

Appendix
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Ministers
of 21 December 2020

Ministry of the Interior and Administration

**Programme for Social and Civic Integration
of the Roma Community in Poland
for 2021-2030**

Warsaw, 2020

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List of abbreviations

RSM(s) – Roma school mediator(s)

DWRMNIÉ – Religious Denominations and National and Ethnic Minorities Department of the Ministry of the Interior and Administration

ESF – European Social Fund

GUS – Statistics Poland (Główny Urząd Statystyczny)

LGU(s) – local government unit(s)

EC – European Commission

NPH – National Police Headquarters (Komenda Główna Policji)

NPSÉD – National Programme for Social Economy Development until 2023 Social Solidarity Economy

KWRiMNIÉ – Joint Commission of the Government and National and Ethnic Minorities

MEN – Ministry of National Education (Ministerstwo Edukacji Narodowej)

MFFiPR – Ministry of Finance, Development Funds and Regional Policy (Ministerstwo Finansów, Funduszy i Polityki Regionalnej)

MKDNiS – Ministry of Culture, National Heritage and Sport (Ministerstwo Kultury, Dziedzictwa Narodowego i Sportu)

MRPiPS – Ministry of Family, Labour and Social Policy (Ministerstwo Rodziny, Pracy i Polityki Społecznej)

MRiPS – Ministry of Family and Social Policy (Ministerstwo Rodziny i Polityki Społecznej)

MS – Ministry of Justice (Ministerstwo Sprawiedliwości)

MSWiA – Ministry of the Interior and Administration (Ministerstwo Spraw Wewnętrznych i Administracji)

NGO(s) – non-governmental organisation(s)

NEET – Not in Education, Employment, or Training

NIK – Supreme Audit Office (Najwyższa Izba Kontroli)

NCPH'02 – National Census of Population and Housing 2002

NCPH'11 – National Census of Population and Housing 2011

NCPH'21 – National Census of Population and Housing 2021

OPS – Social Assistance Centre

Voivodes' Plenipotentiaries – Voivodes' Plenipotentiaries for National and Ethnic Minorities

Police Plenipotentiaries – Plenipotentiaries of Voivodeship Police Commanders for Human Rights

OP HC – Operational Programme Human Capital

OP KED – Operational Programme Knowledge Education Development

Integration Programme for 2014–2020 – Programme for the Integration of the Roma Community in Poland for the period 2014–2020

Integration Programme for 2021–2030 or Programme – Programme for Social and Civic Integration of the Roma Community in Poland for 2021–2030

EIS – Education Information System

MFF – Multiannual Financial Framework

Introduction

The Programme for Social and Civic Integration of the Roma Community in Poland for 2021–2030, hereinafter referred to as the '*Integration Programme for 2021–2030*' or '*Programme*' is the fourth¹⁾ strategy for the improvement of the situation of the Roma ethnic minority in Poland.

In 2011, the European Commission, (the 'EC'), when analysing the situation of Roma in its Member States, deemed them a group requiring particular support by way of establishing so-called national Roma integration strategies. In May 2018, the EC published a Communication on the Multiannual Financial Framework (MFF) for 2021–2027, where national Roma integration strategies were indicated as one of the thematic conditions of the Cohesion Policy.

It should be noted that Poland's strategies for reducing the social exclusion of Roma in Poland were 10 years ahead of the EC's actions in this respect. The continuation of actions for the civic and social integration of the Roma, undertaken in Poland in 2001 on a systemic basis, illustrates two important factors: the existence in Poland of a political and a social consensus with regard to the necessity of engaging in non-standard efforts in order to equalise the opportunities of this group.

The clear need for continuing actions is evidence that the causes, scale, force and scope of lack of integration of this group are not due exclusively to the lack of inclusive legal mechanisms or discrimination by the majority community, as the situation of this group still requires systemic support.

However, this does not mean that there are no noticeable changes as a result of the actions implemented since 2001. It is worth mentioning the most important of these:

- noticeable mobilisation of the Roma community in the sector of non-governmental organisations; the previous programmes triggered self-organisation initiatives and led to the establishment of several dozen Roma organisations,
- active engagement of Roma in activities initiated by the State, both in the scope of integration programmes and outside such programmes,
- empowerment of the Roma community, both at central level – Roma people are members of the Joint Commission of Government and National and Ethnic Minorities and of the Team for Roma Affairs and participate in their work – and primarily at local level (for example as Roma school mediators, entities running daycare centres, participants in cultural events, etc.),
- reduced enrollment of Roma pupils in special schools.

The legal, organisational and financial mechanisms introduced since 2001 did not bring about a significant advance in the situation of the Roma in terms of post-elementary education which is an essential condition for improving the situation of the group. Lack of education is the reason for the absence of Roma on the labour market, their uncertain housing situation, impacts lifestyle and health condition, limits involvement in public and social life, thus contributing to increasing social distance towards this group, its marginalisation, and, in extreme cases, may lead to acts of hostility towards it. Therefore, this strategy should strengthen educational measures, addressed particularly to the young generation of Roma, but also to adults. The least educated group that does not possess the appropriate

¹⁾ [The pilot governmental programme for the Roma community in the Małopolskie Voivodeship for the years 2001–2004](#) and [the Programme for the Roma Community in Poland for the years 2004–2013](#)

tools – knowledge – is always particularly exposed to discrimination and marginalisation, irrespective of its ethnic origin.

During nearly two decades of support activities, several legal, financial and organisational inclusive mechanisms have been elaborated. These include in particular:

- legal measures – placing the profession of the Roma school mediator, hereinafter referred to as ‘RSM’, on the list of official professions in Poland²⁾, introducing changes to the so-called *school education part* of the general subsidy (hereinafter: ‘increased school education subsidy’) which allowed to finance specific educational needs of Roma pupils³⁾, inscribing RSMs as an entity that may initiate the provision of psychological and educational support to individual pupils in a given school⁴⁾;
- budgetary measures – adopting multiannual programmes, financing from the special-purpose reserve (part of the State budget earmarked for a strictly defined purpose), financial sustainability;
- organisational measures – establishing a network of Voivodes’ Plenipotentiaries, a network of Police Plenipotentiaries, RSMs, a network of teachers supporting the education of Roma pupils, creating scholarship systems at all levels of education, setting up post-graduate studies of Roma history and culture, etc.

The described changes were introduced into the legal and/or organisational system of the State in order to separate the operation of effective integration mechanisms for this group from government integration programmes, so that such mechanisms continue after the programmes are completed.

Despite solutions functioning in a stable manner for many years and certain symptoms of improvement, it is difficult to consider that the Roma have become a group that is significantly more socially integrated. One can certainly talk about an increase in the presence of Roma children in the elementary education system, however, in the elementary school system of ‘6+3’ (6 years of elementary school and 3 years of lower secondary school) in place until the school year 2018/2019, the phenomenon of early school leaving was already apparent at lower secondary school level, despite the obligation of schooling/education until the age of 18. The participation of Roma youth in post-elementary education may be considered as symbolic – the numbers do not exceed a few dozen pupils. Therefore, the number of students of Roma origin is also small, and it must be noted that part of the students do not come from a ‘typical’ Roma environment but from mixed families, in which the attitude to formal education is more demanding.

A matter of concern with regard to education is the fact that in Poland fulfilment by Roma pupils of the obligation of schooling/education until the age of 18 still remains a desideratum, and the small numbers of Roma in post-elementary and higher education do not augur qualitative changes in the situation and status of this group. This is worth noting because in Poland the problem of limited physical access to education does not exist, like it does in other countries, as one of the reasons for the low

²⁾ Ordinance of the Minister of Labour and Social Policy of 7 August 2014 on the classification of occupations and specialties for the needs of the labour market and the scope of its application (Journal of Laws of 2014, item 227). The occupation of the Roma school mediator was classified under personal care and related workers (53), child-care workers and teachers’ aides (531), child-care workers (5311), Roma school mediator (531203).

³⁾ The detailed appropriation of the funds is effected on the basis of the Regulation on the principles of distribution of the educational part of the general subsidy provided to local government units (LGUs), issued every year by the Minister of National Education.

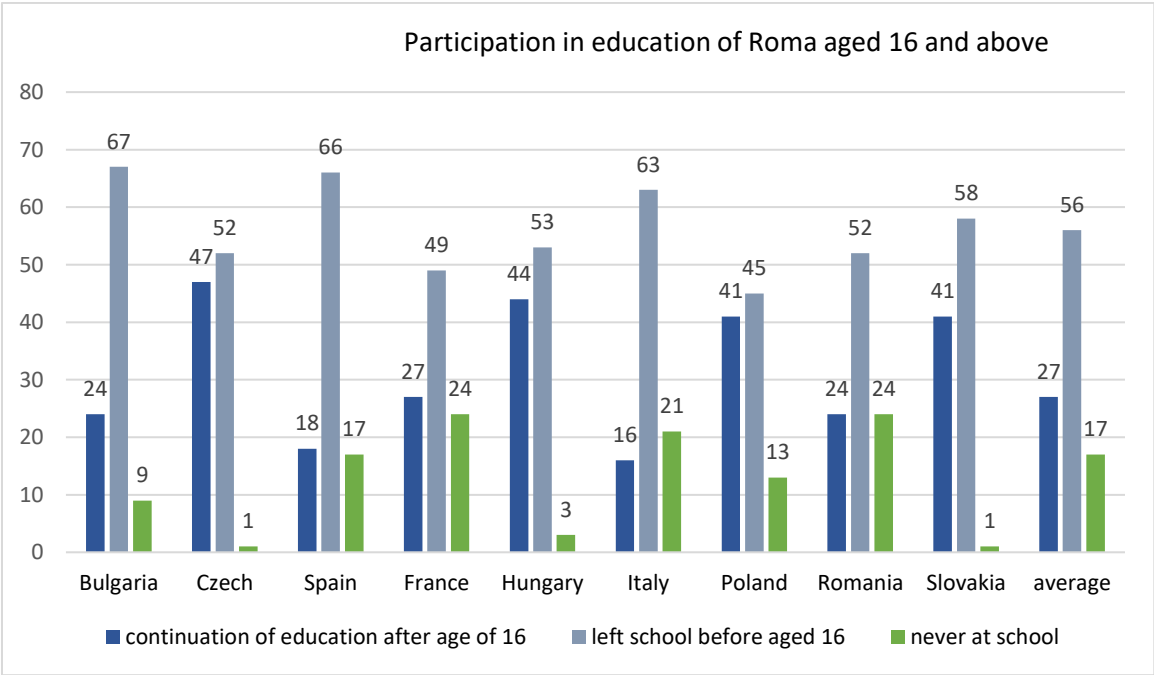
⁴⁾ Regulation of the Minister of National Education of 30 April 2013 on the principles of providing and organising psychological and educational support in public schools and establishments (Journal of Laws item 532, as amended).

education of the Roma (due to the fact that 92% of the Roma population in Poland lives in urban areas⁵⁾).

According to a survey carried out in 2016 by the European Union Agency for Fundamental Rights (FRA)⁶⁾ 63% of young Roma in EU Member States remain outside the education system and at the same time outside the labour market (so-called NEET – Not in Education, Employment, or Training). In 2011, this share was 56%. Thus, the present document places a particular emphasis on the necessity to enforce fulfilment of the compulsory schooling/education obligation until the age of 18 among Roma, to support a ‘smooth transition’ from elementary to post-elementary schools and to prepare young Roma for entering the labour market by promoting training allowing them to rapidly acquire professional qualifications.

Considering the above, it must be acknowledged that the perpetuating role of the cultural element in this group, which limits the scope of education, remains underestimated in national integration strategies, including the Polish one, as evidenced by the fiasco of certain integration measures conducted both in Poland and in other European countries. The FRA survey shows that, on a European scale, the percentage of Roma leaving school before the age of 16 still remains high (Figure 1). In the case of Poland, the reasons stated for early school leaving include factors that are partially culturally motivated: the conviction indicated by Roma respondents of having a sufficient level of education (28% of Roma respondents⁷⁾) and the tradition of early marriages and pregnancies (18%; Figure 2)⁸⁾:

Figure 1. Participation in education of Roma respondents aged 16 and above in selected EU countries according to FRA (%) (FRA EU MIDIS II)



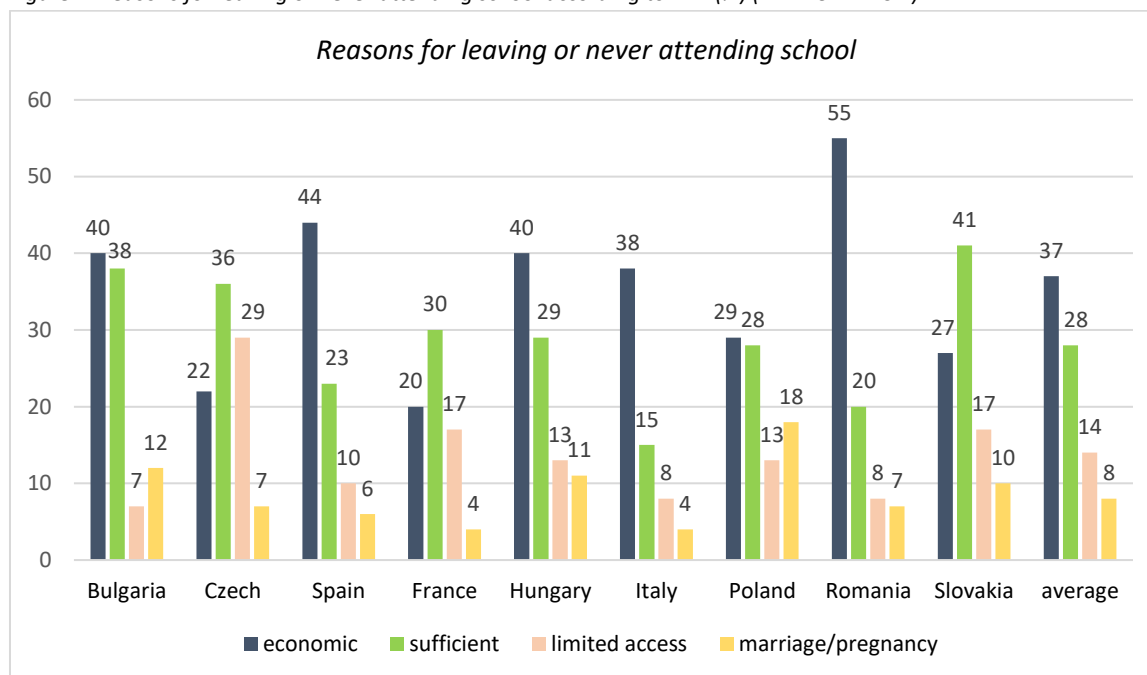
⁵⁾NCPH data: pages 34–37 of the present document.

⁶⁾ [Second European Union Minorities and Discrimination Survey – Selected.](#)

⁷⁾ [Roma Pilot Survey. Technical report: methodology, sampling and fieldwork](#), p. 11. 670 Roma people from Poland participated in the survey.

⁸⁾ The European Union Agency for Fundamental Rights [Survey on discrimination and social exclusion of Roma in EU \(2011\)](#) was conducted in 11 countries: Bulgaria, the Czech Republic, Greece, Spain, France, Hungary, Italy, Poland, Portugal, Romania i Slovakia; the average shown on the graph includes all 11 surveyed countries; graphs 1 and 2 show only selected countries with a large population of Roma people.

Figure 2. Reasons for leaving or never attending school according to FRA (%) (FRA EU MIDIS II)



Previous strategies did not significantly improve the share of Roma people on the labour market, largely due to the circumstances of the labour market at that time, which was characterised by high unemployment (detailed information is included in the part entitled *Labour market developments*, p. 13). However, it may be assumed that the solutions applied in Poland are unique among the EU countries. Earmarking of funds from the European Social Fund, hereinafter: the ‘ESF’, for career support for Roma led to several thousand Roma obtaining professional qualifications, acquiring previously lacking professional experience through traineeships and obtaining a knowledge of labour market principles (in the broad sense) (detailed information is included in the part entitled *Implementation of the Integration Programme for 2014–2020, by areas; Work*, p. 22, and in the part entitled *Operational Programme Knowledge Education Development*, p. 30).

The health situation of this group has improved due to the measures carried out and thanks to an increase in health awareness among community members, although the average life expectancy – according to the data of the National Census of Population and Housing of 2011 – remains considerably lower compared to the general population (a more detailed discussion is included in the further parts of this publication).

The living conditions of Roma families improved as a result of the renovation work carried out, however there are still several locations requiring urgent intervention. In this respect, one must consider that in this culture the succession of generations takes place much faster compared to the general population, which – with the persisting lack of education that impacts the chances for economic self-sufficiency – exacerbates the problem of lack of housing or the so-called ‘overcrowding’ of flats.

The Roma culture is gaining its rightful place on the cultural map of Poland thanks to the activation of the Roma community, particularly young and educated Roma. It has become visible at local level, among others thanks to the grants offered by the Ministry of the Interior and Administration for the protection, preservation and development of the cultural identity of national and ethnic minorities. Grants from the Ministry of Culture, National Heritage and Sport also play an important role here.

Participation of the Roma community in Poland in processes concerning them, also at central level, is an expression of enhanced visibility and empowerment of this group. The Roma community has two representatives in the Joint Commission of the Government and National and Ethnic Minorities, and 20 representatives of the community make up its sub-commission – the Team for Roma Affairs. The Joint Commission of the Government and National and Ethnic Minorities is a consultative and advisory body to the Prime Minister whose role is to express opinions on issues regarding the mode of implementing the rights and fulfilling the needs of minorities, proposing actions to be taken, giving opinions on appropriate programmes and drafts of legal acts concerning minorities, formulating opinions on the principles of fund division and funding amounts as well as taking measures to counteract discrimination against persons belonging to a minority.

The voice of this community is also heard during the work of the Sejm of the Republic of Poland at sessions of the National and Ethnic Minorities Committee which regularly monitors the situation of the Roma: according to an independent report prepared by one of the Roma organisations for the European Commission: *Roma actively participate in sessions of the National and Ethnic Minorities Committee and – what is very important – have access to Deputies sitting in Parliament and the possibility to enter into direct contact with them. They can submit their postulations, report problems encountered on the ground and engage in discussions about the solutions they propose*⁹⁾.

This strategy adopts a different perspective than the previous ones: instead of actions in the scope of social assistance (as previously) it focuses primarily on strengthening structural mechanisms, identifies particular groups to be supported and aims at improving the level of education which is a key issue with regard to the situation of the Roma. This is because lack of education lies at the root of all other problems, including the threat of discrimination.

Whenever the *Integration Programme for 2021–2030* refers to ‘the Roma’ or ‘the Roma community’, these should be understood as terms defining primarily Roma affected by problems contributing to the process of their being socially disadvantaged. Therefore, the fact that there are Roma communities in Poland which do not need material support, should be clearly emphasized. It is their own informed choice to remain outside the scope of integration measures included in the *Integration Programme for 2021–2030*.

The term ‘integration’ in this document shall be understood as the process of essential changes, jointly elaborated and agreed upon, whose aim is for the Roma community to acquire the capacity of accessing existing rights, services and the possibility of functioning effectively in modern society. The process of integration should by no means be considered as equivalent to assimilation – integration is understood hereunder as a socio-economic phenomenon which is unrelated to cultural identity. The *Integration Programme for 2021–2030* is a specific, additional form of supporting mainstream policies that are implemented for the benefit of citizens at risk of various forms of social exclusion.

The draft *Integration Programme for 2021–2030* was subject to consultation by government administration, public consultation within the Joint Commission of Government and National and Ethnic Minorities and during numerous working contacts with representatives of the Roma community.

The main coordinator of this *Programme* is the Minister of Internal Affairs and Administration. At the time of adoption of this strategy this is the minister is competent for religious denominations and

⁹⁾ Art Foundation Jaw Dikh, *Civil Society Monitoring Report on implementation of the national Roma integration strategies in Poland. Focusing on structural and horizontal preconditions for successful implementation of the strategy*, June 2018, p. 12; report prepared for the EC.

national and ethnic minorities¹⁰⁾. Should the government administration division of 'religious denominations, and national and ethnic minorities' be assigned to a different member of the Council of Ministers, he shall automatically assume further coordination of the *Programme*.

