

## **Comments on the Second Draft for Consultations of the World Bank Report “Diagnostics and Policy Advice for Supporting Roma Inclusion in Romania”**

The report aims to present a comprehensive representation of the situation of Roma in Romania nowadays based on both quantitative and qualitative data. However, a critical lecture of the second draft reveals significant departures from the norms of producing scientific knowledge, remarkable flaws in the literature review, and dangerous recommendations. In addition, critical issues, such as combating discrimination against Roma, remain insufficiently developed and not properly supported with proposals for effective implementation mechanism. It is the purpose of this paper to point out some of the shortcomings of the report and to contribute to its improvement by proposing amendments to the current policy recommendations.

The novelty of this study is the three social dimension of Roma exclusion proposed: skills development, earning opportunities, and basic service and living conditions. However, even though it is mentioned that these dimension should be approached in an integrated manner still there are is not clear how this should be done. There are some recommendations similar with all the recommendations from previous studies. Policies on Roma focused only on social inclusion without measure for promoting Roma identity and without serious measure for empowering Roma can increase the social exclusion. The most useful and sustainable investment is the empowerment of the people from community. If is done properly, the Roma become active and involved in developing their communities, speaking for themselves. In other words, they become autonomous, partners of institutions and NGOs instead of clients of social measures and policies.

In contrast with the majority of studies done so far, which present Roma as a problem for the entire society, the WB study insist on something positive; the potential economic benefits of Roma inclusion for Romania. Also, our organizations appreciate the fact that the study insists on early childhood development. However, there is a risk on insisting too much on these aspects. Firstly, it started to become a trend to present Roma population as the youngest population in Romania which will become in 20150 almost 40 % of the Romanian population, the payers of our pensions. Insisting too much on this in a time of crises can raise the phenomena of anthitigansim. Secondly, it seems to us that you consider as main target group preschool children (0-6). The other target groups are secondary and the fact that you insist so much on early childhood development, in an unbalanced way, make us to believe that you consider the other target groups are lost from an inclusion perspective. Nevertheless, as it is now it looks like you consider other target groups only because it is not possible to develop a new generation without to take into account the other members of the families. We consider that this is a cynic approach and hide stereotypes that the Roma adults or young cannot be included into society.

Roma are exclusively treated, in this study, as a disadvantaged social group and not at all as a recognized national minority as they should be. Measures and policies (as it is also those that EC promote) for social inclusion without any investment for promoting Roma identity will contribute even more to the assimilation of Roma. Our organizations combat such policies which have no measure for promoting Roma identity.

When it comes to education, there is little written about the Rromani language, history and culture teaching in schools, about the role of ethnic identity in education, as if the Rroma are not a national minority, but a disadvantaged social group.

In order to ensure the treatment of the Rroma as a recognized national minority and to build up the ethnic self-esteem of Rroma children, there is a fundamental need to add measures / interventions aiming to extend the teaching of Rromani language, history and culture in schools,

to extend / develop the teaching in Rromani language in schools, to develop cultural production in Rromani language and about Roma (books, magazines, documentaries, movies, cartoons etc.) and to establish public institutions aiming to develop and to promote Rromani ethno-culture.

### **Shortcomings of the second draft**

- Unsubstantiated claims. The report is replete with claims for which no evidence is provided, or the evidence is presented elusively. To give a random example from the chapter on Education (p. 14): "...the quality of teaching and learning is of even greater concern in areas with significant share of Roma population. School and classroom level segregation have had negative impact on both teaching and learning and recent studies conducted in 2008 and 2010 suggest that segregation affects between 31 and 60 percent of the schools in areas with higher share of Roma population in Romania." There is no reference here to the studies from which percentages have been taken, the ways of coming to these values (i.e. the methodological choices), and the limitation of the data. **As such, refutability of the claims is made impossible and the reader is prevented from consulting the original data sources.**

The situation above might appear as a negligence of the authors that can be easily addressed by providing quotes and references of the primary sources of data. In other instances, unsubstantiated claims are coupled with logical flaws, seriously altering the approach. For example, there are numerous references to the alleged skill gap between Roma and non-Roma. On page 5, the authors compare the poverty of Roma and non-Roma living in their proximity. After controlling for key variables such as age and education level, they observe that the disparity continues to exist; Roma are more prone than non-Roma neighbors to be exposed to poverty, all other things being equal. How do the authors make sense of the situation? By inferring that "This maybe [sic!] a reflection of a myriad of factors, including lower skills of Roma (not captured by the education level)..." A data-proven economic cleavage between members of different ethnic groups is tentatively explained by a mere speculation, for which no empirical foundation is provided.

