should have been contracted by the end of 2014. According to CFCD, this restricted call for proposals was responded by 113 concept papers of which 60 were invited for further application. Finally between 15 and 25 projects might be funded. This means the size of grants awarded is likely to be between € 150,000 and € 200,000, although call for proposals allowed size of grants between € 50,000 and € 200,000. This de-facto excludes most local Roma NGOs to participate as lead partners due to limitations in their capacities (see case study 9 for more on this).

Other two projects from the evaluation sample were efficient insofar they timely delivered planned outputs (see below). Both projects were implemented in the envisaged period of 15 months and within given budgets. The involvement of international NGOs does not always provide for cost efficient implementation. These can consume a major part of funds - in case of the sample project “Supporting Roma women in accessing the labour market” it was nearly half.81

Delivery of outputs has been a strong point of the IPA assistance in the sample. “Strengthening capacities for integration of disadvantaged women in the labour market, with special focus on ethnic minorities” delivered extensive capacity building relevant to national, regional and local institutions, as well as social partners and NGOs. The project left behind a set of recommendations and identified 5 priority areas and 11 types of interventions for future investment. “Supporting Roma women accessing the labour market”

81 See the case study
also delivered outputs such as a core of Roma women trained in job-seeking and a small network of Roma employment advisers (see case study 9 for more on this).

**Effectiveness**

**Effectiveness of the IPA assistance in the sample appears to be limited.** Whilst some local, short term effects are observable, there is little evidence of wider benefits in terms of observable changes on the target Roma populations.

The cancellation of the IPA TAIB 2010 project that should have supported institutions in implementation of policies for non-majority communities failed to provide, among other things, support in updating RAPs. In this respect it even had a negative effect. A coherent plan of actions providing a link with updated RIS remained lacking, thus leaving programming of any further interventions towards Roma inclusion without any strong basis. According to CFCD there is ongoing discussion that the project similar to the cancelled one would still be needed.

The two IPA Component IV projects from the evaluation sample completed over a year ago, despite rather good efficiency, did not achieved expected effectiveness. There is hope that their results might be reinforced by the projects currently under evaluation, the grant scheme “Fostering social inclusion” (included in the evaluation sample) and the second grant scheme “Inclusion of Roma into labour market” (not included in the sample).

All three sampled Component IV projects fitted well with the specific objective and measures defined under Axis 3 – Social Inclusion of the MOP HRD 2007-2013.

The objective of the project “TA at the institutional level regarding support to disadvantaged women in the labour market” - - was directly linked to **Measure 1**\(^{82}\) - **Fostering social inclusion of people and areas at disadvantage by facilitating their inclusion in the labour market** and had potential to contribute to it. It left behind very good analysis of the situation and valuable recommendations to be undertaken in future. If enacted, these recommendations would have significant effects on social inclusion of disadvantaged people.

However, one year after the end of the project there is little evidence that any of this has been taken on board by the MLSP as the key beneficiary and the owner of those documents. There is little evidence that the training provided to the beneficiary institutions significantly influenced their everyday work.

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\(^{82}\) Sumarised definition of measures; For detailed definitions see the MOP HRD 2007-2013
The purpose of the project “Supporting Roma women in accessing the labour market” - clearly responded to the objectives of measures 2 and 3 of the HRDOP but had only small effects at local level, without any significant wider benefits.

**Impact**

Based on the projects selected for in-depth analysis in this evaluation, the limited utilisation of the project level results suggests that no significant impact has been delivered from the IPA assistance. Of the 4 projects in the sample, one was cancelled and thus has had no positive impact, but has in fact negatively impacted upon the strategic framework into which other IPA and national-funded interventions should fit. Of the remaining two projects, both finalised over a year ago, some local impacts are evident but without significant wider impact.

In spite the fact that the TA for integration of disadvantaged women in the labour market had intention of achieving much wider impact as it targeted relevant institutional level, the impact so far has not been as expected. Very useful set of documents and clear recommendations and priority measures provided by the effort of project experts, could not be implemented so far due to lack of adequate funds. The Ministry of Labour and Social Policy and the Agency for Employment prepare active measures on a yearly basis, but Roma population had so far very limited access to those. Obviously specific measures and targeted funds are much needed, and even could be linked with the network of employment mentors that is being established by UNDP and Swiss Cooperation funds.

However, any wider impacts in terms of the “integration in the labour market of disadvantaged people, inter alia by training professionals and volunteers involved in social inclusion, enhanced linkages between all partners and the strengthening of the capacity of civil society to provide (quality) social assistance” (objective of PA3 of the HRD OP) are not observable. There is little evidence if the institutions targeted by the TA project apply newly acquired knowledge and techniques. On the other hand the project implemented at the local community level benefitted a very small number of beneficiaries thus providing minimal impact.

Given the limited effectiveness of Access to labour Market for Roma Women it is unsurprising that it has had little tangible impact, with only 4 Roma women employed part time currently and only 1 Roma job advisor in post.
Sustainability

Evidence from the evaluation indicates that sustainability of IPA funding is not strong. The main factors influencing sustainability of IPA are:

- Inadequate sequencing of IPA interventions not allowing build upon each other and capitalising of the lessons learned;
- Limited capacities of relevant national institutions to take forward the recommendations/priority investments concerning inclusion in the labour market of disadvantaged women;
- Lack of resources in the Employment Agencies to continue the services to Roma women after the project’s completion (lack of ALMM for Roma in general);
- Lacking support to municipal authorities in implementation of the local RAPs, including measures for Roma women inclusion in the labour market.

As regards the projects from the evaluation sample, the physical ownership of results from the project “TA for integration of disadvantaged women in the labour market” – is assured i.e. All the project trainees have been the employees of the national or local institutions, agencies and NGOs; Participatory training and transfer of skills techniques used; All the project outputs (Assessment Report; TNA; Training Report and training materials) are the property of the MLSP. The Project also delivered to MLSP the set of general (strategic and policy level) and specific (that require immediate attention) recommendations as well as directions for future priority actions and projects that should help to put those recommendations into effect. However the MLSP clearly stated that, although the capacity building provided under the project has been very useful as well as all the recommendations for priority investments, the funds are lacking for implementing those.

For Access to labour market for Roma women sustainability of results is worrying. Out of the 70 women trained, only 8 women were able to find work after the project completion. At the time of this evaluation, only 4 still maintained employment, but no one has a longer term employment contract which would present a more sustainable employment solution; Whilst the knowledge and skills provided to 70 women certainly empowered them, without job opportunities at their disposal it will not provide a more sustainable impact; Only those 3 Roma employment advisors trained remain as an asset for implementation of the local Action Plans, especially in the case of Prilep where the advisor is employed in the municipality; The other two advisors remain attached to local RE NGOs which allow them to continue providing support to Roma population. However, their involvement is dependent on funding being found to cover their costs, which is not guaranteed.
9.5.5. Monitoring

Monitoring arrangements for Roma-specific support are not in place. At country level, the main monitoring tool is the EC country progress report, which does not track performance of IPA, although it does offer insights into changes at typically political level.

No monitoring systems at programme level are in place for TAIB in relation to Roma inclusion. The JMC forum doesn’t deal with such issues to any detail. The MIPDs are not subject to monitoring and don’t offer any usable indicators to assess any changes at programme or even sectoral level. As such, it is difficult to track whether IPA assistance has been meeting any of its planned milestones or objectives concerning Roma.

Individual projects are subject to ROM and EUD internal monitoring. However, monitoring and evaluation at the project level are not very useful for programming and policy level since usually they are by their nature operational in character.

The HRDOP is subject to its own monitoring arrangements. Evaluators were unable to judge the extent to which these arrangements were functional and enabled implementers and programmers to assess IPA IV performance. According to EUD the IPA Monitoring Committee and Sectoral Monitoring Committees (SMC) are functioning. Twice a year meetings of the SMC for HRD component are organised by the SMC Strategic Coordinator for HRD. The mechanism that exist to monitor the RIS and Roma Decade – the MLSP and the Minister without Portfolio – should in theory suffice for monitoring both progress in meeting RIS objectives and also how far IPA has contributed to this.

However, in practice this mechanism’s performance is widely reported to be sub-optimal. This is reportedly due to limited interest at political level to devote resources to the process and the absence of adequate baselines to report against. Likewise, Decade coordinating institutions claim to do monitoring but their reports provide only information on activities accomplished and little information on achievements towards any valid indicator.

Roma CSOs are not systematically involved in impact monitoring; they do shadow monitoring and report for Roma Decade Watch but this does not seem to have been fed into either the delivery of the RIS or influenced IPA programming in any substantial way.

83 Evaluators requested information from the relevant parties on monitoring of HRDOP via email, but received very brief information and no documents providing insight into monitoring mechanisms.
Indicators exist that could be used for monitoring performance of IPA. However, these belong to other agencies. These are found in the UNDP/WB/EC Regional Roma Survey and the UNICEF MICS 4 Survey done in 2011. UNDP intention is to repeat their survey already this year. Any attempt to develop a distinct set of indicators for IPA II support to Roma should logically seek to make use of these indicators and associated methodologies.

**9.5.6. EC Cooperation with External Stakeholders**

The EUD maintains contacts with international organisations and bilateral donors but apparently a more structured dialogue is lacking. Some of the IOs participated in Roma Integration seminars (no list of participants available) – mainly for the purposes of coordinating actions. Otherwise, no other direct cooperation was noted. This is in spite of the fact that UN agencies (UNDP in particular but also UNICEF and UNHCR) have a substantial amount of experience and body of knowledge in areas of relevance to IPA funding for Roma e.g. UNDP in the areas of Roma employment, indicators for Roma and work on capacity building within the MLSP. The OSCE has a strong insight into the issues affecting Roma migration, currently an active topic and one with potential for creating problems in future.

Partnerships with donors are in place, both formally via donor coordination overseen by NIPAC, and also informally via bilateral meetings. Among the main donors are REF, Open Society Foundation, USAID and Netherlands and Italian governments focusing mainly education sector, CoE supporting policy development and ROMED network, and UNDP focusing creating mechanisms for increased Roma employment. Given IPA’s prominence as the largest external cooperation fund in the country, other donors tend to programme around IPA. The level of coordination is sufficient to prevent overlaps.

Within the national administration, the EU and the IPA programmes cooperate with a number of institutions. The roles of the MLSP, MoE and Minister without Portfolio have already been discussed in section 9.5.3. MLSP is perceived as the leading institution for Roma in the country, and is also responsible for IPA IV, which reflects on the structure of IPA assistance to some extent.

Coordination of IPA is maintained by the NIPAC office. It follows standard IPA EC procedures in its roles with other bodies involved in IPA. NIPAC also maintains communication and consultations with other donors, which allows avoiding overlaps. However, the evaluators could not find specific examples of clearly harmonised and synergic interventions.

CFCD is the contracting authority responsible for administrative and procedural aspects of tendering, contracting, financial management and payments of project activities. It plays an
important role in ensuring the efficiency of IPA support, although evidence from the evaluation suggests that it may require increased capacity to discharge its duties more successfully.

Line ministries, e.g. MLSP, Ministry of Education, are crucial stakeholder in programming of IPA funds and responsible for implementation and monitoring of project activities. However, the Minister without portfolio, although being Coordinator for Roma Decade and RIS implementation, has less influence on programming due to weaker capacities and lack of own budget.

Partnerships between the EUD and Roma CSOs are reported to be constructive. However, as mentioned in section 9.5.3, there is no formal arrangement to facilitate a structured involvement of Roma CSOs in the programming, monitoring and implementation of Roma-specific IPA assistance.
9.6. Montenegro

9.6.1. Overview of IPA Interventions covered by this evaluation

Five project interventions have been examined under this evaluation. Details of these are given in the table below. Of these, two projects (highlighted yellow) were selected for an in-depth assessment of IPA performance.

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>IPA Financing Year</th>
<th>IPA Financing Allocation (€M)</th>
<th>Estimated allocation for Roma (€M)</th>
<th>Lead beneficiary</th>
<th>Status at time of evaluation mission</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.Cross-sectoral Initiative on Preventive Health and Special Education for Displaced Roma in Konik 2..Challenging Education for Roma Inclusion 3.Support to Social Policy Development and Creation of Service Delivery Partnership between CSO networks and Public Authorities in Montenegro (Roma are one of the target groups).</td>
<td>2007</td>
<td>1,000,000</td>
<td>510,000</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>Comprehensive Support to Refugees and Displaced Persons in Montenegro</td>
<td>2008</td>
<td>1,500,000</td>
<td>1,500,000</td>
<td>Bureau for Care of Refugees, Ministry of Labour and Social Welfare</td>
<td>Completed</td>
</tr>
<tr>
<td>Child Care System</td>
<td>2010</td>
<td>1,250,000</td>
<td>164,000</td>
<td>Ministry of Education and Sports, Ministry of Labour and Social Welfare</td>
<td>Completed</td>
</tr>
<tr>
<td>Identifying durable solutions for (I)DPs and residents of Konik camp (Phase I)</td>
<td>2011</td>
<td>2,500,000</td>
<td>2,500,000</td>
<td>Ministry of Labour and Social Welfare</td>
<td>Completed</td>
</tr>
<tr>
<td>Support for residents of Konik camp in Podgorica (Phase II)</td>
<td>2012/13</td>
<td>1,000,000</td>
<td>1,000,000</td>
<td>Ministry of Labour and Social Welfare</td>
<td>In progress</td>
</tr>
</tbody>
</table>
9.6.2. Overview of Roma in Montenegro

According to the latest census from 2011, there are 620,000 people in Montenegro, of whom 6,251 declare themselves to be Roma, and 2,054 Egyptians. In the same census, 5,169 declared Roma to be their mother tongue. The Council of Europe average estimate is twice as high: it puts the Roma and Egyptian population at around 20,000, or around 3.2% of the population. EU project fiches documents use the official census data as the basis for planning.

According to the national strategy, the majority of Roma people live in Podgorica (3,988), then in Berane (531), Nikšić (483), Bijelo Polje (334), Herceg Novi (258), while most of Egyptians live in Podgorica (685), Nikšić (446), Tivat (335) and Berane (170).

A 2008 study and publication “Data Base on RAE population in Montenegro” provided comprehensive information on the Roma and Egyptian population. It concluded that their situation is significantly poorer and more marginal than the majority population. In a Government report to the Council of Europe, the illiteracy rate of the Roma population is put at 28.1%, while only 62.5% of the primary age RAE populations are attending primary school and a paltry 5.5% of are attending secondary school. 41% of the population has no educational qualifications.

Since 1999, Konik, an area on the outskirts of Podgorica the capital has been home to several thousand displaced people mainly from Kosovo. In 2011, 3,642 people (mainly but not exclusively Roma and Egyptians) were identified as living in the area.


The Government also adopted a “Strategy for permanently resolving the issue of displaced and internally displaced persons in Montenegro for the period 2011-2015 with special focus on Konik Camp” together with annual Action Plans for its implementation. The Strategy

84 Reported in THE SECOND REPORT OF MONTENEGRO ON IMPLEMENTATION OF FRAMEWORK CONVENTION FOR THE PROTECTION OF NATIONAL MINORITIES Submitted on the basis of Article 25 paragraph 2 of the CoE Framework Convention for the Protection of National Minorities
85 Monstat, 2008 paper copy only, referred to in “Strategy for Improving the Position of Roma and Egyptians in Montenegro 2012-2016” p5
outlines two ways to resolve the issue: integration of the persons concerned in Montenegro through access to the status of “foreigner with permanent residence” (or foreigner with temporary residence) or voluntary return to their place of origin. Obtaining Montenegrin citizenship is apparently not an option.

The issue of Konik is a high political priority because of the EU accession process. In the 2010 EU Opinion on membership the EC states that one of the priorities for Montenegro to meet EU membership criteria is to “guarantee the legal status of displaced persons, in particular Roma, Ashkali and Egyptians, and ensure respect for their rights. This will include the adoption and implementation of a sustainable strategy for the closure of the Konik camp”.

The EC Progress Report for 2014 highlighted some progress in terms of school attendance, desegregation in schools and civil registration, but expressed concern about discrimination and political underrepresentation. Discrimination was of concern “especially in the field of employment, health issues and housing”. The Progress Report highlights concern about the low proportion of female Roma students, one of the few gender specific references for the IPA region.

9.6.3. Intervention Logic and Programming

The three MIPDs (2007-2009, 2009-2011, 2011-2013) all identify Roma issues as of concern, and refer to the need to support implementation of the relevant strategies and action plans. The sectoral approach of the last MIPD puts Roma issues under the Justice and Home Affairs sector, making it primarily one of human rights and discrimination: “...targeted action will tackle the key priorities on anti-discrimination and on developing sustainable solutions for the Roma, Ashkali and Egyptian (RAE) populations and other vulnerable groups”.

In reality, IPA programming for support to RAE populations in Montenegro has been driven by the issue of Konik. As can be seen in the table of projects above, just under EUR 5.7 million has been programmed for Roma inclusion of which over 88% was targeted at resolving the problem of the Konik camps. The EU has relied on other donors and international organisations (e.g. German Ministry of Foreign Affairs, UNDP) to tackle the issues faced by the domicile Roma and the displaced RAE people living in other locations.

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87 Montenegro Progress Report, DG Enlargement, Brussels October 2014
Some small EU funds from EIDHR and Civil Society Facility have also been channelled for Roma inclusion outside Konik.

The guiding government strategy for IPA support for Roma inclusion has therefore been the strategy on resolving the problems of the displaced, rather than the strategies for improving the situation of Roma.

The programming of support for Konik has followed a logical and continuous path, with each project building on the lessons learned from the previous, supported by appropriate studies to assist in the programming of IPA funds.

The last phase of the support for Konik also linked into the forthcoming support from the Regional Housing Programme. Some 78% of RHP assistance for Montenegro will be allocated to IDPs from Kosovo\(^\text{88}\), representing 761 households (some 4,702 individual beneficiaries, including non-Roma).

\(^{88}\) [www.regionalhousingprogramme.org](http://www.regionalhousingprogramme.org)
Of all the countries in the IPA region, Montenegro has the second highest average IPA expenditure per Roma person after Kosovo, at EUR 284 per person. However, since 88% of the IPA expenditure on Roma is directed only at the 3,600 residents of Konik camp, the expenditure per person is heavily skewed in their favour (see chart above). It seems, therefore, that IPA assistance has been largely driven by the political priority represented by the conditions at Konik camp, rather than the overall needs of Roma in Montenegro.

9.6.4. Performance of Assistance

This section on the performance of IPA assistance for Roma inclusion in Montenegro is based on the two sample projects highlighted in the table above:

- IPA 2011/Identifying durable solutions for (I)DPs and residents of Konik camp/EUR 2,500,000
- IPA 2012/13 Support for residents of Konik camp in Podgorica Phase II/EUR 1,000,000

Efficiency

Phase I was divided into two lots; Lot 1 aimed to provide housing for 90 socially vulnerable households, including an unspecified number from Konik. The housing aimed to be connected to services and a community centre. Lot 2 provided support for social integration, obtaining civil documentation, access to education employment.

The works contract tender procedure for the housing provision was launched in 2013, but later cancelled because there was no compliant tender submitted. By the end of 2014, it was announced that work would begin on the construction of 50 apartments for displaced persons from Konik, and are due to be completed by August 2015.

The services contract for phase I was awarded to a consortium led by HELP, a German international NGO with long experience working in Montenegro with displaced people. By September 2014, the project had achieved the following highlights, mostly meeting or exceeding targets:

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89 EuropeAid/135184/DD/WKS/ME
- Over 300 people involved in education sessions, workshops and information sessions;
- Legal assistance provided for 899 persons, including 119 procedures started for subsequent birth/citizenship registration, and obtaining 1,301 documents for 527 persons;
- Enrolment and support for 62 children in primary school (57 completed the first year); 122 children enrolled in preschool facilities (target was 60); Roma/Egyptian school mediators in place and supporting attendance at primary schools.
- Grants for income generating equipment provided for 172 individuals, with some success in terms of actual income generation performance;
- Two RAE Assistant Health mediators employed
- Go and See and Go and Inform Visits (GSVs, GIVs) for 363 individuals; 54 families (288 individuals) referred for return assistance, of whom 30 RAE displaced families approved for assistance. By September 2014, 8 families with 55 family members had already returned and 22 families with 117 family members whose houses are under construction planned to return to Kosovo.

Phase II was also awarded to a consortium led by HELP, and the project began in September 2014. The main components are as follows:

- Activities supporting local integration
- Legal aid and access to civil documentation
- Social and community programme
- Support for inclusive education
- Support for employment and income generation
- Access to healthcare/health promotion
- Return to Kosovo.

Since the project was at a very early stage of implementation at the time of the field visit, it was not possible to assess the likely efficiency. However, since the consortium was experienced and had also implemented the previous phase, there was no time lag in setting up new project teams and project management structures.

Effectiveness

Phase I of the support for Konik aimed to achieve the following:
**Overall Objective:** To ensure durable and sustainable solutions for RAE and other (I)DPs residing in the Konik area, both those who wish to obtain residence and opt for integration in Montenegro, and those who wish to return voluntarily to their countries of origin.

**Project Purpose:** Provide RAE and other (I)DPs in Konik with adequate living conditions and improved access to legal status, education and employment to enable their full integration in Montenegro. Enhance conditions for those who wish to return to their countries of origin.

Since the housing component has not yet been completed, it is not possible to say that Phase I has been effective. However, the other components of phase I has realised some solid achievements. In particular, it has provided more institutionalised support for education, and has gradually been able to desegregate the provision of education in the local area. The involvement of the Roma Education Fund as a partner greatly contributed relevant know-how and authority to work with government and local schools, and assisted in the desegregation process.

The introduction of health mediators has also been a success, and this, if sustained, may well bring considerable health gains to the local population.

The self employment components need to be watched carefully to see if the early promise can be sustained, and whether the example can be transferable. It seems that the income provided by the grant support has indeed generated some monthly incomes, though whether it is sufficient remains to be seen:

- 1 – 100 Eur / 40 beneficiaries
- 101 – 200 Eur / 29 beneficiaries
- 201 – 300 Eur / 14 beneficiaries
- 301 – 500 Eur / 8 beneficiaries
- 501 – 800 Eur / 4 beneficiaries (seasonal)

The average salary in Montenegro is EUR 478, so these incomes have to be seen in this context.

Support for return to Kosovo has been realised for some. Again, this is something that needs to be watched carefully. RAE people had been generally excluded from return assistance in the past because of their inability to show ownership of land or property. This new generation of assistance takes this into account, and intends to provide land and housing for those who cannot prove prior ownership. This is likely to be a significant incentive to return. However, the economic and security situation in Kosovo has not to date proven to be
conducive to sustainability; returns need to be monitored carefully to see to what extent they will be sustainable.

**On the whole, apart from the provision of improved housing, the Phase I has so far proved to be effective in achieving the goals.**

It is worth pointing out that the integrated nature of the assistance, focused as it is on a single community in a defined geographical area, is perhaps one of the main factors contributing to the effectiveness of the project.

The effectiveness of phase II is likely to be similar to that of phase I, with the additional benefit of lessons learned, and some approaches modified. Some key issues relating to sustainability will need to be addressed during this phase, and these are discussed below.

**Phase II goals:**

**Overall objective:** Durable and sustainable integration of RE and other I/DPs residing in the Konik area in Montenegro (for those who wish to stay) and in countries of origin (for those who wish to return);

**Specific objective:** RE and other I/DPs in the Konik area resolved their legal status in Montenegro or voluntarily returned to Kosovo, which allows them to attain social inclusion in the society and have improved access to their rights on primary healthcare, employment and education.