As the document will also be sent to the EC, it has been decided to include an approximate euro equivalent of amounts indicated in the text, calculated according to the appropriate foreign exchange rates of the National Bank of Poland¹¹⁾, in order to illustrate expenditure amounts.

¹⁰⁾ Regulation of the Prime Minister of 18 November 2019 on the detailed scope of operations of the Minister of Internal Affairs and Administration (Journal of Laws, item 2264).

¹¹⁾ The exchange rate was calculated on the basis of the arithmetic average of the average rates from the last day of January and December of a given year; if the data refer to several years – the average rate was calculated on the basis of the above arithmetic average for relevant years.

Output concerning the Roma Community in Poland

Statistics

Properly estimating progress on the implementation of integration programmes for the Roma in Europe is hindered by the prohibition to collect data on ethnic origin. In recent years – precisely because of the aforementioned phenomena – there has been a slow but visible change in approaching the issue of collecting data on ethnic origin, in particular with regard to the Roma. One of the first institutional symptoms of the new approach is Recommendation 8(b) made in the ECA 2016 Report, evaluating the impact of EU initiatives for Roma integration, for the EC to incentivise Member States to collect statistical data on ethnic origin¹²⁾.

Poland is among the few European countries that collect statistical data on national and ethnic minorities as part of their census activities. Due to the timing of the next National Census of Population and Housing scheduled for 2021, hereinafter: the ‘NCPH’21’, and considering that its detailed results regarding national and ethnic minorities should not be expected sooner than around 2023, the statistical data used in this strategy come mostly from the National Census of Population and Housing carried out in 2011, hereinafter: the ‘NCPH’11’, and to a lesser extent from the National Census of Population and Housing carried out in 2002, hereinafter: the ‘NCPH’02’. One can assume that even with potentially more people declaring their affiliation with the Roma ethnic minority in the NCPH’21, the educational trends and proportions in labour force participation are unlikely to be significantly affected. The need to continue the measures aimed at the social integration of the Roma is not determined by the group’s population size (difficult to estimate)¹³⁾, but rather by their lacking social and civic integration, which largely stems from the negative consequences of education gaps that have persisted across generations.

Educational data:

Monitoring the educational situation is facilitated by the collection of data from the Education Information System, hereinafter: the ‘EIS’, on the number of pupils, including of Roma descent, for whom schools organise extra curricular activities.

The analysis of data (NCPH’02 and NCPH’11, as well as EIS) indicates that the majority of Roma pupils do not take their education beyond primary school level (many of whom fail to complete it¹⁴⁾), and the number of pupils in secondary schools (upper-secondary schools in the previous system) is negligible. It hovers between 50 and 60 children. Even assuming that not all Roma in secondary schools attend extra curricular activities (which would make them appear in the EIS), dropping out of school before

¹²⁾ The European Court of Auditors (ECA) (2016); this recommendation was dismissed by the Commission on account of being too costly and difficult to implement in certain Member States. However, the ECA recommendation was repeated by the EU Agency for Fundamental Rights – MIDIS II of 2016, report, p. 16

¹³⁾ According to the NCPH’11: 16,723 people declared their nationality as Roma, which is an increase compared to the 2002 National Census of Population and Housing, where 12,731 made this declaration; an important factor representative of population size (although not a universal rule), may be the number of people listing Romani as the language spoken at home: in the NCPH’11 12,075 people listed Romani as their home language, while in the NCPH’02 it was 15,657 people – this presents us with a paradox of sorts: a rise in the number of people declaring themselves to be of Roma ethnic origin in the last census occurred alongside a decline in the number of Romani language speakers; still different data emerges from the estimates regarding the implementation of prior strategies, pointing to about 22,000 people.

¹⁴⁾ This conclusion refers to data on the 6+3 model of primary education: many Roma pupils leave the education system before graduating from lower secondary school.

the age of 16 and not participating in compulsory schooling/education until the age of 18, is a common phenomenon among the Roma. Hence, education remains a priority area in this document.

It is also necessary to strengthen the patriotic dimension of civic education, especially with regard to children and youth. The exclusion of Roma, discussed repeatedly in various international documents, manifests in ways such as this group's lacking sense of belonging to a broader civic and state community. Regardless of their ethnic and cultural distinctness, the Roma are citizens of the Republic of Poland and shared the historical plight of the country and all its people. The most telling example of this shared fate is World War II – both in terms of the suffering inflicted by the Third Reich's policy of extermination, as well as the events that took place in the Borderlands during that period, whose victims included the Polish Roma, still a little known fact from our shared history. In previous years much energy was devoted to strengthening the cultural distinctness of the Roma folks by promoting symbols characteristic for this group (promoting familiarity with the Romani flag and the Romani anthem, organising celebrations related, among others, to the World Day of Romani Language, promoting the works of Papusza, etc.). While continuing to pursue the aforementioned activities, efforts should also be made to strengthen the ties of Roma pupils to broader communities, local and state alike, by e.g. including them in school events and patriotic celebrations. Such activities will be conducive to the majority and the minority coming together to build a civic community.

For this reason, the *Integration Programme for 2021–2030* will support the said activities related to historical education, which include restoring the memory of the Roma World War II victims.

Improving the economic standing of the Roma in Poland

The new integration strategy was constructed to account for the crucial changes, which in recent years have contributed greatly to improving the economic standing of the Roma in Poland. Mention should be made here of the following government programmes:

- the government demographic programme *Rodzina 500+* [Family 500+]¹⁵⁾,
- the government programme *Dobry Start* [Good Start]¹⁶⁾,
- government programme *Mama 4+*¹⁷⁾

The outcomes of these measures with regard to the Roma are presented in more detail in Chapter 3. *Public policies relevant in the context of measures for the benefit of the Roma.*

The functioning of these universal programmes allows to eliminate the *ad hoc* measures meant to improve the material status of Roma pupils, which were part of previous Roma integration strategies and included: purchases of school supplies (textbooks and school accessories) for Roma pupils attending primary schools (the *Programme* leaves this option available to pupils attending secondary schools, vocational schools in particular, as they often require buying specialised equipment), paying for personal accident insurance, food allowances, etc., while introducing a one-year compulsory pre-school education eliminates the need to co-finance pre-school fees, which were previously covered by the parents.

¹⁵⁾ Act of 11 February 2016 on state aid in raising children (Journal of Laws of 2019, item 2407).

¹⁶⁾ Regulation of the Council of Ministers of 30 May 2018 on detailed conditions for the implementation of the government programme 'Good Start' (Journal of Laws, item 1061, as amended).

¹⁷⁾ Act of 31 January 2019 on supplementary parental benefit (Journal of Laws, item 303).

Labour market developments

Changes that took place in the Polish labour market over the past two decades, impacted the professional activation of the Roma. Although the State measures for this group began to be implemented in 2001, which marked the peak official (registered) unemployment rate at about 20%, since 2016 the situation in the labour market has been clearly improving, measured by the continued decline of unemployment (Figure 3):

Figure 3. Statistics Poland's % unemployment rate registered between 2001–2019 (as of December of a given year)

year	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
unemployment rate	17,5	20,0	20,0	19,0	17,6	14,8	11,2	9,5	12,1	12,4
Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	
unemployment rate	12,5	13,4	13,4	11,4	9,7	8,2	6,6	5,8	5,2	

It is noteworthy that the overall improvement in the labour market situation for the Roma should be viewed alongside the outcomes of past projects implemented with aid from structural funds, which in Poland meant mostly ESF: Operational Programme Human Capital during the years 2007–2013 and Operational Programme Knowledge Education Development during the years 2014–2020, which offered, among others, professional training courses and internships to a relatively large Roma population (the data is discussed below), preparing them to independently enter the labour market.

On the other hand, however, the last years of the implementation of the *Integration Programme for 2014–2020* were when some factors emerged which could prove detrimental to the scale on which the Roma would be entering the labour market:

- significant economic migration of the Ukrainians (often better educated than the Roma),
- advances in automation eliminating demand for low-skilled workers,
- potential aftermath of the labour market situation becoming worse due to the state of epidemic emergency declared on 13 March 2020 and the state of COVID-19 outbreak that followed.

1. Additional support for the Roma community in Poland so far

On account of their marginalisation, the Roma are a group that benefits from a unique form of state aid when compared to other national and ethnic minorities and other social groups. Although the Roma's access to rights and services is on par with other citizens, the centuries of marginalisation, which resulted in the group's lacking social and civic integration, in practice meant that this access was far from equal, further contributing to their exclusion. Therefore, a system of solutions had to be created that was 'parallel' (albeit *ad hoc* in nature) to the one universally available. The solutions include: the aforementioned government integration programmes, funds for additional education tasks, funds for nurturing cultural identity and ESF funds for professional activation (Figure 4):

Figure 4. Amounts allocated to support the Roma community in 2001-2020 (in PLN)

year	Roma integration strategies	in it of:			increased school education subsidy	culture grants from Ministry of Interior and Administration	total from state budget	European Social Fund - "Roma component"
		regional level realisation	Ministry of Interior and Administration scholarships	Ministry of Education budget				
2001-2003	5 355 000	5 355 000	-	-	-	-	5 355 000	-
2004	5 024 200	5 000 000	-	24 200	-	-	5 024 200	-
2005	5 698 100	5 000 000	-	698 100	3 401 000	354 500	9 453 600	-
2006	5 960 549	5 000 000	233 000	727 549	10 413 000	888 649	17 262 198	-
2007	10 918 800	10 000 000	310 000	608 800	10 024 000	1 076 359	22 019 159	94 742 283
2008	11 028 632	10 000 000	358 000	670 632	10 504 000	1 248 428	22 781 060	
2009	11 102 790	10 000 000	373 400	729 390	12 861 000	858 183	24 821 973	
2010	11 095 000	10 000 000	395 000	700 000	15 655 000	499 294	27 249 294	
2011	11 060 000	10 000 000	360 000	700 000	16 692 000	895 424	28 647 424	
2012	11 170 000	10 000 000	470 000	700 000	17 511 000	1 507 540	30 188 540	
2013	11 260 000	10 000 000	560 000	700 000	17 988 000	1 040 106	30 288 106	
2014	6 100 000	5 000 000	400 000	700 000	17 929 000	1 166 340	25 195 340	
2015	11 146 000	10 000 000	446 000	700 000	16 269 412	1 026 664	28 442 076	
2016	11 102 993	10 000 000	491 000	611 993	17 445 807	956 500	29 505 300	
2017	11 194 842	10 000 000	495 000	699 842	17 109 762	1 107 000	29 411 604	36 000 000
2018	11 140 000	10 000 000	440 000	700 000	15 150 171	1 496 412	27 786 583	
2019	11 109 660	10 000 000	410 000	699 660	14 896 000	977 252	26 982 912	
2020	11 200 000	10 000 000	500 000	700 000	13 355 093	1 113 014	25 668 107	
TOTAL	172 666 566	155 355 000	6 241 400	11 070 166	227 204 245	16 211 665	416 082 476	
TOTAL								
546 824 759								

As per the above data, it should be stressed that in reality some of the funds do not go directly to the Roma community. In the case of the increased school education subsidy, the funds are managed by LGUs, which may allocate them to broadly interpreted educational needs, not necessarily related to the direct organisation of extra-curricular activities for pupils belonging to national and ethnic minorities, including of Roma descent. The desirable model for the use of these funds is still to transfer them through LGUs to schools attended by Roma children. Then the schools – in cooperation with the teaching staff and Roma school mediators – allocate the funds to extra-curricular educational activities that align with the individually diagnosed educational needs of Roma pupils. Examples of LGUs that allocate the entirety of subsidy funds directly towards bridging the educational gap of Roma pupils, are Bydgoszcz and Żywiec.

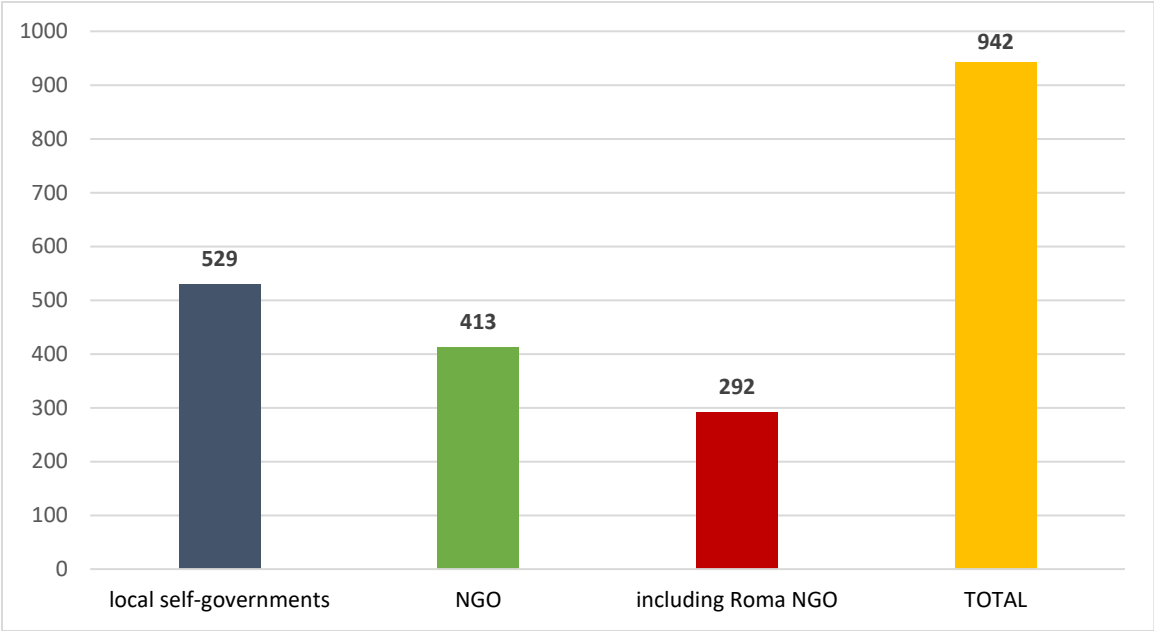
In the case of ESF-funded projects it should be noted that they are meant to support the Roma community by involving its members in projects as participants, less frequently as partners or independent project implementing entities.

1.1. Programme for the Integration of the Roma Community in Poland for the period 2014–2020

1.1.1. General information

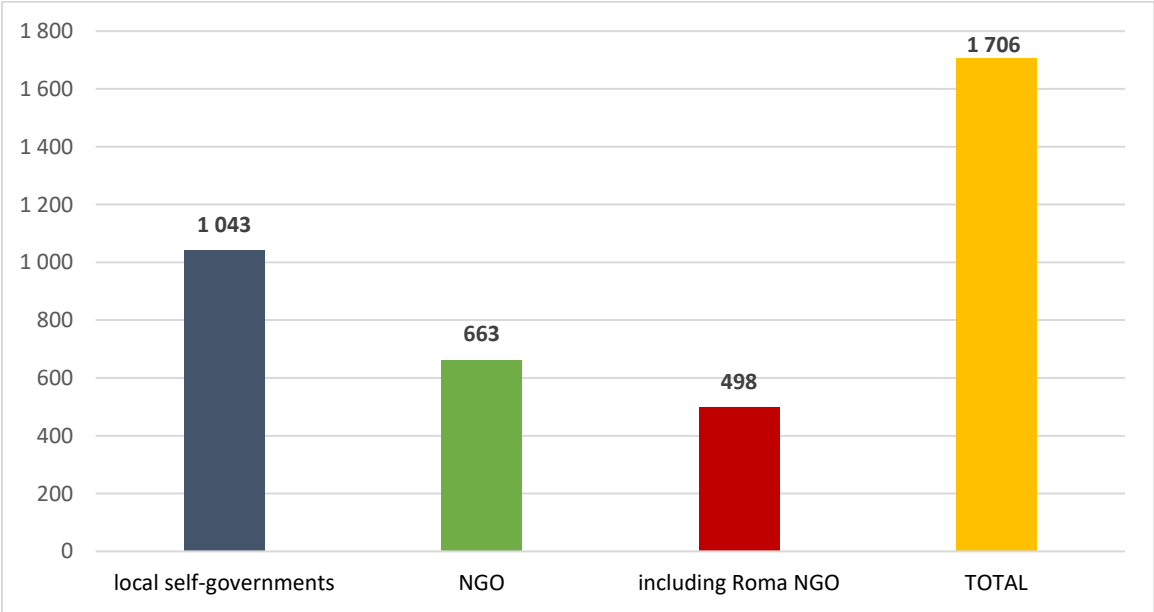
The *Integration Programme for 2014–2020* covered 4 areas: education, labour, housing and health. Overall, the measures covered 942 entities (Figure 5), 529 of which (56%) were entities from the public finance sector, including local government units, and 413 (44%) non-governmental organisations, including 239 (70% of NGOs) Romani organisations:

Figure 5. Total number of entities carrying out tasks in 2015-2019



Therefore, it may be assumed that the non-governmental sector, dominated by Roma organisations, was an important partner in the *Integration Programme 2014–2020*. These entities carried out a total of 1,706 tasks (Figure 6):

Figure 6. Total number of tasks implemented by the different entities in 2015-2019

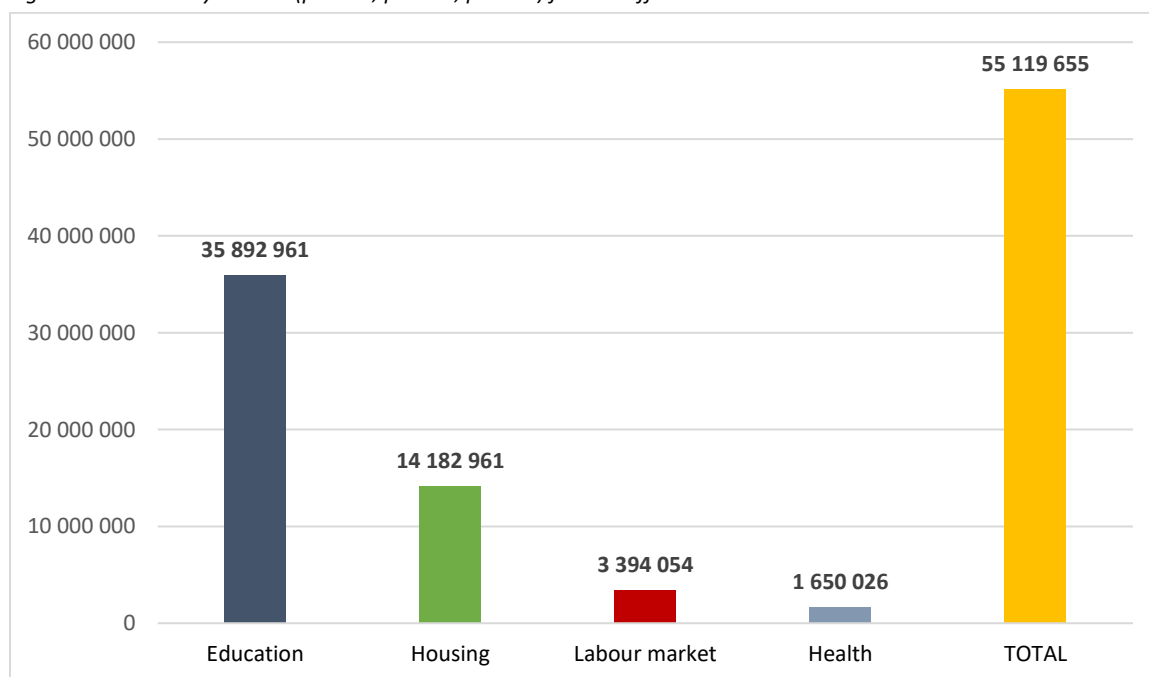


The budget of the *Integration Programme for 2014–2020* totalled PLN 11,400 thousand per year (approx. EUR 2.6 million), of which:

- PLN 10 million (approx. EUR 2.3 million) per year came from the special purpose reserve called *Aid to the Roma community*,
- PLN 700 thousand (approx. EUR 165 thousand) per year from the Ministry of National Education for educational measures addressed to Roma pupils,
- PLN 500–700 thousand (approx. EUR 120–165 thousand) per year from the Ministry of the Interior and Administration (coordinator of the *Integration Programme for 2014–2020*) allocated to such initiatives as scholarship schemes for the Roma and Romani studies at the Pedagogical University of Kraków.