What was initially formulated as a mere possibility (pages 5 and 8) becomes later an objective problem, whose existence is not a matter of debate, and to which solutions are to be found. Thus, sectional policies are proposed to address "the intergenerational [?] skill challenge", with the anticipated outcomes of "closing the skill gap on the long run" and "improving skills and employability." It is of little importance for the current comments whether such a gap exists or not in reality. The point is that **the use of unsubstantiated claims and the logical flaw of passing from possibility to necessity are serious challenges to the scientific nature of the report, affecting its credibility and increasing the likelihood of finding practical solutions to imaginary problems, while leaving aside the serious deterrents to the social inclusion of Roma.**

Particularly significant are situations in which unsubstantiated claims deny the existence of problems affecting Roma. Thus, on p. 18, the authors make the vocal claim that "Whereas in other Eastern European countries Roma children are often disproportionately likely to end up in special school, this is not necessarily the case in Romania, which has one of the lowest shares of Roma children enrolled in special education in the region." This claim is made in spite of the obvious fact that the Romanian educational system, including the special education, does not make public any data on the ethnic belonging of the students enrolled and their distribution. The authors seem to be in possession of, but unwilling to share with the readership, ethnic disaggregated data on the enrollment in special education school in Romania and the countries in the region. These data contradict anecdotal evidence suggesting that teachers in both mainstream (Agency Împreună 2010:93) and special education schools (ISE 2009:197) see many Roma students unfit to follow mainstream educational institutions because of their alleged limited stock of knowledge as compared to non-Roma peers; difficulties in reasoning, and expression; and

behavior. **The refusal to present data on controversial topics such as the placement of Roma children in special schools violates the ethics of scientific research and has the potential of hindering adequate intervention measures from policy-makers.**

Also, it is mentioned that “9 out of 10 Roma live in severe material deprivation”. There is not source for this data and it is obvious exaggerated.

There are used some case studies from America. It is very unlikely something that functioned in some context to work in other context. It was more relevant to use some best practice where Roma people were the beneficiaries.

## 2.2 Legal, Institutional and Policy Context for Roma Education in Romania

The assertion “education in Romani language is still absent” is not true, there are a number of schools in which the teaching language is Rromani, so the Ministry of Education should be consulted in order to add the concrete data on this topic. The Ministry of Education should be also consulted in order to add concrete data on the teaching of Rromani language, history and culture in schools. (Page 17)

The assertion “designated Roma school inspectors responsible for the implementation of intercultural education at the county level” is not true, the school inspectors employed by the County School Inspectorates are not responsible for intercultural education, they are employed for different tasks such as the schooling of Rroma children, education for minorities, projects and programs etc., so the County School Inspectorates should be consulted in order to make available the job description for these inspectors. (Page 18)

The Order no. 1529 from 2007 July 18<sup>th</sup> regarding the development of diversity in the national curriculum is not mentioned in this chapter, so it should be mentioned. (Page 19)

## 8. INSTITUTIONAL MECHANISMS FOR EFFECTIVE LOCAL SERVICE DELIVERY AND USE OF EU INSTRUMENTS

### 8.2 INSTITUTIONAL MECHANISMS FOR ROMA INCLUSION

The assertion “the National Agency for Roma (NAR) is tasked with promoting social inclusion of the Roma through developing Roma Inclusion Strategies and coordinating their implementation “ is not practically true. These tasks suppose huge budgetary and human resources the NAR has not. The National Agency for Roma (NAR) is actually tasked with developing and monitoring policies addressed to Rroma.