**Impact**

The Phase I project has reached maybe more than 1,000 people not including the school children, out of the Konik population of over 3,000. This means the impact is likely to be at a reasonable scale within the Konik population. The provision of housing, and particularly the housing solutions proposed by the forthcoming Regional Housing Programme, will have a much greater impact.
Some of the unintended impacts, however, have been felt already. Not all Konik residents are Roma or Egyptian; some are ethnic Serbs from Kosovo or Bosnia and Herzegovina, and there have been sporadic conflicts arising out of the feelings of unfair treatment\(^{91}\).

**A key concern of interlocutors was that the housing solutions proposed and under way for the residents of Konik camp will reproduce the segregation already present in the camps. This is a concern that needs to be taken seriously, and quickly addressed before all plans for construction and housing of Konik residents are finalised.**

**Major positive impact will also be felt with the successful desegregation of schools, and if the work to ensure children finish their primary education continues. In order to have an impact, children will need to complete all eight years of their primary school education, and go on to secondary education. This means that the level of support currently available must continue and be institutionalised, funded by the Ministry of Education. It remains to be seen whether this will indeed be the case. It is a similar situation for the health mediators and the health components.**

The impacts will not be felt, however, on the domicile Roma and Egyptian populations (except those also resident at the Konik camp). The domicile Roma population has been almost completely ignored by IPA support for Roma inclusion, despite the compelling evidence that they are also living in difficult circumstances, and facing daily discrimination.

**Sustainability**

One of the components of Phase I aimed to provide capacity building support for national government, and this is a key element of the sustainability of the project. Central government will need to take on responsibility for – in particular – the education and health components. It will also need to ensure that there is an appropriate legal framework in place for the management and maintenance of the social housing to be provided.

**Care is needed, however, to ensure that there is no backlash against the displaced Roma and Egyptian population, especially from those non-displaced Roma and non-Roma displaced who may be facing similar hardships.**

The support for Konik has provided a spin off in terms of capacity development support for central government. IPA support would be truly sustainable and high impact if the lessons learned in terms of the support for health and education could be adopted by government applied in other parts of the country.

9.6.5. Quality of Monitoring

Performance against the original national strategy for Roma inclusion, 2008-2012, was assessed at a conference for the main stakeholders, but no evaluation or assessment of progress was published to provide a basis for the next strategy. The newer version of the national strategy, Strategy for improvement of position of Roma and Egyptians in Montenegro 2012-2016, contains a large number of indicators for measuring progress. These, however, are mostly input and process indicators, and the strategy has no real strategic measures of impact. There is no real capacity in government to be able to conduct monitoring against this strategy.

There is a special inter-ministerial commission on implementing the strategy, which includes responsible line ministries, the Roma National Council and selected Roma NGOs. It has responsibility to report to the government on the implementation of the strategy, but as far as this evaluation is aware, no monitoring reports have been produced by this commission that are publicly available.

The Government of Montenegro has submitted a Roma Decade progress report for each year 2010-2013. These reports give an indication of inputs and some process changes, but do not provide any indication of changes at the impact or outcome level.

As with other countries in the region, assessment of progress at the impact level is hampered by the lack of availability of official systemic data disaggregated by ethnicity.

At strategic level, therefore, there are no functioning means of monitoring real progress in the improvement of the situation of Roma.

At programme level, there was one indicator with a reference to either Roma or Konik camp. MIPD 2011-2013 contains an indicator for the Justice and Home Affairs sector support for Montenegro includes: “Implementation of sustainable measures in favour of the population of the Konik camp areas”. The two previous MIPDs did not identify any indicators specifically mentioning the Roma and Egyptian populations.
As noted in other country profiles, there were no meaningful indicators relevant to assessing the progress of Roma inclusion, and monitoring at the programme level was not able to provide an assessment of progress.

9.6.6. EC Cooperation with External Stakeholders

*International Organisations/NGOs*

Given the small size of the country, and the limited range of the programming for Roma inclusion, it is difficult to draw generalised conclusions. Nevertheless, it is worth noting that IPA support for Roma inclusion has been complemented by the work of UN agencies, in particular UNICEF, UNDP and UNHCR, broadly in line with their mandates. UNHCR has provided support for the displaced populations, UNICEF has worked extensively with child protection services and education reform, while UNDP has been providing support for municipalities in developing their social services provision. Some of this is EU IPA funded, while other work is complemented by other international and private donors. In general, cooperation between the EU and international organisations is positive and constructive.

The International NGO HELP has won competitive tenders for all three major support projects for Konik camp. It is worth noting that the EUD and government decided on competitive tenders, and did not, as elsewhere, use direct awards. This may well have contributed to the efficiency of implementation, although in the case of the cancelled works contract for housing construction, it did slow down implementation by over a year.

*Government bodies*

Montenegro perhaps typifies the challenges faced for governments of small countries. While there might be a similar range of necessary functions as in larger countries, there is very limited capacity for specialisation. The Ministry for Human and Minority Rights has a Directorate for the Advancement and Protection of Minority Rights. Within this Directorate is an Office for Roma and Egyptians, with a full staff complement of one person. This Office reported that it has not been involved in the preparation of IPA programming, and does not have the resources to monitor the implementation of the Roma strategy.

Instead, cooperation with government for the implementation of IPA support for Roma inclusion has focused on the Ministry of Labour and Social Welfare, and its refugee care administration (Uprava za zbrinjavanje izbjeglica). It is this Ministry that is the main beneficiary of the Konik IPA projects.
Civil Society

Roma civil society in Montenegro is generally recognised as weak, and no Roma NGOs have been involved as a partner in any of the IPA funded projects. The Roma National Council holds a dominant position when it comes to government consultation with civil society, and there are divergent views about its efficacy.
9.7. Serbia
9.7.1. Overview of IPA Interventions covered by this evaluation

The evaluation Terms of Reference provided a list of fifteen IPA I funded interventions that were billed as for support of Roma inclusion, and these were the focus of study for this evaluation. These are listed in the table below.

Of the fifteen, four were selected at inception stage as sample projects for in-depth study, based on the selection approach described in the methodology (section 3.5). These four are highlighted in the table below in yellow.

<table>
<thead>
<tr>
<th>Year</th>
<th>Title</th>
<th>Total IPA funds €m</th>
<th>€m allocated to Roma</th>
<th>€m allocated to Roma</th>
<th>Lead Beneficiary</th>
<th>Status at time of evaluation mission</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPA 2007</td>
<td>Further support to Refugees and IDPs in Serbia (indirect support to ROMA)</td>
<td>10.0</td>
<td>5.0</td>
<td>2.0</td>
<td>Commissariat for Refugees</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2007</td>
<td>Implementation of priorities in the area of human rights and protection of national minority groups (indirect support to ROMA)</td>
<td>1.5</td>
<td>0.75</td>
<td>0.75</td>
<td>Ministry for Human and Minority Rights</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2008*</td>
<td>Support to refugees and IDPs</td>
<td>6.0</td>
<td>n/a</td>
<td>1.2</td>
<td>Commissariat for Refugees</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Social inclusion and poverty reduction among most vulnerable groups (children with disabilities, women in rural areas, Roma)</td>
<td>5.50</td>
<td>2.75</td>
<td>0.55</td>
<td>Ministry of Labour and Social Policy</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Education for All</td>
<td>2.70</td>
<td>2.70</td>
<td>2.70</td>
<td>Ministry of Education</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Second Chance – systemic development of elementary, practice based adult education in Serbia (dedicated for Roma population)</td>
<td>4.2</td>
<td>4.2</td>
<td>4.2</td>
<td>Ministry of Education</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Sustainable Waste Management Initiative for a Healthier Tomorrow – SWIFT II (NEW)</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
<td>Not available</td>
<td>IPA contribution to SWIFT was halted, and funds reprogrammed by UNOPS, to start implementation in 2015</td>
</tr>
<tr>
<td>Year</td>
<td>Title</td>
<td>Total IPA funds €m</td>
<td>€m allocated to Roma</td>
<td>€m allocated to Roma</td>
<td>Lead Beneficiary</td>
<td>Status at time of evaluation mission</td>
</tr>
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</tr>
<tr>
<td>IPA 2009</td>
<td>Supporting access to rights, employment and livelihood enhancement of refugees and IDPs <em>(indirect support to ROMA)</em></td>
<td>12.65</td>
<td>6.325</td>
<td>2.53</td>
<td>Commissariat for Refugees and Migration</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Support to Civil Society <em>(indirect support to ROMA)</em></td>
<td>2.0</td>
<td>1.00</td>
<td>1.00</td>
<td>NGOs</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Pre-school IMPRES project dedicated to the reinforcement of the pre-school network for vulnerable groups - predominantly Roma</td>
<td>3.75</td>
<td>3.75</td>
<td>3.75</td>
<td>Ministry of Education</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2009*</td>
<td>PROGRES area based development project for South/South West Serbia</td>
<td>14.1</td>
<td>n/a</td>
<td>0.853</td>
<td>Municipalities of Zlatiborski, Raški, Moravički, Rasinjski, Jablanicki, Pčinjski and Toplicki districts</td>
<td>Completed (new follow up project began 2014)</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>Provision of legal aid – refugees and IDPs <em>(indirect support to ROMA)</em></td>
<td>1.5</td>
<td>0.75</td>
<td>0.30</td>
<td>Commissariat for Refugees</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2009</td>
<td>IPA 2009 ADDENDUM Livelihood Enhancement for the Most Vulnerable Roma Families in Belgrade (Belvil)</td>
<td>3.60</td>
<td>3.60</td>
<td>3.60</td>
<td>City of Belgrade</td>
<td>In progress</td>
</tr>
<tr>
<td>IPA 2010/2011</td>
<td>Support to refugees, IDPs and returnees – important part related to Roma (housing, legal aid)</td>
<td>18.10</td>
<td>9.05</td>
<td>3.62</td>
<td>Commissariat for Refugees</td>
<td>Completed</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Support to social development, with one specific measure to support specifically the Strategy for Improvement of the Status of Roma (access to basic rights and civic participation, labour market, education, health, social welfare, adequate housing and job creation) (TARI)</td>
<td>4.80</td>
<td>4.80</td>
<td>4.80</td>
<td>Ministry of Health (MoH)/ Office for Human and Minority Rights (OHMR)</td>
<td>In progress</td>
</tr>
<tr>
<td>IPA 2012</td>
<td>Support the social inclusion of the most vulnerable groups, including Roma, through more diversified community-based social services</td>
<td>1.50</td>
<td>1.50</td>
<td>1.50</td>
<td>Ministry of Labour, Employment and Social Policy (MoLESP)</td>
<td>In progress</td>
</tr>
</tbody>
</table>
 Projects marked with * were not included in the original Terms of Reference listing, but nevertheless have a significant component relevant to Roma inclusion, and were therefore included in this list by the evaluation team.

In addition to the projects submitted in the terms of reference, other IPA I projects emerged that had a Roma inclusion component. These include the **PROGRES** project managed by UNOPS and jointly funded by IPA 2009 and Swiss Cooperation. It is a territorial (area-based)
project aiming to support stability and socio-economic development in South and South West Serbia. As part of this programme, some level of support has been contributed to Roma communities in the project areas. According to the project team, around EUR 850,000 (6% of the total budget) has been used to support Roma inclusion. This included 450,000 EUR on water supplies and other infrastructure for settlements and 231,000 EUR in small grants to civil society organisations and local authorities.

The Civil Society Facility grant scheme for 2012 awarded three grants to projects worth nearly 234,000 EUR (12% of the total grant value), all of which had clear Roma inclusion related objectives. The 2011 CSF had no Roma inclusion related measures. The CSF call under IPA 2009 was the only CSF call on the Terms of Reference list of Roma projects, but from the information available, it is not clear which and how many of the granted projects were supporting Roma inclusion.

9.7.2. Overview of Roma in Serbia

Serbia has one of the largest Roma populations in the IPA region, after Turkey. From the 2011 census, 147,604 Roma people were identified. The Council of Europe average estimate suggests rather more, at 600,000. Of the Roma population in Serbia, an estimated 23,000 were displaced from Kosovo in 1999 and subsequently, very few of whom have returned successfully to Kosovo. An estimated 17% of Roma IDPs did not have identity cards or birth certificates in 201192.

The problems faced by the Roma population in Serbia are well documented and recognised. A large number of Roma live in some 593 settlements under very poor conditions, often without water and electricity93. Many are subject to forced eviction: Amnesty International estimates some 2,500 people were forcibly evicted between 2009 and early 201494.

92 UNHCR/JIPS Serbia Profile at a glance, 2011. This is based on an extensive survey of displaced persons from Kosovo. Substantial work on personal documentation since the survey should mean that the situation has improved, but there has been no comparable survey since then.
93 Seminar conclusions 2011
94 Serbia: Submission to the UN Committee on Economic, Social and Cultural Rights, 52nd Session, May 2014, Amnesty International, March 2014
Serbia also has high rates of returnees under readmission agreements. Between January and October 2013, 1,695 Roma individuals were returned to Serbia, mostly from Western Europe. By contrast, during the same period, 420 non-Roma individuals were returned.\textsuperscript{95}

Education and employment levels are well below the average. Anecdotal evidence suggests that enrolment has generally improved over the past decade, but primary school completion rates are still well below that for the non-Roma population. Even those with a good education find employment very difficult. According to the Roma National Council, some 96 Romani people are trained nurses in Belgrade, but none is employed.\textsuperscript{96} Discrimination is blamed.

The health status of Roma is also significantly lower than the non-Roma population.\textsuperscript{97}

\textbf{9.7.3. Intervention Logic and Programming}

The assessment for intervention logic was made on the basis of a review of national strategic documents and all project and sector fiches for the IPA I interventions listed in the Terms of Reference. Additional interventions have been identified which are relevant, and which are also referred to in this analysis.

\textit{National Policies on Roma}

The national Roma strategy (“National Strategy for Improving the Status of Roma in the Republic of Serbia”) was adopted in 2010, and contained 13 areas of objectives (see table below). However, the strategy did not define any impact indicators nor baselines, and so it has not been possible to systematically assess progress.\textsuperscript{98} The strategy was accompanied by two action plans (one in 2010 and a revised plan for 2013-2015). Indicators for the action plan are mainly at the activity and output level, and not at impact level.

The Government of Serbia EU Integration Office (SEIO) produces a substantial document “National Priorities for International Assistance (NAD) 2014-2017 with Projections Until 2020”. This document provides a comprehensive overview of the government programme requiring international assistance, including from IPA. It sets out programmes and measures

\textsuperscript{95} Source: Commissariat for Refugees and Migration, Republic of Serbia
\textsuperscript{96} Interview with National Council of the Roma National Minority, 27 January 2015
\textsuperscript{97} UNICEF MICS 5 July 2014
\textsuperscript{98} See “Baseline Study for Development of a Strategy for Inclusion of Roma in Serbia in Accordance with the Europe 2020 Strategy”, Goran Basic et al, 2014 (Serbian language only)
in sectors aligned with IPA sector planning. Support for Roma is included mainly under the Justice sector (for human rights and discrimination) and the Human Resources Sector (social, education, employment and housing).

**IPA Programming**

IPA programming for the period 2007-2013 has been driven by the three Medium-term Indicative Planning Documents (MIPDs) (2007-2009, 2009-2011, 2011-2013). These have provided very scant analysis and direction for IPA support for Roma inclusion.

The MIPDs from the period under review show some evolution of the depth of analysis. For 2007-2009, MIPDs highlighted “Fighting discrimination and promoting human and minority rights, including Roma” as a priority for political requirements, and “support to decrease vulnerability of minorities, in special of Roma [sic]” as a relevant programme to be implemented. Roma are also mentioned in the context of priorities for socio-economic requirements in sections on employment, education, but without special measures being defined.

By 2011-2013, the MIPD had migrated to a sectoral approach and included more in-depth description of some of the issues. It was also based on solid national strategies and the ‘NAD’ document. This basis gave the MIPD greater alignment with national policy direction. As a consequence of this last MIPD and the influence of the 2011 Seminar, there were large allocations for Roma inclusion in IPA 2012 and IPA 2013.

There is a sizeable presence of Roma settlements in the west of Serbia close to the borders with Bosnia Herzegovina and Croatia, and in the south of the country close to the border of the former Yugoslav Republic of Macedonia. Despite this, none of the Cross Border Cooperation programme documents\(^99\) mentioned Roma at all. However, some EUR 3 million\(^100\) was allocated for Roma inclusion from the Cross Border programmes since 2007 out of the total EUR 90 million available.

In the project fiches, the Roma-specific projects (e.g. Education for All, IPA 2008) there were detailed descriptions of the problems faced by the target population. Other project fiches, such as those for the refugee/IDP projects, typically only mention Roma as a particularly

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\(^100\) From SIPRU presentation, February 2013
vulnerable group within the target population. For example, in the fiche for the IPA 2012 project on “Support for improvement of the living conditions of forced migrants and closure of Collective Centres” mentions that “Displaced persons belonging to the RAE community (Roma, Ashkali and Egyptian), represent a particularly vulnerable category of IDPs and they have more difficulties attaining their guaranteed rights, citizen status, healthcare, education, employment and accommodation”, but do not offer specific actions for the Roma displaced. Even the Roma specific project fiches describe the problems and the proposed solution, but do not offer an analysis of why and how the selected policy or project solutions will tackle the problems.

The national Roma strategy (Strategy for the Improvement of the Status of Roma in the Republic of Serbia 2010-2015) of all official documents provides the most comprehensive overview of the issues faced by Roma, and a set of proposed measures covering 13 main topics (see table below). The strategy provides a very detailed set of actions in relation to education, and a somewhat lighter set of measures for the other twelve areas. The strategy was approved in 2010, so only programming documents subsequent to this date include a reference to the strategy.

Two Roma Seminars were held in Serbia, in 2011 and 2013, and another is planned for mid-2015. Interlocutors reported that the seminars – particularly the 2011 one – strongly influenced IPA programming, and this can be seen in the increasing allocation of funding for explicitly Roma interventions. The IPA 2012 Support to Social Development sector fiche and its relatively large Roma focus has been described as a direct consequence of the 2011 Seminar.

The EU accession Progress Reports provide feedback on the situation at a political level, and frequently highlights both the human rights aspects of Roma inclusion as well as the socio-economic and institutional.

On the whole, analysis of problems is descriptive rather than truly analytical.
The allocations of funding to Roma issues in Serbia is more balanced and diverse than in the other IPA countries. There are sizeable allocations for housing and social inclusion/social welfare – mainly through the large (EUR 20 million) forthcoming IPA 2013 programme. Education fared well in IPA 2008 with a trio of projects funded for pre-school, primary and adult education. Employment was identified as a priority in the national strategy, and in the last MIPD 2011-2013, but allocations for projects in this area are rather small. This may be a consequence of the failure of the SWIFT project (originally funded by the Norwegian government), for which IPA was going to fund a second phase. This funding has since been re-programmed by UNOPS, although details of the project were not available at the time of the field visit.

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<td>Education</td>
<td>X</td>
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<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Return/readmission</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Displacement (IDPs/refugees)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information (i.e. media)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Political Participation</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Discrimination/Hum Min Rights</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social Inclusion</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

The IPA II Indicative Strategy Paper also identifies support for implementation of the Roma Strategy and Action plan, and the conclusions of the 2013 seminar, without mentioning the objectives explicitly. Education, discrimination and social inclusion are the only explicit aims of the ISP regarding Roma.

101 The IPA II Indicative Strategy Paper also identifies support for implementation of the Roma Strategy and Action plan, and the conclusions of the 2013 seminar, without mentioning the objectives explicitly. Education, discrimination and social inclusion are the only explicit aims of the ISP regarding Roma.

102 an X represents a policy statement or objective on the theme included in the document, not an analytical remark or mention of past activities

103 Described under the heading ‘freedom of movement’

104 Refugees and IDPs are primarily seen as a non-Roma issue in MIPDs; MIPDs identify refugee/IDP as an objective for action, but do not explicitly link this to Roma issues. While the Roma strategy identifies both displacement and return/readmission as specific issues for Roma.
In the original analysis, by far the largest allocation of IPA funds in Serbia was allocated to refugees and IDPs (in practice, IDPs – there are almost no Roma refugees). The project list provided by DG NEAR in the evaluation terms of reference suggested that of the projects for IDPs, around 50% was spent for Roma inclusion. On deeper analysis, this proved to be a substantial over-estimate. The majority of refugee/IDP funds were distributed via competitive grant mechanisms mainly to international organisations and NGOs. A review of 14 final reports from the implementers showed that, where there were Roma beneficiaries separately identified, the proportion of Roma IDPs varied from 2% to 16%\(^{105}\). However, there were also some refugee/IDP projects that were not included on the ToR list, which

nevertheless had some Roma IDP beneficiaries. These have been subsequently added for consideration by the evaluation team. Therefore the estimation of the total of IPA funds allocated for Roma inclusion through refugee/IDP programmes reduced from EUR 14.8 million to EUR 8.64 million.

\(^{105}\) For the statistical analyses presented here, 20% of refugee/IDP funds have been allocated for Roma inclusion as an estimate to allow for potential additional costs of Roma interventions.
Serbia shows a more systematic and balanced approach to selection and prioritisation than in the other IPA countries. This may partly be due to the larger amounts of funds available, and so it is possible to allocate reasonable levels of funding to a range of projects. It is also partly due to the greater institutional capacities and continuity in the EUD and key government institutions.

The allocations partly follow the national strategy, but the decisions to allocate funds to one theme rather than another do not appear to have been the result of an analysis of the comparative benefits to Roma communities from all available alternatives. There was no systematic evaluation of the benefits of, for example, housing versus employment or education. Rather, they seem to be the result of reaction to events, lobbying and the availability of convenient project ideas and implementation structures.

As can be seen from the table above, the set of programming documents and Seminar conclusions do not cover the full range of objectives set out in the national Roma strategy. **Notable gaps in the programming documents are health, gender issues, culture, and political participation.**

Some of these gaps are logical, and can be attributed to good donor coordination. For example, SIDA and the World Bank provided substantial support in both grant and loans for investment in the system of health mediators, and therefore meant the EU/IPA could focus elsewhere.

**Other gaps, such as for gender are less explicable.** The situation of Roma women in Serbia is, on the whole, very difficult. Early marriage and early childbirth is very frequent, literacy rates are lower, and the reproductive health situation is significantly poorer than for the general population (see, for example, MICS 5 2014, UNICEF). However, this situation is rarely reflected in programming documents, and there are few gender disaggregated indicators (see Quality of Monitoring section 9.7.5, below). There were also no projects or actions that had as a primary objective an improvement in the situation of Roma women or girls. Interlocutors describe gender as a cross-cutting issue that should be addressed in every project or action. However, the absence of gender specific analysis and gender specific indicators in all project and programme fiches suggests that there is much work to be done in this area.

**Political participation** is another area in which there were no IPA country funds allocated, and no reference made in programming documents, despite this being a priority in the national Roma strategy.
There is no overall assessment in any programming document of the priorities for Roma inclusion given in the national strategy and how they link to EU IPA programming.

**Stakeholder involvement in programme design**

The Government of Serbia has been very involved in the design of IPA interventions. The main institutions – Office for Human and Minority Rights, Serbia EU Integration Office (SEIO), and the Social Inclusion and Poverty Reduction Unit (SIPRU) all play an active role in shaping the programmes and projects/actions. The SIPRU model consists of a well-resourced and highly skilled team of social policy experts who provide a centralised policy and research service to relevant line ministries, government institutions and local government. This model could be replicated elsewhere in the region with benefits in terms of quality of policy making and programming that might not be obtained if resources are distributed to individual ministries. The capacities of SIPRU and SIEO generally make up for the recognised weaker capacities in the Office for Human and Minority Rights, which has struggled to obtain adequate levels of budget and staffing.