On account of the *Integration Programme for 2014–2020* being adopted as late as October 2014, by the end of that year PLN 4,148,445 (approx. EUR 980 thousand)¹⁸⁾ was used for tasks financed from the special purpose reserve and PLN 400,000 (approx. EUR 95 thousand) from the budget of the Ministry of the Interior and Administration for scholarships awarded to gifted Roma university students, and secondary school pupils.

Figure 7. Total outlays in PLN (part 83, part 30, part 43) for the different areas in 2014–2019



The percentage share of expenditure from the special purpose reserve for the different areas of the *Integration Programme for 2014–2020* is illustrated by the chart below (Figures 8 and 8a):

¹⁸⁾ For the purposes of this document the average exchange rate of EUR for 2014, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.25.

Figure 8. State budget expenditure in % (part 83, part 30, part 43) for the different areas in subsequent years

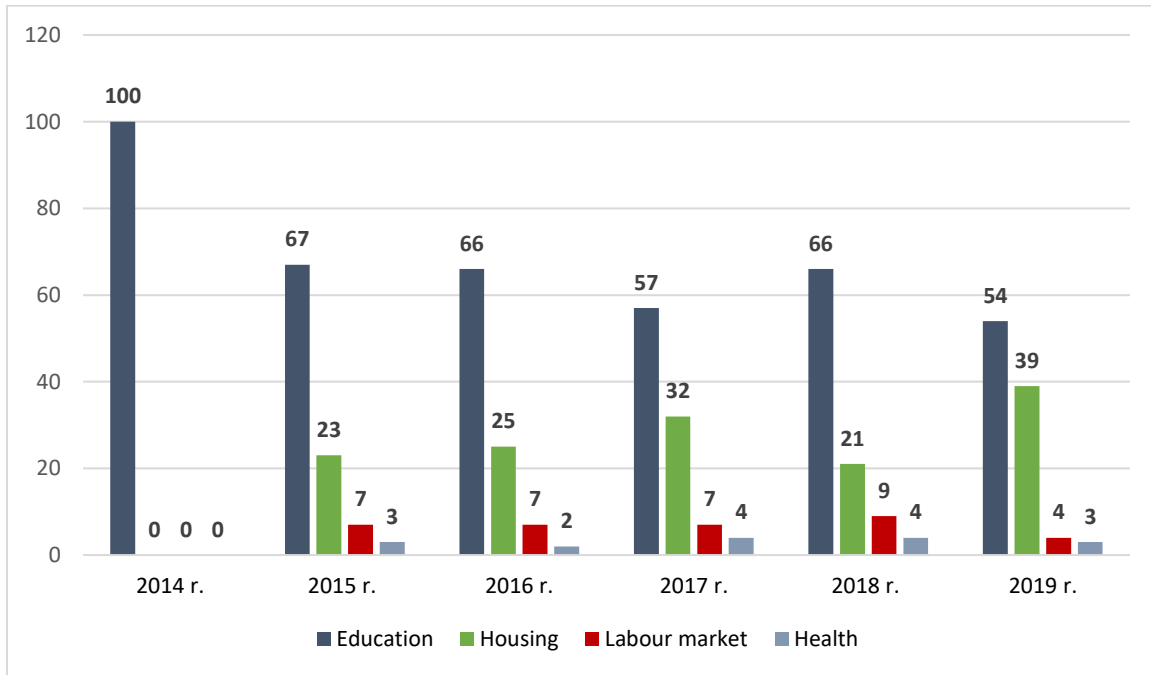
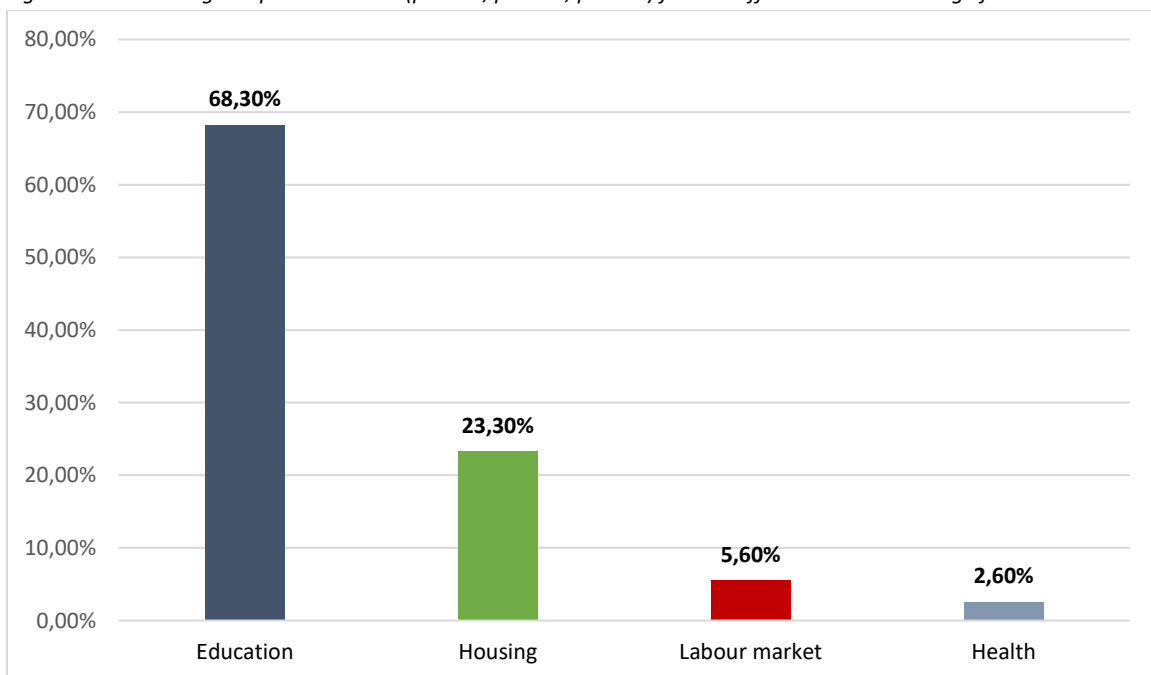
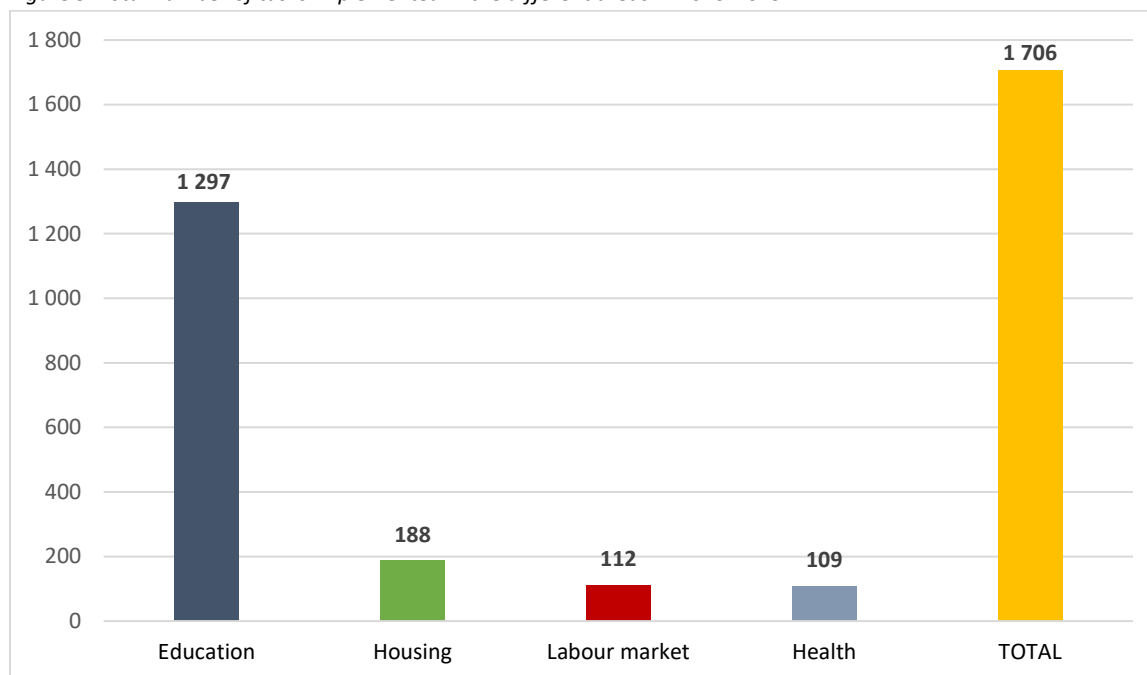


Figure 8a. State budget expenditure in % (part 83, part 30, part 43) for the different areas – average from 2014-2020



The expenditure presented above translated to the implementation of 1,706 tasks; when broken down by area, the number of tasks is as follows (Figure 9):

Figure 9. Total number of tasks implemented in the different areas in 2015-2019



Educational tasks were the most requested among the participants (Figure 10). The tasks that entailed improvement of housing conditions were in practice carried out by LGUs on account of ownership structure – the Roma for the most part reside in communal apartments. Project contractors showed considerably less interest in tasks related to access to the labour market and healthcare. The described phenomenon was related to objective difficulties having to do with the Roma’s professional activation and somewhat limited interest in healthcare related tasks (less interest in the *Health* area was already signalled in the independent evaluation of the previous *Integration Programme for 2004–2013*, implemented in 2011¹⁹⁾):

Figure 10. Total number of entities carrying out tasks in the different areas in 2015-2019



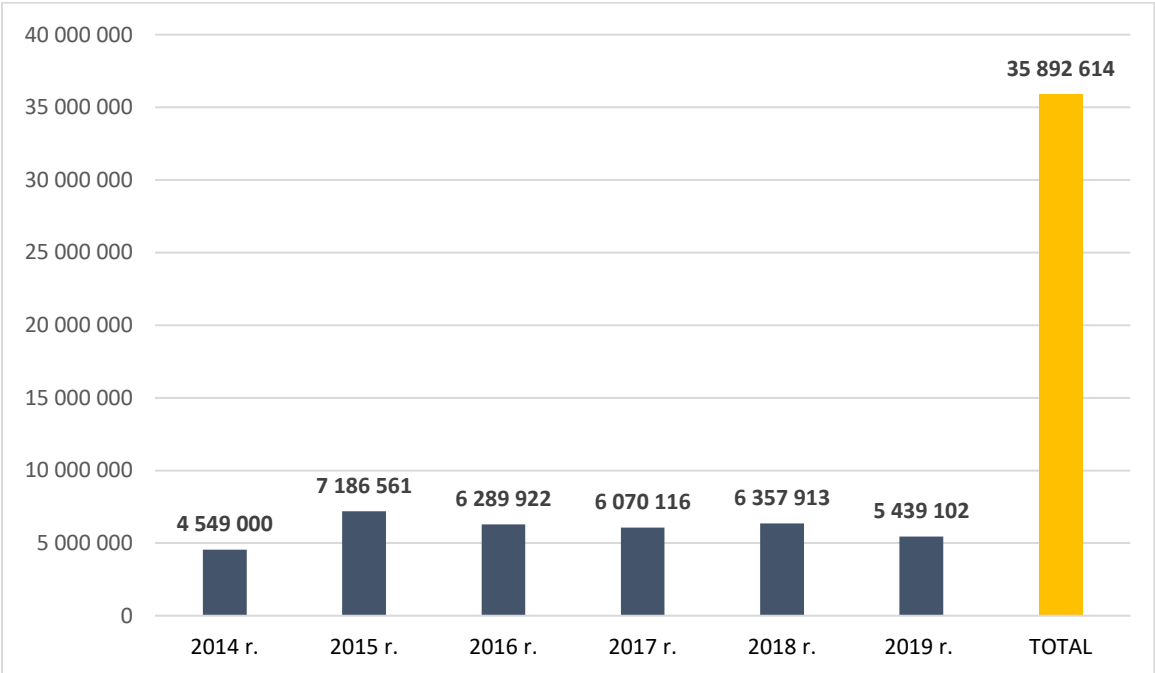
¹⁹⁾ Final report from the evaluation study of the ‘Programme for the Roma community in Poland’, carried out as part of the project ‘Q-quality – the improvement of functioning of the Roma Programme’, evaluation carried out in 2011 by: Evaluation Centre, Non-Governmental Evaluation and Development Agency and the Office for Support of Social Initiatives BORIS, pp. 128–129.

1.1.2. Implementation of the Integration Programme for 2014–2020 by area²⁰⁾

Education

A considerable portion of funds (Figures 9, 10 and 11) was allocated to the priority area *Education*, where a total of 1,297 projects were implemented (Figure 9). The tasks carried out were related to such areas as pre-school education (Figure 12) or purchasing school supplies (Figure 13):

Figure 11. Outlays for carrying out tasks in the Education area (part 83, part 30, part 43 of the budget) in subsequent years

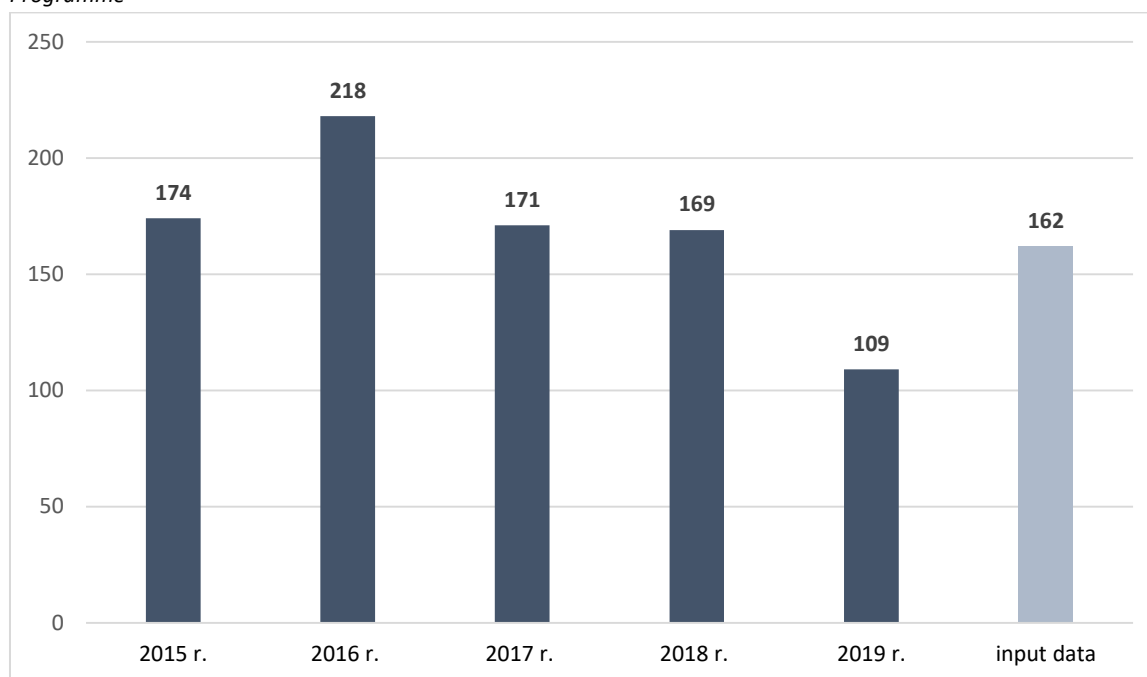


Pre-school education is of fundamental importance to the education that follows – lacking it results in failing in primary school. For cultural reasons, some of the Roma are reluctant to send their children to pre-schools, as was clear on the outset of implementing the previous integration strategy. However, in time this community became more cognizant of the benefits that come with pre-school education. Still, participation in this form of education is still not common in this group, as illustrated by the chart below (the statistical data presented in the NCPH’11 show that the average population size from a given year should be 299 children²¹⁾):

²⁰⁾ The base data used in the charts refer to the figures constructed for the Integration Programme for 2014–2020 to illustrate the dynamics of the processes taking place.

²¹⁾ According to the NCPH’ 11 the population aged 1–9 is 2,689 children, that is 299 children per year of birth.

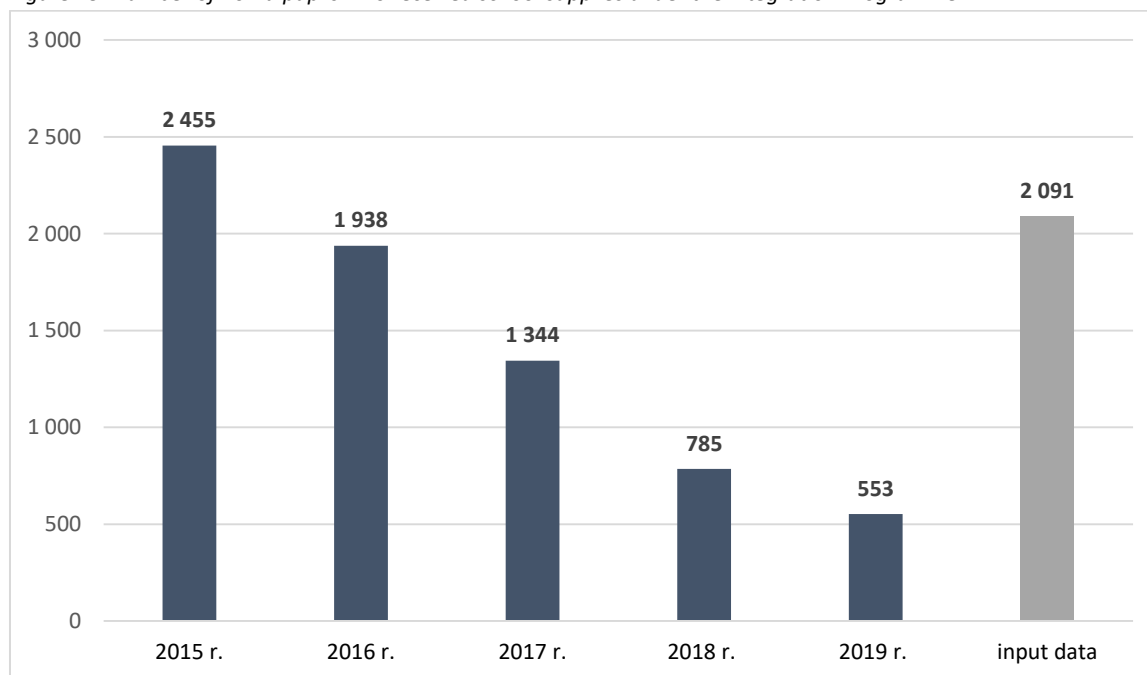
Figure 12. Number of children who benefited from subsidies to pre-school education offered as part of the Integration Programme



The chart below (Figure 13) illustrates the degree to which Roma pupils were provided with school supplies, whereby it should be kept in mind that the apparent declining trend follows from the introduction of financial support for each child (under the *Family 500+* programme) and support for the purchase of school supplies (under the *Good start* programme) and gradually limiting welfare support. Prior to the introduction of the aforementioned programmes, school supplies were purchased for all Roma pupils. Contrary to the belief held at the time, namely that one of the reasons for Roma students' poor grades is not having textbooks and school accessories, the audit by the Supreme Audit Office (NIK) (cf. p. 40 of the present document) reveals that the average of grades received by Roma pupils in 9 inspected municipalities of the Małopolskie Voivodeship remains low, despite all students having received school supplies²²⁾. Therefore, these pupils' poor educational performance does not stem solely from lacking school supplies.

²²⁾ Information of the Supreme Audit Office on the audit results: [Implementation of tasks under the Integration Programme for 2014–2020 for the Roma community by municipalities from the Małopolskie Voivodeship](#), p. 24.

Figure 13. Number of Roma pupils who received school supplies under the Integration Programme



Housing

Addressing the collective needs of the local government-level community in the area of communal residential construction falls under the purview of the municipality. The municipality provides social housing and replacement housing, in addition to meeting the housing needs of low-income households, e.g. by paying out housing benefits. The municipality is also obligated to maintain the housing infrastructure in good condition, which includes carrying out necessary repairs and renovations of its housing resources. Due to the housing situation of many Roma being difficult, the *Integration Programme for 2014–2020* provided support to municipalities in this area.

In the years 2015–2019, 188 tasks were carried out in the *Housing* area, related to the improvement of housing conditions. On average, these tasks consumed about 23.3% of annual funds allocated in subsequent years – the total amount was PLN14,182,961 (approx. EUR²³⁾ 3.3 million, Figure 14) and provided support to 2,291 people (fig. 15). It bears recalling that the activities related to improving the Roma's housing conditions in the region of Małopolska (Lesser Poland), which has the largest Roma population, have been conducted since 2001, while nationwide activities began in 2004. It should be stressed however, that none of the previous integration programmes managed to address the problems of several settlements in Małopolska that required urgent action.