- Circularity. What is presented in a chapter as something pertaining to the realm of possibility is presented in a different chapter as unquestionable evidence, the reader being redirected for proof to the former chapter. To come back to the alleged skill gap example, the chapter on education mention it as a potentiality, whereas the chapter on employment provides a tentative classification of skills where differences are to be found (cognitive, socio-emotional, or job-specific; p. 73) and explains that “there are major gaps in skills, arising from the deficiencies in education analyzed in the Education Chapter” (p. 65). Indeed, the chapter on education enumerates pitfalls of the educational system, and it also mentions that skills are not ethnically distributed in a uniform manner. Nonetheless, no proof is given for them and no straightforward connection is drawn between the educational system and the skill level disaggregated on ethnicity. **Circularity is yet another rhetorical means of creating the pretense of scientific reasoning in a report that obstinately refuses scientific ways of producing knowledge.**

- Internal inconsistency. Arguments made in one chapter are later dismissed in the same chapter. For example, on page 5, the authors note that “attitudes” (of Roma towards work) are likely to be linked to poverty. Not only no evidence is provided in support of the claim, but,

three pages later, the authors write that “Simple descriptive indicators on Roma’s desire to work suggest that the latter is very similar to the same desire among non-Roma neighbors.” **In this case, the internal inconsistency reveals the gratuitous depiction of Roma as unwilling to work, a common stereotype that is taken for granted and is given the appearance of scientific legitimacy, in a rather racist note.**

- Omission of contributions to the scholarship on Roma. On p. 15, the authors correctly mention that “Lower levels of education among Roma do not reflect preferences: generally, Roma parents want to see their children achieve the same levels of education as non-Roma parents.” One page after, the report mentions factors likely to explain the ethnic gap in participation to education (of course, without mentioning any sources). However, no explanation is provided with regard to the apparent contradiction between parents’ willingness to let children complete mandatory education and the reality of high rates of early school dropout among Roma. The Romani CRISS report mentioned on p. 15 provides an explanation for the cleavage between attitudes and behavior: although parents display positive attitudes towards the educational system and see in education a prerequisite for upward social mobility, they are also aware that many Roma in the community with a level of formal instruction above average were unable to secure jobs, or to obtain jobs matching their level of education. Therefore, school dropout appears a rational-choice decision, cutting an investment that is seriously affecting the family budget with slim chances of paying back in the future. The explanation is missing, similar to many other contributions of Romani CRISS. For example, the chapter on Health fails to mention any of the following reports directly related to the health condition and access to health care services among Roma in Romania:

- Romani CRISS. 2009. “Sănătate și comunitatea romă. Analiză a situației din România.” Madrid: Fundacion Secretariado Gitano [but makes reference to the international report presenting comparative data employing partially data collected in Romania]
- Romani CRISS. 2012. “Roma Health. The perspective of actors involved in the healthcare system – doctors, mediators, patients.” Bucharest: Romani CRISS
- Romani CRISS. 2013. „Roma Health Mediation in Romania.” Copenhagen: World Health Organization – Regional Office for Europe.
- Romani CRISS. 2014 [forthcoming]. „Roma Childhood Vaccination in Europe.” Stockholm: European Center for Disease Control and Prevention

These works, commissioned or funded by important organizations – World Health Organization, Open Society Institute, Fundacion Secretariado Gitano – and relying on quantitative and qualitative research provide data that are missing in the report, including the doctors’ and Roma patients’ perceived quality of the intercultural communication in medical settings, the social production of ethnic exclusion in the emergency ward, the reconfiguration of the health mediation system following the decentralization, the practical difficulties encountered by the health mediators, and the profile of parents whose children tend not to get properly immunized. **Given that the stock of knowledge on Roma in Romania is limited, the deliberate omission of important contributions in the field leads to a partial and distorted representation of the current situation.**