The **Ministry of Education** played a driving role in the development of the three education projects for IPA 2008 and 2009. There is a clearly defined trajectory of programming for the interventions in IPA 2008 and 2009. The three key education projects – Education for All (primary education), Second Chance (adult primary education), and IMPRES (pre-school) tackle three high priority aspects of the education system. All interventions had a solid logic, and were based on previously tested policy initiatives (see the Education for All case study). The absence of education projects subsequently may be attributable to a change in senior personnel in the Ministry, but could also be a symptom of the lack of a long-term strategic approach to planning IPA support for Roma inclusion.

**Roma civil society stakeholders** and the National Council of the Roma National Minority reported low involvement in both problem analysis and design of IPA programmes. They say that consultation tends to be superficial. In some cases it relates to identification of problems (for which there is anyway wide agreement). In other cases, there are consultations on project and programme fiches for which interlocutors reported that they were often consulted at a late stage in the drafting and given a very short time to respond. Nevertheless, the Serbia – EU Integration Office (SEIO) has a formalised consultation mechanism (known as SEKO) which is organised around the main programming sectors. Most of the consultation relevant to Roma inclusion takes place within the human resources sectoral consultation mechanism, which involves many actors, not only those with a specific Roma focus. Civil Society and Roma National Council stakeholders argued for a much greater participation in formulation and implementation of IPA projects.
In summary, the intervention logic for Serbia has been good rather than outstanding, and was much improved for IPA 2012/13. Choices of projects and actions appear to have been made on the basis of the good projects available proposed by Government or international organisations, rather than on the basis of any structured assessment of priority or overall strategy. The recognised weak programming capacity of the Office for Human and Minority Rights has contributed to an under-representation in the IPA project portfolio in essential areas such as fighting discrimination and encouraging Roma political representation. The presence of a large displaced population has meant that much of the support for refugees and IDPs has been included in the basket of Roma inclusion projects, although they are not specifically designed to meet the needs of the Roma displaced.

9.7.4. Performance of Assistance

This assessment of the performance of the assistance is based on the sample selected for in-depth analysis, listed in the table in section 9.7.1, above. As noted elsewhere, since there are no programmes as such to support Roma inclusion, the evaluation of performance is based on the collected assessment of individual projects.

The sample projects are as follows:

- IPA 2008 Social Inclusion and Poverty Reduction
- IPA 2008 Education for All
- IPA 2009 Livelihood Enhancement for the Most Vulnerable Roma Families in Belgrade (‘Belvil’/‘Let’s Build a Home Together’)
- IPA 2010/2011 Support to refugees, IDPs, and returnees.

Efficiency

The Social Inclusion project consisted of four components, the first two of which were managed by UNICEF under a direct award arrangement:

- Strengthening the capacity of the Ministry of Labour and Social Policy to oversee community based social services (EUR 2m direct award to UNICEF)
- Clusters of Local governments develop community-based social service protection strategies and develop appropriate services to implement the strategies (EUR 500,000 direct award to UNICEF)
- Grant scheme to fund the provision of local social services (EUR 3 million distributed as grants to 10 municipalities)
Public information campaign to make public more aware of the needs of vulnerable people (EUR 300,000 awarded by competitive contract)

Roma people were expected to be involved in two ways – as beneficiaries of the community services and as potential providers of care services.

In the end, this project involved only very small numbers of Roma people. Out of children who were intended to benefit, only a very small proportion were Roma and no Roma women were trained as care providers because of a change of plan at the design stage.

**In the end this project cannot be described as having any significant activities or impact for Roma inclusion, other than incidentally by impacting the provision of community care services for disabled children.**

In terms of efficiency, the project largely delivered the required support and grants for municipalities and community services, although the total number of beneficiaries was lower than planned.

The “Let’s Build a Home Together” project (also known as ‘Belvil’) is a direct award of EUR 3.6 million to UNOPS to provide housing and livelihood opportunities for some 250 Roma families evicted from a site in Belgrade known as ‘Belvil’. The project is providing various housing solutions, including social housing, village houses and self-build, plus training and grants for livelihood support. See Annex section 11.10 for the full case study.

The project faced delays primarily caused by the difficulties for the City of Belgrade to identify suitable land sites for construction of social housing. The project has now been awarded a one year no-cost extension, and is expected to finish by the end of 2015. Changes to the building code have led to cost increases of the proposed housing and so the project will not be able to provide for all those evicted from the Belvil site. By the end of the project it is now estimated that only 122 out of the planned 200 households will receive durable housing solutions. There are also concerns raised in the ROM monitoring reports that the promised socio-economic components providing the ‘livelihood enhancement’ aspect of the project will not be sufficient.

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106 From interview with UNICEF. The Project evaluation report says in a footnote that “Administrative data on Roma and children with disabilities are lacking due to regulations which prohibit the collection of ethnicity data and the complexity of definitions of disability”
Education for All was implemented by a consortium of for-profit consultancy companies, led by WYG Ltd. It provided support to the Ministry of Education and some 120 schools for the introduction of Roma teaching assistants – or ‘pedagogical assistants’ as they became known. 128 teaching assistants were introduced by this project, and support provided for up to 180 primary and pre-school institutions. The teaching assistants primarily but not exclusively work with Roma children and their families, increasing enrolments and aiming to reduce dropout. See annex section 11.11 for the full case study.

The Education for All project surpassed planned expectations and delivered more than the targets: the project trained a total of 1432 persons, against a target of 517. It trained 190 Pedagogical assistants, while the target was 128. It also provided support for 180 elementary schools and preschool institutions, including training of over 1000 teachers and school managers. The project made a contribution to the systemic conditions for the appointment and support of Pedagogical Assistants, and established a continuing training programme for new PAs. The project was completed on time, to budget and delivered more than the target. It can therefore be regarded as particularly efficient.

IPA Support to refugees, IDPs and returnees: There were in total five project fiches developed over the IPA I period which provided some direct support for displaced persons in Serbia. These were delivered in a variety of ways, totalling 66 separate contracts. Originally, one fiche was selected as the project for this evaluation to look at in depth. It was later decided that based on the available information, it would be more useful to look at the general lessons learned overall from all the IPA support for refugees/IDPs, since they had a broadly similar approach to support for Roma inclusion.

<table>
<thead>
<tr>
<th>IPA Year</th>
<th>Title</th>
<th>Total EU contribution</th>
<th>EU Contribution to Roma population</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Original estimate</td>
<td>Revised estimate</td>
</tr>
<tr>
<td>2007</td>
<td>Further support to Refugees and IDPs in Serbia (indirect support to ROMA)</td>
<td>10,000,000</td>
<td>5,000,000</td>
</tr>
<tr>
<td>2008</td>
<td>Support to refugees and IDPs</td>
<td>6,000,000</td>
<td>n/a</td>
</tr>
<tr>
<td>2009</td>
<td>Provision of legal aid – refugees and IDPs</td>
<td>1,500,000</td>
<td>750,000</td>
</tr>
<tr>
<td>2010/2011</td>
<td>Support to refugees, IDPs and returnees</td>
<td>18,100,000</td>
<td>9,050,000</td>
</tr>
</tbody>
</table>

107 Source: project final report
### IPA Year | Title | Total contribution (EUR) | EU contribution | Contribution to Roma population
--- | --- | --- | --- | ---
2012 | Support to the improvement of living conditions of forced migrants and closure of collective centres | 15,200,000 | n/a | 1,520,000

**TOTALS** | 50,800,000 | 14,800,000 | 8,640,000

Each of the fiches was implemented mostly through action grants issued in response to a competitive call for proposals. In all, there were some 66 individual contracts, of which 59 were action grants either to NGOs or municipalities, and 7 were services contracts. The total value of all these grants and services contracts was just over EUR 56 million\(^{108}\).

The majority of assistance was provided as either support for housing, or support for income generation. The two were not exclusive, but it is not possible from the statistics to know whether the same households were beneficiaries of both housing and income generation assistance, or beneficiaries of only one type of assistance. Additional support was provided in the form of free legal aid which was contracted separately\(^{109}\).

The overall numbers of refugees and IDPs is a contentious issue, but the accepted planning figures are that there are roughly 43,000 refugees (as of July 2014), 90,000 IDPs *in need* (also 2014), of whom around 18,000 Roma IDPs also *in need*. This means that Roma IDPs in need make up roughly 13% of the total number of displaced in need. A key question for this evaluation is therefore to what extent the refugee/IDP assistance projects reached Roma IDPs in Serbia.

There were two main sources of information for this. One is the official statistics of refugee/IDP assistance provided by the Commissariat for Refugees and Migration in Serbia. The other is the project final reports for each of the individual Action Grants/Services contracts.

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\(^{108}\) Source: spreadsheet provided by EUD Serbia, author analysis; differences to the table shown above can be attributed to incomplete project information in the fiches and/or variations between fiche data and actual implementation

\(^{109}\) Ethnically disaggregated figures of legal aid beneficiaries was not available.
For this evaluation, the EUD in Serbia provided 14 final reports from the action grants\textsuperscript{110}, and these were reviewed systematically by the evaluation team.

### Analysis of Sample of Final Reports of Action Grants

<table>
<thead>
<tr>
<th>IPA year</th>
<th>project end date</th>
<th>implementer</th>
<th>HOUSING total beneficiaries</th>
<th>Roma beneficiaries</th>
<th>% Roma</th>
<th>INCOME GENERATION total beneficiaries</th>
<th>Roma beneficiaries</th>
<th>% Roma</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>2011</td>
<td>Danish Refugee Council</td>
<td>305</td>
<td>0</td>
<td>0%</td>
<td>282</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>2009</td>
<td>2013</td>
<td>Danish Refugee Council</td>
<td>795</td>
<td>29</td>
<td>4%</td>
<td>122</td>
<td>15</td>
<td>12%</td>
</tr>
<tr>
<td>2009</td>
<td>2012</td>
<td>NGO ENECA Niš</td>
<td>24</td>
<td>n/a</td>
<td></td>
<td>236</td>
<td>17</td>
<td>7%</td>
</tr>
<tr>
<td>2009</td>
<td>2012</td>
<td>Housing Center</td>
<td>117</td>
<td>14</td>
<td>12%</td>
<td>102</td>
<td>4</td>
<td>4%</td>
</tr>
<tr>
<td>2009</td>
<td>2012</td>
<td>ASB</td>
<td>234</td>
<td></td>
<td></td>
<td>1075</td>
<td>24</td>
<td>2%</td>
</tr>
<tr>
<td>2009</td>
<td>2013</td>
<td>CARE</td>
<td></td>
<td></td>
<td></td>
<td>150</td>
<td>7</td>
<td>5%</td>
</tr>
<tr>
<td>2012</td>
<td>2014</td>
<td>NGO ENECA Niš</td>
<td></td>
<td></td>
<td></td>
<td>80</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>2013</td>
<td>HELP</td>
<td>234</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>2012</td>
<td>INTERSOS</td>
<td>1075</td>
<td>24</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>2013</td>
<td>IOM</td>
<td>150</td>
<td>7</td>
<td>5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td>2011</td>
<td>UNHCR</td>
<td>257</td>
<td>42</td>
<td>16%</td>
<td>150</td>
<td>7</td>
<td>5%</td>
</tr>
<tr>
<td>2012</td>
<td>2014</td>
<td>ASB</td>
<td>176</td>
<td>n/a</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**TOTALS/AVERAGES**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th>HOUSING total beneficiaries</th>
<th>Roma beneficiaries</th>
<th>% Roma</th>
<th>INCOME GENERATION total beneficiaries</th>
<th>Roma beneficiaries</th>
<th>% Roma</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>1908</td>
<td>85</td>
<td>4%</td>
<td>2047</td>
<td>67</td>
<td>3%</td>
</tr>
</tbody>
</table>

Based on these reports (which are not a representative sample), we see that the proportion of Roma beneficiaries is overall very low: 4% for housing solutions, and 3% for income generation.

Since this sample was not necessarily representative of all IPA funded refugee support, the evaluation team had to turn to other sources to assist in verification. Statistics of Roma beneficiaries were available from the Commissariat for Refugees\textsuperscript{111} as well as statistics of overall support provided since 2008. These are shown in the tables below.

---

\textsuperscript{110} Selected by the EUD on the basis of which were available electronically

\textsuperscript{111} At a presentation on 8 April 2015
### Type of housing solution provided 2008 – 2013 (number of households)\(^{112}\)

<table>
<thead>
<tr>
<th>Source of funds:</th>
<th>Partial self-help (delivery of building materials)</th>
<th>Social housing in supportive environment</th>
<th>Prefab</th>
<th>Village housing</th>
<th>Total housing solutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU IPA</td>
<td>708</td>
<td>687</td>
<td>292</td>
<td>0</td>
<td>1,687</td>
</tr>
<tr>
<td>UNHCR</td>
<td>505</td>
<td>73</td>
<td>14</td>
<td>604</td>
<td>1,196</td>
</tr>
<tr>
<td>Other donors</td>
<td>3061</td>
<td>167</td>
<td>40</td>
<td>562</td>
<td>3,830</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>4274</strong></td>
<td><strong>927</strong></td>
<td><strong>346</strong></td>
<td><strong>1166</strong></td>
<td><strong>6,713</strong></td>
</tr>
<tr>
<td>Of which allocated to Roma(^{113}):</td>
<td>280</td>
<td>60</td>
<td>50</td>
<td>80</td>
<td>470</td>
</tr>
<tr>
<td>Roma as % of total</td>
<td>7%</td>
<td>6%</td>
<td>14%</td>
<td>7%</td>
<td>7%</td>
</tr>
</tbody>
</table>

Source: Commissariat of Refugees and Migration, Republic of Serbia

### Income generation assistance (beneficiaries)

<table>
<thead>
<tr>
<th>Source of funds:</th>
<th>Income generation assistance (beneficiaries)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU IPA</td>
<td>2,285</td>
</tr>
<tr>
<td>UNHCR</td>
<td>397</td>
</tr>
<tr>
<td>Other donors</td>
<td>3,096</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>5,778</strong></td>
</tr>
<tr>
<td>Of which allocated to Roma:</td>
<td>200</td>
</tr>
<tr>
<td>Roma as % of total</td>
<td>3%</td>
</tr>
</tbody>
</table>

Source: Commissariat of Refugees and Migration, Republic of Serbia

Care needs to be taken in interpreting both these sets of statistics. First, the Commissariat statistics represent all assistance to refugees and IDPs over the period, including from international and government budget sources. Second, it makes a distinction between EU IPA and UNHCR as sources of finance. However, around 28% of UNHCR funding over the period has come from IPA, so it is not clear whether the UNHCR figure excludes IPA support via UNHCR, or whether there is some double-counting here.

---

\(^{112}\) Based on figures from Commissariat for Refugees and Migration

\(^{113}\) This is the overall number of beneficiaries according to the Commissariat for Refugees and Migration, and not specifically the number of beneficiaries from IPA support
Nevertheless, if we take these statistics as a reasonable indication of the overall outputs of assistance to refugees and IDPs and the extent to which they reach Roma displaced families, we see that Roma beneficiaries make up a very small proportion of the overall total.

We see that Roma IDPs comprise around 7% of the total beneficiaries of housing solutions (although 14% of the beneficiaries of pre-fabricated housing). And 3% of the total beneficiaries of income generation assistance.

Given that Roma IDPs are around 13% of the total displaced population, but are also those most in need, it appears that the refugee/IDP assistance has not adequately targeted the displaced Roma. It is particularly indicative that income generation assistance for Roma is very poorly represented.

Effectiveness

The effectiveness of the social inclusion project was positively evaluated “The Project was effective in achieving its planned results and objectives [although] ...The planned number of beneficiaries was achieved only in a proportion of 78%, caused by an over-estimation of the potential beneficiaries during the applications development...”

However, there were two aspects regarding the specifically Roma component of the project for which it is not possible to say whether they were achieved, because appropriate ethnic data was not collected. The first is the licensing of Roma women as care providers. One indicator from the fiche required “a total of 1,000 women licensed as service providers at the local level among targeted municipal clusters by 2012”, and these women were supposed to be “victims of family violence, Roma women, women in rural areas, older population of women that have the least chance of employability”. According to the evaluation, this design point was not carried through to the project “for good reasons: according to the Rulebook on Licensing of Service Providers, a service provider should comply with very strict conditions for being licensed, which are impossible to be met by the categories of vulnerable women mentioned in the IPA 2008 Project Fiche”.

In terms of the Roma children who were supposed to benefit, there was no ethnically disaggregated data collected to identify the extent to which Roma children benefited from the reforms to the provision of social welfare services, and the new services supported by

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114 Final Project Evaluation, Developing Community Based Services for Children with Disabilities and their Families, RFP 4-2013, Final Evaluation Report vol. 1 p10, Gheorghe, Camelia & Ozren Runic
the grant scheme. In interview with UNICEF, it was reported that the proportion of Roma children benefiting was very low, but no precise figure could be given. This evaluation can therefore not provide any assessment of the effectiveness of the project specifically with regard to Roma inclusion objectives.

The **Education for All** project achieved the placement of 128 additional teaching assistants in schools, all of whom received appropriate training. The project purpose was “[t]o increase the inclusion of children from marginalised and special needs groups in the system of preschool and elementary education and to reduce their dropout rate by formalising and broadening the support that is provided by teaching assistants and community liaison coordinators”.

Interlocutors reported that the introduction of pedagogical assistants was effective in increasing enrolment in pre-school and primary school, and in supporting children during their first years in primary education. However, because support from the pedagogical assistants is only available to children in the first four years (out of eight), there is limited effectiveness in achieving the goals related to reduction of dropout. It is also somewhat early to assess the impact on dropout, because the children who entered primary school when the pedagogical assistants began their work (school year 2010/2011) have only just started the second half of their primary careers. Generally, however, interlocutors report that the introduction of pedagogical assistants has been necessary, but not sufficient to reduce dropout. Additional support for reducing dropout is being planned under IPA II.

Assessing the effectiveness of the project is hampered by the vagueness of its objective: “Provision of adequate support for up to 200 Roma families affected by resettlement actions, including where appropriate, with durable housing solutions”. This is not an outcome, but is rather stated in terms of delivering activities. And what, we ask, is ‘adequate’? There is also no available logical framework with defined indicators for the project impact and outcome levels. Therefore assessment of effectiveness is somewhat difficult.

As noted above, outputs will be less than planned – the support provided will only be sufficient to accommodate up to 122 households. And given the concerns about the socio-economic support, it appears that overall the project will not be able to provide the beneficiaries with sustainable livelihoods and housing. To that extent, the project is likely to be less than fully effective.
Refugee/IDP interventions

The following table sets out the overall objectives, purpose, and associated indicators given in each of the relevant fiches. Taken together, they provide good evidence for a) why Roma represented such a low proportion of the total number of beneficiaries, and b) why fifteen years after the conflict there appears to be a sizeable number of people still in need despite assistance.

In general, the objectives and indicators are defined in terms of outputs rather than outcomes/impact: “number of refugees and IDPs returned”, “to contribute to sound implementation of strategies...” and so on. It is also remarkable that at this level, there is only one indicator over the five years of programming that specifically mentions Roma: “Number of RAE and other minorities included in project” (IPA 2009).

<table>
<thead>
<tr>
<th>Fiche</th>
<th>Objective</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPA 2007</td>
<td>Overall Objective: Building durable solutions to address the IDP/Refugee Challenge</td>
<td>Objective indicator: Appraisal of progress in resolving refugee issues in the Republic of Serbia</td>
</tr>
<tr>
<td></td>
<td>Project purpose: 1. Integration of refugees – through projects that will develop accommodation solutions, employment and income generation activities; 2. Supporting Return/reintegration through cross-boundary initiatives as well as crossborder initiatives; 3. To contribute to the self-reliance of specifically targeted refugees/IDPs through socio-economic support packages and legal assistance; 4. Securing the full implementation of the Sarajevo Declaration.</td>
<td>Purpose indicators: 1.Number of refugees integrated in the Republic of Serbia through durable solutions 2.Number of refugees and IDPs returned to their place of origin 3.Number - percentage of refugees and IDPs in the category of poverty 4.Appraisal on implementation of Sarajevo declaration</td>
</tr>
<tr>
<td>IPA 2008</td>
<td>Overall Objective: To contribute to resolving the problems of refugees and IDPs in Serbia while ensuring them full access to their rights.</td>
<td>Objective Indicators: Number of refugees who found a durable solution Number of internally displaced persons who improved their living conditions Number of refugees and IDPs who benefited from legal aid/assistance Media material disseminated</td>
</tr>
<tr>
<td></td>
<td>Project Purpose: Component 1: Housing and Income-generation Support Support to integration of the most</td>
<td>Purpose indicators: 1.Number of refugees who found a durable housing solution 2.Number of internally displaced families</td>
</tr>
<tr>
<td>Year</td>
<td>Overall Objective</td>
<td>Project Purpose</td>
</tr>
<tr>
<td>------</td>
<td>------------------</td>
<td>----------------</td>
</tr>
<tr>
<td><strong>IPA 2009</strong></td>
<td>To contribute to resolving the problems of refugees and IDPs through the provision of adequate support</td>
<td>Livelihood enhancement of the most vulnerable IDP and refugee families through facilitated access to rights</td>
</tr>
<tr>
<td><strong>2011</strong></td>
<td>The project aim is to contribute to sound implementation of strategies for refugees, IDPs and returnees according to Readmission Agreements</td>
<td></td>
</tr>
<tr>
<td><strong>2012</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

vulnerable refugee families through the provision of durable solutions, and to livelihood enhancement of IDP families in Serbia.

Component 2: Legal Aid/Assistance and Information Provision
Improved provision of legal aid/assistance and increased availability of timely and accurate information necessary for realization of the rights of IDPs and refugees in Serbia.

who improved their housing conditions
• Number of refugee families and internally displaced families who started up or expanded their income-generating activity

• Number of refugees and IDPs who benefited from accessing legal aid / assistance and obtaining reliable information
<table>
<thead>
<tr>
<th>Adequate living conditions and integration of forced migrants who choose to stay in Serbia while supporting the sustainable return of those wishing to return to Kosovo</th>
<th>Number of migrant families which have resolved their housing concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific objective: 1. To support the closure of the remaining CCs and improvement of the living conditions of an additional 450 refugees, IDPs and returnees under the Readmission Agreement</td>
<td>• Number of returnee families who have achieved sustainable return to Kosovo</td>
</tr>
<tr>
<td>2. To support the sustainable return of IDPs to Kosovo</td>
<td>Specific objective indicators:</td>
</tr>
<tr>
<td></td>
<td>• All CCs closed</td>
</tr>
<tr>
<td></td>
<td>• Improved living conditions of 450 vulnerable IDPs and returnees in private accommodation</td>
</tr>
<tr>
<td></td>
<td>• Number of families that have achieved sustainable return to Kosovo</td>
</tr>
</tbody>
</table>

Since most of these fiches were implemented through small grants, the work to achieve these objectives was fragmented, as was the reporting. There was, as far as we know, no associated overall monitoring mechanism to look systematically at the changes in the situation of the displaced over this period. Therefore we do not have an overall picture of the extent to which housing and income generation assistance helped to improve the living standards and conditions of the displaced, and contributed to sustainable return of those who chose to return.