²³⁾ For the purposes of this document the average exchange rate of EUR for 2014–2018, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.26.

Figure 14. Special purpose reserve of the State budget – outlays for carrying out tasks in the Housing area in subsequent years

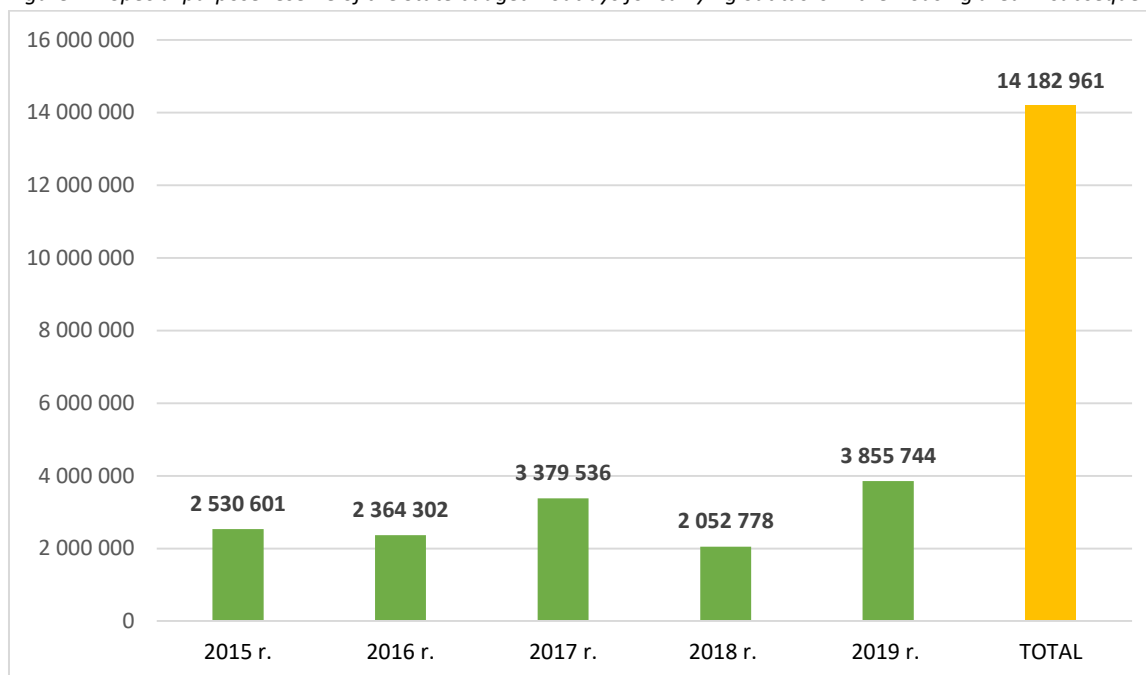
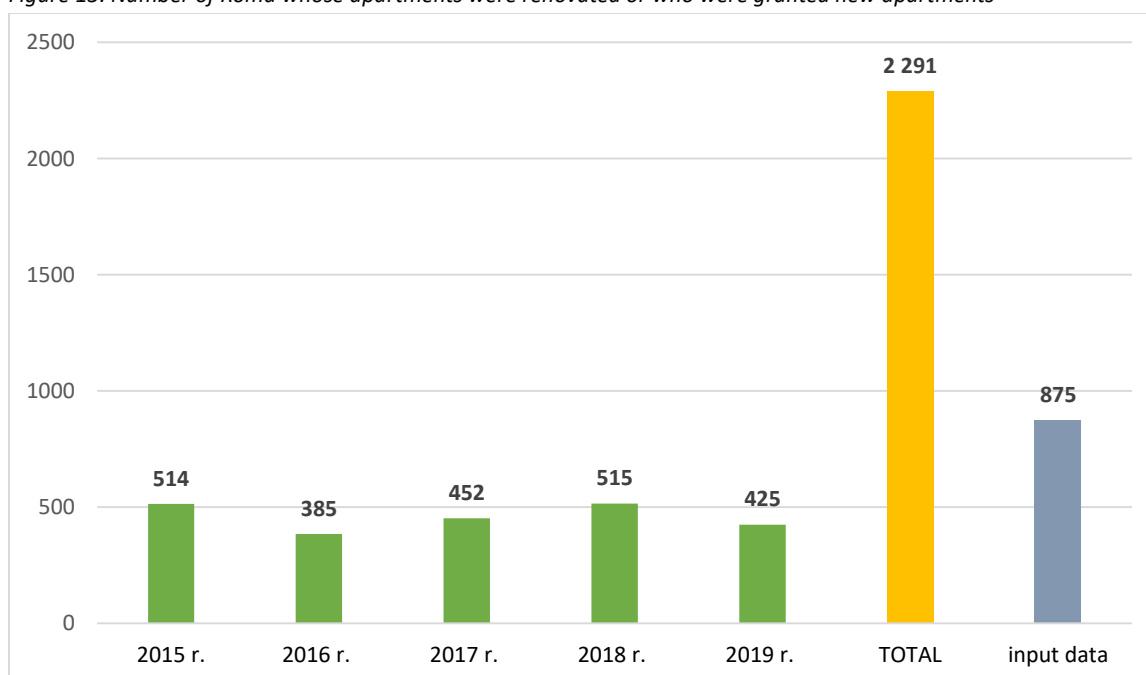


Figure 15. Number of Roma whose apartments were renovated or who were granted new apartments



Work

The measures aimed at labour market activation, conducted since 2001 under successive programmes, failed to produce the expected results. It was the result of unfavourable dynamics of the labour market as mentioned on page 15 (Figure 3), which during the initial years of the integration programmes severely limited labour market opportunities available to the Roma whose education and professional qualifications were of the lowest tier. In addition, successful measures promoting professional activation are relatively capital and time-intensive and require more flexible mechanisms than are

allowed under integration programmes. Also important was the fact that measures promoting professional activation in this community had to be accompanied by other projects, e.g. related to the organisation of care for people who are dependent upon others, mainly children.

For this reason, following its accession to the EU, Poland decided to direct part of the ESF funding to support the Roma community: in 2007–2013, this took the form of *Sub-measure 1.3.1 Projects for Roma community* under the Operational Programme Human Capital, with a budget of EUR 20 million, and in the 2014–2020 programming period – *Measure 2.7* under the Operational Programme Knowledge Education Development. *Increasing employment opportunities for people who are at particular risk of social exclusion*, with a budget of EUR 10 million.

Since 2007, this decision has, in fact, shifted the burden of professional activation to the ESF funding, leaving the *Work* component under previous programmes for potential small projects. The poor attractiveness of the component for the beneficiaries of the previous programmes is reflected in the figures: the projects implemented in the *Program for the Roma community in Poland for 2004–2013* for professional activation consumed only 2.5% of the total funding²⁴⁾, while in the case of the *Integration Programme for 2014–2020* – 112 projects promoting professional activation were implemented, which on average consumed about 5.6% of the annual funding in subsequent years – the total amount of funds was PLN 3,394,054 (approx. EUR 800 thousand)²⁵⁾ (Figure 16), providing jobs for 459 people from the Roma community (Figure 17):

Figure 16. Special purpose reserve of the State budget – outlays for carrying out tasks in the Work area in subsequent years, in thousand PLN

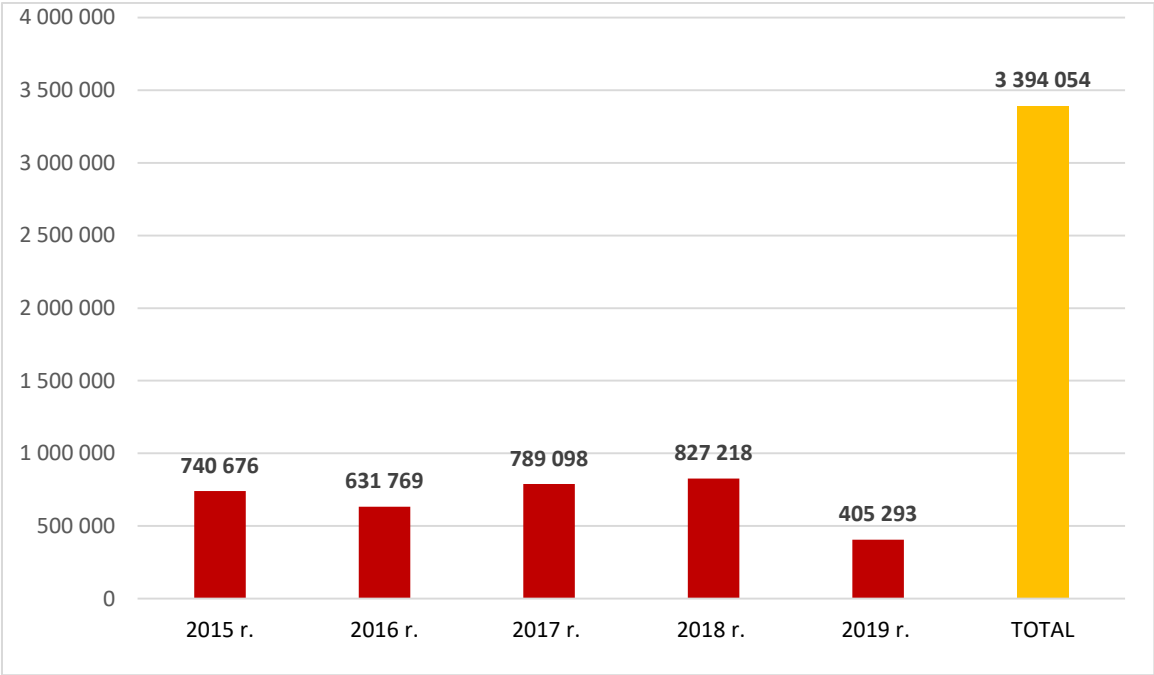
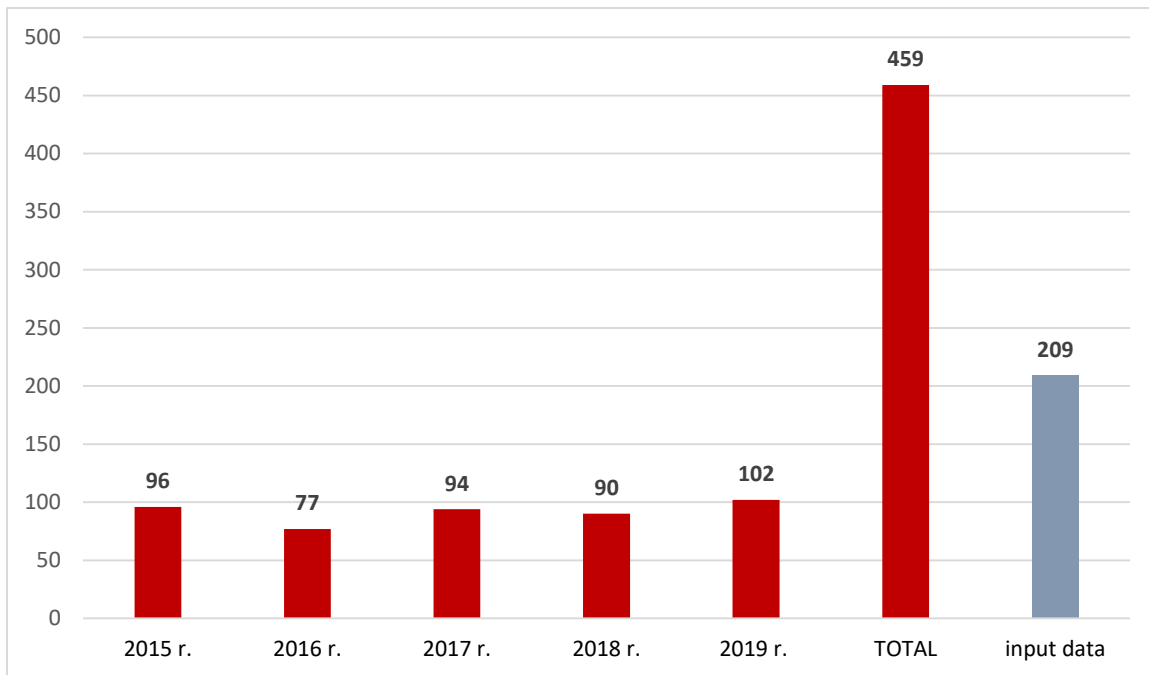


Figure 17. Number of Roma employed for the tasks financed from the Integration Programme
The data presented above does not include the number of hired Roma school mediators (cf. Figure 25)

²⁴⁾ Cf. [Programme for the Roma Community in Poland for the years 2004–2013](#), p. 28.

²⁵⁾ For the purposes of this document the average exchange rate of EUR for 2015–2018, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.26.



Data pertaining to beneficiaries of projects under Measure 2.7. Operational Programme Knowledge Education Development *Increasing employment opportunities for people who are at particular risk of social exclusion* is as follows (as of 30.06.2019):²⁶⁾

- 1,966 Roma received support under the projects and
- 270 Roma found employment following the project.

Health

109 projects were implemented in the *Health* area. On average, these tasks consumed approx. 2.6% of annual funds allocated in subsequent years – the total amount was PLN 1,650,026 (approx. EUR 390 thousand)²⁷⁾, (Figure 18) and provided support to 6,169 people (Figure 19):

²⁶⁾ The data comes from the materials provided by the Ministry of Family, Labour and Social Policy to *The 4th Report on the Implementation of the Convention for the Protection of National Minorities by the Republic of Poland* – to be updated by the Ministry of Family, Labour and Social Policy.

²⁷⁾ For the purposes of this document the average exchange rate of EUR for 2015–2018, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.26.

Figure 18. Special purpose reserve of the State budget – outlays for carrying out tasks in the Health area in subsequent years

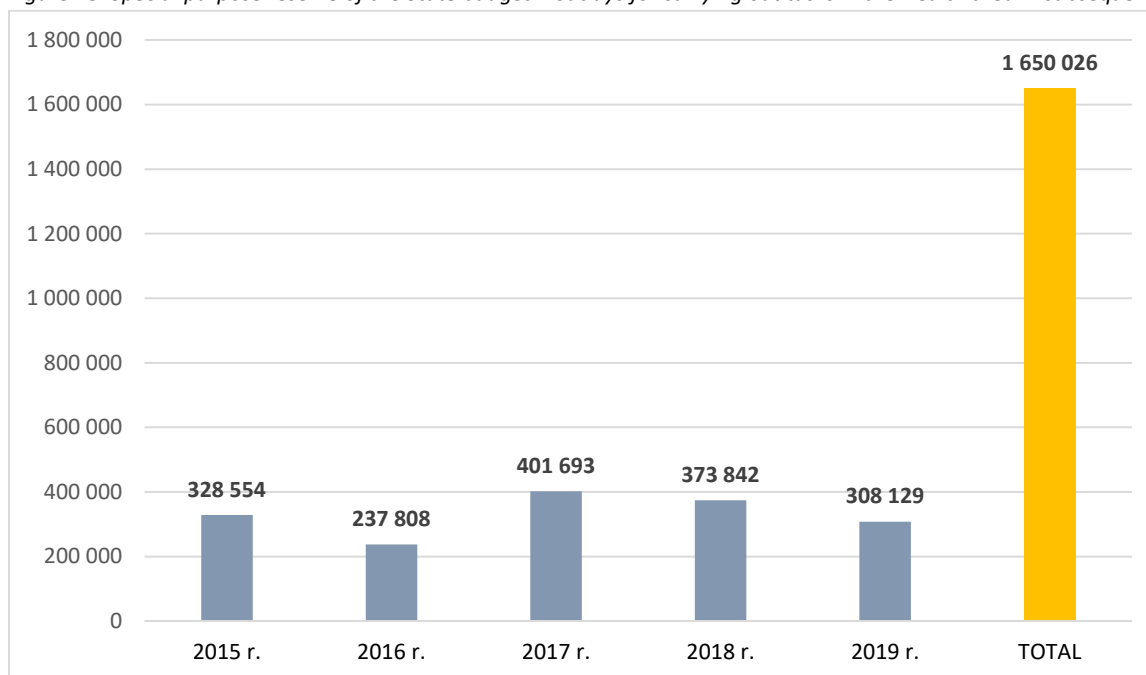
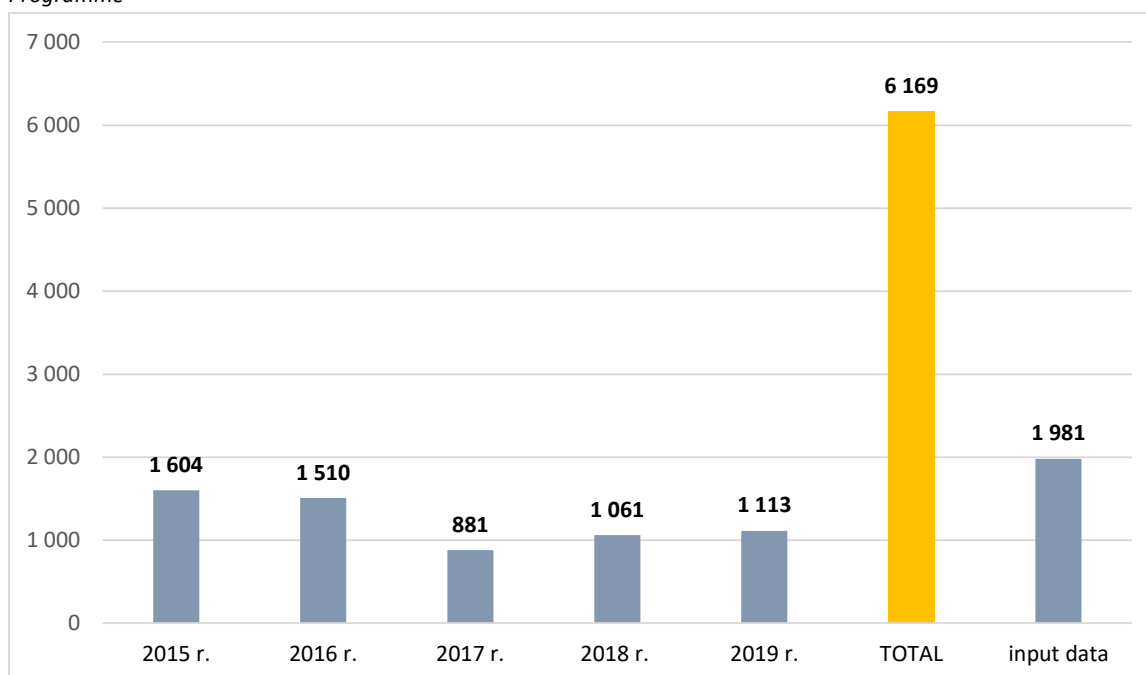


Figure 19. Number of persons covered by preventive medical examinations, including vaccinations, under the Integration Programme



1.1.3. Country-wide tasks of the Ministry of Internal Affairs and Administration

Scholarship schemes implemented by the Ministry of Internal Affairs and Administration

One of the conditions for the Roma's social integration is bridging the gap in educational attainment that separates this group from the general population. This is to be achieved through such means as scholarship schemes, especially at the level of secondary schools and higher education institutions. The

schemes contributed to improving the availability of secondary school education, although the noticeable decrease in the number of scholarship applicants (Figure 20) warrants a separate analysis: the reasons for it may be demographic and/or follow from this group’s mobility towards the markets of Western Europe, which continue to be more attractive in terms of wages.

The scholarship schemes are kept in this strategy, focusing in particular on offering support to pupils in secondary schools, including vocational schools and technical colleges.