- One-sidedness. The report has the tendency of taking sides in the controversial topics, presenting some arguments while obscuring the counter-arguments. An illustration is to be found on p. 19, in the presentation of the “Second Chance” program. The authors mention a report contesting the four-year period of ineligibility for enrollment for persons who dropped out of school, and suggest that the requirement be eliminated: “Modifying the eligibility rules for the Second Chance program as to include early school leavers from the moment they are declared in a dropout situation might be a solution to overcome this issue.” However, the report fails to mention the rationale of preventing recent drop-outs from enrolling in Second Chance: the

legislator aimed to prevent people shortcutting the educational trajectory by leaving mainstream education, with its more rigid requirements and higher standards, for the remedial education, a less strict, considerably more flexible route. The authors also fail to note that removing the ineligibility increases the likelihood of further decreasing the quality of education to which Roma have access. **One-sidedness prevents the correct informing of the readers on important topics, such as the Second Chance remedial education program.**

- Dangerous propositions. The aforementioned recommendation of changing the regulation of the Second Chance is not the only risky change proposed by the report. An even more problematic one is that of creating “girls-only schools” targeting traditional communities in order to increase their participation to education: “Civil society voices have vehiculated [sic!] the idea of establishing girls-only schools targeting this type of communities, but more research is necessary to prove the usefulness of such a measure. Pilot initiatives are an adequate option in this case.” It is our strong belief that reliable data and sound arguments rather than ‘voices’ should inform policy proposals. While the gender gap in school participation has to be recognized as an important problem, the proposed solution opens some dangerous avenues. **The establishment of gender- and ethnic-segregated school institutions contravenes the philosophy governing the Roma civil society’s social integration approaches in the past two decades.** It is even more surprising to find such a proposition in a report that acknowledges the connection between segregation and low quality of education, high rates of dropout, and absenteeism.

### 2.1, 2.2 and 2.3

The too much used terms “the prototypical Roma child” or “typical Roma household”, “typically born”, “typically expect”, “typical Roma family”, “Roma families typically face” etc. induce prejudice, ethnic stigma and negative stereotypes against Rroma, seen as irremediably damned to poverty and exclusion.

#### 2.1.1 Access and Participation

The whole point “Various social norms influence participation in education, such as the prescription to marry young and to protect the virginity of girls, leading to early school leaving” is not true or at least controversial, so there is an absolute need for an anthropological consultation specialized in Rromani traditional culture in order to deeper analyze this point. As it is now it is superficial and dangerous. Just to give three examples: 1. the protection of girls’ virginity is not a cause for the early school leaving, the situation is far more complex: there is deep need for an intercultural dialogue and an exchange of values and cultural patterns between the family education and the school education in order to create a harmonious educational environment for children; 2. the assertion “children are seen as productive resources” in traditional families from rural areas is equally false and dangerous, actually we should take into consideration the definition of a child and its age limits in traditional cultures and also the roles of different family members in traditional cultures; the assertion that traditional family from rural areas “encourage early marriages and pregnancies as a result of a strategic rational choice to strengthen the capacity of families to gather resources” is also false and dangerous because early marriage in traditional cultures has other reasons being linked with the way traditional cultures sees the aim in life of a person and has nothing to do with the so-called “strategic rational choice” striving for material / economic success of a family and, of course, early pregnancy comes as a regular result of early marriage and has absolutely nothing to do with this “strategic rational choice”. (Page 19-20).

## **Proposed amendments of the policy recommendations**

### 1.2.1 Targeting Sectoral Policies

To add, among the recommendations at the point “Synergies between education and employment policies can help addressing the intergenerational skills challenge”, the following recommendation: “education policies should be focused on making the school relevant from the ethnic point of view, by extending the teaching of Rromani language, history and culture in schools, by developing the teaching in Rromani language, by including disciplines on intercultural education and diversity in school compulsory curriculum, by including the management of diversity and intercultural education in the initial and in service training for teachers”. (Page 8)

## 2. EDUCATION

To add the following recommendation: “education policies should be focused on making the culturally school relevant for Rroma, by extending the teaching of Rromani language, history and culture in schools, by developing the teaching in Rromani language, by including disciplines on intercultural education and diversity in school compulsory curriculum, by including the management of diversity and intercultural education in the initial and in service training for teachers”. (Page 14)