Neither of the relevant evaluations that look at support for refugees/IDPs can shed any more light on the effectiveness of support. The “Thematic Evaluation of EU's Support to Refugees in Bosnia and Herzegovina, Kosovo*, Montenegro and Serbia”, January 2014; argues that the economic environment has hampered the effectiveness of income generation support: “Internationally funded programmes, including EU-funded programmes, have insufficiently contributed to the objective of enabling refugees and IDPs [sic] to gain solid livelihoods. Income-generating grants have often been identified as the most flexible and preferred option, being easy to set-up and implement, although the evidence on the field shows a difficulty to achieve stable incomes.”

The “Evaluation of Grant Contracts Implemented and Financed by IPA and EIDHR” [in Serbia], November 2014 looked only at the IPA 2012 grants, and so did not have full information on completion of the implementation. Nevertheless, the authors suggested that “Overall, the effectiveness is likely to be satisfactory to good depending on further progress with project activities”.

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Impact

For the social inclusion project we are unable to provide any commentary about the impact of the project on Roma communities. Since there was no ethnically disaggregated data on project beneficiaries and no explicit Roma focus, it is not possible to say what changes the project brought to Roma communities. We can, however, say that welfare services improved in scope and scale as a result of the project, and therefore there was some benefit to Roma communities in the sense that some are also beneficiaries of social welfare services.

The Education for All project is likely to have brought a significant impact to those children who were enrolled in and attended schools where teaching assistants were introduced. While there is no ethnically disaggregated system-wide data on educational attainment, nor on completion of primary schools there is sufficient qualitative evidence to suggest that the teaching assistants have increased the rate of enrolment, and have had a positive influence on the early years of primary education. Since their role is limited to the first four years of primary education, however, it is not possible (and it is too early) to say what is the impact on overall primary education completion rates and educational attainment. PISA testing indicates an improvement in Roma children’s attainment\(^\text{115}\). More work needs to be done to determine more recent changes in education attainment of Roma children over time, and to identify the key factors driving any changes. It is also worth noting that the introduction of teaching assistants is, while necessary, not sufficient to tackle the very big problem of Roma children’s lower attainment and higher rates of school dropout.

The Let’s Build a Home Together project will provide housing solutions to 122 households evicted from the Belvil site. These housing solutions will, in the short to medium term, provide better quality shelter than currently available. There are some major reservations, however. The social housing to be provided is largely in segregated settlements, and the social housing law may prove to be an inappropriate long term solution. The village house solution may be appropriate for some, but for others it may prove to be unsustainable. (see the section on sustainability, below).

On the other hand, the project is attempting – through its partnership with the UNHCHR – to provide examples of good practice and introduce more solid practices in the resettlement of Roma citizens for the City of Belgrade, and it is possible that these aspects are having an impact on the housing policy and practice of the City. The City was slow in allocating

\(^\text{115}\) Cited in Gheorghie et al 2013 p53, but no source given
appropriate land for the project, and there were many problems with the land offered. In the end, the land available was not sufficient for all families, and was the ‘least bad’ choice on offer.

As was noted in the regional EU evaluation of support to refugees\textsuperscript{116}, “it is difficult to measure the impact of [...] assistance, as very few in-depth surveys have been conducted and actual impact (or absence of impact) can be linked to socio-economic factors independent from the quality of implementation”. We know from interviews in Kosovo that return rates are very low, with figures of around 20% of the total number of supported returnees actually remaining in Kosovo. Since there are no mechanisms to look at the impact of support, there are certainly no disaggregated data that could tell us whether the impact has been greater or lower on the lives of the Roma displaced.

If we take a wider view of the total population of the Roma displaced, and look at the overall assistance figures from the Commissariat for Refugees and Migration, the impact on the total displaced population is rather small: 470 housing solutions provided to Roma households and 200 income generating grants/assistance, with a total displaced Roma population of around 3,600 households\textsuperscript{117}.

\textit{Sustainability}

The social welfare services provided through the social inclusion project were based on a grant scheme. The intention is for services to be then continued with support from municipalities. However, given that municipalities’ financial situation has considerably worsened in the last few years there are concerns that these services will not be sustainable. These concerns are echoed in the evaluation of grant schemes in Serbia\textsuperscript{118} although this specific grant scheme was not a focus of the study.

The teaching assistants introduced by the Education for All project are still in place, and are still being financed by the Ministry of Education. While not full, permanent members of staff, they are more and more accepted into the school system. More work and money are needed to increase the numbers of teaching assistants, and to make the systems of

\textsuperscript{116} Thematic Evaluation of EU’s Support to Refugees in Bosnia and Herzegovina, Kosovo, Montenegro and Serbia, Simoni, Alessandro, Thomas Vasseur & Christiana Spinola, Dec 2013, p.29
\textsuperscript{117} This data is for all assistance to Roma since 2008 – government and international, and not just EU/IPA
\textsuperscript{118} EU Delegation in Serbia, Evaluation of Grant Contracts Implemented and Financed by IPA and EIDHR, Georis, Paul et al, November 2014
recruitment fairer and more open. Nevertheless, the prospects for sustainability are very good.

There are major concerns about the sustainability of the social housing models used by the Let’s Build a Home Together project. Standard social housing requires small rent payments, plus payment of normal rates of utilities. For many, especially those entirely dependent on social security payments, this is not affordable. They will enter a cycle of eviction and homelessness once again. The alternative solution found – that of ‘social housing in a supported environment’ reduces the financial burden, and possibly makes the provision of housing more sustainable, but is only seen as a temporary compromise solution and has created tensions between households with the preferential treatment and those required to pay full rents and utilities. Some of the new settlements and village housing were located far from existing livelihood options. This may have a detrimental effect on incomes and livelihoods. However, the EU is prioritising these households for further income generation support in a forthcoming project.

The dependence of the City of Belgrade on the support of the international community for the provision of social housing means that these models will be hard to replicate without further international or EU assistance.

For the support to Roma displaced, again, there is limited information on which to draw conclusions. The field work conducted in Kosovo (see the Kosovo section of this report, 9.4) suggests that assistance for return is limited in its sustainability – primarily because of the difficulties of realising successful income generation and livelihoods. It is also argued in the regional evaluation of refugee assistance that instead of focusing on the individual household, “More impact and sustainability could have been achieved if more attention had been paid to introducing consistent socio-economic measures for both refugees and IDPs and, on a limited scale, for resident population”119. Further, the report points out that interventions did not make the connection between support for the individual and the local economic environment. The situation for Roma is doubly difficult. Assisting with employment or self-employment prospects but not tackling local prejudice and discrimination, for example, is unlikely to yield results. The nature of these projects supporting refugees and IDPs is that there was little attention given to the specific needs of Roma IDPs as distinct from Serb or other ethnicities, and no specific actions targeted at

119 “Thematic Evaluation of EU’s Support to Refugees in Bosnia and Herzegovina, Kosovo*, Montenegro and Serbia”, January 2014, Alessandro Simoni, Thomas Vasseur and Cristiana Spinola, p30
them. As a result, results, effectiveness, impact and sustainability are all most likely well below expectations.

9.7.5. Quality of Monitoring

Country level

At the country level, the main monitoring tool ought to be the Strategy for Improvement of the Status of Roma in the Republic of Serbia (2010). This strategy however, does not contain indicators associated with the strategic goals and priorities identified in the document. The associated action plan has mainly input and process indicators, and some output indicators at the level of activities but no outcome or impact indicators at the level of strategic goals. Clearly, this makes the strategy very hard to monitor.

Official data which identifies Roma and other ethnic groups is only available for the Census (latest is 2011), and some selected surveys with Roma booster samples (e.g. for Labour Market Surveys, Multiple Indicator Cluster Surveys (MICS, UNICEF)). With the exception of the UNICEF MICS 4 and 5 from 2010 and 2014 respectively, there are no data which enable a comparison of the situation of Roma people in Serbia through time, except at the highest level of the number of people.

There are many qualitative and quantitative surveys which have been conducted over the past ten years (see the statistical annex for more information). However, these are limited in their application for monitoring. They are usually one-off, and so cannot provide time-series data, and most are limited in sample size hampering the ability to draw wider conclusions. Even the rigorous methodologies of the MICS surveys and the UNDP/World Bank regional surveys have methodological limitations (for example, they focus the surveys only on those Roma living in identified settlements, whereas there are many who do not live in such settlements).

Programme Level

Sectoral programming for IPA was introduced for the 2011-2013 MIPD. In earlier MIPDs, objectives were defined in general terms (e.g. “Progress in the reform of local self-government”) and expected results were defined qualitatively rather than quantitatively (“Better functioning municipalities and more effective delivery of municipal services to citizens”).

For the programming of the 2011-2013 MIPD, eight sectors were selected and indicators identified that are both quantitative and qualitative. The Roma population was explicitly
mentioned only in the Social Development sector (one sector objective: “To prevent social exclusion of vulnerable groups and minorities, notably the Roma”). There were no associated indicators explicitly identifying Roma people.

The IPA 2013 sector fiche for Social Development has the specific objective “To support the implementation of the Strategy for Improvement of the Status of Roma in the Republic of Serbia through the further development and realisation of sustainable and inclusive models for resolving housing and improvement of physical infrastructure in selected Roma settlements”. The associated indicators are, however, process based, not outcome based: e.g. “Housing and physical infrastructure operations for 20 pilot municipalities prepared under IPA 2012 implemented”, so do not guide monitoring for IPA impact on the situation of Roma communities and households.

The Government of Serbia’s National Priorities for International Assistance (NAD) 2014-2017 With Projections Until 2020 document, prepared by Serbia EU Integration Office (SEIO), provides more robustly defined objectives and indicators for the Human Resource Development Sector, including baselines and sources and in some cases disaggregated by ethnicity. This has set very high expectations for the quality of monitoring in the future. The Justice Sector indicators relating to human and minority rights are not so well defined, but are nevertheless more relevant and useful than those in IPA programming documents. It remains to be seen to what extent these indicators can be reported against.

Project level

The primary instrument for project level monitoring is the ROM (Results Oriented Monitoring) mechanism. There has been no systematic review of this mechanism for this evaluation. However, it can be noted that the quality of the ROM reports varies widely. In one case, the (very good) ROM report for the ‘Let’s Build a Home Together’ project correctly identifies design issues for the project\textsuperscript{120}, but which have not apparently been addressed.

\textsuperscript{120} “The project title, i.e. livelihood enhancement of the most vulnerable Roma families in Belgrade, correctly evokes a larger focus on actions beyond the provision of housing. The Description of Action mentions the need for a multi-sector approach granting the target group access to citizenship services, such as employment opportunities, access to health facilities, education and social protection and equal access to justice and human rights protection. Accompanying measures, which would complement the provision of adequate housing, have not consistently been incorporated in the LFM and could considerably jeopardise the sustainability of the action” ROM Background Conclusion Sheet, October 2013, BCS-146746.01
On the whole, the project level monitoring mechanisms would benefit from a greater component of ‘output to impact’ review. In other words, assessing the extent to which the outputs achieved and as defined in the planning documentation are likely to achieve the desired impact. The current focus on results achieved has tended to focus ROM monitors’ attention on the outputs and efficiency.

9.7.6. EC Cooperation with External Stakeholders

International Organisations/NGOs

The EU Delegation has a good working relationship with the international organisations active in the field of Roma inclusion in Serbia. Most are also direct or indirect recipients of IPA funds: e.g. OSCE, UNHCR, UNOPS, Danish Refugee Council and UNICEF. There is, therefore, a clientilist relationship evident. Most UN organisations do not have substantial amounts of their own funding, and the EU is the biggest donor in town. International organisations often provide project designs which they then implement when directly awarded contribution agreements.

The Let’s Build a Home Together project is an example of excellent inter-agency cooperation, with the OSCE using SIDA funds working closely with the EU, UNOPS and the City of Belgrade, and using the services of international and local NGOs such as the Danish Refugee Council and Housing Centre to assist with implementation. SIDA funds that were originally earmarked for purchase of village housing through the OSCE were re-allocated for social inclusion measures when it became apparent that purchase of village houses was not possible within OSCE rules. The EU then picked up the responsibility for village housing (through UNOPS), reallocating its funding for social inclusion measures for this purpose.

A key concern is in the cases where there are directly awarded contribution agreements. The implementers (e.g. OSCE for the TARI/‘Ovde smo zajedno’ project, UNOPS for Let’s Build a Home Together) have both designed the projects and are responsible for commissioning evaluations. This means there is no proper independent assessment of all options for implementation. It is assumed that the designing agency will lead in implementation, so the design and budget is therefore implicitly (even sub-consciously) tailored to their capabilities and costs. In-house commissioning of evaluation limits independence and objectivity. There are also transparency issues, because the decisions on allocation of funding (often substantial amounts) are not published in the same way as for competitive calls. Project documents, reports and evaluations are not systematically made publicly available (unlike, for example, the World Bank).
National level actors

Cooperation at national level is very good. The Government of Serbia has very strong capabilities for programming of EU assistance (Serbia EU Integration Office (SEIO)) and an exemplary policy team for social inclusion policy (Social Inclusion and Poverty Reduction Unit (SIPRU)). Together with the line ministries, these specialist offices are instrumental in ensuring that IPA support for Roma inclusion is relevant and in line with government policy. They also help the line ministries to develop and adopt more effective policy measures by providing technical expertise, policy impact assessments and other forms of evaluation. At present, the SIPRU is funded by the Swiss Agency for Development Cooperation (SDC), which gives it the capability to provide technical support far above that normally available in Ministries in Serbia. It is an example of good practice that could be used in other IPA countries.

The strength of these units makes the work of the EU delegation much easier than in other countries. The delegation can rely on the government to provide a lead in policy making, and to be reasonably sure that there will be ownership from government for the implementation of projects and actions.

Municipalities

There is not much evidence that municipalities in Serbia are consulted regarding the programming of IPA funds for Roma inclusion. The OSCE TARI project selected the 20 local municipalities for the project based on selection criteria, data from the field and the advice of ministries. The exception is the City of Belgrade for the Let’s Build a Home Together project; the city was instrumental in obtaining the funds from the EC in the first place, and played a key role in planning and implementation.

Other donors

Donor coordination in Serbia is good, largely as a result of the expertise within Serbia EU Integration Office (SEIO), and the very useful (if detailed) ‘NAD’ document. Donors including the Swedish International Development Agency (SIDA) and the Swiss Cooperation Office/Swiss Agency for Development and Cooperation (SDC) generally refer to the NAD document and the plans of the EU when they decide their project priorities. At a higher
level, their strategic priorities are informed by government priorities as well as their own strategic objectives, with less reference to IPA programming.

While donor coordinating for Roma inclusion is not systematic, it functions reasonably well through a network of individuals and based on the guidance from the NAD.

Civil Society

Government coordination with civil society is well developed, and has two key formal mechanisms of relevance. SIEO formally coordinates with civil society organisations on a sectoral basis, the most relevant for this report being the Human Resources Development sector (the ‘SEKO’ mechanism). SIPRU has its own mechanisms of formal cooperation with civil society, including representatives of Roma NGOs.

Given that the cooperation mechanisms are well developed, the EU delegation tends to rely on the government for consultation with civil society. This is of benefit and encourages government ownership of consultation and is an efficient mechanism for the delegation. However, it has a fundamental weakness when it comes to consultation relating to civil society itself. The government’s view of civil society and its role is not the same as civil society’s view(s) of its role. Therefore, relying on government for consultation tends to perpetuate the view that the role of civil society is to provide lower cost, more effective services, rather than the promotion of voice, representation and accountability. One of the key roles that civil society should be playing for Roma inclusion in Serbia (and elsewhere) is exactly this; it needs to strongly advocate for improved measures, policies and actions and monitor to ensure proper implementation.
9.8. Turkey

9.8.1. Overview of IPA interventions covered by this evaluation

Three project interventions have been examined under this evaluation. Details of these are given in the table below:

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>IPA Financing Allocation</th>
<th>Lead beneficiary</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improving Social Integration and Employability of Disadvantaged Persons (Employability of Disadvantaged Persons)</td>
<td>€M9.0 Grant Scheme for Roma (part of €M30.0 Grant Scheme)</td>
<td>Ministry of Labour and Social Security (MLSS)</td>
<td>GS launched in 2014. No grants yet awarded. TA under tender</td>
</tr>
<tr>
<td>Employment and Social Support Services Coordination and Implementation Model for the Integration of Disadvantaged Persons (Employment and Social Services Implementation)</td>
<td>M€6.0 (€M5.0 - TA contract, €M1.0 – Supply)</td>
<td>Turkish Union of Municipalities (TBB)</td>
<td>TA under implementation since July 2014 Supply contract under tender (twice cancelled)</td>
</tr>
</tbody>
</table>

9.8.2. Overview of Roma in Turkey

Council of Europe estimates that around 2.75 million Roma live in Turkey, making it the country with the single largest Roma population in the world. Roma groups put this number as high as 5 million. At least 4 Roma groups - Rom, Lom, Dom and Abdal - live in Turkey. Rom are found predominantly in Thrace and Western Turkey, Lom in North Eastern Turkey, Dom in South Eastern Turkey and Abdal in central Anatolia.

IPA support for Roma communities in Turkey started relatively recently and is linked closely to the political recognition of Roma as a distinct community in Turkey (The Turkish Government’s so-called ‘Roma Opening’ in 2010) as well as negotiations related to EU political criteria and the drafting of the Joint Inclusion Memorandum, which featured the Roma issue as well.

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122 This project was not in the list of projects for in-depth analysis found in the Inception Report. However, it was included in the sample to give a better understanding of the different approaches being taken in Turkey to support Roma communities.
9.8.3. Intervention Logic and Programming

IPA support to Roma is currently provided via IPA component 4 - the Human Resources Development Operational Programme (HRDOP) – where they are included as a target group in the HRD OP. The Operating Structure (OS) and lead ministry for the HRDOP is the Ministry of Labour and Social Security (MLSS). IPA support for Roma de facto started in 2011 with the programming of the three interventions included in this evaluation.

The HRDOP is endowed with a solid intervention logic that provides a reasonably sound foundation for programming Roma related interventions. It also provides a focus for IPA assistance that is lacking in programme documents on the EC side (see below). Employment, education (including lifelong learning) and social inclusion are the priority areas. It identifies Roma as a target group for measures 4.1 & 4.2 under Priority Axis (PA) 4 - Social Inclusion. This provides the avenue for the programming of Roma-explicit and implicit interventions. There are no specific indicators for Roma at programme or measure level, but they are stated at operation (project) level. All three interventions in this evaluation contribute to the overall objective of PA4 in the HRD OP.

In Turkey, IPA support to Roma is framed within the context of social inclusion, with Roma classified as one of a number of disadvantaged groups in Turkey. There is no recognition of their national/ethnic minority status, with implications for some sectors such as education, and also Roma communities that consider themselves not to be Roma. Also, no other IPA components directly look at Roma e.g. fundamental rights - as this would consider Roma as a national minority, which Turkish law currently does not recognise. This does not appear to prejudice the chances of Roma benefitting from assistance under the OP, with an ‘inclusive’ approach taken to IPA support, even in the case of the one intervention in this evaluation that explicitly targets Roma.123

As regards programming on the EC side, Progress Reports make references to Roma issues, primarily in terms of minority rights and general social inclusion. Also, MIPDs include Roma as potential beneficiaries of IPA assistance as a ‘vulnerable group’ in the sectors Civil Society (MIPD 2007-9, 2009-11), Employment (2007-9), and Social Development (2011-13). There are no further specific measures or priorities outlined in them. As such, they share the shortcomings of MIPDs in other IPA countries.

123 The OIS for Roma Social Inclusion states that it takes as its starting point one of the EC’s 10 Principles for Roma Inclusion (explicit but not exclusive targeting of Roma).
There is a shortage of reliable statistics or analyses on the Roma communities in Turkey\textsuperscript{124} complicating the targeting of IPA or other programmes/interventions towards Roma difficult. Nevertheless, one of the IPA interventions in this evaluation specifically targets ‘densely populated Roma areas’. The OIS doesn’t state how these locations will be selected for the delivery of assistance, which suggests that these locations are unofficially already known by municipalities and ministries but are not formally recognised.

As regards the programming process, the three interventions covered by this evaluation have emerged as a result of interactions between the EU Delegation (EUD), the OS and other relevant ministries, Turkish Union of Municipalities (Türkiye Belediyeler Birliği – TBB) and with some Roma NGO platforms. Programming of these interventions appears to have been done without any wider strategic or policy considerations – other than that they should fit in with the HRDOP objectives. Nevertheless, all three interventions have strong elements in their design that have considerable potential to deliver valuable results. They are complex in their structure (particularly Roma Social Inclusion), which may pose challenges for their efficient delivery.

All the projects make reference to each other in their respective Operation Identification Sheets (OIS) and the design of each provides for synergies to emerge (through steering committees primarily). Taken as three ‘pilots’ they also offer a chance to test out new approaches and integrate successful elements into future IPA programmes. Ensuring that wider synergies at a programme level are secured and that the lessons learned from the projects are scaled up nationally would require a mechanism to be in place, and an institution to lead it. Currently, it is unclear which institution should do this but it would logically be either the future OS or the body responsible for the delivery of the National Roma Strategy and Action Plan (see below).

A positive element of the programming is that gender issues are explicitly mentioned in all programming and project documents, with indicators given for measuring gender balance in implementation and in outputs. The extent to which this will be translated into action remains to be seen. However, the one project under implementation has specific targets for women and men, which augurs well for this.

\textsuperscript{124} The CoE estimates 2.75 million Roma live in Turkey, making the country home to the largest single Roma population
National Roma Strategy and Action Plan

Currently the Turkish Government has no strategy for Roma into which IPA programming can link. However, a National Roma Strategy and Action Plan (NRS) has been under preparation since 2012. This document is currently in draft form and it is unclear exactly when the NRS will be adopted, with mid-2015 identified as the most likely date. The 6 draft NRS priority areas correspond to those of the EC Roma Framework. The NRS also has 3 horizontal themes – Gender Equality, Anti-discrimination and Safety – that are implicit in the Framework. Only a summary was available to the evaluators in English so a detailed assessment of the draft was not possible. However in principle, it appears to be sound. However, the quality of the strategy is disputed by Roma NGOs consulted during the evaluation. It was commented extensively by them in summer 2014 but there appears to have been no transparent addressing of these comments by the government (see section 9.8.6/v below).

It is currently unclear which ministry will ‘own’ the NRS. Currently it is under the aegis of the Ministry of Family and Social Policy (MFSP) but this could change. The NRS claims to be an action plan but in fact this is not the case. It lacks many of the main elements typical for such a document. It will need to be elaborated further if it is to fulfil its assumed purpose.

All the IPA interventions currently under implementation fall within the priorities of the NRS draft. As such a window of opportunity exists to bring together IPA II assistance (under axis 4), the NRS (AP) and the lessons learned from the 3 ongoing IPA interventions. Timing for this is crucial but end of 2016 seems a realistic date when IPA II will be reviewed and linkages to the NRS Action Plan can be explored. The IPA 1 interventions will be approaching a conclusion and a detailed assessment of their benefits would allow lessons from them to be integrated directly into IPA II measures linked to NRS Action Plan priorities.