The figures regarding Roma at the different levels of education who were receiving MSWiA scholarships in 2004–2019, are as follows (Figure 20):

Figure 20. The number of Roma who were receiving MSWiA scholarships in 2004-2019

Type of scholarship	'04	'05	'06	'07	'08	'09	'10	'11
for gifted pupils	12	10	13	15	17	14	18	15
	'12	'13	'14	'15	'16	'17	'18	'19
	17	25	21	20	21	21	23	22
for secondary schools' pupils	'04	'05	'06	'07	'08	'09	'10	'11
								55
	'12	'13	'14	'15	'16	'17	'18	'19
	56	70	66	51	57	67	53	52
for students	'04	'05	'06	'07	'08	'09	'10	'11
	40	44	51	53	53	80	70	74
	'12	'13	'14	'15	'16	'17	'18	'19
	75	72	59	37	34	41	40	42

Post-graduate studies: Roma in Poland – history, legislation, culture, ethnic stereotypes

This programme has been in the offer of the Pedagogical University in Kraków since 2006. The students include teachers, LGU employees and people interested in Romani culture and/or policies for this group’s integration. The curriculum covers the group’s history, national and international legislation, classes on the group’s culture and problems it faces in today’s Poland and Europe.

1.1.4. Other aspects related to the functioning of the Integration Programme for 2014-2020

Education Information System (EIS)

Each year, the EIS collects data on pupils from national and ethnic minorities, for whom schools are obliged to organise extra-curricular activities. EIS data indicate a certain decline in the number of Roma pupils, which should be analysed and should incentivise adequate measures in the coming years. This phenomenon could have been caused by demographic processes, migration, but also by LGUs being less interested in hiring Roma school mediators and/or limiting their work to a single educational institution.

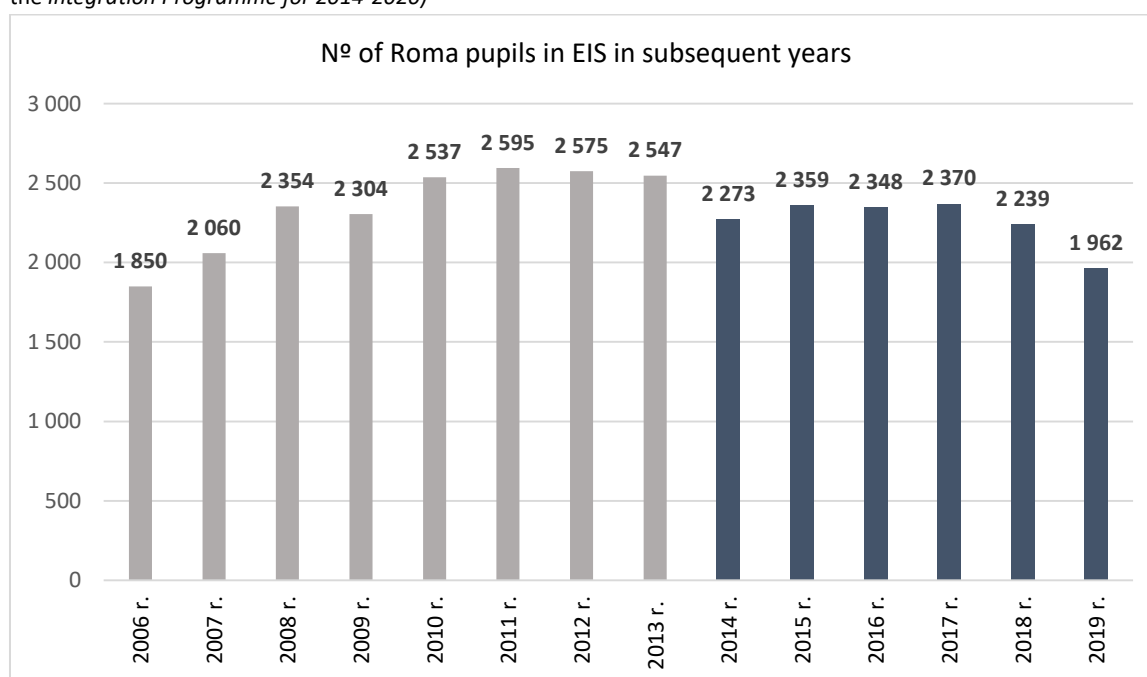
The amount of the increased school education subsidy allocated to support the education of Roma children in 2006-2019 was as follows (Figure 21):

Figure 21. The amount of the increased school education subsidy provided to Roma pupils in 2006-2019, including the number of pupils covered with additional educational measures (in thousand PLN)

year	'06	'07	'08	'09	'10	'11	'12	'13	'14	'15	'16	'17	'18	'19
amount	10 413	10 024	10 504	12 861	15 655	16 692	17 511	17 988	17 914	16 269	17 446	17 110	15 150	14 896
Nº of pupils	1 850	2 060	2 354	2 304	2 537	2 595	2 575	2 547	2 273	2 359	2 348	2 370	2 239	1 962

The aforementioned data are indicative of a systematic and significant increase of funds allocated to extra-curricular educational tasks for Roma pupils and at the same time a decreasing number of Roma pupils indicated in the EIS. As part of the measures implemented under this strategy, the Ministry of the Interior and Administration, in cooperation with the Ministry of National Education and other state agencies, will incentivise LGUs to allocate these funds towards the aforementioned forms of direct support for the education of Roma pupils.

Figure 22. Number of Roma pupils for whom schools and institutions organise extra-curricular tasks aimed at preserving and developing their ethnic identity and supporting their education (darker colour on the chart marks (in years) the duration of the Integration Programme for 2014-2020)



Roma pupils in special schools

Significant educational problems faced by the Roma community include the relatively high percentage of pupils in the special education system. There are several reasons for this: 'family tradition' (many pupils attend special schools that were attended by their siblings or parents), parents of children with a certificate for needing special education (for the overwhelming majority of these children it means certificates of mild disability) not exercising their right to place their children in public institutions, which are obliged to adjust their curriculum to the requirements states in such certificates, or counselling and guidance centres being ill-prepared to work with bilingual and bicultural children and relying on verbal tests. The latter of the factors listed was addressed by the Regulation of the Minister of National Education of 7 September 2017 on certificates and statements issued by committees

established at public counselling and guidance centres (Journal of Laws, item 1743), which states that when issuing certificates concerning children and pupils belonging to national and ethnic minorities, their linguistic and cultural distinctness should be taken into account, and diagnostic tests should use diagnostic tools adapted to the students' linguistic competence, including tests that are non-verbal and culturally unbiased. In addition, Roma school mediators may attend the certification panel meetings in an advisory capacity and with the consent of the child's parents.

The measures taken made it possible to curtail this phenomenon from about 17% (data from 2010) to around 10%²⁸⁾. Nevertheless, they are still among this strategy's key objectives: to curtail this phenomenon to a level comparable to the data for the general population (which is about 3.5%²⁹⁾). In 2015–2019, the percentage of Roma pupils attending special schools was as follows (Figure 23):

Figure 23. Percentage of Roma pupils assessed as requiring special education in the EIS 2015-2019

year	2015	2016	2017	2018	2019
Nº of Roma pupils in EIS	2 359	2 348	2 370	2 239	1 962
Nº of Roma pupils assessed as requiring special education	213	203	225	217	361
%	9,02	8,64	9,49	9,69	18,25

Roma school mediators³⁰⁾

The work of Roma school mediators needs to be particularly emphasised. Their number has remained relatively stable for many years, totalling approx. 90 people³¹⁾ (about 70 full-time positions). Roma school mediators, in Europe and Poland alike, proved to be one of the most effective tools for changing attitudes within the Roma community. For this reason, this professional group is in particular need of support. Of the 89 mediators employed by LGUs in the 2019/2020 school year with the funds from the school education part of the increased general subsidy – 72 are employed in schools on the basis of permanent employment contracts (81%), while 17 (19%) – on the basis of fixed-term employment contracts. (Figure 24).

²⁸⁾ A disturbing exception to the trend which in the years 2015–2018 continued at 10%, is a significantly higher percentage of Roma pupils enrolled in special schools in 2019, which requires a separate analysis.

²⁹⁾ Data for 2019: out of a total of 6,024,875 pupils attending pre-schools and schools in Poland, 212,486 students were assessed as requiring special education, accounting for 3.5% of the total number of students.

³⁰⁾ The term and function of a 'Roma school mediator' – a person of Roma origin working in a profession defined in the Regulation of the Minister of Labour and Social Policy of 7 August 2014 concerning classifications of professions and professional specialties for the needs of the labour market and the scope of its usage, hired by an LGU with the funds from the increased school education subsidy – should be differentiated from a 'Roma mediator': a person of Roma origin hired by non-governmental organisations with the funds from subsequent Roma Integration Programmes and/or projects financed with European funds, who works with Roma children in community daycare centres or is hired by welfare centres. As of the beginning of 2020, there were 30 such people in employ (in 26 daycare centres and two welfare centres). Some confusion arises over the use of the term 'Roma mediator' to refer to both groups and the fact that Roma school mediators often also work in community daycare centres after they finish work at a school. However, the two functions should be kept distinct because of their different employment status.

³¹⁾ The phrase used here is 'approx. 90 people', as this number fluctuates slightly, e.g.: 87 people were employed at the time of drafting this document. Differences in Roma school mediator employment figures can vary slightly even for the same calendar or school year – influenced in part by the different timing of fixed-term employment contracts in several cases (e.g., hiring some mediators in January–December, others in September–August, and others still in September–June, depending on the individual needs). The latter practice follows from the mediators seeking additional earning opportunities outside the education system during the school vacation period. However, this situation should be monitored while making sure that there are no cases of the practice where Roma school mediators are intentionally not offered permanent contracts of employment.

In addition to the educational aspect, in the context of their work it is important to point out a certain ‘emancipatory’ aspect when it comes to the Roma women – 74% of the working mediators are Roma women.

Figure 24. Roma school mediators by gender and type of employment contract

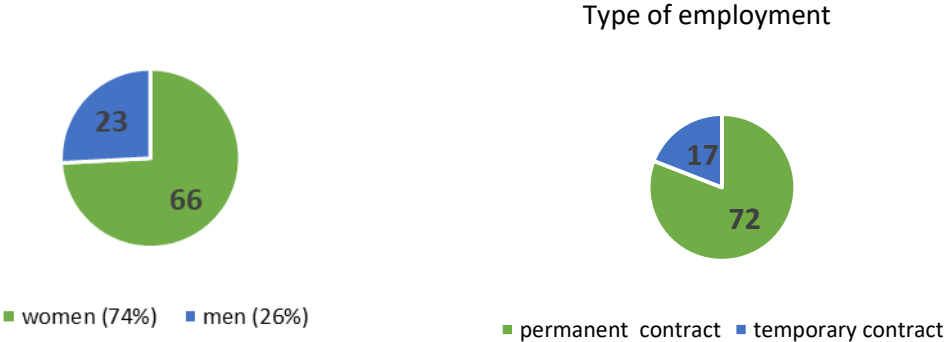
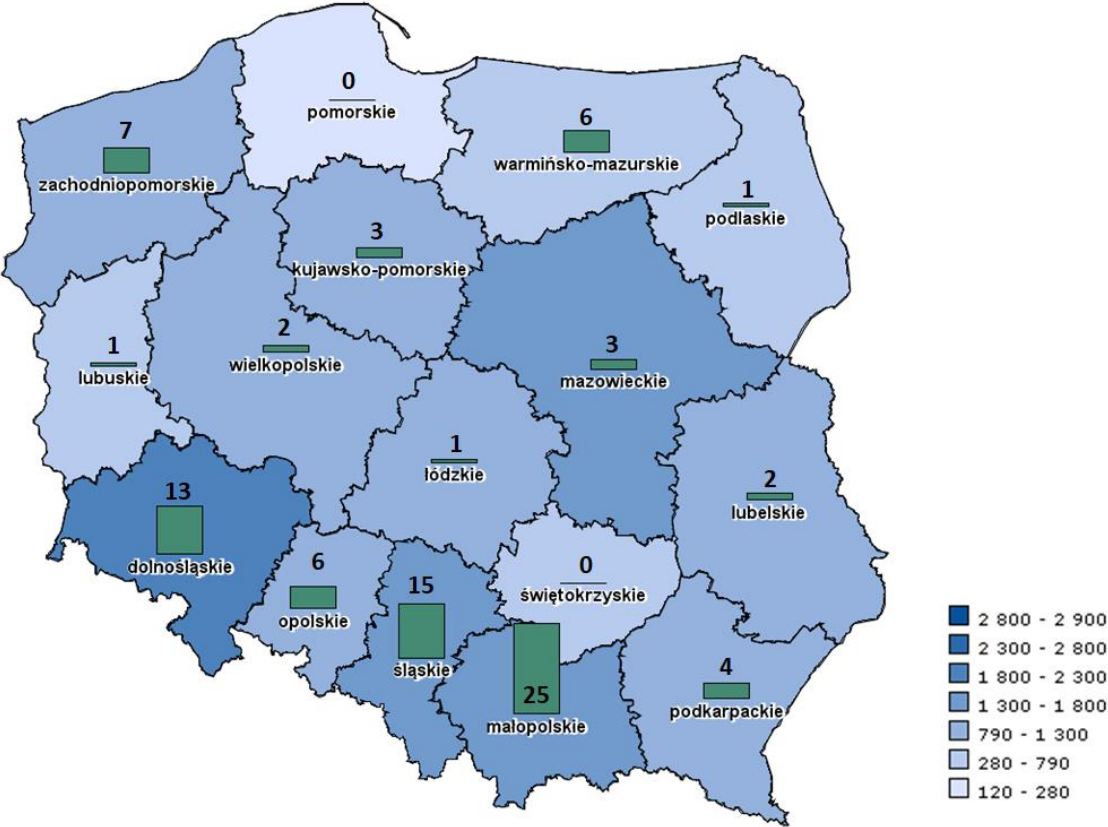


Figure 25. Employment map for Roma school mediators in Poland compared to the Roma population size, by voivodeship



The EIS data on the increased subsidy (cf. Figure 21) are indicative of a systematic and significant increase of funds allocated to extra-curricular educational tasks for Roma pupils and at the same time a decreasing number of Roma pupils appearing in the system. These funds allows for hiring a Roma school mediator, a learning support teacher assisting these children in education, as well as organising

extra-curricular activities, adequate to the diagnosed problems of the pupils. As part of the measures implemented under this strategy, the Ministry of the Interior and Administration, in cooperation with the Ministry of National Education and other state agencies, will incentivise LGUs to allocate these funds towards the aforementioned forms of direct support for the education of Roma pupils.

The present strategy assumes the need to provide incentives for LGUs to increase the number of Roma school mediators employed in places where the number of pupils is relatively high (mainly in large cities) and the number of mediators employed e.g. results in 100 students (and thus 100 families) being under the care of a single Roma school mediator. Ultimately, the model solution seems to be ensuring that a single Roma school mediator has no more than 20–25 pupils (20–25 families) under their care. Furthermore, regardless of whether a mediator is employed by a single school, they should carry out their duties in all schools based on an agreement concluded between institutions attended by Roma pupils. Due to both the Plenipotentiaries, as well as the Roma school mediators themselves, signalling operational differences, attempts should be made to solve the problem by introducing a degree of standardisation to the mediators' duties throughout the country. In previous years, training sessions organised for Roma school mediators and learning support teachers resulted in developing a model for the scope of RSM and support teacher duties and it requires widespread (re)introduction. The scope of the said duties is presented as an Annex to this Programme.

The Programme for the Integration of the Roma Community in Poland for the period 2014–2020 was the subject of an independent evaluation exercise carried out by the BORIS Association, commissioned by the Ministry of the Interior and Administration. The report from the nationwide survey discusses in detail the advantages and disadvantages of the measures undertaken within the framework of the *Programme* and assesses their impact on raising the level of the Roma community's civic integration in Poland. The report from the *Integration Programme for 2021–2030* is available at:

<http://mniejszosci.narodowe.mswia.gov.pl/mne/romowie/program-integracji-spol/11251,Raport-z-ewaluacji-Programu-romskiego-2014-2020.html>

1.2. Operational Programme Knowledge Education Development for 2014–2020

Support for the Roma community from the European Social Fund in the years 2014–2020 was foreseen under Measure 2.7 of the Operational Programme Knowledge Education Development (OP KED) for the years 2014–2020. *Increasing employment opportunities for people who are at particular risk of social exclusion*. This is the only measure under the Operational Programme Knowledge Education Development and it is addressed directly to the members of the Roma community. There are plans to launch two competitions under this measure, with a total allocation of PLN 42 million. The competitions' terms were set based on the *Integration Programme for 2014–2020*.

The main objective of the competitions was to ensure comprehensive implementation of activities aimed at improving education and employment of the Roma community members. The most important task in the projects under implementation was to define a detailed and individual path of support. Each project participant took part in the following forms of support:

- individual action plans, preceded by a participant diagnosis, taking into account age, gender, individual needs, predispositions, cultural factors and the local labour market potential. Support provided to the project participant had to be in line with the dedicated Individual action plan,

- social skills trainings (e.g. methods of job seeking, self-presentation, job interviews with potential employers, drawing up documents for employment purposes, motivation coaching),
- vocational training (e.g. building courses, florist courses, courses for commercial agents, catering courses, etc.),
- support of a job assistant (person responsible e.g. for assisting project participants in implementation of official or administrative matters as well as for vocational courses),
- work placement of a minimum length of 4-month / subsidised employment or support to set up a social economy entity.

Support provided to the project participant had to be in line with their Individual action plan, The Department of the EFS Implementation at the Ministry of Family, Labour and Social Policy announced three competitions under Measure 2.7 of the Operational Programme Knowledge Education Development 3 competitions to improve education and employment of the Roma community members. Following the announcement of the results of the competitions, 33 agreements for co-financing of projects were concluded, amounting to approximately PLN 30 million.

Output values (to be achieved by the end of the programming period) are:

- the number of Roma to be covered with the programme support – (target value),
- 20%³²⁾ of Roma covered by the support under projects will secure employment after having concluded the programme (including the self-employed),

Output values achieved as of 30.06.2019:

- 2,056 Roma received support under the projects,
- 359 Roma found employment after the conclusion of the project.

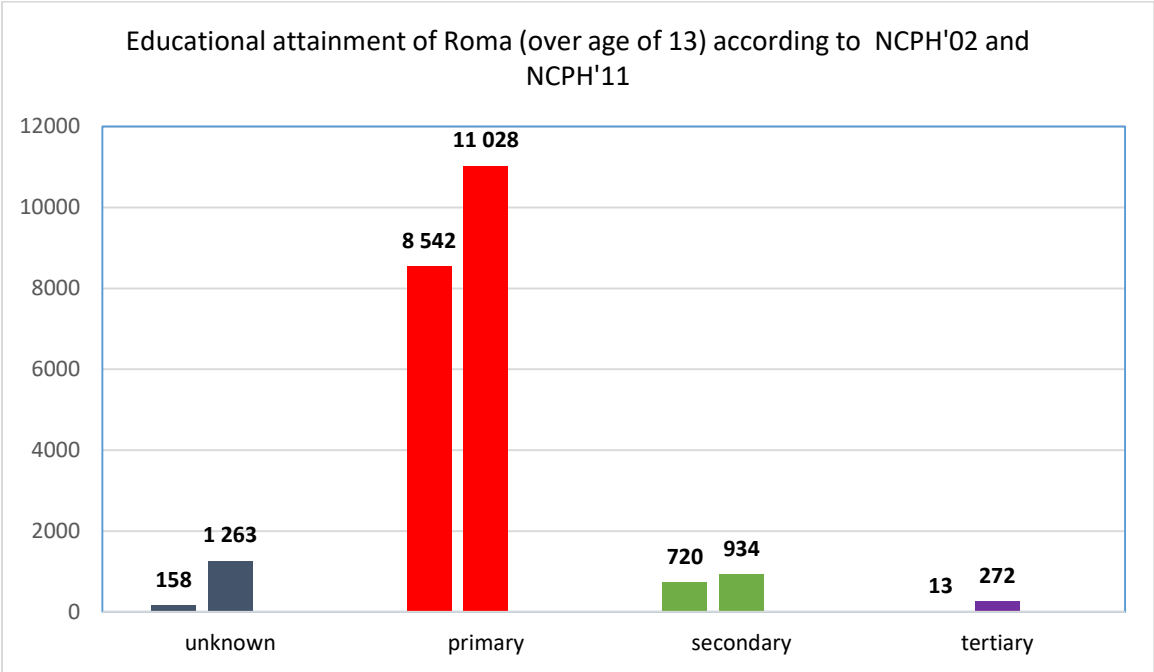
³²⁾ The 2019 mid-term review reduced the value of the ratio from an initial 28% to 20%.