### 2.1.4 Compulsory Education

To add the following recommendation: “education policies should be focused on making the school relevant from the ethnic point of view, by extending the teaching of Rromani language, history and culture in schools, by developing the teaching in Rromani language, by including disciplines on intercultural education and diversity in school compulsory curriculum, by including the management of diversity and intercultural education in the initial and in service training for teachers”. (Page 29)

### 2.3.9 Teacher Training

To add the impact that the preschool teacher’s assistant had upon improving Rroma children’s participation and performance in preschool education. (Page 34)

### 2.3.11 Lessons Learned

To define the *friendly school* as a school where Rromani language, history and culture is taught, where intercultural education and diversity is among the compulsory or at least optional disciplines and where teachers are trained about the management of diversity and intercultural education”. (Page 37)

To add to this “The studies recommend the need to introduce in the school curriculum elements of culture, history and language of Roma” the following: “to increase the number of schools / classes where Rromani is the teaching language, to train and employ Rroma teachers, to initially and in service train teachers on management diversity and intercultural education and to create and develop non-formal and informal education programs addressed to Rroma and non-Rroma children and parents focused on cultural diversity, intercultural dialogue and on building up the individual and ethnic self-esteem.” (Page 39)

## 2.2 RECOMMENDATIONS

### 2.2.1 POLICY GOAL 1: INCREASE EARLY CHILDHOOD EDUCATION IN COMMUNITIES WITH HIGH ROMA POPULATIONS

To add the following POLICY MEASURE: INCREASING RROMANI SPEAKING CHILDREN’S PARTICIPATION TO PRESCHOOL EDUCATION

Kindergartens with teaching in Rromani language with bilingual teaching methodology should be established in Rromani speaking communities in order to facilitate learning for Rromani speaking children, so to increase their participation and to improve their performance in preschool education.

In order to ensure the treatment of the Roma as a recognized national minority and to build up the ethnic self-esteem of Roma children, there is a fundamental need to add measures / interventions aiming to develop, extend and ensure an intercultural preschool education, among them the intercultural training of teachers, intercultural educational objectives and activities and, when needed, the teaching in Rromani language with bilingual methods in kindergartens, this last measure aiming to teach the Romanian language to the Roma children who are native speakers of Rromani language.

### 2.2.1 POLICY GOAL 2: PREVENTING SCHOOL DROPOUT RATHER THAN WAITING FOR COMPENSATION MEASURES

To add to the POLICY MEASURE 2B: MAKING SCHOOLS MORE FRIENDLY FOR ALL CHILDREN the following measures:

- Extending the Rromani language, history and culture teaching in schools;
- Increasing the number of schools / classes where Rromani is the teaching language;
- Introduce minorities' history and culture and intercultural education among the disciplines of the school compulsory curriculum;
- Endow the school libraries with books and magazines about Roma history and culture, cultural diversity and intercultural education;
- Making the voice of Roma parents heard in the school's decision making process, by including them in the school councils and by consulting them in what concerns optional disciplines, extra-curricular activities and other school issues.

To add to the POLICY MEASURE 2C: DEVELOPING COMPLEMENTARY FORMAL AND NON-FORMAL EDUCATION MEASURES BEYOND SCHOOL HOURS the following idea:

- To focus these extra-curricular activities on individual and ethnic self-esteem building and on intercultural education;
- To develop cultural production in Rromani language and about Roma (books, magazines, documentaries, movies, cartoons etc.);
- To establish public institutions aiming to develop and to promote Rromani ethno-culture.

To add to the POLICY MEASURE 2E: IMPROVING THE TARGETING OF THE AFFIRMATIVE MEASURES FOR ROMA CHILDREN AND YOUTH TO ENSURE THEIR PROGRESSION TO HIGHER EDUCATIONSL LEVELS the following measure:

- Putting a condition to the candidates for the special seats allocated to Roma in high-schools and faculties: to pass an exam or to provide a written prove that he or she studied Rromani language at school, or at least his or her parent to declare, in written, that he or she wants his or her child to study Rromani language at school.