IPA II

Under IPA II Roma (and Lom, Dom and Abdal – ‘Roma-like people’) are a target group in the Sectoral OP ‘Employment, Education and Social Policies’. There is considerable potential for IPA II to be deployed for the benefit of Roma communities in Turkey as its focus and funding allocations are in principle sound. It may be held back by ponderous implementation arrangements that have already hindered the performance of the three IPA interventions covered by this evaluation (see section 9.8.4).
9.8.4. Performance of Assistance

Efficiency

The preparatory phase of all the projects were very lengthy due to large numbers of stakeholders that needed to be consulted. This means that the original concept behind them is potentially outdated. Aligned to this is the lengthy contracting process. The OS at the MLSS faces significant challenges in tendering these contracts. In the sample there are 3 Technical Assistance (TA) contracts, 1 Supply, and 1 grant scheme (GS). The contracting process for all of these started at roughly the same time. Only 1 TA contract is under implementation at the moment. The Employability of Disadvantaged Persons GS is the most critical of these. The call was closed in August 2014 but is unlikely to award grants earlier than 2016. This weakens the relevance of the applications and undermines confidence in the GS mechanism among applicants.

Feedback from NGOs on the parameters of the GS was critical in several respects. The NGOs stated that funding allocations in the scheme are too large (€30000 - €150000), the application process is too complicated/difficult, and that there was a lack of information/feedback from the OS HRD OP on status of their applications to the scheme. Furthermore it compared poorly with the EIDHR GS managed directly by the EU Delegation, which was stated as being more accessible for them. A clear view from NGOs was that the current model for supporting Roma is unsuitable and a more NGO-friendly, less political (distant from government) arrangement is needed (see Section 9.8.6/v for more on this).

In the case of Employment and Social Services Implementation, this protracted preparation and contracting process for the TA contract has necessitated a lengthy review of the project to re-establish its relevance. Also, the supply contract has failed twice and has negatively affected the delivery of the TA. The beneficiary (TBB) has helped address this problem from its own resources (see case study 12). The OS capacity has evidently been particularly stretched by the GS of Employability of Disadvantaged Persons. This OS capacity in combination with the protracted preparation phase, the GS design and DIS procedures has created a highly inefficient mode for implementing IPA assistance to Roma. It should be reconsidered.

Due to these efficiency problems, no results to speak of have emerged from the interventions. Only in the case of Employment and Social Services Implementation is there an effect to be noted, but this is in the capacity of the TBB to prepare and manage IPA projects, not in terms of direct benefits to the project target groups.
The capacities of Operation Beneficiaries can be summarised thus:

- **TBB** is well organised with good resources, institutional reach and political influence – plus it is evidently aware of what it wants to achieve from IPA. Municipalities have mixed capacities, from good to weak. The project design takes this into account and is sufficiently flexible to allow deployment of resources as needed (i.e. more to weaker municipalities).

- **MLSS** has a good awareness of Roma needs. Its programming and monitoring capacities appear to be sound. However as mentioned earlier, the capacity of the OS for the HRD OP may not be optimal. Also, the General Directorate for Labour, the unit within the MLSS responsible for this project, has also had its capacities stretched in processing the large volume of applications (2000) to the GS Call for Proposals.

- **The MFSP** have designed an ambitious project which they believe is within their capacities to manage efficiently. It remains to be seen how this will work in practice.

**Effectiveness and Impact**

At the moment it is too early to make any specific observation on the projects not yet under implementation. However the protracted contracting process for the grant scheme of *Employability of Disadvantaged Persons* is likely to undermine the relevance of applications, will require the update of the design of many of the supported projects (as they will be nearly 2 years old), reducing time for their implementation, which may negatively affect the quality of their results due to lack of time to delivery good quality outputs.

*Employment and Social Services Implementation* is well placed to deliver planned effects and impact. However the supply tender will need to be contracted quickly to ensure that the facilities to deliver the services developed under the project will be in place in time. The surveys under preparation will map in some detail some issues affecting Roma in the pilot locations. If successful this approach – working through municipalities in partnership with local stakeholders including Roma CSOs, has potential to map Roma needs, locations and numbers to a detail and breath needed, and can be rolled out to other municipalities in future. Research of this type is an eligible action under IPA II, specifically the Sectoral Operational Programme for Employment, Education and Social Policies (EESP).

**Sustainability**

Prospects for sustainability are good for *Employment and Social Services Implementation*. The TBB is committed to the delivery of the project and has the capacities to both support the delivery of results and roll them out to other municipalities upon the project’s
completion. The 4 municipalities involved have demonstrated their own commitment to this issue by voluntarily selecting Roma as a target group. Feedback from Roma NGOs confirmed that one target municipality (Mersin) was working with it actively on the project implementation. This should secure sustainability of results. The municipalities in question should have sufficient resources to sustain the project results. Also the differentiated approach to municipalities taken by the TAT should ensure that their capacities to deliver the SSSUG model at the end of the project will be at the required level.

9.8.5. Quality of Monitoring

The arrangements that are in place for HRD OP for monitoring and evaluation of these interventions should be sufficient. The capacity of the OS for this is strong in terms of numbers of staff, structure, and also methodology.

According to feedback from the evaluation mission, the OS is considering using Roma NGOs to help monitor IPA performance on the ground. This is laudable, but the exact mechanism to make this happen is not clear yet.

An explicit monitoring and evaluation plan/strategy for these ‘pilot’ interventions would be needed if lessons are to be learned for future IPA II measures linked to the NRS Action Plan. This is not in place at present, but there is sufficient time for this to be put in place.

The EUD monitoring mechanisms appear sufficient to follow operational performance as a member of the HRDOP monitoring committee. More generally, it lacks the capacity to play a more proactive role in, for example, pressing for greater synergies between ongoing interventions, although this would be both a logical task for it.

As regards ROM, this is under the Ministry for EU Affairs (MEUA). As the remit of the MEUA doesn’t extend to component 4 of IPA and OP HRD, ROM assessments will not be available to institutions implementing these Roma-focused projects.

9.8.6. EC Cooperation with External Stakeholders

There is evidently a working partnerships in place between the MLSS and MFSP. Both ministries recognise Roma as a disadvantaged group and have played a leading role in programming 2 of the 3 current interventions under evaluation. The MLSS is the lead institution for the SOP EESP under IPA II. The MFSP is currently the nominated coordinator of the NRS. Clearly both ministries will play a central role in support to Roma communities in Turkey for the foreseeable future.
The Ministry for National Education (MoNE) is involved in the *Roma Social Inclusion* project as one of the implementing partners. The Ministry for National Education (MoNE) is involved in the *Roma Social Inclusion* project as one of the implementing partners. Turkey’s education policy guarantees the right to education and training to all, regardless of race, gender and religion. However, this approach precludes the recognition of differing needs of social (or ethnic) groups, which appears to be at odds with the underlying philosophy of the IPA intervention and may therefore affect its implementation. Having said that, its collaboration with TBB on the implementation of *Employment and Social Services Implementation* (vocational training) was reported as being good – protocols of cooperation have been signed between the two organisations and implementation is progressing.

**Specific Stakeholders**

A wide array of stakeholders are involved in IPA support to Roma in Turkey, many of whom are crucial to the success of both current as well as future assistance. Their role and relationships to IPA are assessed below.

1. **EU Delegation (EUD)**

The EUD has thus far played a proactive role in the programming of the 3 interventions targeting Roma. In addition to its involvement in programming and monitoring of IPA IV assistance, the EUD also manages funds for CSOs directly via its Sivil Düşün and EIDHR programmes. These are a potentially important source of funding for Roma NGOs.

Whilst it can encourage government policy change in the area, unlike many other Delegations in IPA countries, its leverage is otherwise limited. For example, any direct pressure on the Turkish Government to adopt the NRS is unlikely to have the desired effect. Within the existing institutional arrangements, it can primarily facilitate closer collaboration between state institutions and other stakeholders (especially NGOs) on ensuring effective use of IPA II funds for Roma.

Its relationship with Roma civil society appears to be open and constructive. However, there appears to be no formal structure to its consultation with these groups. The evaluation has established that a more structured arrangement would be beneficial for at least two reasons: Firstly, it would increase the likelihood that the measures to be supported under SOP EESP targeting Roma are designed with the full participation of Roma civil society prior to their approval for funding. The facilitator role of the EUD is likely to prove crucial as evidence thus far suggests that where consultation with Roma CSOs has happened, it has been on interventions that have already been designed. Any subsequent changes have been to the details of the existing design, not to its fundamental focus or structure. This approach
needs to be revised and made more thorough. Secondly, feedback from Roma CSOs was uniform in stating that existing funding mechanisms fail to take their specific needs and capacities into account. Thus, any future support to Roma civil society may require new delivery model to reflect the capacities of Roma NGOs in Turkey, and the EUD with its experience to date will play a central role in its preparation and implementation.

ii. Ministries

As mentioned above, the MLSS has been an important player in this area and will remain so. As the OS it has capacity to programme, monitor and even evaluate IPA support under OPHRD and presumably SOP EESP. Its capacity to manage the contracting process is less strong – based on the sample for this evaluation. Aside from affecting programme efficiency, this is evidently affecting its relationship with other stakeholders, who have expressed frustration at the slow progress in tendering/selection process.

The MFSP is the other most visible user of IPA funds in this area as Operational Beneficiary of Roma Social Inclusion project. It will face the challenge of managing this complex, multi-agency project. It remains to be seen whether it will be up to this challenge, but it sees this as not being a problem. Its ability to successfully deliver this IPA project will give an indication of how effective it will be as a coordinator of the NRS, which is currently under its aegis.

The MoNE is an institutional partner in two of the three projects (Roma Social Inclusion and Employment and Social Services Implementation) and a potential indirect beneficiary in the Employability of Disadvantaged Persons GS (via schools applying for funds). As mentioned above, its underlying philosophy tends to limit the potential for this to happen. This would need to be addressed both within the NRS Action Plan once adopted and reflected in IPA II funds (possibly conditioned by MoNE commitment to Roma-focused support).

The Ministry for EU Affairs (MEUA) as the NIPAC is responsible for overall coordination of IPA support to Turkey and political reporting in regard to the accession negotiations. It is also responsible for programming, monitoring and evaluation of IPA components 1 & 2. It has little direct contact with the programming or monitoring of the interventions covered under this evaluation, although it does participate in the HRD OP sectoral monitoring meetings. NIPAC will be responsible for overall coordination of IPA II assistance and so theoretically could play an important role in ensuring that IPA support from all the SOPs is used in a coordinated way to support the implementation of tenets of the NRS, for example. The TAIEX seminars could be a suitable starting point for this coordination process.
Under TAIEX, the MEUA has thus far reportedly organised a Roma seminar in December 2010 and a further event on employment in 2011. Since then it has not organised similar events. These were reported to be well attended and fed into the programming of the current tranche of IPA interventions. It is therefore unclear why there was no follow up on these.

As mentioned above, the TBB is a strong and influential institution in Turkey. In the context of IPA support to Roma communities, it represents a potentially important partner in delivering services to address Roma needs at municipal level. It is using IPA for the first time – initial indications are that it has the capacity, networks and influence needed to make a success of this intervention. It will also be well placed to roll out project results in the pilot projects to other municipalities. It has strong links to all key agencies at national and local level, as well as having a mandate to work directly with all 1395 municipalities throughout Turkey. Depending on its performance in the current IPA intervention under its charge, any future support to Roma via IPA II programmes should consider TBB as a key partner in both programming and delivery of Roma-related interventions.

iii. Other national bodies

A key player in the area of employment is the Turkish Employment Agency (İŞKUR). It is involved in all three interventions as indirect beneficiary. Some problems noted with its participation in Employment and Social Services Implementation – no protocol of cooperation has been signed with it yet due to misunderstandings of project purpose/possible inter-institutional competition. İŞKUR needs to be brought on board as it will remain an important stakeholder under OP EESP and the NRS.

iv. Municipalities

There are 1395 municipalities in Turkey, divided among Metropolitan municipalities and other (second level) municipalities. Under recently adopted legislation they have been vested with extensive new responsibilities for service provision, many of which directly affect Roma. They also coordinate with decentralised central government in several sectors (education, employment, social security).

Feedback from the evaluation indicated that they also have rather extensive interactions with Roma NGOs, although their character evidently varies widely, from collaborative to conflictual. The Employment and Social Services Implementation project works directly with them to pilot new models of social service provision for selected target groups including Roma. It is in several respects a crucial intervention for exploring tailored approaches to addressing Roma needs.
Municipalities evidently have a stronger appreciation of Roma numbers, needs and locations than any other body in Turkey. This was confirmed by some Roma NGOs. As such they represent potentially the key interlocutor in channelling IPA II support to Roma communities in Turkey especially in collaboration with the TBB at central level.

v. Roma NGOs

The number of Romany NGOs in Turkey is between 200 and 300. Most represent Roma (Rom) but a small number represent other Romany groups (Lom, Dom, Abdal). Several platforms, confederations and networks exist to which an uncertain number of these NGOs are affiliated. Among the most prominent of these are the ROMFO (Romany Forum) which is linked to the ERRC, and the network of organisations coordinated by the Zero Discrimination Association, a human rights organisation with a strong Roma orientation. Roma NGOs have links to political parties across the political spectrum. There also appears to be some rivalries between the different platforms. Any consultations with Roma civil society for IPA II programming or implementation will need to take this factor into account.

In relation to the NRS, consultation on the current draft took place in mid-2014. Roma NGOs were provided with the draft by the MFSP and asked to provide comments to it. Both NGO platforms interviewed for this evaluation provided extensive comments. Thereafter no feedback from the government side was forthcoming. Some elements of the strategy (e.g. Housing) were roundly criticised by the NGOs. The NGOs are now concerned that the strategy will be adopted without taking their feedback into account and will exacerbate problems facing Roma, rather than addressing them.

Roma NGOs have evidently interacted with central government bodies on IPA. The Zero Discrimination Association network was directly consulted by the MLSS on the design of the Employability of Disadvantaged Persons grant scheme, albeit only on its parameters (e.g. size of grants given, types of eligible actions) rather than its fundamental focus or structure. It was reported that the MFSP also consulted with ROMFO on the preparation of Roma Social Inclusion, although ROMFO stated that this had in fact been very limited.

As mentioned above, their relationship with the EUD is open but not structured, with no formal inputs into the EUD’s programming of IPA assistance for Roma. They stated that they had no direct inputs into the preparation of other civil society instruments managed directly by the EUD (EIDHR, Sivil Dusun), but believed these funds to be more accessible and effective than those from the government.
vi. International organisations

Very little engagement of international organisations such as UN agencies, Council of Europe or OSCE was noted in connection with Roma/IPA funds. None have been involved in delivery of IPA support for Roma, unlike in many other IPA countries. According to the EUD, this may change under IPA II, although, with national and local administrations exhibiting generally good institutional capacities, the rationale behind this was unclear to the evaluators.
10. Annex 3: Summary Assessment of the IPA Multi-Beneficiary Programme

10.1. Overview of IPA interventions covered by this evaluation

The MBP has been used to support at least four project interventions that target Roma (both exclusively and inclusively). Details of these are given in the table below. Two projects - Social inclusion: regional support to the marginalised communities and Regional Initiative for Roma Integration – Best Practices in Roma Integration were selected for an in-depth assessment of IPA performance (highlighted in yellow).

<table>
<thead>
<tr>
<th>Title/Short Title</th>
<th>IPA Financing Allocation (€M)</th>
<th>Lead beneficiary</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social inclusion: regional support to the marginalised communities/Social Inclusion</td>
<td>1.0</td>
<td>UNHCR</td>
<td>Completed October 2011</td>
</tr>
<tr>
<td>Regional Initiative for Roma Integration – Best Practices in Roma Integration/BPRI</td>
<td>3.0</td>
<td>OSCE</td>
<td>Completed November 2013</td>
</tr>
<tr>
<td>Promoting human rights and minority protection in South East Europe</td>
<td>3.0</td>
<td>Council of Europe</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Regional Initiative on Inclusive Education</td>
<td>5.115</td>
<td>Council of Europe</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>

10.2. Intervention Logic and Quality of Programming

The main programming document for the MBP are the three multi-annual indicative programme documents (MIPD) for the periods 2007-9, 2009-11 and 2011-13. These form the foundation stone of intervention logic of the MBP. They share similar characteristics to their national counterparts i.e. they provide a general basis for programming assistance but lack the focus needed for detailed programming of IPA assistance to Roma at a strategic, supranational level. Furthermore, unlike national IPA support, the MBP doesn’t benefit from the existence of any EC progress reports to act as a political reference point for any programming. Likewise, no regional ‘Roma strategy’ exists into which it can feed, with even Roma Decade goals being national in character. In the area of Roma support, the MBP MIPDs’ intervention logic is not particular clear, whilst indicators of achievement are sparse and of little practical value when assessing performance. Nevertheless, individual interventions funded from the MBP are in line with Decade goals.

The MIPDs for the period of this evaluation make several references to Roma and their quality varies. The MIPD for 2007-09 explicitly refers to Roma under the chapter on ‘Supporting Civil Society’, ‘Refugee Return’ and ‘Social Inclusion’. However, no specific measures or planned outcomes are mentioned. The 2009-11 MIPD contains no explicit
references to Roma and it is unclear why they ceased to be a priority for this programming period.

By contrast, the final MIPD, 2011-13 provided a clearer definition of the problems that affect minorities and vulnerable groups and Roma needs are mentioned in general terms. Priorities identified therein were subsequently covered by three interventions funded from the MBP from this programming period. E.g. “the creation of legislation ensuring anti-discrimination and protection of minorities,” “regional cooperation networks set up promoting sharing of best practices,” “design and implementation of policies and programmes for inclusive education and training” and “activities promoting tolerance, reconciliation and interethnic dialogue.”

Although the final (2011-13) MIPD represents an improvement in terms of general content, the MIPDs do not contain any wider vision of how the regional or horizontal dimension of IPA can clearly add value to national IPA Roma interventions. Nor do they state what niche the MBP is aiming to fill that hasn’t or couldn’t be filled by other IPA (and non-IPA) sources. Indeed, in many cases, the MBP projects tended to cover areas that were also the focus of interventions funded from national IPA allocations e.g. education, legislation, documentation/civil registration. In those areas where the regional dimension does provide added value (e.g. creation of regional networks) benefits were reported. However, these benefits were often weakened due to their lack of linkage to national policy initiatives or the absence of follow up (IPA or other) support to roll out results. This assessment has found there were few examples of observable direct integration of MBP results into national policies (although it is possible that at local level, some were taken forward by municipalities such as the local action plans developed under the BPRI intervention).

In an attempt to improve the strategic focus of Roma MBP interventions, the EC HQ in 2011 attempted to link three interventions programmed under the MBP (BPRI implemented by the OSCE and Promoting Human Rights and Minority Protection in South East Europe and the Regional Initiative for Inclusive Education implemented by the Council of Europe), into one wider ‘strategic regional framework’. This involved requesting the parties selected to implement the projects to review and adjust project design and implementation methodologies in an effort to promote potential synergies between them. As all three projects were originally conceived and designed as stand-alone interventions, there was only limited potential for synergies to be created ex-post (as each covered different areas of activity) and this fusing caused some difficulties in implementation (most notably for the BPRI project, as this redesign took place after the project had started). Feedback from stakeholders indicates that this retrospective redesign did not prove particularly successful.
and was symptomatic of the ad-hoc approach taken by ECHQ to the MBP in the area of Roma support.

To ensure complementarity of funding sources and reduce any risk of overlap, the MBP interventions would need to have been closely coordinated with national IPA programmes that were also targeting Roma. Evidence suggests that this didn’t happen to any significant extent. This is not surprising as IPA assistance in beneficiary countries were largely based around individual projects and programmed without reference to the MBP. Thus the onus fell on the MBP to take into account individual projects being prepared in-country, which for several reasons (differing programming cycles, amount of work involved) proved difficult to do in practice.

In principle, the programming of individual MBP interventions follows the MBP Programming Guide. This evaluation doesn’t aim to assess MBP programming process as a whole. However, in relation to Roma-targeted assistance covered in this evaluation, it appears that programming was led by EC HQ primarily in collaboration with the selected project implementer – international organisations to whom a direct grant was awarded. Feedback from stakeholders in IPA countries indicated they had little direct involvement in this process (with the exception of NIPACs, who were consulted on MBP interventions but who mostly lacked any expert capacity to contribute to programming in detail). This also extended to their limited involvement in their implementation, with few of the main institutional stakeholders expressing awareness of, or involvement in MBP project activities. The Interim Evaluation of the MBP programme of 2013 findings in this regard are consistent with this assessment i.e. the programming process remains driven by the Commission Services which negatively affects ownership within beneficiary countries.

In summary, the Roma specific interventions funded from the MBP give the impression of being a collection of discrete projects that have only a distant connection with national Roma policy efforts and often lack clear complementarity with nationally programmed IPA Roma interventions. Nevertheless, they have offered some useful potential insights into areas of relevance to the needs of Roma in the region. However, the limited involvement of national stakeholders in the programming process weakened their ownership of outcomes and their sustainability.

**Design of individual interventions selected for in-depth assessment**

The project ‘Social inclusion: regional support to the marginalised communities’ (hereafter Social Inclusion) had as its objective “To contribute to the social inclusion of Roma, Ashkali and Egyptians and to their full enjoyment of citizenship rights in the region of the WB. To contribute to the prevention and reduction of statelessness in the WB region.” It was a
continuation of a first phase with identical objective. The objective of ‘Regional Initiative for Roma Integration – Best Practices in Roma Integration’ (hereafter BPRI) was “to improve the quality of life and access to rights of the Roma communities in the Western Balkans”. Both objectives are very broad and evidently over-ambitious. One component of BPRI covered personal documentation and citizenship which was dropped in the inception phase once it was discovered that the UNHCR project had done the same activity before. This suggests that programming and needs assessments within the MBP were not as rigorous as could have been. Work in areas covered by these interventions have also been carried out via IPA national funds. Only the regional networking element of the BPRI project offers something not fundable through national programmes.

Both projects had multiple components implemented in all countries in the region. In this context, the size of budgets (especially for Social Inclusion) are small. The BPRI budget on first inspection appears substantial until seen in the context of the results it aims to deliver across the whole IPA region. In practice this project tested a series of pilot approaches that, if successful, could be scaled up at national or regional level, integrated into national policy measures, or in the case of regional cooperation among Roma professionals be supported from follow up funds. However, in itself it could not deliver any definitive solutions and thus meet its objective.

10.3. Performance

Two of the four projects in the sample were selected for assessment of performance. These are Social inclusion: regional support to the marginalised communities (hereafter - Social Inclusion) implemented by the UNHCR and Regional Initiative for Roma Integration – Best Practices in Roma Integration (BPRI) implemented by the OSCE. Both had been completed at the time of this evaluation. The other two, both implemented by the Council of Europe, were under implementation. Both were funded via direct grants awarded to the implementers.

10.3.1. Efficiency and Effectiveness

The use of a direct award and the centralised implementation arrangements in principle should facilitate good efficiency. This was the case for Social Inclusion. The project was contracted without delay, started on time, and used up its budget on activities anticipated. It delivered its planned outputs, although it did require a 10 month time extension for this. The use of a direct award mobilised funding quickly, while the UNHCR’s network of national
offices facilitated a smooth delivery of implementation. The BPRI was awarded on the basis of a restricted call for proposals, and experienced more difficulties in delivery of assistance due to its size and complexity, as well as problems in start-up. In its inception phase BPRI found that it was overlapping in the area of civil registration and legal aid provided by the Social Inclusion project financed from the previous MBP annual allocation. This led to its redesign, with the cancellation of one component of the project and allocation of funding to other areas. Second, the EC’s request to re-orient BPRI towards the two other Roma MPD-funded interventions led to the project being stalled for some six months. Other factors complicated efficiency – OSCE and EC procedures differed which caused confusion and delay in procurement and recruitment. Also the management of the project was located in OSCE Warsaw but the implementation team was located in the western Balkans. Coordinating activities within the project and also with other interventions provided time-consuming.