2. Diagnosis of the situation of the Roma in Poland

2.1. The socio-economic characteristics of the Roma community in Poland according to the 2002 and 2011 censuses

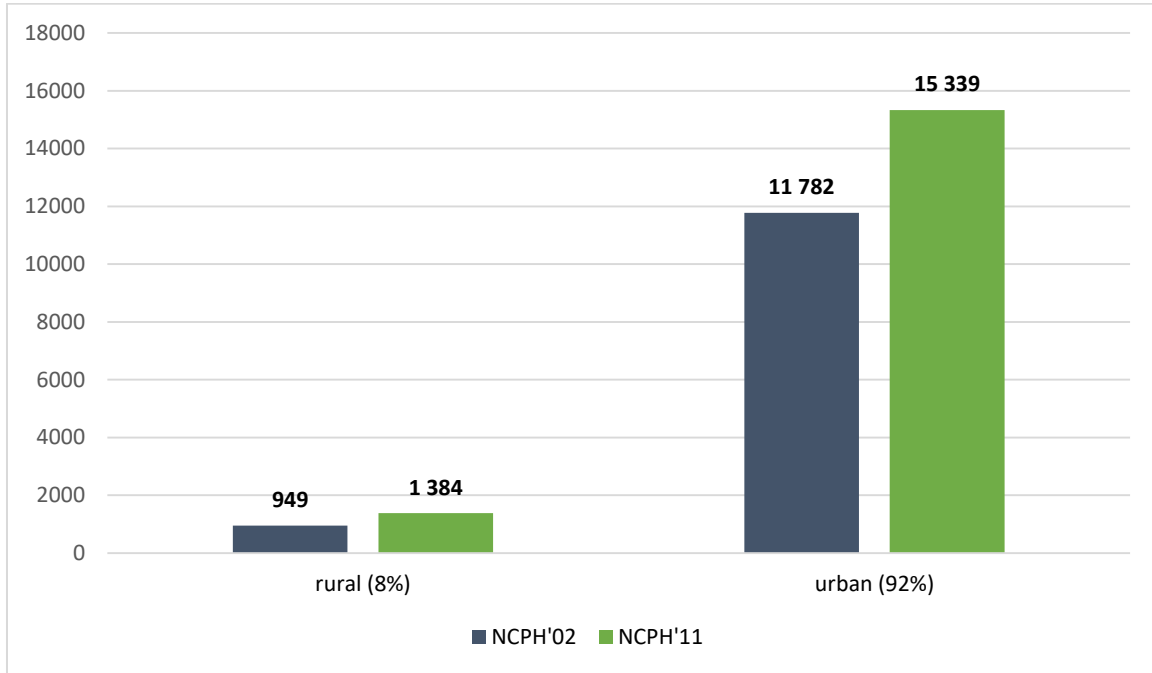
The Roma in Poland are the least educated group (Figure 26). The negligible percentage of people, mostly young people, with higher educational attainment (result of measures aimed at promoting education undertaken in previous years) shows that this narrow group cannot serve as a basis to build a model. The so-called Elders are still a group of crucial importance, and it is one least educated, often harbouring prejudices towards formal education, solidified by bad past experiences taken away from schools ill-adjusted to accommodate any form of cultural diversity, including linguistic.

Figure 26. Educational attainment according to NCPH'02 and NCPH'11



Unlike in many countries in the region, in Poland the Roma are urban settlers (Figure 27), which is an important factor enabling them to freely access public services. Therefore, their non-presence in education, healthcare, labour market, etc. is not caused by lack of physical access to infrastructure and the services market, as is the case in other countries in the region. Moreover, their relatively small numbers and a somewhat even dispersion throughout the country are not causing the problem of 'ghettoisation', or high concentration in small areas. In isolated cases, however, such concentration occurs with all its negative consequences. Therefore, in the area of housing-related measures this will be the focus of the present strategy.

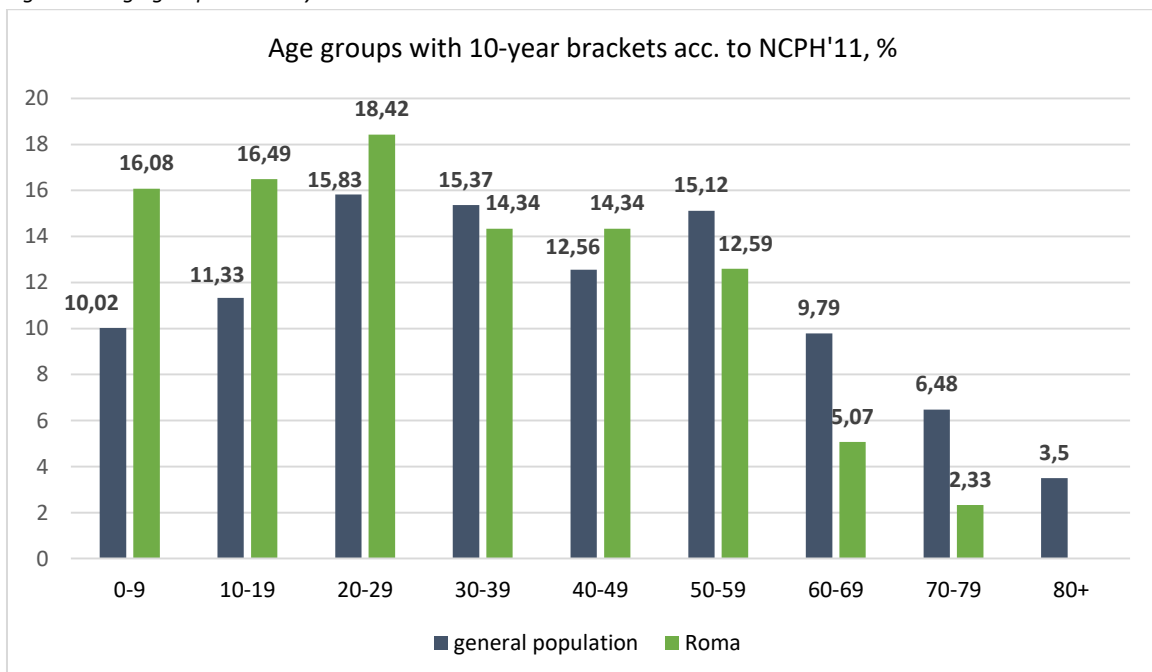
Figure 27. Nature of cities inhabited by the Roma



The analysis of age groups shows that the Roma are the youngest community in Poland (and in Europe), characterised by significantly shorter life expectancy rates (Figure 28).

It follows that failure to take action with regard to children and young people in particular – on account of the more rapid succession of generations in this group – will exacerbate the problem of exclusion in the near future. Roma children and youth are therefore a group assessed as in need of particular support under this strategy.

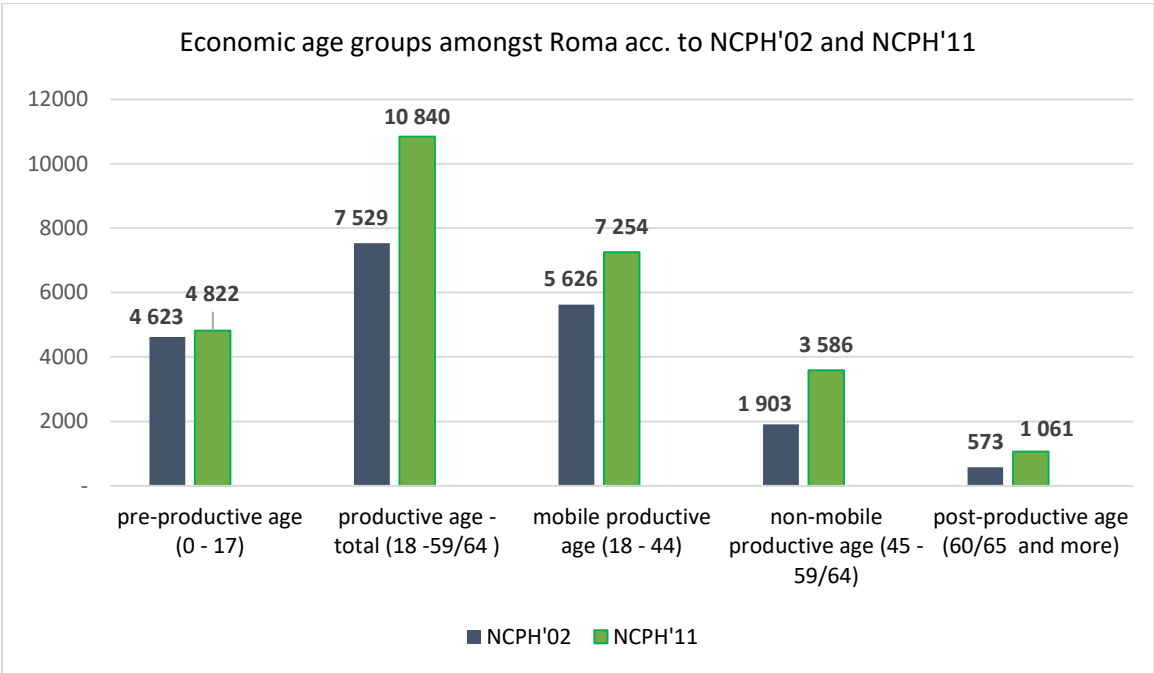
Figure 28. Age groups with 10-year brackets



Economic age groups

The Roma group’s low average age and shorter average life expectancy mean that the largest proportion of the Roma population is made up of working-age individuals (Figure 29). A natural need arises to intensify measures aimed at rapid acquisition and improvement of professional qualifications and support for the process of transition from the education system to the labour market, e.g. through vocational education. This is crucial with regard to a group in which tradition dictates that families should be started at a relatively young age, so rapid acquisition of vocational education will allow for gaining professional qualifications enabling economic independence. In addition, the impact of the COVID-19 outbreak at the beginning of 2020 negatively affected the labour market, which tends to affect the least educated groups. For the Roma, vocational education may prove as an attractive safeguard against unemployment, whilst for the market it can strengthen, for example, the services sector, badly affected by the pandemic.

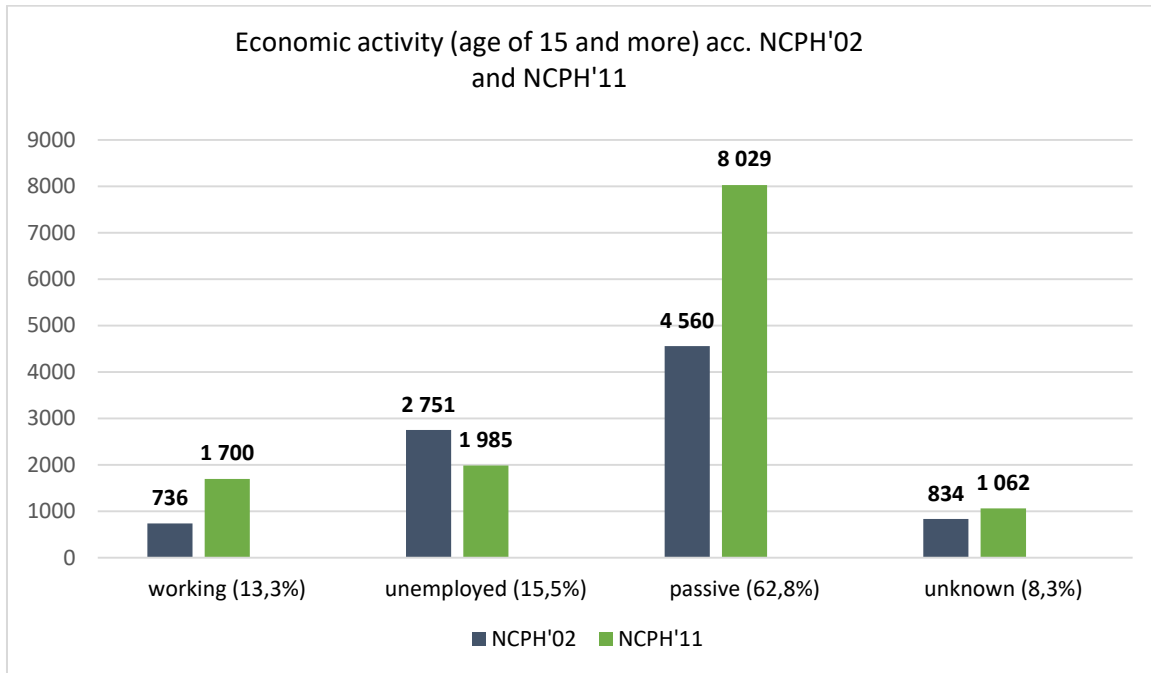
Figure 29. Economic age groups amongst the Roma



The previously mentioned long-term high level of unemployment in Poland was one of the factors preventing people with the lowest education level and limited professional qualifications from entering the labour market. The census data (Figure 30) shows a small percentage of employed persons (13.31%), a similar percentage of unemployed persons (15.54%) and a large percentage of inactive persons (62.58%)³³⁾. At the same time, the latter may indicate the extent of the so-called shadow economy in the group. This, in turn, is indicative of challenges related to the labour market, including the difficulty of transitioning from the shadow economy to legal employment. The shadow economy attracts the group not only because the income is not taxed or is hidden in the context of social care, but also because illicit work makes it possible to obtain higher income, does not require formalities or proof of education and professional qualifications.

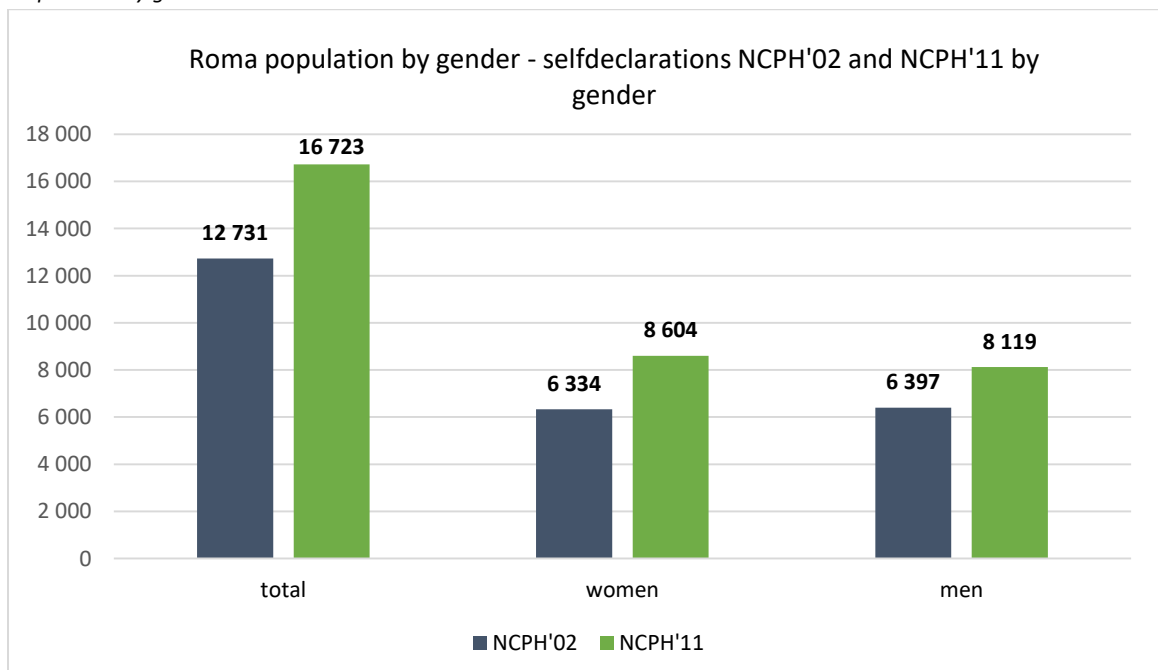
³³⁾ Percentages refer to NCPH'11 data.

Figure 30. Economic activity



Gender proportions in this group are similar to other groups – with a slight predominance of women (Figure 31). Roma women and girls are a group assessed as in need of particular support under this strategy because of their exposure to multi-sectoral discrimination, domestic violence, etc. It is a paradox of sorts – observed both in Poland and in other countries in the region – that in spite of the nature of the Roma culture being clearly patriarchal and gerontocratic, in practice it is possible to observe a particular involvement of women in projects implemented under previous strategies. Women represent the majority of working RSM (74%)³⁴⁾ and the majority of Roma pupils (67%).

Figure 31. Population by gender



³⁴⁾ As of January 2020.

2.2. Evaluation of support aimed at the Roma community in Poland under OP KED and other implemented programmes targeting the Roma

In 2019, the MRPiPS commissioned an evaluation of the effectiveness of programmes targeting the Roma, with a particular focus on *Measure 2.7* of the OP KED³⁵⁾. The *Integration Programme for 2014–2020* was also evaluated in the terms of complementarity between the two measures.

The general evaluation conclusions pertaining to the *Integration Programme for 2014–2020* are as follows:

- the evaluators considered the *Integration Programme for 2014–2020* as an intervention featuring a potentially more effective formula for combating the social exclusion of the Roma community than *Measure 2.7*, which is only complementary; therefore, similar measures should be continued,
- the *Integration Programme for 2014–2020* is perceived by its beneficiaries, both institutional applicants (LGUs) and non-governmental organisations (NGOs), as well as by the Roma, as broader, more flexible and better adapted to the (relatively limited) competences of Roma entities, and enabling quick responses to the specific deficits of this group,
- the *Integration Programme for 2014–2020* helped shape the capacity of OP KED applicants, which programme in turn creates opportunities for the Roma to take the next step towards entering the labour market,
- at the local level, not a single case of synergy effects was noted between the OP KED projects and the measures of the *Integration Programme for 2014–2020*, which would amount to a local Roma integration policy; this is due to, among other things, unfamiliarity with *Measure 2.7* of OP KED among LGUs and their limited interest in improving the situation of the Roma; the evaluation explicitly mentions LGUs' insufficient involvement in measures aimed at the Roma: *some LGUs may even be considered to be ignoring the needs of the Roma*³⁶⁾,
- final beneficiaries favourably evaluate the *Integration Programme for 2014–2020* in terms of its orientation towards community/family, absent in the OP KED, which targets individual professional development,
- the evaluation highlights the significant role of the RSM (an institution developed under previous government integration programmes) in the integration process.

The evaluation conclusions, pertaining to OP KED projects and the final beneficiaries in general (the Roma) in the context of integration measures' effectiveness, which should be taken into account in the development of subsequent measures, are as follows:

- a group of regular and repeat participants in ESF projects has emerged (approx. 25% of participants), yet while participation for a second time significantly improves employability, a third one does so only slightly; participants are characterised by greater openness to contacts with the non-Roma world, as observed among young women in particular,
- the profile of Roma participants in OP KED projects differed from the average of the whole Roma population: on average, they were better educated and a higher share of their children

³⁵⁾ *Evaluation of support aimed at the Roma community in Poland under OP KED and other implemented programmes targeting the Roma. Final report*, Warsaw 2019; the evaluation was carried out by the company *evalu 2004–2016 Agrotec Polska*; the figures quoted refer to data from the surveys conducted among OP KED projects' participants; 29 projects with 1,568 identified participants were analysed (according to ESF rules, if the same participant took part in two projects, they are counted as 2 participants; the number of unique users was 1,164 and the final number of those participating in the analysed projects was 1,113. The survey sample was n=300.