### 2.2.2 POLICY GOAL 3: INCREASING THE QUALITY OF EDUCATION IN SCHOOLS WITH A HIGH PERCENTAGE OF ROMA

To add to the POLICY MEASURE 3B: ADAPTING LEARNING FACILITIES (MATERIALS AND CURRICULUM) AND MAKING IT CULTURALLY RELEVANT FOR ROMA CHILDREN AND PILOTING SOCIO-EMOTIONAL LEARNING PROGRAMS IN SCHOOLS the following measures:

- Extend the Rromani language, history and culture teaching in schools;
- Increase the number of schools / classes where Rromani is the teaching language;
- Introduce minorities' history and culture and intercultural education among the disciplines of the school compulsory curriculum;
- Endow the school libraries with books and magazines about Roma history and culture, cultural diversity and intercultural education.

To add to the POLICY MEASURE 3C: REVISING THE INITIAL AND CONTINUOUS TRAINING SYSTEM FOR TEACHERS IN THE VIEW OF PROMOTING INCLUSIVE AND INTERACTIVE LEARNING APPROACHES the following measure:

- Introducing specific modules on minorities' history and culture, cultural diversity and intercultural education both in the initial and in service training for teachers.

#### 2.2.3 POLICY GOAL 4: PROMOTING INTEGRATED APPROACHES TO INCREASE PARTICIPATION TO EDUCATION AT THE COMMUNITY LEVEL

To add the following POLICY MEASURE:

- Implementing integrated after school programs with intercultural approach, mentorship, scholarships / incentives and parental education;  
- Implementing integrated second chance programs with intercultural approach, mentorship and scholarships / incentives.

#### 2.2.4 POLICY GOAL 5: CLOSING THE GENDER GAP BETWEEN ROMA BOYS AND GIRLS IN TERMS OF PARTICIPATION IN EDUCATION

To remove, from the POLICY MEASURE 5A: INCREASING PARTICIPATION OF ROMA GIRLS AT ALL LEVEL OF EDUCATION, the culturally sensitive measure "Implementing reproductive and sexual education in schools".

#### 2.2.5 IMPLEMENTATION

Add, to the table, correspondent Entity(ies) best placed to implement the recommendation, Impact, Time frame, Monitoring indicator for the new policy goals and measures proposed.

The chapter on Health acknowledges the importance of mediation for the improvement of the health situation of Roma (p. 179), considers mediators among the entities best placed to implement policies (p. 190), and admits the existence of structural deficiencies negatively impacting the work of the mediators (pp. 179-180). Surprisingly, the policy recommendations fail to address the structural factors hindering the activity of the mediators. In our opinion, **the consolidation of the Roma health mediation program should be a priority policy goal.**

#### Policy measure 1: Improve the work conditions of Roma health mediators

Studies regrettably omitted by the authors of the chapter on health provide a complex representation of the difficulties faced by health mediators. Meager income represents a serious challenge to the functioning of mediation. Health mediators in Romania earn only 133 euros a month, less than incumbents of similar positions in other countries in the region, such as Bulgaria, Macedonia, Serbia, Slovakia, and Ukraine (Schaff 2011). Moreover, although legally entitled to claim reimbursement of the expenses incurred as part of their work, particularly related to transportation, communication, and supplies, more often than not they do not receive any money back allegedly because of budgetary constraints (Romani CRISS 2013; Romani CRISS 2012). To increase the retention of mediators and to ensure them a decent standard of living, **it is necessary to increase the monthly wages by at least 50% and to ensure the provision of adequate material compensation for the costs directly associated to the performance of mediation duties.**

Decentralization created insecurity regarding the long-term prospects of the mediation program. Data collected in 2011 indicate that 70% of the mediators work on contracts for a determined period, whose renewal is contingent upon the continuation of funding from the central budget. Employment security is a prerequisite for the success of a demanding, long-term program such as that of health mediation. **Therefore, legislation should be amended to ensure permanent work contracts to mediators.**