**Effectiveness of the assistance was mixed, but the projects delivered some positive results.** Several project results from BPRI were considered to be useful – for example the main outcomes of ‘Result 1’ - multi-sector municipal collaboration, Roma involvement in decision-making and participation of Roma in political life - were assessed positively by stakeholders. Also, studies carried out on housing were considered valuable for assisting in policy formulation and implementation. However, these, like planned results in other areas, whilst considered of good quality in the final evaluation report of the project, do not appear to have been either scaled up or integrated into national policy to any noticeable degree. As such, the project made only very modest contribution to its specific objective of improving the quality of life and access to rights of the Roma communities in the Western Balkans.

Social Inclusion evidently provided support to a substantial number of Roma (some 18000 direct beneficiaries of free legal aid in obtaining personal documents and accessing basic rights) during its implementation. This translated into an improvement of the lives of those Roma and thus a contribution to the project’s objectives. Of the other results, the advocacy and capacity building measures appear to have contributed in part to improvements in legislative frameworks and capacities of national authorities dealing with civil registration in the target countries.

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10.3.2. Impact

The MBP projects have provided some useful effects but there is little evidence of them being followed up either by subsequent IPA projects or taken forward by national/local beneficiaries. The scaling up of these (often localised) results to generate better impact or securing funding after the project completion were the greatest challenge, which appears not to have been met.

Wider benefits from the BPRI are not apparent as they haven’t been taken forward upon the project’s completion. For example, with no follow-on funding to finance the regional networking, any short term impact from this model is likely to be lost over time. Studies on housing, while valuable in themselves, have not even been used as a foundation for national IPA-funded interventions in this sector. Contributions to wider objectives are only going to be achieved if these conditions are in place.

The impact of Social Inclusion can be seen primarily in the continued work of UNHCR and others in gradually reducing the numbers of Roma is a stateless status in the region. In this respect the project delivered some wider benefits which have been taken forward by other donors. Changes in related national legislations are also potentially attributable to this project, although there is no direct evidence of this.

10.3.3. Sustainability

Both projects’ sustainability is influenced by issues mentioned above i.e. the lack of a clear strategy on the side of the EC of how it wishes to use the MBP for benefitting Roma in IPA countries, the lack of linkage to national IPA support and limited buy-in of local stakeholders. BRPI would ideally have been a pilot first phase whose best results would have been financed through a second phase to allow their scaling up or integration into national (IPA) measures. None of this happened as no phasing was programmed, national involvement in the project was limited and follow-up funding from either IPA or national budgets was not forthcoming. Social Inclusion is less problematic inasmuch as its main result was a substantial number of Roma with civil documentation. However, an arguably more sustainable approach would have been a long-term focus working directly with national authorities on enhancing national legislation, centred on the provision of free legal advice in this area, linked to capacity building for these institutions. Both the project final report and ROM assessment note that despite the success of the project in assisting some 18000 Roma in gaining civil
10.4. Monitoring

Monitoring of project level performance is adequately addressed. This is done primarily via ROM, whose quality varies but which ECHQ considers a useful operational tool. Also, ECHQ programme managers can conduct monitoring of individual projects. However, time and financial constraints limit opportunities for this to happen.

Feedback from field missions indicate that EUDs has very little or no involvement in monitoring of the MBP. National authorities are usually involved in the ROM exercise as interviewees or beneficiaries of assistance.

At programme level, Multi-beneficiary programming/coordination meetings exist where progress in programme implementation is discussed. It is unclear how robust this mechanism is for monitoring the MBP at any strategic level, especially for Roma support. However, no dedicated system seems to exist.

10.5. Partnerships and Stakeholders

The central partnership that underpins the MBP revolve around the ECHQ (MBP unit) and the international organisations such UN Agencies (UNHCR, UNDP, OSCE, Council of Europe) who implement many of the projects funded from the MBP. These international organisations’ involvement in MBP extends into liaising with the EC on areas where IPA assistance could be programmed – for example in the area of refugees with the UNHCR or with Roma education in the case of the Council of Europe.

Their international standing, access to sometimes unique expertise and regional reach are clear benefits. Previous evaluations and feedback garnered in this evaluation indicate that

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126 The Project final report notes that “Despite the tangible progress and achievements made so far, lack of civil registration and documentation among RAE remains a widespread problem and a serious impediment to social inclusion. Proposed solutions have not yet been fully incorporated and a gap at local, national and regional level remains and needs to be further addressed to efficiently deal with the backlog of non-registered persons. As the EC support will not be extended, UNHCR will strive to continue under its mandate to prevent and reduce statelessness - to support and implement similar activities. This will however depend on its overall funding situation”.

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the implementation of IPA funded assistance is often their weak point. The projects in this sample illustrate these contrasting characteristics.

Based on the evaluation sample, it can be said that international organisations have a broadly positive role to play in the MBP’s future formulation and delivery. This needs to be set within a clearly defined strategic focus for the programme itself, building on lessons learned from previous interventions, and looking to add value above and beyond what can be achieved from national IPA programmes.

**EU Delegation (EUD)**

Findings from other evaluations and ROM reports indicate that EU Delegations are rather peripheral to the programming and monitoring of MBP IPA Roma support. In programming the EUDs are consulted, but the extent to which they have provided active inputs into the process varies from country to country. Feedback from field missions suggests that this involvement tended to be formal in character, with most EUDs not having the expertise or resources to provide more than general responses to any project fiches circulated by ECHQ.

**National Governments/Ministries**

NIPACs are participants in the programming process of MBP – According to ECHQ they are "involved from early stages in the appraisal of actions, notably in the Multi-beneficiary programming/coordination meetings." Discussions held with NIPAC staff during the evaluated identified that for the most part they had very limited understanding of Roma-related issues. In the programming process, they depended on feedback from national authorities responsible for Roma issues. The extent to which this feedback mechanism ensured that Roma needs were adequately reflected in the overall design of MBP-funded interventions is debatable. The limited awareness and involvement of national authorities or NGOs in MBP Roma interventions suggests that this mechanism is sub-optimal.

**Municipalities and Regional Government**

Municipalities have been involved in several MBP-funded interventions, usually for piloting innovative approaches such as the local action plans in the BPRI project. Their ability to participate in programming MBP interventions is limited by IPA procedures and also their capacities. Having trialled innovative approaches in these local authorities, logic would dictate that they would then be rolled out to other municipalities, using follow up IPA national or MBP funds.
Evidence indicated that this was not the case, at least as regards the project in the evaluation sample. This questions the validity of such an approach and also influences the credibility of the EU in the eyes of the participating local governments and those that may have expected to benefit from similar support in future.

**Roma NGOs**

Roma NGOs based in the region had very little knowledge of the MBP apart from the young Roma professionals component of BPRI. The evaluators conclude that if consultations are done with Roma civil society for MBP programming, this takes place centrally in Brussels. The extent to which Brussels-based Roma NGOs can effectively represent Roma needs in the programming process is unclear.

Closer collaboration in country with Roma civil society would be beneficial to bring the programme closer to its final beneficiaries, currently it is evidently remote to them.
11. Annex 4 – Case Studies

11.1. Case Study 1 – Albania Area Based Development – UNDP SSIREC

IPA 2011, EUR 1.5 Million, July 2012 – December 2014

Background

The UNDP Supporting Social Inclusion of Roma and Egyptian Communities (SSIREC) project aimed to work specifically with Roma and Egyptian communities in three defined locations in Albania, in parallel with supporting central government capacity development.

It was a complex project, aiming to complete a wide range of interventions in a short timeframe.

The project builds on prior experience of area based interventions by UNDP and others. It makes a solid link between engagement with local authorities and the implementation of project activities. Local authorities are involved in the planning and decision making for small infrastructure investments alongside the Roma and Egyptian communities.

Achievements

Overall, the project has achieved inter alia the following:

- 63 self-help community activities, such as neighbourhood cleaning and tree planting
- 9 infrastructure interventions jointly identified with Roma/Egyptian communities and co-funded by local government: community/health/pre-school centre in Berat; Kindergarten and School Library in Novosela; Road rehabilitations in Shushica; Rehabilitation of Transitory Center for Emergencies in ShishTufina, Tirana; Construction of community centre and sports ground in Korca; Intercultural community centre in Pogradec, Rehabilitation of Pelion Road in Pogradec; Rehabilitation of main road in Roma neighbourhood in Morava/Ottlik, Rehabilitation of road in Partizani quarter in Vlora.
- Training and coaching of Roma and Egyptian NGOs, plus provision of 15 small grants;
- 90 Roma and Egyptian artisans, job-seekers and potential entrepreneurs were supported with vocational training in non-traditional vocations (e.g. camera operators, film producers, news reporters, cultivation of medicinal plants, craft design and marketing, plus coaching for establishing business.
In Berat, where the evaluation team met many of the project personnel and beneficiaries, progress in implementation was clear. Women farmers (Egyptians) in rural areas had an opportunity to grow a new crop (sage) with access to a new market, potentially increasing incomes. A group of young Roma people were working through a course to develop self-employment business ideas and put them into practice. A community centre had been built, and was providing health services, dental care and a Roma pre-school. Links were forged between the pre-school and the local primary school which would receive pupils at the start of the next school year.

Crucially, personnel in local government had been involved in the development and implementation of the project and recognised its value. The municipality was funding the running costs of the kindergarten, health and dental facilities.

**Analysis**

While the project appeared to be on target to achieve its goals, there were a number of concerns arising.

First, it was recognised at the primary school that enrolment is the easiest part of getting Roma children into school. The hard part is encouraging them to stay and complete their primary education. For this, additional resources in the form of teaching assistants or other model would be needed. There needs to be a stronger link between the project and wider reforms – potentially as a pilot testing site.

Second, the community centre was designed as a ‘multi-cultural’ centre, but it was evident in reality that this was a Roma/Egyptian only centre. The pre-school was also a Roma/Egyptian only pre-school. This may be the best possible solution given local constraints, but it would be good to ‘aim for the mainstream’, and establish new institutions that are not segregated.

The focus on income generation – for the young women farmers and for the self-employment group – is a welcome innovative initiative, and should be closely watched to identify lessons for wider application elsewhere. At the time of the field visit, it was too early to be able to make any predictions about success.

Which brings us to the final, and most crucial point. The model of working with local government, providing expertise and resources to tackle community issues is a good one, and needs further investment. Timeframes for this kind of intervention need to be much longer than the two years allocated for this project; time is needed for local action plans to be developed, for infrastructure projects to be realised, and most importantly, for interventions to learn and develop from their success or failure.
11.2. Case Study 2 - Support for inclusive education in Albania

IPA 2009 Civil Society Facility, grant of EUR 159,986; Dec 2010 – Oct 2012

Background

The project was awarded as part of the 2009 Civil Society Facility grant scheme (IPA 2009 fiche “Civic Initiatives and Capacity Building”). The overall objective of the grant scheme was “To strengthen civil society within participatory democracy, stimulating a civil society friendly environment and culture”. To achieve this, two activities were defined, one technical assistance for capacity building of civil society organisations, and the other a grant programme with support for CSOs in three sectors: fight against corruption, environmental protection, and support to vulnerable people. The award to Help for Children came under the third sector.

Help for Children is a child-focused NGO originally established by Terre des Hommes Switzerland. It is well established, and works with donors and international organisations such as UNICEF, Swiss Development and USAID. For this project, it teamed up with Romani Baxt, one of the leading Roma NGOs in the country.

The project worked with seven selected schools in three cities, supporting Roma children to prepare for, enrol and complete the first two years.

Project Achievements

The project supported 131 pre-school children with three months of classes to prepare for enrolment in primary school, followed by a year of additional lessons as first year children. Another group of 153 children received additional lessons for one school year. The project also worked with head teachers, school inspectors, teachers and parents.

The final report argues that the project “contributed significantly to the integration of Roma children in the public education system”.

Analysis

The project did with little doubt assist in enrolment and the educational attainment of the targeted children during the first two years of schooling. The intervention was not sustainable, however. During the course of the project, teachers were being paid supplements to provide the additional classes. At the end of the project, the supplements stopped, and so did the additional classes.
Another concern is that the targeting of Roma children for additional support was on the basis of their ethnicity rather than the educational needs: we do not know if non-Roma children might also have benefited from the additional classes, or whether there were Roma children who did not need these additional classes. Finally, there were concerns that in cases where individual schools were supported (as was the case in Fier), that additional enrolment and support for Roma children to enrol in one school leads to non-Roma children enrolling in other schools and creating de facto segregation. There was at least one example of this in Albania, though not from this specific project.

There are two key lessons to be learned from this case study. The first is that civil society interventions in education (and other areas) are not trivial; they can have profound effects on the lives of children and their families. The push to disburse funds must not overshadow the need to ensure appropriate quality standards and good practice. This project, from its design, was targeted at Roma children exclusively rather than at good inclusive education practice. This should be identified and tackled from the beginning.

The second is that sustainability of interventions that do not take place in the context of overall system reform is highly unlikely. In this case, there was no support from the Ministry of Education for systematic provision of additional classes for Roma children. The provision of pre-school classes was not linked in to wider support for establishing a pre-school education system. It is clear again from the design stage that if incentives are being paid to teachers for the project duration that only in exceptional cases will these teachers continue the additional work without financial compensation.
11.3. Case Study 3 – Roma Action: Housing for Roma in Bosnia and Herzegovina

IPA 2011 EUR 2.5 million, June 2013 – July 2015

Background

An OSCE survey carried out in 2002 found around 100 informal Roma settlements with a total population of 22,000 persons. Approximately 64% of the settlements were illegally built on publicly owned land, and the others have also unclear ownership rights. There are no data on what destruction was caused to Roma settlements during the conflict of 1992-1995. Nevertheless, there are reported cases in which houses or entire settlements were destroyed or made uninhabitable. The possibility for affected families to return to their original homes was minimal, which is also connected to the fact that their tenancy right was typically unclear. For the same reason they were often not eligible for return related reconstruction aid127.

By 2013, the Ministry of Human Rights and Refugees database suggests that there are needs for 4,170 housing units for Roma families. Other estimates suggest up to 6,500 families do not have secure housing, and 6-700 are homeless.

The MHRR allocates around EUR 1.5 million per year for the implementation of the Action Plans for Roma, of which around EUR 1m is for housing, and the rest for employment and health. Other donors have also contributed with support for housing construction, including Swiss Caritas and the Swedish International Development Agency (SIDA).

The overall aim of this IPA 2011 project is described as “Support to socio-economic inclusion of Roma population through provision of housing and socio-economic measures with proactive participation of local authorities and local stakeholders”. The project aims to construct 152 housing units, of which 64 apartments will be in 11 social housing buildings, and 86 individual dwellings will be reconstructed for those who own land or property. The social housing is intended for the most vulnerable who cannot demonstrate ownership or tenancy rights. This housing provision was intended to be complemented with socio-economic support to enhance livelihoods and social inclusion.

127 See, for example, p10 of the “Special Report on the Status of Roma in Bosnia and Herzegovina”, Institution of the Ombudsman for Human Rights of Bosnia and Herzegovina, undated, probably 2013 accessible at https://www.osce.org/bih/110495?download=true
There is no state or entity level legislation covering social housing, but some cantons and municipalities have developed local by-laws with the support of international NGOs (e.g. Catholic Relief Services).

The project is being implemented with the full cooperation of the cantons and municipalities, which are themselves contributing an additional EUR 0.5 million.

**Achievements**

The project has succeeded in constructing social housing and reconstructing private dwellings according to the plan. At the time of the field visits to one of the project sites (Zenica, December 2014), the social housing units had not been completed, but were on target to be completed by the end of the project.

The socio-economic components of the project were severely limited by the flooding that took place in spring 2014. EUR 45,000 of project funds were reallocated to provide for emergency aid to flood affected families.

**Key issues emerging**

Construction takes priority for project funds, and the softer components are reduced if construction costs exceed budgets. Implementers commented that the project budgets proposed in project fiches are often unrealistic, and mean that funds for other measures are insufficient.

The evaluation mission visited families who had moved into social housing in an identical model on an adjacent site to that under construction. They reported that the housing conditions had significantly improved over the conditions in the informal settlement where they had been previously. The locations of the social housing buildings were not very far from the city centre and market, where many Roma have their economic activities, and not far from other, non-Roma. The housing provided therefore contributes to their inclusion, rather than segregation as seen in other projects (in other countries/territories).

On the negative side, electricity bills were being paid only intermittently (when they had enough money) and rents were not being paid at all. Responsibility for the maintenance of the building was not clear, and there was some significant wear and tear after 4 years. Municipal authorities reported that they were not enforcing rent collections because they didn’t want to evict the tenants and there were no other reasonable measures. Social security payments are between 60-90 EUR per month, while social rents are EUR 10-12 per
month and utility bills average around EUR 70 per month. This means that life in social housing is unaffordable for unemployed households with no other source of income.

Gender issues were not a major concern of the project team or municipal authorities. The gender composition of the housing selection committee was not considered important. Whether the man or the woman of the household signs the tenancy agreement with the municipality was not considered important\textsuperscript{128}.

One school age girl in one family interviewed was not attending school, although she expressed a desire to continue. This is obviously not a sufficient sample to draw conclusions; however, the nature of the project to deal with housing and socio-economic issues only is a missed opportunity that could have provided a more holistic level of support, including working with municipalities, local schools and social welfare services to ensure children complete their education. An obvious link might have been made with the SPIS project implemented by UNICEF – but these two projects overlap only in one or two municipalities.

The diversion of funds for flood relief means that only 11 families will be supported with small grants for income generation.

There were no components of the project that provided for assistance to the wider community.

\textsuperscript{128} By contrast, in Kosovo, both the male and female heads of household (if there are both) sign the tenancy agreement, giving some protection to the female head in cases of domestic violence, separation or divorce.
11.4. Case Study 4 – Strategy Implementation in Bosnia and Herzegovina

Background

Bosnia and Herzegovina adopted its national Roma strategy in 2005, and associated action plans for education, and for employment, housing and health. Progress on implementation of these action plans was slow and institutional arrangements for supporting implementation and monitoring progress unclear.

The €M0.55 project was conceived as providing “support [to] a state-level coordination body able to ensure a proper and effective implementation of the Action Plans throughout the country”. This state level coordination body was proposed, and the Ministry for Human Rights and Refugees (MHRR) would provide secretarial assistance. The main themes of the action plans – education, employment, housing and health – fall mainly within the competences of the entities and cantons, and not at the state level. Implementation of the action plans therefore requires action to be taken at the sub-national levels, which needed to be coordinated and monitored. The project would also provide some incentives for implementation of the action plans.

The project was awarded as a grant to CARE International after a competitive process, and began in January 2011.

Project Achievements

The project focused on putting into place institutional arrangements for ensuring the implementation of the national action plans. This included:

- A Roma Coordinators’ Network of six individuals working as part of the MHRR, employed by the project, who reported from Roma communities. Their role was to report on the situation in Roma communities, prepare proposals for initiatives or recommendations to resolve specific problems in Roma communities and liaise with local government institutions.
- Organising meetings of ‘operative teams’ composed of Roma representatives and government officials.
- Training of employees of Centres for Social Work in data collection, supported by Monitoring Guidelines.
- Disbursement of 9 small grants for addressing specific problems in Roma communities with project funds supplemented by municipalities (total EUR 38,000)
- Workshops, training and support for Roma civil society organisations
At the time of the evaluation, it was evident that the main mechanisms of coordination, except for the state level coordination body, were no longer in place or functioning. The Roma Coordinators Network was operational only as long as project funds were available for salaries, and there was clearly no interest from government to sustain this network. Only one coordinator was retained by a local administration. The operational teams continued to function in some form, mainly for beneficiary selection committees for housing projects.

The main tangible outcome of the project was considered to be the results of the small grants component. Although a very small component of the project (3.5% of total funds, some 20,000 EUR from the project, and an additional EUR 18,000 from municipalities)\textsuperscript{129}, the small grants achieved solutions to very real problems faced by Roma communities. The box (right) contains some quotes from grants beneficiaries.

The project also set an example in terms of cooperation with Roma people and Roma civil society. There is some evidence to suggest that government institutions are more likely now to consult with Roma representatives and seek their cooperation. The MHRR works with prominent Roma NGOs for planning and monitoring.

The project attempted to deal with the issues of coordinating implementation of the action plans by establishing specific structures. These structures proved unsustainable, and demonstrate the weak resources and low incentives from the side of government. There may also have been a problem of perceived ownership of the project from some government institutions.

The small grants, however, show what can be done with small amounts of money and a constructive approach to working with communities and local government.

\textsuperscript{129} From CARE final report “Five BiH municipalities donated additional 35,500.00 KM on top of initial funds of the Care International in the amount of almost 40,000.00 KM, so that the total value of the projects was 74,433.00 KM” p18/24
**Small grants: appreciative comments**

- For the first time in several generations Roma in our settlement now have a paved road. Now, for us this is a life dignified to a human being! (Tuzla)

- 4 families with around 30 members have access to water for the first time! (Bijeljina)

- A Roma settlement can be for the first time reached by a road worth of a human being. This is a small step, but for the Roma people it means a big change and a better life! (Prnjavor)

- Now our children can finally go to school freely and without fear. After several generations the Roma in our settlements finally have street lights and can live a life without dark! (Tuzla)

- More than 20 families certainly live a better life after this project. Bathrooms, façade arrangement, painted rooms, can seem insignificant to someone, but for the Roma living in the settlement where we implemented the project, this means a better life. (Sarajevo)

- Fixed roof and at least a little bit reconstructed house, new bathroom so the family has the place to wash, represents only the beginning of better, more dignified life for Roma in our settlement. (Sarajevo)

- We never had the issue of streetlights in our community solved. Now, the “light” shines on our Roma people announcing a better life! (Visoko)

- With this project the Roma people showed that they can take care of their community. We cleaned our community and now we know that the Roma can do anything only if they are given a chance! (Zavidovici)
11.5. Case Study 5 – IPA assistance to the Roma community in Orechovica, Croatia

Background

The town of Orechovica is located in Međimurje County and has a population of 2,700. Approximately 500 inhabitants are Romani (speaking both the Bajashi Romanian dialect and Croatian), the majority of which live in a settlement some 1km from the edge of the town. This settlement was originally composed of a mix of legal and illegal housing and much of it lacked basic infrastructure such as asphalted roads, sewerage, running water and electricity supply. The adult population experience problems typical for other Roma i.e. lower education levels and high unemployment (reported as being around 90%). School attendance rates had historically been lower but this had started improving following efforts by the local school to offer specific services to Roma (see below).

IPA I support for Infrastructure

The Roma settlement in Orechovica was included in the 2008 IPA I “Improvement of infrastructure in two Roma settlements” as a target location. It financed works on roads, electrical and water infrastructure. This project was conceived to complement the efforts of the Međumurje County Administration to formalise and upgrade Roma settlements in the region. Whilst there is little doubt that Roma settlements in the region were in a poor condition, the approach of the County Administration bears the hallmarks of reinforcing the spatial segregation of Roma and Non-Roma. Using EU funds to roll out this approach goes against the EC 10 Principles for Roma Inclusion, which advises against use of EU funding for financing segregatory measures.