³⁶⁾ *Ibid.* p. 121.

participated in school education (with a lower number of children on average); therefore, it can be concluded that OP KED support does not reach those who are most in need (the least educated, with an above-average number of children, inactive, etc.),

- for large families participating in the projects, possible employment is not on competitive footing with available social and family benefits,
- there was no reported independence of project participants from social assistance benefits; according to 82% of respondents, at the beginning of their participation in the project, they or other persons in their household were receiving benefits (benefits, pension or 500+), and 85% of respondents confirmed having received benefits in the month preceding the survey,
- although the evaluation explicitly confirmed that the Roma still required an intermediary's assistance in their contacts with the majority community, the institution of a job assistant, very highly valued by the participants (including the entities in charge) of the projects, contributed to the effective recruitment and participation of the final beneficiaries (the Roma) on the one hand, while on the other hand, it made them dependent on the assistant's help even after the project's completion,
- a narrow group of entities participating in ESF-funded projects emerged: applications are submitted by training companies specialising in obtaining funds and by non-governmental organisations (non-Roma), which participated in the previous OP HC; the 29 applications analysed as part of the evaluation were submitted by 18 entities, and the number of key contact persons was 16,
- the beneficiaries' activities are based on successive projects addressed to the Roma, implemented by organisations that the participants are already familiar with; some participants did not become independent from the support: in their case, project initiators remain a link to the world of education and work, meaning that the integration objectives were not met,
- the evaluation indicates the need to send participants to different mainstream courses and vocational training instead of training them in homogeneous Roma groups,
- the majority of project participants work in the shadow economy; another issue is the participants' accounts, often seized by bailiffs,
- cases of near-overlap, according to the evaluators: relations between OP KED and Regional Operational Programmes (e.g. Social Assistance Centres' projects) are varied: from competing for participants to cooperating,
- OP KED Roma-centric projects had a weakness – lack of analysis of local labour markets; in the evaluators' opinion, improvement in this area is desired,
- the evaluation explicitly formulates the need to train the staff of psychological and pedagogical counselling centres to better diagnose multilingual and multicultural children (including Roma children), as well as to take measures to prevent Roma pupils from dropping out of the educational system, to solve problems connected with them dropping out of the educational system and to implement measures supporting Roma youth in acquiring a profession,
- the evaluation highlights the potential of social workers working with the Roma, whose knowledge and understanding of their environment should be drawn on in future interventions,

- the evaluation's results, similarly to the results of the 2011 evaluation of the *Programme for the Roma community in Poland for 2004–2013*³⁷⁾, indicate that a change in the approach of the Roma to health issues and that this area does not require specific interventions, apart from pro-health education related to the promotion of a healthy lifestyle; unhealthy lifestyles should be noted as a dominant pattern in this community (diet rich in fats and sugars, lack of physical activity, smoking), resulting, among other things, in obesity (also related to poverty) and related diseases, as well as a significantly shorter average life expectancy of this population,
- poor education is a barrier to obtaining many qualifications; pathways to support entry/return to formal education are needed,
- the evaluation emphasises interest in entrepreneurship and self-employment, as paid work for non-Roma entrepreneurs is less attractive from the perspective of the final beneficiary (the Roma),
- measures are necessary to encourage employers to hire the Roma,
- employment is characterised by impermanence, which is typical for people with low qualifications; the prospects of gaining permanent employment are negatively influenced by the effect of work being substituted by internships, both among employers (large number of interns, with remuneration from projects) and final beneficiaries (internship perceived as gainful employment, waiting for the next project/internship instead of seeking employment on the market),
- the declared reason for not seeking internship/employment opportunities is most often (and only in the group of women) the obligation to care for dependant persons,
- the identified barriers for the Roma on the path to employment are internal cultural factors: low perceived value of formal education, limited willingness to enter non-Roma environments, a different sense of time (which affects e.g. planning), unrealistic – given their educational level – salary expectations, which is related to the amount of benefits received, exceeding the salaries offered; external factors include the majority's attitudes towards the group,
- only 6% of participants did not seek employment due to the belief that as Roma they would not get hired.

This last finding of the evaluation contradicts the (overused) claim that the passivity of Roma in seeking employment is mainly due to negative experiences in contacts with employers. An analogous conclusion can also be drawn from the FRA survey mentioned above, in which a similar percentage of Roma (an average of 5%) claim that their reason for not seeking employment is the refusal to hire them on account of 'being Roma'³⁸⁾. It is important to be aware that the claim related to 'denying employment on ethnic grounds', regardless of the difficulty of verifying the degree of its accuracy, triggers inactivity among the Roma and can serve as an easy excuse for not attempting to change their situation.

³⁷⁾ Final report from the evaluation study of the 'Programme for the Roma community in Poland', carried out as part of the project 'Quality – the improvement of functioning of the Roma Programme', commissioned by MSWiA and carried out in 2011 by the Evaluation Centre, Non-Governmental Evaluation and Development Agency and the Office for Support of Social Initiatives BORIS.

³⁸⁾ <https://fra.europa.eu/en/publications-and-resources/data-and-maps/survey-discrimination-and-social-exclusion-roma-eu-2011>

2.3. Information of the Supreme Audit Office on audit results: Implementation of tasks under the Programme for the Integration of the Roma Community in Poland for the period 2014–2020 by municipalities from the Małopolskie Voivodeship³⁹⁾

According to the Supreme Audit Office, the *Integration Programme for 2014–2020* is rather yet another element of social and material assistance for the Roma community, reinforcing the attitudes of entitlement among members of this community, instead of encouraging the Roma to become more involved in the different areas of social life. The Roma happily agree to be included in projects that provide direct material benefits, but they are generally not interested in tasks that require their engagement, such as children’s participation in extra-curricular activities, attending courses to improve their professional qualifications, or permanent employment.

In the opinion of the Supreme Audit Office, although the disbursement of public funds under the *Integration Programme for 2014–2020* took place in accordance with the applicable provisions, the municipalities’ measures targeting the Roma community were not fully effective, even though in the audited municipalities the number of Roma is only 827 people, which represents between 0.5% and 1.3% of the municipalities’ population. Moreover, in the case of some municipalities, a significant part of the funds at the disposal of social care is allocated to benefits for Roma in particular, and their amount (approx. PLN 6 million) exceeded the amount of funds for the implementation of tasks under the *Integration Programme for 2014–2020* (approx. PLN 4 million). Regardless of these disparities, indicating a pressing need for corrective action, none of the audited municipalities developed a local programme for the social integration of the Roma. The tasks carried out by municipalities were of an *ad hoc* rather than systemic nature. In 7 out of 9 audited municipalities, no unit responsible for the coordination of tasks related to the community was designated.

In the *Education* area, no visible improvement in children’s attendance and academic performance has been achieved, e.g. the average of grades received by Roma pupils ranged between 2.3 and 3.0, including in the Polish language class – between 2.0 and 2.7. Above all, implemented tasks resulted in improving the financial status of Roma pupils. Municipalities do not implement (or do not effectively implement) measures to enforce compulsory school attendance among Roma pupils (e.g. in the Łącko municipality 23 pupils did not fulfil their schooling obligation). Pre-school education for Roma children needs to be intensified.

In the *Work* area, employment opportunities offered were incidental and concerned mainly temporary work.

With regard to measures in the *Health* area, the audited entities indicated a lack of interest in such forms of care (e.g. a health visitor) on the part of the Roma community.

The Supreme Audit Office criticised the purchase of real estate on behalf of Roma families in a municipality other than the applying one. The Office recommends clarifying provisions concerning such a solution.

³⁹⁾ The audit for the period between 2014 and September 2016 was conducted in 9 municipalities of the Małopolskie Voivodeship: Krościenko nad Dunajcem, Limanowa, Łącko, Nowy Targ, Ochoznica Dolna, Szaflary and the urban municipality of Limanowa. Although it concerned a specific voivodeship (with the largest number of economically disadvantaged Roma), its conclusions are largely transferable to other voivodeships and municipalities.

It recommends linking measures to specific obligations of beneficiaries, e.g. educational support to fulfilling the schooling obligation, housing aid to participation in vocational courses, etc.

2.4. Fourth Opinion on Poland of the Council of Europe Advisory Committee on the Framework Convention for the Protection of National Minorities⁴⁰⁾

In its opinion, the Advisory Committee's recommendations for immediate action point to the need to: continue the national strategy; increase the number of RSMs in schools and increase their salaries; increase the participation of Roma children in education, especially in secondary education. One of the barriers identified is early marriage and the limited participation of Roma children in pre-school education.

The Committee notes that the *Programme for the Integration of the Roma Community in Poland for the period 2014–2020* brought about clear benefits. At the same time, it points to the need to strengthen consultation mechanisms at local level.

The Committee emphasises the need to collect disaggregated data on housing and employment. It identifies the situation of the Roma in Maszkowice as requiring urgent intervention.

2.5. Consultation meetings on the experiences from the implementation of the Integration Programme at the voivodeship and local level

In the course of consultation meetings with the participants of the previous programmes and the Voivodes' Plenipotentiaries for National and Ethnic Minorities, it was agreed that the main shortcomings in the implementation of the support systems for the Roma stem from:

- lack of a systemic approach to the issue at local level,
- late transfer of funds to project implementers (task implementing bodies) by the Ministry of Finance,
- limitation of the deadline for implementing the task for projects financed by the Ministry of National Education,
- restricting the transfer of funds as part of increased school education subsidy directly to schools attended by Roma children.

The procedure is evaluated positively, even with regard to less experienced Roma organisations⁴¹⁾, however, the application form requires adjustment.

2.6. SWOT analysis of previous measures for the Roma

Summarising the experience of implementing the *Integration Programme for 2014–2020*, drawn both from the comments of the implementers (task implementers), as well as from audits and independent

⁴⁰⁾ Adopted on 6 November 2019; Polish language version is available on the website of the Council of Europe at: <https://rm.coe.int/4th-op-poland-pl/1680998acb> and the website of MSWiA at: <http://mniejszosci.narodowe.mswia.gov.pl/mne/prawo/konwencja-ramowa-rady/raporty-dla-sekretarza/-ivreport/10989,IV-Raport-dla-Sekretarza-Generalnego-Rady-Europy-z-realizacji-przez-Rzeczpospoli.html>

⁴¹⁾ Art Foundation Jaw Dikh, *Civil Society Monitoring Report on implementation of the national Roma integration strategies in Poland. Focusing on structural and horizontal preconditions for successful implementation of the strategy*, June 2018, p. 12; report prepared for the EC, p. 16.

evaluations, it is important to note the following conclusions, which are reflected in the measures envisaged by 2030.

Figure 32. SWOT analysis of the Integration Programme for 2014-2020

<p>Strengths:</p> <ul style="list-style-type: none"> ▪ improvement in the educational situation, ▪ creation of the RSM network and establishing this function as an official profession in Poland, ▪ improvement in the participation of Roma pupils in pre-school and primary education, ▪ lower population of Roma pupils in special schools, ▪ Roma empowerment and active citizenship, ▪ embedding this ethnic group permanently in the agenda of various public institutions. 	<p>Weaknesses:</p> <ul style="list-style-type: none"> ▪ low educational attainment; in spite of implemented measures, the average of grades is in the vicinity of acceptable, ▪ lack of effective involvement of many LGUs in systemic measures targeting the Roma; this lack of involvement was reflected in missing local, systemic strategies, despite the fact that – according to the Supreme Audit Office’s report – municipalities understand the group’s situation very well; the plus side of previous measures under the <i>Integration Programme for 2014–2020</i> is their orientation towards family; this approach will be maintained in the upcoming years, ▪ the need to identify specific measures aimed at specific support groups, that is Roma women and girls, Roma youth and RSMs, ▪ the same group of participants can be explicitly observed in the <i>Integration Programme for 2014–2020</i> and measures under ESF projects. On the one hand, this implies the existence of a group actively seeking support, while on the other – the need to seek out and activate other members of this community and involve them in measures as more than passive recipients, ▪ the so-called ‘benefit trap’ may be limiting pro-professional activity, especially among large families, ▪ special attention should be paid in the implementation of the measures to ensure that RSMs or functioning community mediators do not become ‘independence crutches’, absolving the local Roma community from seeking existing opportunities on their own: a mediator is there to help – not act in their stead, ▪ duplication of existing mainstream services through the implemented measures should be avoided – instead of measures ‘for the Roma’, access to them ought to be facilitated, ▪ the shadow economy remains a challenge; vocational training and the services sector, which can serve as an incentive for economic activity, especially for the youngest generation, remain a remedy for reducing this phenomenon over time, ▪ the issue of improving housing conditions requires clarification in cases of purchasing properties in another municipality.
<p>Opportunities:</p> <ul style="list-style-type: none"> ▪ the Roma’s interest in continuing the Programme, ▪ the experience and network of partners acquired to date, 	<p>Threats:</p> <ul style="list-style-type: none"> ▪ weakening of the economy due to the COVID-19 pandemic and the reduction of the state’s budgetary capabilities, ▪ lack of LGUs’ sufficient involvement in measures targeting the Roma,

<ul style="list-style-type: none">▪ monitoring of the Roma's situation by international organisations and exchange of experience at international level,▪ further gradual improvement in the education situation,▪ creating a system for standardising RSMs' work,▪ increasing Roma cultural awareness and active citizenship,▪ improving their housing situation.	<ul style="list-style-type: none">▪ passive attitudes of the Roma community,▪ lack of innovation in the approach to solving the group's problems.
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3. Public policies relevant in the context of measures targeting the Roma

The *Integration Programme for 2021–2030*, coordinated by MSWiA, covers the main areas of intervention with the aim of integrating the Roma community in Poland, namely the broader notion of education and improving the housing situation of families living in sub-standard housing conditions.

Independent of the *Integration Programme for 2021–2030* under the mandate of other state authorities, there are issues equally important for the functioning of the group's representatives in social and economic life.

3.1. Social policy

The policies that have contributed to the greatest extent to improving the situation of the Roma community in recent years include:

- the government's pro-demographic programme *Family 500+* (operating since 2016), which grants a monthly benefit of PLN 500 (approx. € 117)⁴²⁾ per child; the Roma became its relatively largest beneficiaries on account of their large family model,
- the government's programme *Good start* (operating since 2018): a benefit of PLN 300 (approx. € 70)⁴³⁾ granted once a year per child up to the age of 20 (or 24, if they have a disability certificate),
- the government's programme *Mother 4+* (since 2019), under which mothers who gave birth to and brought up at least four children will be entitled to a so-called 'parental supplementary benefit' (in practice: the equivalent of the lowest pension). This programme fundamentally changes the situation of Roma women who often have no chance of earning a pension due to the phenomenon of early marriage.

In order to have a complete picture of the Roma's situation in Poland, the state agencies listed below will present relevant information to the minister competent for religious denominations and national and ethnic minorities. Representatives of these authorities sit on the Joint Commission of Government and National and Ethnic Minorities and its sub-committee, namely the team for Roma affairs, therefore, Roma integration issues do not constitute new tasks for these institutions. On the other hand, the structuring and inclusion of systematic exchange of information on the Roma in the data and information collection mechanism of the DWRMNiE is a novelty compared to previous integration programmes.

3.2. Labour market

Measures under structural funds, in particular the 2021-2027 European Social Fund, hereafter referred to as 'ESF+', remain the main policy tool for Roma professional activation. The *Integration Programme for 2020–2030* meets the basic requirement for ESF+ concerning the preparation of a strategic framework for the integration of the Roma community in Poland. In accordance with the EC

⁴²⁾ For the purposes of this document the average exchange rate of EUR for 2016–2019, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.26.

⁴³⁾ For the purposes of this document the average exchange rate of EUR for 2018–2019, based on the rates of the National Bank of Poland, was determined at EUR 1 = PLN 4.24.

recommendation and the model of support for the Roma community developed in Poland in previous programming periods (under the Operational Programme Human Capital in 2007–2013 and the Operational Programme Knowledge Education Development in 2014-2020), ESF+ funds will be complementary to the measures of the *Integration Programme for 2020-2030* with regard to integration, active participation, promotion of equal opportunities and socio-economic and professional activation of excluded persons or persons at risk of social exclusion, including the Roma.

The authority in charge of ESF+ funds for the professional activation of the Roma in the 2021-2027 perspective will report data on the use of funds for the support of the Roma community to the Ministry of the Interior and Administration on a yearly basis.

3.3. Safety – crimes on the grounds of intolerance, xenophobia and hate

Hate crime monitoring⁴⁴⁾ is carried out, among others, by the National Police Headquarters. Meanwhile, the Ministry of Justice monitors the number of relevant court judgements. Both institutions will provide the DWRMNiE with statistics on the aforementioned crimes against the Roma minority on a yearly basis.

For many years, Polish Police has pursued an active policy of raising officers' awareness of issues such as human rights, organising training courses on relevant topics (or participating in them), and the plenipotentiaries for the protection of human rights established within the Police structures cooperate with Voivodes' Plenipotentiaries. The National Police Headquarters also conducts activities, including training, aimed at increasing the effectiveness of prosecution of hate crimes committed on the grounds of national, ethnic and racial differences, among others. Each year, the National Police Headquarters will provide the DWRMNiE with information on the measures implemented in this area and training on respect for human rights and non-discrimination of persons belonging to the Roma community as well as effective prosecution of hate crimes against this group. In light of the long-standing good practice of mutual participation in training on national and ethnic minorities, cooperation between the above-mentioned plenipotentiaries should be maintained at central, regional and local level.

Furthermore, it is worth noting that according to the Roma, the relationship between the community and the Police clearly improved: *Roma NGOs and Roma leaders did not report cases of negative, discriminatory actions by the Police, prosecutors or judges. According to the Roma (mainly from the Małopolska region), community police officers working in their areas treat them well and are helpful*⁴⁵⁾.

3.4. Free legal assistance system

A publicly funded system of free legal assistance, provided in points established for that purpose by starosts, has been in operation since 1 January 2016⁴⁶⁾. The assistance points are run by attorneys advocates or attorneys-at-law and non-governmental organisations. The aim of the Act is to ensure access to basic legal services to a group (of beneficiaries) which, because of its financial situation or situation in life, is unable to receive professional legal assistance at the pre-litigation stage.

⁴⁴⁾ Articles: 118 §1, 118 §2, 118 §3, 118a §1, 118a §2, 118a §3, 119 §1, 126a, 126b §1, 126b §2, 195 §1, 195 §2, 196, 256 §1, 256 §2 and 257 of the Act of 6 June 1997 – Penal Code (Journal of Laws of 2020, item 1444, as amended).

⁴⁵⁾ Ibid. p. 19.

⁴⁶⁾ Act of 5 August 2015 on free legal assistance, free civil counselling and legal education (Journal of Laws of 2020, item 2232).

As of 1 January 2019, due to the amendment of the aforementioned Act:

- the scope of free legal assistance was extended (the possibility of drafting a letter in preparatory, administrative, court or court and administrative proceedings was introduced),
- new free-of-charge assistance services were introduced: free civil counselling (beneficiaries receive assistance in a way that is understandable to ordinary citizens, including with official activities or with solving life problems, e.g. with paying off loans or getting out of a vicious cycle of debt),
- free mediation was introduced,
- the group of beneficiaries of free assistance was extended (any natural person is entitled to receive free assistance, as well as any sole trader (as of 16 May 2020) who submits a written statement that they are not in a position to bear the costs of paid legal assistance),
- the system of providing free assistance services was improved (after making an appointment by phone or e-mail, assistance services are provided in the points on a 'first-come, first-served' basis; on-call duty in the points lasts at least 4 hours a day, 5 days a week on average),
- legal education in every poviát (non-governmental organisations providing free legal assistance or free civil counselling were obliged to organise educational campaigns at least once a year),
- access to the system of assistance services for people with physical disabilities and communication difficulties was facilitated,
- the highest standards of service were guaranteed (through a multi-level system of internal quality control, inspections by Poviát Starosts' Offices, Voivodeship Offices and supervision by legal local governments, satisfaction surveys),
- assistance services are integrated with other forms of free counselling (if a problem presented by a beneficiary cannot be solved in whole or in part by providing free legal assistance or civil counselling, the entity providing counselling is obliged to inform about the possibilities of obtaining other appropriate assistance in free counselling points included in the list drawn up by starosts, e.g. in psychological or pedagogical counselling centres or poviát family assistance centre).

Improved systemic support for legal and civil counselling is in line with the needs of the Roma community diagnosed during previous integration programmes by civil counselling offices. The needs concern mainly advice for people in debt, advice on housing matters, information on social security and counselling related to current important social problems.

This solution creates an opportunity for Voivodes' Plenipotentiaries operating in 16 voivodeships, cooperating with LGUs on the implementation of this strategy, to indicate the possibilities described above in the cases where the Roma are seeking free legal assistance.

3.5. Supporting culture

At the central level, Roma culture is supported in two ways: through grants from the Ministry of the Interior and Administration and the Ministry of Culture, National Heritage and Sport.

Ministry of the Interior and Administration

The Ministry supports the culture of the ethnic Roma minority by providing grants for the implementation of tasks aimed at protection, maintenance and development of cultural identity of national and ethnic minorities and the maintenance and development of the regional language, as referred to in Article 18(2) of the Act of 6 January 2005 on national and ethnic minorities and on the regional languages (Journal of Laws of 2017, item 823).

It regularly provides grants of a subjective nature (for the day-to-day operation of Roma minority NGOs) and of a targeted nature (to support specific projects carried out for the benefit of the minority). Occasionally, grants are also provided for investments, subject to the receipt of applications and the availability of appropriate budgetary resources⁴⁷⁾.