Another problem often reported by health mediators is related to the absence or insufficient equipping of work spaces (Romani CRISS 2013:16; Romani CRISS 2012:80). There are numerous cases reported of mediators who do not have a desk or are assigned on a daily basis to work spaces that are temporarily unused by other workers. This practice not only prevents mediators from properly accomplishing their tasks, but also symbolically positions them in a subordinate position, affecting their self-esteem and motivation. **The legislative framework regulating the organization of health mediation should make explicit the minimum standards of work units to be allocated to the mediators.**

Policy measure 2: Develop the potential of Roma health mediators

Studies monitoring and evaluating the health mediation program throughout the years were consistent in pointing out the limited initial training of the persons appointed as liaisons between the community and the healthcare practitioners. Mediators themselves expressed the need to develop their knowledge and skills in order to increase the quality of the services they deliver. In 2011, mediators were interested in increasing the medical knowledge, particularly with respect to cancer, tuberculosis, reproductive health, neonatal care, family planning and sexually transmitted diseases; developing personal and professional skills – first aid, informatics, communication, and project drafting; and increasing their awareness of anti-discrimination legislation (Romani CRISS 2012:81). **The organization of continuous training sessions every year is essential for increasing the stock of knowledge and developing the skills of mediators and for standardizing mediation practices.** It is also an excellent opportunity to ensure that the priorities set by health authorities are adequately incorporated into the work of the mediators.

**In addition to training sessions, mediators would greatly benefit from the dissemination of training materials,** such as books, reports, leaflets, and posters. Such materials, designed to cover aspects pertaining to health relevant for the Roma communities, will improve their knowledge and will contribute to the transfer of scientifically-sanctioned information to members of the Roma community.

Policy measure 3: Ensure the continuation of the mediation system

One of the actual risks of the mediation system nowadays is the discontinuation of the service once a mediator quits her position. **It is necessary to ensure that replacement is found in a timely manner so that the community continues to benefit of mediation services.**

Policy measure 4: Ensure scaling up of NGO initiatives

Often times, NGO initiatives remain improperly exploited, in the sense that the implementation of certain projects

Policy measure 5: Ensure effective challenge discrimination

Discrimination remains one of the main problems Roma face in achieving equality. Despite this, the report fails to conduct a realistic inquiry into the issue and to put forward some proposals for concrete effective measures to curb the phenomenon. The report fails to address the shortcomings of the legal and institutional framework (e.g. the NCCD – National Council for Combating Discrimination) and to review the practical experience in combating discrimination. On a more general note, the report largely fails to address antidiscrimination properly, mainly by failing to identify the key problems (e.g. issues related to the accessibility of antidiscrimination information and remedies for Roma marginalized communities; it does not present the role of the political bias of the NCCD or the role of the poor sanctioning mechanism etc) and by failing to put forward solutions. More concretely, as a mere example, Romani CRISS has set up a network of local monitors for combating discrimination over a decade ago, in 2002. Hundreds of cases have been documented and litigated before national courts, and a score of them are pending before the European Court of Human Rights in Strasbourg. Yet, there is no reference in the

report to such initiatives. Overlooking what is arguably one of the most effective initiatives in Romania for combating discrimination against Roma casts shadow also on the professionalism of the report.

**A substantive revision of the report is needed with the aim of ensuring, at the very least the following goals: (a) following minimal scientific standards in terms of substantial claims with actual means of proof rather than mere statement or rumors; (b) ensure impartiality; (c) establish criteria for proposing positive-practice examples; (d) eliminate bias of authors who tend to over quote their own previous works; (e) include relevant areas which are currently ignore/underdressed, such as combating discrimination or culturally relevant education.**

**In order to discuss this we ask you for an urgent meeting with a delegation of our organizations.**

Works cited:

- Agenția Împreună. 2010. O școală pentru toți. București: Vanemonde
- ISE. 2009. Situația copiilor cu cerințe educaționale speciale incluși în învățământul de masă. București: Vanemonde
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