The project fiche states Roma community members were consulted in the design process, but this was disputed by some Romani inhabitants in the settlement as well as Roma leaders in the county. They pointed out that an alternative approach to housing Roma by rehousing those in informal settlements in uninhabited housing in non-Roma areas offered a better solution to both poor housing, segregation and the social exclusion that comes with it. However, there was reportedly little appetite for such a model among the local or regional authorities. This gave the impression that Roma had not been participants in the design process to the extent necessary.

The evaluators found that the planned infrastructure had been mostly completed, although some 30 houses had not yet been connected to the electricity grid and there was some uncertainty about connection to the water and sewerage systems for several families. Some of those families without electricity had already illegally connected to the grid, despite the hazards associated with this practice. More generally, there was major concern among
the Roma families about how they would be able to afford these new water and electricity services, whilst the authorities had little idea of how this problem could be practically addressed. This raises serious question-marks over the sustainability of such a housing model. On a more positive note, despite these shortcomings there was general agreement that IPA support had made a big difference to the living conditions in which the Roma lived.

**IPA IV Support for Education**

Whilst in the town, the evaluators visited the local primary school located close to the Roma settlement. The school had received a €140,000 grant from the HRDOP grant scheme *Support Roma and other national minorities in education and capacity building of educational institutions* to finance teaching assistants, provide additional classes for Roma pupils and purchase teaching materials. The project was reported by all stakeholders (Roma non-Roma and school staff) to have been successful, with attendance rates and academic performance of Roma children improving noticeably since IPA funding was awarded. However, the grant was due to finish in March 2015 and, without any follow-on support in the pipeline, the impressive benefits achieved to date were at severe risk of being lost. The school was planning to apply for more support, but would have to wait for a grant call to be launched and had no certainty that their application would be successful. This highlights the weakness of grant schemes as a tool for supporting Roma inclusion.

**Unplanned Synergies between IPA I and IPA IV**

Interestingly, the school staff also noted that the improvement in the attendance of Roma children had followed the upgrading of infrastructure in the settlement. This was reportedly due to the better conditions at home for the children and their personal safety linked to lighting and a paved street between the settlement and school. This suggests a clear synergy between different types of IPA funding being used in combination. However, this synergy was not programmed or even intended, but instead coincidental. Discussions with the representatives of the GOHRRNM and Međimurje County Administration indicated that they were aware of the benefits of an integrated area-based approach. The latter organisation had its own Roma action plan (developed with the help of an IPA Multi-beneficiary project), and stated its willingness to use structural funds to finance measures using a more integrated approach. As Međimurje County Administration is reportedly one of the strongest in Croatia, it should be well placed to put these intentions into practice although its record on housing issues raises a note of caution.
11.6. Case Study 6 – Return and Re-integration in Obiliq/Obilić, Kosovo

Overview

The municipality of Obiliq/Obilić is located in central Kosovo. It covers an area of approximately 105 km² and includes Obiliq/Obilić town and 19 villages. According to the Kosovo Population and Housing Census 2011 the total population is 21,549, of which 661 were registered as Roma, 578 as Ashkali, and 27 as Egyptians. The Municipal Office for Communities and Returns estimates that 720 Roma live in the municipality. The town is some 15 km from Pristina, the capital of Kosovo. It is dominated by the country’s two biggest (lignite fired) power stations, Kosovo A and Kosovo B, which are the main employers in the town. Kosovo A is also described as “the worst single-point source of pollution in Europe”.

IPA Support for Return and ‘Reintegration’

Under RRK II, 32 RAE families were returned to Kosovo as part of 214 minority families covered in the project. Of the four target municipalities included in the project, 22 RAE families were relocated to Obiliq/Obilić municipality. The reasons for their location into the municipality were unclear to the evaluators. According to the project documentation, returnees would have to demonstrate that they originated from the location to which they would be returned. They would also have to demonstrate formal title to their land. Once this was done, the project implementer (Danish Refugee Council) would construct housing on this land and facilitate return. It was reported that most RAE families had no formal title to land so could be relocated only if land was provided by the municipalities (which it wasn’t) or if they bought it. Thus RAE had arrived in Obiliq/Obilić only as they could afford it (as the land was cheap), others had sold land in one part of municipality in order to be included in the project and get a house. One family had no connection with Obiliq/Obilić but been relocated there from Serbia “as they thought it was the best for their children”.

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130 These figures are likely to have been subject to some fluctuation since then due to additional RAE returns from outside Kosovo (funded inter alia from IPA Return and Re-integration in Kosovo – RRK - interventions) and outward migration of RAE that has steadily increased throughout 2014.
Among these returned RAE were 9 families who were located in the settlement of Plementina on the periphery of the town (see photo above). A visit to this location by the evaluators found that:

- Housing was in unsuitable locations (on marshland, subject to flooding, directly next to power stations)\(^{132}\);
- Houses were evidently not fully complete (the houses had exposed outer walls and wiring, no external isolation or façade for heat retention, damp inside the houses due to their location\(^{133}\));
- Housing was not served by basic infrastructure (no adequate access road, inadequate water supply, no direct access to sewerage system).

The location of the housing next to the power stations was also reportedly affecting the health of the residents, with children suffering serious respiratory problems such as asthma due to the dust and gas discharged from the power stations. It seems logical to assume that RAE families had returned to locations where the value of the land was lowest.

The arrival of the returnee RAE families has put additional pressure on already barely adequate municipal services. Schools were particularly affected, with the primary school adjacent to Plementina lacking the space and teacher to handle the RAE children. In this context it is puzzling that IPA support was not used to link RAE returnees to a more general

\(^{132}\) The location of housing is determined by the ownership of land by the beneficiary family. However, the selection criteria for assistance were based on assumptions that the family had lived in the location prior to 1999 and were returning. Many Roma families could not prove ownership or occupancy of land to qualify for reconstruction assistance. One family included here had bought the land in order to qualify for assistance, and there had apparently not been an adequate assessment of the suitability of the land for habitation.

\(^{133}\) Although these were the agreed standards at the time of implementation, according to the official manuals on housing for returnees.
improvement of municipal services, thus bringing wider benefits to all inhabitants of the municipality.

RAE families were given 6 months’ worth of provisions once returned. They also received a piece of equipment and some business training in the expectation that this would help them to become economically active. One Roma family visited during the field mission had received welding equipment but had sold this as they could not find any clients and needed the money. Another family had received a primitive tractor that was being used to produce subsistence crops (although the cabbages grown by them in their field were reportedly full of dust from the adjacent power station). Unemployment in the town was reported as around 70%, with RAE suffering near total unemployment. In such a depressed economic climate, the assumption that RAE could eek out some sort of sustainable livelihood with such basic equipment and training appears to be wholly unrealistic.

Role of the Municipality

Capacity building for the municipality was also provided by the project. This involved training local officials in a range of skills such as PCM, public procurement, and leadership and team-building. The RRK2 project final report noted that there was a “Lack of managerial capacity to implement projects on the part of municipal officials and No clear municipal mechanisms for project initiation and fundraising.” This was confirmed by the field mission for this evaluation. Despite evident goodwill on the part of municipal officers to provide assistance to RAE returnees and the existence of a municipal action plan providing a framework for their activities, the multiple and complex challenges facing the RAE in Obiliq/Obilić were beyond these officials’ capacities to address effectively. Furthermore, with a municipal budget of €15000 over 3 years to finance these activities, funding is manifestly inadequate.

Continued Migration of RAE in Kosovo, despite the Returns and Reintroduction Programme

During the field mission it was reported that substantial number of RAE in Obiliq/Obilić (as much as 30%) had left in the last 12 months in search of asylum in Western Europe. Given the desperate conditions into which they had been returned, this can hardly be considered surprising. It does however underline the strong impression gained from the evaluation mission that the RRK model for RAE families is fundamentally flawed and potentially unsustainable. RAE families will continue to leave the locations earmarked for their settlement unless a more economically and socially viable alternative is found for them.

Despite the evidence gathered from this field mission, the main institutional beneficiary, the MCR, during interviews stated its satisfaction with the RRK model and believed it to be
successful. Likewise, The ROM assessment from late 2010 gave a positive assessment of the RRK2 project and recommended its continuation under RRK3. In the face of the facts established by the evaluation, this raises serious questions about the adequacy of the ROM instrument for assessing such interventions.
11.7. Case Study 7 – Mitrovicë/a RAE Support Initiative (MRSI) Phase 2, Kosovo

Background

The camps in northern Kosovo for Roma people displaced by the 1999 conflict in Kosovo became notorious in the 2000s for their unsanitary conditions and lead contamination. There were three camps, Cesmin Lug, Osterode, and Leposaviq/Leposavić which were home to around 130 families. An earlier phase of EU IPA support (EUR 5 million, 2010 - 2012) led to the closure of the first two camps. In 2013 there were 40 families still living in Leposaviq/Leposavić camp where the conditions were bad, but there was less lead contamination. This case study looks at the second phase of the project, from 2013 – 2015.

The first phase of the project was successful in negotiating the availability of land for resettlement of the displaced Roma. While the displaced themselves were keen to remain in the north of Kosovo, for reasons of security, language and livelihood, the municipalities in the north did not or were not able to allocate appropriate land. After much delay, the municipality of Mitrovice/a identified a site close to an area where many Roma had lived before the war – a location known as Roma Mahalla on the outskirts of Mitrovice/a south of the Ibar.

Project Results

Here a new settlement has been built (see picture) consisting of small one and two storey houses with little plots of land. The majority of the families from the camps in the north have now been located here. The residents (usually both male and female heads of household jointly) have right to remain in the property, and for their children to inherit that right, but they do not have the right to sell. If the property is vacant for some time, the occupancy right reverts to the municipality.
Sustainability is a Problem

Sustainability is a major problem here. Only 25 out of 1,800 residents are employed. Many of the residents reportedly used to claim for social security benefits in both the south and the north of Mitrovica. This ended recently when the Brussels agreement led to the sharing of social security information between the Belgrade and the Pristina authorities. There are also new stricter application procedures for social assistance, reducing overall social security incomes.

Children are usually enrolled in schools in the north of Mitrovica, partly because of language and partly because of the higher entitlements to social security under the Serbian administrations. Regular attendance is reportedly a problem, and the schools are not active in encouraging children to attend. Project activities to encourage attendance, such as provision of snacks with vouchers faced many practical difficulties.

Residents are reportedly not paying their utility bills and large debts have accrued. Garbage collection is infrequent, and there is no clear responsibility under municipal statutes for the care and maintenance of the properties.

A health centre was constructed by a bilateral donor, and the EU MRSI phase I project provided equipment and training for staff to detect and treat lead contamination. The health centre is being funded for now by the municipality, with no support from the Ministry of Health.

The main counterpart for the project is the Ministry for Communities and Returns, which has participated in co-financing the project, and providing four of the houses. Beyond that, their participation has not been especially active. Neither the Ministry of Education nor the
Ministry of Health were involved in the design and development of the projects\textsuperscript{134}. Considering their essential role in the sustainability of the health and education components, this was a major oversight.

The two phases of the MRSI project succeeded in the difficult task of relocating the 130 families from the lead contaminated camps in the north. However, the solution faces severe problems of sustainability. For now, there are many international NGOs and donors providing support in employment, education and health. However, the results so far show that employment in the current economic climate in Kosovo will not be a solution for many of the residents of Roma Mahalla. Attendance of children at school is very challenging, and there is no clear responsibility (or incentive) for encouraging them to attend. The health care provision is dependent on municipal funds, which are diminishing. It is feared that when international attention on the Roma population of Mitrovica/a disappears, the facilities for the community will have an uncertain future.

Objective Achieved?

The project succeeded in relocating residents from the poisoned ‘lead camps’ north of the Ibar, and in providing essential health services to tackle the consequent health problems. Good quality housing has been built, and residents have largely moved in. Given that the indicator for achieving the project objective is “Leposaviq/Leposavić Camp is closed and uninhabited”, the project can be regarded as successful. However, a more holistic review of the action would give a much more equivocal verdict of its impact on the lives of the former residents. While the risk of lead poisoning has all but disappeared, a segregated Roma community has been re-created in which there are few appropriate or sustainable employment or education opportunities.

\textsuperscript{134} Although the Ministry of Health was involved in the project, approving the protocol for lead screening and treatment, and issuing certificates for chelation therapy importation.
11.8. Case Study 8 – IPA Support for Roma Learning Centres and Education Mediators, Kosovo

Background

Support explicitly targeting education of RAE constitutes 10% of the IPA funding allocated specifically to RAE (and 4% of all IPA support covered in the sample). An additional 8% has been allocated to education as part of support to RAE Strategy implementation (also covering culture and media). There is a good linkage between actions funded by IPA and RAE Strategy priorities. One would assume that these national RAE Strategy priorities would be in line with those of government ministries responsible for policy development and implementation.

National RAE Strategy and Education Policy appears not aligned

However, at least in the area of education it appears that this is not the case. This has been highlighted by problems with two education models targeting RAE i.e. educational mediators and learning/educational centres. Both these models have been conceived by international organisations with the tacit agreement of the Ministry of Education, Science and Technology (MEST), the body responsible for education policy in Kosovo, but neither have been integrated into the mainstream education system in Kosovo.

Mediators are not recognised as a pedagogical profession by MEST. MEST’s standpoint is that without formal qualifications (which should ensure quality), there is no guarantee that mediators can do a good job. According to them, there is an absence of evidence from the NGOs and other bodies supporting mediators to demonstrate their effectiveness. Although efforts have been made by donors (e.g. SDC) to get these mediators officially accredited, these have not been accepted by MEST.

Donor Funding, Including IPA, continues to fund these models

Despite this, donor funding has been continuously channelled into this area, including IPA. There appears to have been expectations from donors\textsuperscript{135} that MEST would move towards

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\textsuperscript{135} For example “It is expected that Kosovo institutions take over the financial responsibility for school mediators starting from 2014. To facilitate certification of the school mediators, and with support from the OSCE, an advanced training programme was produced and certified by MEST. The training will take place between August and November 2012. Following the completion of the training, a final certification conference
including the mediators in the system, which is understandable given that it is stated as a measure in the RAE Strategy and its 2014-15 Priorities Framework.\(^\text{136}\)

The MEST has thus far not moved to prevent mediators from working in schools so they can continue to work as long as external funding can be found. Mediators will therefore be dependent on external funding for their existence until such time as MEST changes its position.

Learning centres are funded from IPA and other sources. Like Roma mediators, the centres are not part of MEST policy and as such are not included in the government education structure or receive any state funding. Thus they are dependent on external funding for their operation. The learning centres offer an ‘optimal solution’ that is reportedly effective but which are expensive - their running cost is estimated to be around €40000 which is currently unaffordable for national authorities or municipalities.

Above: A Learning Centre for Roma children in Mitrovice/a

\(^{136}\) “The Government of the Republic of Kosovo shall in particular employ mediators/assistants from the three communities working in the education and health sector, thereby providing the budgetary resources for their employment” RAES, p. 31;

“Education EU/MEI Recommendation #3: Parents’ and mediators’ key role has to be recognised and reinforced.” RAES Priorities Framework 2014-2015, p. 4
As regards the 49\textsuperscript{137} individual centres, 6 were set up by the Kosovo Foundation for an Open Society (KFOS) with IPA funding as part of SIMRAES. These are recognised as delivering quality services by MEST and will be again funded under the upcoming SIMRAES2 IPA intervention. Nevertheless it does not fund the operation of these or the other centres run by local NGOs or other entities. It states that all must be fully accredited before they can be considered as ‘state educational facilities’. There is no prospect at the moment for such an accreditation process to take place.

**The absence of MEST recognition weakens sustainability**

As with the mediators, the MEST is not convinced that NGOs have been able to demonstrate the effectiveness of the learning centres and until they do, there will be no financial support from MEST for them. As there is no monitoring or evaluation of any real value that would be able to establish the effectiveness of the mediators or learning centres, this impasse is likely to remain. All of this is despite these centres being an RAE Strategy Action Plan priority (*Create Community Educational Centres where students from disadvantaged families can do homework and spend time reading*). This reinforces the impression that MEST policy and RAE Strategy priorities are not aligned and that IPA funds are being programmed primarily in conjunction with external organisations whose models, whilst effective, are ultimately unsustainable.

**Educational Success Stories Exist – but not IPA ones**

Sponsorships for RAE to secondary school are seen by stakeholders as being the most effective tool for advancing education among these communities. These are covered by MEST funds and REF support as well, not IPA. IPA efforts via ACCESS to support scholarships have been discontinued as there is no obvious role for them.

\textsuperscript{137} This is the number reported to the evaluators by the Balkan Sunflowers NGO.
11.9. Case Study 9 – Promoting the integration of ethnic minority women into the labour market in former ... Former Yugoslav Republic of Macedonia.

Project overview

This project focussed on the addressing female Roma unemployment in the Pelagonia region by enhancing their access to the labour market. Pelegonia is an agricultural region in south former ... Former Yugoslav Republic of Macedonia that requires seasonal workers – primarily Roma from that and other regions. Aside from seasonal work and collecting secondary materials, very few other employment opportunities are available to Roma there. The three main towns in the region (Bitola, Prilep and Resen) each have significant Roma populations. In all three municipalities there is a high unemployment rate among Roma, especially among Roma women. It was reported that social benefits for delivering the third child are much more attractive than employment measures. High numbers of Roma from this region are asylum seekers in Germany and France. The project was financed via a grant of €194,000 from the HRDOP Priority Axis 3 (Social Inclusion) stemming from an Open Call for Proposals managed by the OS. It was implemented by an Italian NGO (Comitato di coordinamento delle Organizzazioni per il Servizio Volontario) in partnership with three local Roma NGOs and the Pelagonia Economic Development Agency “Preda” (involving 9 municipalities). The project was fully in line with the objectives of the HRDOP 2007-2013, especially the measures for inclusive labour market and fostering social inclusion of disadvantaged people and areas.

The main components of the project were the training of Roma employment advisors and partner NGOs, and testing tools for activation of Roma women in terms of job seeking skills. It was expected by programmers that the IPA grant scheme for inclusion of Roma into the labour market, which is currently still under evaluation, should build upon the lessons learned from this ‘pilot’.

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138 Bitola total population - 105,000; officially 2500 and unofficially 6000 Roma as reported by the local Roma NGO “Bairska Svetlina”; Prilep total population - 66,000; officially 4400 and unofficially 6-7000 Roma according to local Roma NGO “ROMA SOS”; Resen total population - 17,000; some 200 Egyptians. According to their local NGO “Izida” they are often addressed as Roma although they require to be accepted as a separate ethnic group.
Project achievements

The project was successful inasmuch as it delivered its planned outputs. The project targeted 70 Roma women from the region and all of these were trained on accessing employment opportunities. Training was provided for 3 Roma advisors, representatives of employment agencies and municipal authorities (12 participants) across a range of skills relevant to their responsibilities. Roma advisors developed personal employment dossiers for each selected woman and a common data-base of public and private employers was established. Furthermore awareness events for employers were conducted and communication channels established between employment agencies, Roma employment advisors, local NGOs and Roma women trained under the project.

Despite this, overall results were not to the level expected. The numbers of Roma women able to find employment after the project’s completion were negligible. In Prilep, 2 women were employed as seasonal workers but have since become unemployed; in Resen 1 woman is still in employment; in Bitola 5 women were employed and 3 are still working. Thus at the time of the evaluation, of the 70 women targeted, only 4 were working one year later, all of them on a part-time basis. This was far from the project purpose indicator that envisaged “at least 30 Roma women found a job and at least 50 ready to apply for it”. Their employment prospects were limited by numerous factors, many of which should have been identified in the project preparation phase and addressed as part of the project. These included the level of education of the women, their family status, intrinsic lack of employment opportunities in the region, and pervasive prejudices towards Roma among potential employers.

Of the work carried out with municipalities, only Prilep has continued to work with the project outputs, some of which have been integrated into its revised Roma Integration Action Plan (RIAP). It has also established a Municipal Department for RIAP Implementation staffed by Roma including one trained from this intervention. In the other two towns it was reported that no further developments had occurred since the project finished. The Employment Agency in the region emphasised the value of the project as such but was in no position to take on new staff and didn’t have the capacity to continue the services to Roma women after the project’s completion. Interest from employers in engaging Roma women

139 In a target region with some 17000 Roma it is questionable whether such a small number of beneficiaries is justifiable, particularly given the Purpose’s intention of ‘Increasing employability of Roma women’.
proved very low; even with the partnership with PREDA. The failure to involve chambers of commerce in the project was subsequently recognised as a weakness.

As such, the project has a small effect at local level, without wider benefits. Although the project final report emphasises the effectiveness of this intervention and its successes, the field visit found scant evidence of this. Whilst the project implementers in the region had not lacked for effort or goodwill, the flaws in the project design, the limited ownership of key partners and the absence of any follow up project has seriously reduced its impact and sustainability.

This project offers a number of valuable lessons to be learned for future grant schemes aiming to address Roma employment. Firstly, a more thorough preparatory phase is essential for any such intervention targeting Roma, especially Roma women. Without this, such projects are at serious risk of failing to deliver their objectives. This requires a better problem and stakeholder analysis, a longer timeframe for delivery and a more comprehensive strategy for implementation and monitoring. Secondly, projects of this type – de facto pilots – need to be part of a better feedback mechanism to transmit these lessons into future projects or schemes of this type. Without this, valuable lessons cannot be learned. Finally, and perhaps most importantly, grants of this type are not suited to addressing complex Roma issues, whose resolution require multi-dimensional, long term approaches involving numerous partners. International NGOs may have a role to play in this approach due to the lack of local capacities but in this case there is an asymmetric relationship in the partnership – the international NGO consumed nearly half the budget\(^{140}\) whilst the local NGOs did much of the leg-work and gained very little in terms of their own capacity building.

\(^{140}\) In case of the sample project it was over 48%.
11.10. Case Study 10 – Let’s Build a Home Together (‘Belvil’), Belgrade, Serbia

<table>
<thead>
<tr>
<th>Project name</th>
<th>Livelihood Enhancement for the Most Vulnerable Roma Families in Belgrade (Let’s Build a Home Together)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total value</td>
<td>3,600,000 EUR</td>
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<tr>
<td>Contract signed date</td>
<td>2/2013</td>
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<tr>
<td>End date</td>
<td>Jan 2015 extended to 7 Feb 2016</td>
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<tr>
<td>Overall objective:</td>
<td>To contribute to improvement of living conditions for refugee and IDP families</td>
</tr>
<tr>
<td>Project purpose:</td>
<td>Provision of adequate support for up to 200 Roma families affected by resettlement actions, including where appropriate, with durable housing solutions</td>
</tr>
<tr>
<td>Implemented by:</td>
<td>UNOPS in partnership with Danish Refugee Council, Housing Centar, City of Belgrade, UN Office of the High Commissioner for Human Rights (OHCHR),</td>
</tr>
<tr>
<td>Beneficiary:</td>
<td>City of Belgrade</td>
</tr>
</tbody>
</table>

Background

In April 2012, approximately 250 Roma families were evicted from a site in Belgrade, close to a new housing development known as ‘Belvil’. Those families whose residence was registered in Belgrade and those internally displaced from Kosovo – around half of the total – were relocated to seven temporary sites of metal container housing around Belgrade. The other half were removed to the place of last registered residence, mostly in the south of Serbia. There was considerable concern about the human rights of those evicted, and Amnesty International published a critical report attracting international attention.

DG Enlargement was lobbied by the then Mayor of Belgrade to provide funding for durable housing solutions for those evicted families still living in Belgrade. The EC found EUR 3.6 million funds from IPA 2009 and allocated this to assist the evicted population.

A contribution agreement with UNOPS was made in 2013. This agency worked closely with partners, including OSCE, UNHCHR, and the City of Belgrade to revise an action plan for the resettlement of the target population. The Action proposed by UNOPS would provide up to 200 Roma families with support for durable housing solutions. This included construction of new housing units for social housing, reconstruction of private dwellings, and purchase of
village houses for those who wish to relocate to rural areas. Also planned was support for improvements to social and economic infrastructure in the host communities. The target figure of 200 families was later reduced to 170 with the agreement of the steering committee.

The project was signed in February 2013 and was scheduled to complete by January 2015.

There were significant challenges faced during the implementation of the project.

- The minimum legal standards for housing provision changed in 2013 from a space requirement of 10m² to 14m² per person, and the required specification changed from wooden prefabricated construction to construction from concrete blocks. This increased the total cost of the planned housing construction and consequently decreased the possibilities for the project to cover the housing needs of all evicted families.

- The City of Belgrade had promised for its part to provide the land, construction permits and utility connections for the new buildings. It initially proposed five sites, of which three did not meet the minimum standards prescribed by the UNHCHR, creating additional delays for the project.

- A contribution by OSCE to fund the purchase of village houses from Swedish government funds was found to be impossible within the institution’s administrative rules – after a delay of 11 months. The purchase of 30 village houses was then transferred to the UNOPS project.

Inevitably, the solutions found were operational compromises that are imperfect. The changed space requirement meant that fewer social housing units could be built. The specification changed from small houses with yards to social housing in apartment blocks and not all families could be rehoused within the budget limitations.

The land allocations mean that new housing will be built in locations that can only be described as reinforcing segregation of Roma communities, rather than promoting their integration.

The law on social housing requires small rent payments to be made monthly by tenants. Even these low payments are difficult for Roma families who live on day to day income from informal activities such as collecting materials for recycling and scrap. This model is unsustainable for those in extreme poverty who can afford neither rents nor utility bills.

A second legal category of social housing – that of “social housing in supportive environments” – was proposed as a solution to the sustainability problem. This legally
defined category was developed in response to the requirements of vulnerable refugees who are unable to support themselves fully in their own flats – similar to models of sheltered housing. It is therefore not entirely appropriate for the needs of poor Roma families, but does provide a legal means for reducing rents and utilities to minimum or zero. This solution may well work for a limited time for the families who are provided with social housing under this rule, but creates tension with those families (both Roma and non-Roma) who live in ‘normal’ social housing and who are obliged to pay rents and utility bills.

UNOPS took over the responsibility for purchasing village houses, and so far 39 families have been relocated to rural areas. EU/UNOPS reporting notes that out of the 39 resettled families, 30 (77%) were present at their village homes at the time of monitoring. Nine families (23%) were not at home. Of these nine absent families, six were confirmed to be in Germany and one in Austria. Two families were reported to be in Belgrade. One of these is a woman with permanent employment in Belgrade.

By early 2015, the project had been given a no-cost extension to complete the construction of the social apartments and to complete the programme of village house purchases. It was also delivering, through a partnership with the Danish Refugee Council, support for development of livelihoods. Those moved to village houses were also receiving some support for livelihoods through a SIDA-funded OSCE project. By the end of the extension period, it is planned that 122 of the 170 target households will have received some form of durable housing solution. Discussions are continuing with the City of Belgrade to identify potential solutions for the remaining 48 households, although this would require additional funds and is now outside the scope of the Let’s Build a Home Together project.

The project achieved notable progress in terms of highlighting the problems of forced evictions for land development, and providing an improved example for treatment of those evicted. It is an excellent example of inter-agency cooperation, in which agencies share information, provide support to each other where they can and according to their strengths and weaknesses.

However, the project also highlights a wider regional issue of the very difficult problem of sustainable provision of housing for Roma households. There are justifiable concerns about the creation and reinforcement of segregated housing, and an apparent reluctance on the side of the authorities to search for appropriate solutions that would result in greater community integration.

It also highlights the challenge the EC faces in providing financial support to such projects: to what extent should financial support be conditional on compliance with appropriate standards – both under national law and under international treaties? On the one hand, it is
argued that if the money is not provided, the result would be significantly worse treatment of those evicted. On the other, it is argued that providing the support relieves the authorities of their own responsibilities for complying with the standards required by international treaties. Conditionality at the project level might result only in worse treatment of the beneficiaries.

The project illustrates very starkly another issue. The funds were provided as a result of personal interventions by the then Mayor of Belgrade and senior personnel in DG Enlargement; it was not part of regular programming. A relatively small number of households will benefit. The same Belvil eviction resulted in half of the families being evicted to locations outside of Belgrade, and which received a significantly lower level of support – if any at all. There are also at least 2,500 Roma families who have been the subject of forced evictions from other Belgrade locations\textsuperscript{141}, without the same level of support for relocation. The Belvil example raises questions about the planning and fairness of IPA funding, and the extent to which it is used for systemic long-term reform versus short term remedies to inconvenient political situations.

\textsuperscript{141} Serbia: Submission to the UN Committee on Economic, Social and Cultural Rights, 52\textsuperscript{nd} Session, May 2014, Amnesty International
11.11. Case Study 11 – Education for All, Serbia

Project Summary

<table>
<thead>
<tr>
<th>Project name</th>
<th>Education for All</th>
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<tr>
<td>CRIS number</td>
<td>2008/020-406</td>
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<tr>
<td>Total value</td>
<td>3,000,000 EUR</td>
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<td>1/2/2010</td>
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<td>End date</td>
<td>30/4/2012</td>
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<td>Overall objective</td>
<td>To contribute to social inclusion and poverty reduction by enabling greater access to the regular public education system in Serbia for children from marginalised and special needs groups.</td>
</tr>
<tr>
<td>Project purpose</td>
<td>To increase the inclusion of children from marginalised and special needs groups in the system of preschool and elementary education and to reduce their dropout rate by formalising and broadening the support that is provided by teaching assistants and community liaison coordinators.</td>
</tr>
<tr>
<td>Implemented by</td>
<td>WYG Ltd in consortium with</td>
</tr>
<tr>
<td>Beneficiary</td>
<td>Ministry of Education</td>
</tr>
</tbody>
</table>

Background

The Education for All project aimed to establish a network of Roma Teaching Assistants (later re-named Pedagogical Assistants) as a formal resource available to schools with high proportions of Roma children, and/or children with special needs.

The role of the Teaching Assistant had been developed originally in Slovakia as a means to promote greater Roma child enrolment in education, and increase the completion rates of schooling. Since 2001, NGOs in Serbia had been financing and testing various models of support for Roma inclusion in education, including the teaching assistant model.

The role of the teaching assistant as envisaged by this project varies from school to school, and is dependent on local needs. It includes helping children in class, alongside the teaching staff, to assist with lesson planning and to encourage those children with special needs. Outside of the classroom, the teaching assistant also performs a role of community liaison, working with families to identify early signs of dropout and provide support for families to ensure that the children stay in school.
Project achievements

Both the Ministry of Education and the school staff we spoke to regard the project as a big success. They see the improvement in the performance of the children, and also an apparent reduction in dropout rates. The only qualifier is that there is still a high migration rate, so children may still drop out of school when their parents decide to move elsewhere – mostly to Western Europe or for seasonal labour.

In total the project introduced an additional 128 teaching assistants adding to 50 that were in place prior to the project. The earlier teaching assistants were financed by various donors, including Swedish SIDA. Teaching assistants were trained, and a formal training course consisting of 10 accredited modules was established and hosted by the University in Kragujevac.

The position of these teaching assistants was assured by the introduction of new secondary legislation, with the support of the project.

The schools which introduced teaching assistants were also supported with the purchase of new equipment worth EUR 1.2 million, including interactive white boards.

Key success factors

The project was notable for a number of reasons. The teaching assistant position has proven to be sustainable (as at early 2015) within the Ministry of Education system. The project did not itself finance the teaching assistant positions – these salary and other costs were provided by the Ministry of Education budget, and remain so. Perhaps fortunately, this was at a time before government budget cuts really began to bite, and so there was some scope at the time for increasing the headcount within the Ministry.

Second, the project built on a much longer development process prior to the design and start date. The Ministry of Education, bilateral donors including the Norwegian and Swiss governments, and non-governmental organisations working in Serbia – including Roma Education Fund (REF) had been working on similar models since the early 2000s. They had tested models of classroom-, school- and community-based liaison workers over this time, so there was considerable experience available for the development of job descriptions, training programmes and support for schools.

Crucially, senior figures in the Ministry of Education at the time were familiar with the pedagogical assistant model, and were committed to its introduction. They played a key role in advocating for the project with the EUD and supporting its design and implementation.
They also ensured coordination with two other education projects planned at the same time — the IMPRES project working on pre-school education, and the ‘Second Chance’ project to introduce functional primary education for adults who did not complete a primary education.

**Remaining Challenges**

Despite the apparent success of the project, there are some issues that continue. The teaching assistants are still not permanent members of staff of the Ministry, but have their contracts renewed annually. This leaves them vulnerable to potential budget cuts. There are well below the number required; one per school in many areas is insufficient and there are still schools not covered.

In itself, the introduction of teaching assistants is helpful, but not sufficient to address the priority of reducing school dropout. Much more work on policies and interventions is needed to truly tackle this problem. The short term nature of the project meant that only a small segment of the solution could be tackled; a longer term project to deal more holistically with school dropout might have been a more appropriate solution.
11.12. Case Study 12 – Employment and Social Support Services, Turkey

This project aims to create a new model for social service provision in Turkey – the so-called Social Service Support and Employment Guidance Units (SSSEGU). This is being done in 12 pilot municipalities under the supervision and guidance of the Union of Turkish Municipalities (TBB). It comprises a €M5.0 TA contract supported by a €M1.0 supply tender to furnish and equip the SSSEGUs. The SSSEGUs link all main service providers with socially disadvantaged groups and act as a ‘one stop shop’, with tailored services and outreach for the target groups in each location.

Project inspired by EU study tours and conceived by the TBB

The TBB conceived the project in 2011 and partly originated from TBB staff participating in study tours to various EU countries to see approaches taken to the delivery and coordination of services to disadvantaged groups at municipal level. TBB created a small project team (2 people) to develop the project. The design phase took some 12 months due to the numerous stakeholders consulted and the selection process for the pilot municipalities. Also, the inexperience of the TBB project team played a part in this – this project represents the first IPA intervention for which TBB is the primary (operational) beneficiary. Despite this lengthy process (or rather thanks to it), the final design is both comprehensive and robust.

Design built around a selection of pilot municipalities by TBB, with 4 municipalities voluntarily selecting Roma as target group.

The 13 pilot municipalities initially included in the project were selected by the TBB based on several criteria including: Interest in participating; Size (metropolitan and non-metropolitan); Capacity to participate in the project; Political representativeness (all main political parties included in the project). Once selected, the municipalities selected three target groups towards which the services provided by the SSSEGUs would be directed. One target group – people with disabilities - was obligatory. The other two were voluntarily selected. 4 of the municipalities (Bursa Metropolitan, Bursa Yildirim, Mersin Toroslar and Diyarbakir) selected Roma as a target group. This indicates an awareness of Roma as a disadvantaged group among municipalities and also a desire to address the problems of the Roma there.

Lengthy preparatory and contracting phase of the TA affected the relevance of original project design and required its update

The TA contract was put out to tender in January 2013 but the contract was awarded only in July 2014. This lengthy contracting process had an implication for the implementation of the project, as in the meantime two elements of the projects changed: Firstly, municipal...
elections in March 2014 led to the election of new leaders in some of the pilot municipalities. Secondly, a new law on municipalities, published on 6 December 2012 increased the number of metropolitan municipalities in Turkey to 30. The new law was put into effect immediately after the local elections, which took place on 30th March, 2014 and introduced a major change in the administrative boundaries and system of local government in Turkey. This new institutional set up was introduced just before the start of the project.

As a result, the project inception phase had to be prolonged as the TA team (TAT) and TBB had to reconfirm the interest of the selected municipalities in participating in the project with each (sometimes new) mayor. In one case, the new mayor decided to leave the project. The project is now under implementation and is progressing largely to plan. The TBB project team has proved to be both supportive toward the TAT and flexible in dealing with problems within the implementation, most notably related to the supply tender. The TAT was reported to be both experienced and capable, which augurs well for the project’s successful delivery.

**Contracting the supply component has been slow and represents a risk to achieving the project purpose**

The supplies tender remains to be concluded. It was launched in December 2013 but has been subsequently cancelled twice, most recently in November 2014. Expectations are that a contract will be awarded by autumn 2015, which is over 12 months after the TA started. The SSSEGUs will therefore most likely be without refurbished premises for the whole duration of the TA project and the material and psychological benefits of this aspect of the project will be undermined.

**However the TBB and contractor have acted quickly and intelligently to reduce this risk**

To reduce this risk, the TAT and TBB agreed on steps to prevent this delay from seriously hindering the project. They have devised a ‘mobile SSSEGU’ model that will allow the SSSEGUs to function temporarily without the need for offices or special facilities. This stop gap solution will *inter alia* allow the training of the staff in the municipalities and the tailoring of services provided by them to the target groups. Also, the TBB has provided from its own resources 24 laptop PCs for each SSSEGU to allow them to function till the supply contract is concluded. This indicates that the TBB is committed to the project’s success and is willing to devote its own resources to achieve this.

The project contains several innovative elements that offer potentially valuable approaches for addressing Roma inclusion.
The project combines a number of approaches, which offer significant potential for effectively addressing Roma inclusion issues. It takes an area-based approach working with multiple agencies providing employment and social support service at local level through the municipalities under the umbrella of the TBB – this is a strong and influential institution in Turkey. It is well organised with good resources, institutional reach and political influence – plus it is evidently aware of what it wants to achieve from IPA.

Municipalities’ capacities to implement the SSSEGU model vary from good to weak. However, the project design takes this into account and is sufficiently flexible to allow deployment of resources as needed (i.e. more to weaker municipalities). This should facilitate the tailored approach which sits at the heart of the project rationale i.e. of providing services through the SSSEGU to the selected target groups based on their specific needs in the target locations.

The project will also conduct two surveys on Roma in mid-2015 that should generate detailed data on two dimensions of Roma social exclusions. These are: awareness and attitude of service providers and general public with regard to social integration in all 12 target municipalities; social service provision and employment needs for Roma in the 4 municipalities with Roma as a target group. These surveys could, if successful, provide the foundation for a more comprehensive mapping exercise in all municipalities where Roma represent a significant percentage of the population.

**The Project on track to deliver some valuable planned and unplanned effects**

These include a functioning SSSEGUs in all 12 pilot municipalities, with approximately 500 Roma benefitting from the services provided by the SSSEGU in the 4 target municipalities. It should generate increased knowledge and awareness of Roma among key stakeholders at local as well as national level. The surveys on Roma populations will be available, and a mapping model trialled, with potential for its roll-out in future. Finally, the TBB’s capacity as a lead beneficiary of IPA interventions will be established – with the potential for it to play a wider role in future projects of this type e.g. rolling out the SSSEGU to other municipalities. Overall, this project has significant potential to assist Roma and other socially disadvantaged groups in Turkey gain access to employment and social support services.
12. Annex 5 – Terms of Reference Questions

From TOR: Global Objectives, Specific Objectives and key questions

<table>
<thead>
<tr>
<th>Section of consolidated evaluation question structure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Intervention Logic</td>
</tr>
</tbody>
</table>

**1 Intervention Logic**

To provide an assessment of the intervention logic of IPA assistance 2007-2013 national and regional programmes to support Roma communities in the ELARG countries. The evaluators will assess to which extent programming documents are based on a balanced and comprehensive planning of the support to Roma and to which extent the programming documents provide:

1. Adequate assessment of needs (financial envelopes and length of interventions)
2. Adequate sequencing and prioritisation of assistance and in the strategic approaches to Roma inclusion and policy objectives
3. Adequate monitoring tools
4. Adequate and relevant account of beneficiaries’ policies and strategies in the area of Roma inclusion and a degree of coherence of the programming documents with general principles on Roma inclusion
5. Adequate and relevant account of assistance provided by other key donors where applicable and the compatibility of this assistance
6. Adequate mix between assistance measures and labour market intervention focused initiatives
7. How accurate is the knowledge of the issue?
8. Which are the main problems of the Roma communities in the ELARG countries and how did IPA assistance help to address them?
9. To what extent has the IPA assistance 2007-2013 been designed to fit to the policy objectives and national strategies?
10. How effective was the support given by IPA to the implementation of the Roma strategic policy objectives (local, national, EU)?
11. To what extent planning and programming of such assistance are based on an adequate assessment of the needs (both financial and time)?
12. To what extent programming in the field provides adequate prioritisation and sequencing of assistance?
13. To what extent and in what form Roma communities and CSOs are involved in the programming and planning of assistance?
14. To what extent is the project selection mechanism appropriate in the sense of selecting the most relevant, efficient and effective projects to achieve the strategic objectives?
15. To what extent does programming take into consideration and interconnect with already existing national authorities' policies and strategies on support to integration and social inclusion of Roma?
16. What is a degree of coherence of the programming documents with general principles on Roma inclusion?
17. How much are the local authorities involved in the implementation of national and local strategies for Roma inclusion?
### From TOR: Global Objectives, Specific Objectives and key questions

1. To what extent have relevant organisations been involved as stakeholders in the assessment of needs, definition of strategies and other relevant aspects of the intervention logic?

1m. To what extent does programming of this assistance provide for linkages between IPA 2007-2013 national and regional programmes and assistance from other donors?

1n. What is the synergy and coherence of the assistance provided under IPA component 1 and component 4?

1o. Which are the main gaps/weaknesses of the current assistance and programming in the field?

### Section of consolidated evaluation question structure

- 1.2 Stakeholder Involvement in Design
- 1.3 Coherence of Programming
- 1.4 Conclusion of Intervention Logic

### 2 Performance

SO2 To provide a judgement on the performance (either actual or expected) of the efficiency, effectiveness, coherence, impact, sustainability and EU value added of IPA 1 assistance. The judgement for each evaluation criteria should differentiate two levels of sources of evidence and analysis:

SO2.1 At programming level, based mainly on the assessment as per specific objective 1. This is particularly relevant for recent assistance where implementation to date may be more limited.

SO2.2 At implementing level. As far as possible, the evaluator will measure achievements against indicators set up in programming documents. However, adequate programme level objectives and SMART indicators may not always be available. Therefore, some limitations in the use of indicators can appear during the evaluation.

2. Performance

2a. Has IPA financial assistance reached those who needed it? Has it addressed their needs? What is the proportion/share of interventions and resources targeted at "policy level" and those devoted to "reaching people in communities"?

2b. Have Roma communities and their members been involved in all stages of the program/project cycle?

2c. What have been the outputs so far? How many Roma (what proportion of total estimated Roma population) benefited from the supported interventions (with numeric estimates by area of intervention, e.g. number of Roma households improving their living conditions as a result of housing improvement interventions, number of Roma employed after employment generation interventions; number of people living in areas benefitting from infrastructure development (and share of Roma in this population)?

2d. How effective was the IPA 2007-2011 assistance targeting the Roma inclusion? Has it contributed to tangible improvement of the living conditions of Roma (in the specific areas in which IPA projects were implemented)?

2e. To what extent are these outputs translated into outcomes and impacts? What have been the impacts so far? How much of the IPA assistance was directly targeted to Roma community and what was the outcome and impact produced to the life of the Roma communities?

2f. To which extent are interventions financed under IPA efficient in terms of value-for-money when delivering outputs?

- 1.2 Stakeholder involvement in design
- 1.3 Coherence of Programming
- 2. Performance
- 2.4 Impact
- 2.5 Efficiency
- 1.3 Coherence of Programming
- 1.4 Conclusion of Intervention Logic
- 2.1 Results so far
- 2.2 Effectiveness
Section of consolidated evaluation
question structure

2.3 Efficiency
2.8 Coherence
2.2 Effectiveness
2.8 Coherence

2.6 Value Added of EU Interventions
2.8 Coherence

2.5 Sustainability

2.4 Impact

2.7 Institutional Arrangements for Implementation

2.5 Sustainability

2.3 Efficiency
2.8 Coherence

2.4 Impact

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2.8 Coherence
From TOR: Global Objectives, Specific Objectives and key questions

3c What was other external stakeholders’ participation in the monitoring processes?

3d How the monitoring systems were linked to the evaluation of outcomes and what were the feedback mechanisms?

4. Cooperation with external stakeholders

GO4 To provide a judgement of DG Enlargement/EU Delegation cooperation with external stakeholders, supporting Roma inclusion, identifying best practice, taken into account/involved important Roma actors at central and local level with special attention to international organisations and CSOs

4a To what extent does programming of such assistance take adequate and relevant account of assistance provided and reforms promoted by key donors where applicable?

4b What was the leverage achieved of the DG Enlargement cooperation with external stakeholders, supporting Roma inclusion?

4c What best practice could be drawn up?

SO5 Based on relevant findings, conclusions and lessons learned as per the above objective to provide relevant operational recommendations for:

SO5.1 (a) programming future EU assistance in this area, based on good practices which can be recommended for further and possibly expanded engagement, and "negative" programming examples;

SO5.2 (b) role and the best placed actors on the ground which ELARG can use to blend funds, foresee joint actions or implement its programmes (international organisations, CSOs, development agencies, etc.);

SO5.3 (c) if relevant, corrective measures, where applicable, to improve the implementation and monitoring of ongoing actions; SO5.4 (d) areas that do not require the involvement of EU assistance because they are well covered by other donors or require a partial assistance to be coordinated with other donors present in the field;

SO5.5 (e) improvement of the monitoring and evaluation frameworks, namely in regards of the appropriate indicators that should be embedded in the project cycle and the appropriate project-level data collection mechanisms that would generate the data necessary to populate the indicators.

5a What lessons learned can be drawn from assistance to Roma communities in aforementioned countries? Which are good and bad practices/examples?

5b How can programming of such assistance be improved so that to generate stronger links between the needs and priorities of the Roma strategies, programming objectives and project activities?

5c How can the programming process be improved to ensure the active involvement of relevant organisations and needs of Roma feed into EU financial assistance priorities more effectively?
### From TOR: Global Objectives, Specific Objectives and key questions

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<th>Thematic Evaluation on IPA Support to Roma Communities June 2015</th>
<th>Section of consolidated evaluation question structure</th>
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<td>5d How can programming of IPA II assistance be enhanced to achieve strategic objectives more effectively and efficiently, also from the perspective of using of blending mechanisms?</td>
<td>5.2 Recommendations for Programming Assistance</td>
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<tr>
<td>5e How can programming of such assistance be enhanced to improve the impact and sustainability of financial assistance? How can EU assistance better promote inclusion of Roma communities?</td>
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<td>5f Are there any potential actions which would improve the efficiency, effectiveness, impact and sustainability of ongoing assistance (both in terms of technicalities and procedural aspects as well as in regards substantive content)?</td>
<td>5.3 Recommendations for Implementation</td>
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<td>5g Which are the best placed actors on the ground which DG Enlargement can use to implement its programmes (international organisations, CSOs, development agencies, etc)?</td>
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<td>5h Which are the areas that do not require the involvement of EU assistance because they are well covered by other donors or require a partial assistance to be coordinated with other donors present in the field?</td>
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<td>5i Which are the appropriate SMART indicators that should be embedded in the project/programme cycle in IPA II?</td>
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### 14. Annex 7 – List of organisations interviewed

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