Examples of recurring tasks supported by the Ministry of the Interior and Administration and aimed at the protection, maintenance and development of cultural identity of the Roma minority are as follows:

1. *Szlakiem Martyrologii Romów [Roma Martyrology Trail]* – implemented by Integracyjne Stowarzyszenie SAWORE (a total of approx. PLN 80 thousand in 2015–2020),
2. *Roma Culture Days* – implemented by the Association for the Roma Community ‘Zefiryn’ (a total of approx. PLN 56 thousand in 2017–2020),
3. *International Roma Holocaust Remembrance Day* – commemoration of anniversaries of the liquidation of the *Zigeunerlager* – implemented by the Association of the Roma in Poland (a total of approx. PLN 369 thousand in 2015–2020),
4. *International Meetings of Gypsy Groups ‘Romane Dyvesa’* – implemented by Stowarzyszenie Twórców i Przyjaciół Kultury Cygańskiej im. Papuszy [Papusza Association of Creators and Friends of Gypsy Culture] in Gorzów Wielkopolski (a total of PLN 592 thousand in 2015–2020),
5. *Days of Roma Culture in Kraków* – implemented by the ‘KAŁE JAKHA’ Society for the Promotion of Roma Culture and Tradition (a total of approx. PLN 525 thousand in 2015–2020),
6. *Publishing of the Roma newspaper ‘Romano Atmo – Cygańska Dusza’ [Gypsy Soul]* – implemented by the Polish Roma Union (a total of approx. PLN 721 thousand in 2015–2020),
7. *Cztery strony świata [Four corners of the world]* – implemented by the Counselling and Information Centre for the Roma in Poland (a total of approx. PLN 152 thousand in 2015–2020),
8. *Biesiada cygańsko-słowiańska połączona z konkursem piosenki [Gypsy-Slavic festival and song contest]* – implemented by the Royal Roma Foundation (a total of PLN 325 thousand in 2017–2020).

In total, under part 43 of the state budget, currently administered by the Minister of the Interior and Administration, 209 grants in the total amount of nearly PLN 6.6 million were provided for the implementation of the above ‘cultural tasks’.

Ministry of Culture, National Heritage and Sport

Within the framework of its statutory tasks, the Ministry supports cultural projects on a yearly basis, including those implemented by Roma minority organisations.

⁴⁷⁾ In 2018, for example, the Association of the Roma in Poland received a grant for the implementation of a task entitled ‘Adaptation of ground floor rooms for the Roma Historical Institute archive, additional exhibition halls and break rooms – continuation of a task’ in the amount of PLN 388,790.

4. Programme for Social and Civic Integration of the Roma Community in Poland for 2021–2030

4.1. Introduction

Legal basis

Pursuant to Article 35 of the Constitution of the Republic of Poland, Polish citizens belonging to national or ethnic minorities are guaranteed the freedom to maintain and develop their own culture, as well as to participate in the resolution of matters connected with their cultural identity.

The Programme's legal basis is:

- 1) Article 18(1) of the Act of 6 January 2005 on national and ethnic minorities and on the regional languages, which imposes an obligation to support civic and social integration on state authorities:

1. Public authorities shall be obligated to take appropriate measures in order to support:
1) (...);
2) civic and social integration.
2. The measures referred to in paragraph 1 may, in particular, include special-purpose subsidies or core grants to finance:
10) other programmes accomplishing the purposes referred to in para. 1, in particular those carried out within the framework of multiannual programmes.

- 2) Article 136(1) and (2) of the Act of 27 August 2009 on public finance:

1. The Budget Act may establish, within the spending limits for a given fiscal year, the spending limits for multiannual programmes.
2. Multiannual programmes are established by the Council of Ministers to implement strategies adopted by the Council of Ministers, including in the area of state defence and security. When establishing a programme, the Council of Ministers appoints its implementing body.

Conditionality assessment

The Roma remain socio-economically disadvantaged, both within the EU and outside of it, including in candidate countries, and this has underpinned the inclusion of national Roma integration strategies as a condition for obtaining EU funding⁴⁸⁾ in the years 2014–2020. A similar assumption accompanies the next programming period for EU funds for the period 2021–2027⁴⁹⁾. In May 2018, the EC issued a Communication on the multiannual financial framework (MFF) 2021–2027 and proposed a legislative package for the Cohesion Policy and other funds for 2021–2027. It presents both the baseline conditions for the 2021–2027 Cohesion Policy objectives, as well as horizontal and thematic conditions. The fulfilment of horizontal conditions determines whether the entire Cohesion Policy intervention is triggered, while the fulfilment of thematic conditions is necessary to enable the co-financing of

⁴⁸⁾ Multiannual financial framework 2014-2020.

⁴⁹⁾ Multiannual financial framework 2021-2027.

measures that fall under a given policy's objective. National Roma integration strategies were listed as one of the conditions (4.5).

Compliance with strategic documents

The Integration Programme for 2021–2030 complies with the following state strategic documents:

- **The Strategy for Responsible Development for the period up to 2020 (including the perspective up to 2030)**⁵⁰⁾

The Integration Programme for 2021–2030 is directly in line with the objectives of Poland's main development strategy, which sets out the goals and directions of the country's development in the social, economic, regional and spatial dimensions. Included in this strategy are recommendations for public policies.

It assumes that social cohesion is the main driver of growth and a public priority, and that reducing income inequality is a prerequisite for economies achieving a sustainable and long-term prosperity.

Effective implementation of a comprehensive socio-economic policy is the ability to expand the development processes to include the broadest possible social groups. The main goal of the prosperity measures being drafted is to create conditions to increase Polish citizens' income while at the same time improving the social, economic, environmental and territorial cohesion. Social cohesion is defined as equal access to high quality social services, as well as equalising the level and conditions of employment. In the context of the Roma community, the measures under the *Specific Objective II* should be mentioned: *Socially-sensitive and territorially-balanced growth; Area: Social cohesion*.

A challenge indicated in the strategy for sustainable development, is providing support to those most in need and excluded from socio-economic life, one that focuses not only on redistributive measures, leading to the alleviation of income-related poverty, but, above all, measures aimed at activation, which lead to widespread participation in the different spheres of socio-economic life.

Increasing employability, through alignment of educational content and process with labour market expectations, is key to ensure social cohesion. This involves, among other things, making changes in the education system, including in particular vocational education and higher education, and adjusting it to the changing needs of the labour market and the country's economic conditions. This is important in the context of a changing employment structure – a drop in agriculture and industry jobs and an increase in jobs in the service sector, specialised services in particular. The demand for skilled workforce will prevail, while demand for simple, unskilled jobs will decline. In light of these phenomena, the development strategy assumes a new model of cooperation between vocational schooling and the economy, including through such means as education combined with vocational internship, active participation of businesses in preparing curricula, development of Centres for Practical Education, a modular educational offer, vocational courses offering necessary qualifications.

The expected result of implementing the *Strategy* will be an increase in the Poles' affluence and a reduction in the number of people at risk of poverty and social exclusion. Leaving the growing disparities in social development unresolved may, in the long run, lead to some groups being 'pushed

⁵⁰ Resolution No 8 of the Council of Ministers Resolution of 14 February 2017 on the adoption of the Strategy for Responsible Development for the period up to 2020 (including the perspective up to 2030) <http://prawo.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WMP20170000260>

out' from the development processes, which, in turn, may perpetuate their impoverishment and areas of social exclusion.

▪ **Integrated Skills Strategy 2030 (Ministry of National Education)⁵¹**

This strategy is a response to global trends that are causing changes in the organisation of work and the role of the employee, and the rapid obsolescence of existing skills. The Integrated Skills Strategy sets out a framework to increase educational, vocational and social activity across all social groups, particularly among those with low skills or at risk of social exclusion.

The overarching goal of the Integrated Skills Strategy is to create opportunities and conditions conducive to the development of skills that are required to strengthen social capital, social inclusion, economic growth and achieve high quality of life. Delivering on this goal is based on six priority areas, one of which directly refers to levelling the playing field in terms of access to opportunities for development and use of skills.

The strategy addresses the issue of raising the level of key skills in children, young people and adults, developing and disseminating a learning culture focused on active and continuous development of skills, and levelling the playing field in terms of access to opportunities for development and use of skills.

The *Integration Programme for 2021-2030* placing emphasis on continuing education, acquiring vocational skills, falls directly in line with the *Integrated Skills Strategy 2030's* goal of investing in matching skills to anticipated and current social and market needs.

▪ **National Programme for Social Economy Development until 2023. Social Solidarity Economy⁵²⁾**

The NPSED falls in line with such efforts as counteracting social exclusion and professional and social reintegration of people at risk of social exclusion. Social economy is defined as a sphere of civic and social activity, which through economic activity and activity of public benefit is used in such areas as professional and social integration of people at risk of social marginalisation, job creation, provision of public services (serving public interest) and local development. The NPSED draws attention to the fact that despite the beneficial changes that follow from the state becoming more involved in the fight against economic poverty, the phenomenon remains a significant social issue in Poland, although economic poverty is not only a result of unemployment. Indeed, it may also be one of its causes, reducing the capacity of those affected to adapt to the changing conditions on the labour market. Job offers on the market are sometimes inadequate for those at risk of social exclusion, e.g. on account of professional experience or the competence required. It is necessary to match the working conditions to the needs of those people and to ensure, alongside measures aimed at re-integration, that they have access to high quality jobs, which will serve as an incentive for taking up employment and holding onto it. The main objective is to make social and solidarity economy entities an important element of activation and social integration of people at risk of social exclusion and public service providers and bodies implementing tasks in the field of local development. One of the specific objectives is to increase the number of quality jobs in social enterprises for people at risk of social exclusion, and the assumed result is to increase employment of people at risk of social exclusion in high quality jobs in social enterprises and increase the representation of youth (aged 16–34) in social and solidarity economy

⁵¹⁾ <https://efs.men.gov.pl/wp-content/uploads/2019/08/Zintegrowana-Strategia-Umiej%C4%99tno%C5%9Bci-2030-cz%C4%99%C5%9B%C4%87-og%C3%B3lna.pdf>

⁵²⁾ <https://www.gov.pl/web/rodzina/dokumenty-programowe-i-strategiczne>

entities. The planned activities will aim at, among other things, social and professional reintegration and professional activation of inactive and long-term unemployed persons (including, in particular, youth from the so-called 'NEET category') in social and solidarity economy entities.

4.2. Objectives of the Integration Programme for 2021-2030

The main objective of the *Integration Programme for 2021–2030* is to increase the level of social and civic integration of the Roma in Poland.

The key tool for improving the level of the group's integration is broadly understood education. Without improving the level of education all actions carried out in other areas of community life will prove ineffective. One of the factors supporting education is the improvement of housing situation for the most vulnerable families, living in poor conditions that are, above all, a hazard to their life or health. Social and civic integration is also achieved by ensuring the participation of the Roma in consultation and decision-making processes at all levels and by promoting implemented measures, which in effect helps reduce the level of social distance towards the group.

Generalisations about the Roma, while necessary for the purposes of this document, may contribute towards obscuring the specific situation of the different Roma groups and the regions in which they live, as well as towards an unjustified transfer of conclusions from group correlations to correlations at the level of individuals. This is why local diagnoses characterising this minority, carried out by social welfare centres, schools, non-governmental organisations, and the participation of the interested parties themselves in their systematic updating, adjusted to the local specificity, play such an important role in designing measures to integrate the Roma community. Projects must be adapted to local realities, as the Roma are not a homogeneous group: they come from different backgrounds with different customs and dialects, display varying degrees of social and civic integration, function in diverse local communities, etc.

4.3. Areas of intervention

It is an integration programme and, therefore, by definition the projects may and should also include representatives of the majority community, alongside the Roma. The scale and scope of participation of the general population's representatives as beneficiaries of the measures depends on the area of intervention (e.g. in the case of such educational activities as excursions, camps, etc. – participation of non-Roma children should be ensured; in the case of renovations – renovation of the so-called common areas of buildings should also be part of a project; in the case of activities concerning e.g. pro-health and pro-employment education – non-Roma participants, persons from the Roma environment, may take part in them, as the aim of the programme is social and civic integration and not perpetuation of 'ghettoisation' and isolation of this group). Some tasks may be targeted mainly at the Roma – ones that correspond to the deficits specific to this group. This strategy does not determine the percentage participation of the Roma and non-Roma in projects in each area, since it obviously varies depending on the type of area and the location of the project, and should therefore be based on the best knowledge of officials and other participants in the *Integration Programme for 2021-2030* and on an analysis of local needs and opportunities, and should be within the scope of rational and efficient use of public funds. The measures of the *Integration Programme for 2021-2030* cannot perpetuate mutual isolation between the Roma and the local community and cannot lead to local social tensions.

The measures listed in this *Integration Programme for 2021-2030* are not a closed catalogue and may be supplemented by other measures meeting the objectives of the *Integration Programme for 2021–2030*. The substantive adequacy of an application will be verified at the level of Voivodeship Offices, Voivodeship selection boards and the Ministry of the Interior and Administration.

4.3.1. Area of intervention: Education

Objective: increasing Roma participation in education

In light of the information presented in the *Introduction*, education remains a priority issue for the *Integration Programme for 2021–2030*. In spite of the measures implemented in previous years – remedial classes, improved attendance, purchase of textbooks – the average of grades received by Roma pupils did not increase⁵³⁾, and the percentage of pupils dropping out of the school system at secondary level remains unchanged and encompasses almost the entire population aged 15-18.

This area is broadly defined in the *Integration Programme for 2021–2030* and includes, aside from supporting the formal education of Roma children and youth, their informal education as well. Educational measures should also be aimed at adult Roma, as part of lifelong learning. Measures in this area should focus specifically on:

- ensuring the fulfilment of the obligation of compulsory education/schooling until the age of 18,
- ensuring the fulfilment of the obligation of pre-school education by all Roma children and making this education generally accessible to children aged 3–5,
- increasing the share of children and young people in post-elementary education, including in particular vocational education of Roma pupils,
- decreasing Roma pupils' representation in the special schools system,
- adult Roma education,
- health education,
- pro-vocational and vocational education,
- safety education,
- raising civic, historical and cultural awareness.

Measures in the area of education should target children, pupils and adults: parents and legal guardians, teachers and school staff, staff of institutions that are in contact with the Roma community, as well as other key local institutions (e.g. daycare centres' staff, police officers, municipal guards, local media journalists, social welfare centres' staff, etc.). Particular support should be offered to Roma youth who dropped out of the education system, in order to enable their return to education or vocational training.

The experience from previous editions indicates that a large part of the tasks aimed at children were related to organising dance and music ensembles, which were accepted by parents and most willingly attended by children. Attention must be paid to ensure that the projects implemented do not perpetuate the stereotype of the Roma as dancers and musicians, even if it is a positive one. The implementation of only music and dance-related tasks does not develop the intellectual potential of children and so, in the current edition of the *Integration Programme for 2021–2030*, priority will be given to other educational activities: school theatres, school clubs, sports activities, competitions,

⁵³⁾ Cf. the Supreme Audit Office's audit results described in this document, p. 40.

knowledge contests, sightseeing tours, workshops for pupils, organisation of ‘meetings with interesting individuals’, ‘living libraries’, school and inter-school ‘science fairs’, career guidance, etc. Educational tasks should focus on broadening children’s cognitive horizons, supporting children’s intellectual development, replenishing their cultural capital, developing various cognitive functions, memorisation, ability to function in a non-Roma environment, etc.

Examples of educational measures (the catalogue is open):

- formal education (school clubs, knowledge and sports contests, competitions, reviews, sightseeing tours, etc.),
- informal education (daycare centres, educational fairs, sightseeing tours, camps, etc.),
- history education (history of own family, preparation of materials and teaching about the Roma Holocaust, tasks related to identification of unknown burial sites of Roma casualties of World War II, commemoration of the Roma Holocaust, etc.),
- civic education (citizens’ rights and obligations, patriotic ceremonies and ones related to ‘little homelands’, shaping tolerant attitudes, forging bonds with the national community, education related to electoral processes, etc.),
- health education (vaccinations for Roma pupils, prevention programmes aimed at Roma pupils and parents, including addiction prevention, promotion of a healthy lifestyle, healthy nutrition, ecology, sports activities, etc.),
- safety education (educational meetings, including with police officers, municipal guards, e.g. on the phenomena of peer violence, domestic violence, addictions, cyber threats, road safety, safety during holidays, etc.), workshops on peer violence, domestic violence, counteracting discrimination, etc.
- pro-vocational education (meetings with a career counsellor, ‘meetings with interesting individuals’, how to become an entrepreneur, how to establish a start-up, a social cooperative, etc.),
- developing and disseminating methodologies for working with bilingual and bicultural pupils.

Particular attention should be paid to the proper functioning of daycare centres. Previous years saw the establishment of many community daycare centres. It seems, however, that in some cases they failed to play their intended role, instead becoming ‘depot centres’ for children or ‘clubs’ for adults, without providing the necessary educational support to Roma children. Therefore, under the current strategy, the Ministry of the Interior and Administration will prepare a certain minimum standard for the educational activities of daycare centres and centres for the integration of children and young people, which should be met in order to maintain their funding.

Nearly two decades of state action aimed at the Roma enabled the emergence of a group of teachers and school counsellors well-versed in the specifics of this ethnic group. This strategy encourages teachers to construct different types of educational and methodological materials, both to support the special educational needs of Roma pupils more effectively, learn about this culture and to offer methodological support for teachers. Under the *Integration Programme for 2021-2030*, it will be possible to publish and disseminate such materials.

It is also necessary to improve remedial classes for Roma pupils – in some cases, one-year compulsory pre-school education does not bridge the educational gap of Roma children to an extent sufficient for effective learning in primary school, which is reflected in the poor school grades indicated by the

Supreme Audit Office. LGUs should direct more funds from increased school education subsidies to the organisation of remedial classes for Roma pupils.

4.3.2. Area of intervention: Housing

Objective: improving housing conditions for the Roma living in the poorest conditions.

The housing situation of the Roma varies. The situation of groups living in the southern and western regions of Poland, especially in mountainous areas, remains the worst. Several factors contribute to this group's housing problem – the persistent housing deficit in Poland in general, the significant shortage of communal and social housing, the lack of stable income in Roma households enabling the purchase of a flat (or obtaining a loan), the multi-generational character and large size of Roma families, which affects housing densities and quicker appearance of successive generations.

The *Integration Programme for 2021-2030* focuses primarily on rapidly improving housing conditions in those cities where the housing problem threatens the life or health of residents. In order to avoid local tensions, renovation-related tasks should in principle be inclusive, which means they should also cover some non-minority neighbours. Support should be provided primarily to families living in the poorest housing conditions, characterised by readiness for integration and fulfilment of civic duties (e.g. children's obligation of compulsory education, payment of housing charges), where at least one member of the family is professionally active. Such conditionality with regard to assistance helps emphasise that attitudes of pro-activity and independence in solving one's own life problems are promoted. It should be noted that providing assistance to passive persons may increase tensions in the local environment and reinforce attitudes of entitlement.

As per the Supreme Audit Office's assessment, the purchase of houses and flats for the Roma community raised some concerns. Despite the controversy surrounding the purchase of a house for a Roma family by one municipality in the territory of another, such options ought to be considered, taking into account legal considerations. In some municipalities with a relatively high number of Roma and lack of social housing, the purchase of flats/houses should be considered. The above solution is also supported by the fact that in some locations such a purchase may be the only way to improve the housing situation. It is not without significance that the option of buying a property on the secondary market has a positive impact on the aspirations of Roma families, especially as it might involve the possibility of leaving a previous ill-functioning family-neighbourhood arrangement. However, the terms of such a solution must be set out: such a purchase must be preceded by a thorough analysis and justification, prior work with the family, its readiness for integration and fulfilment of civic duties (e.g. children's obligation of compulsory education), agreements and understanding between municipalities, also in the social aspect, preparing various institutions (schools, social welfare centres, etc.) in the new location to work with the incoming family to enable its integration into the local community. The methods and terms for regulating ownership issues are left to local authorities.

4.3.3. Area of intervention: Innovative integration projects

This area provides for the support for participants of the *Integration Programme for 2021-2030* through innovative tasks, going beyond the areas of education and housing, as a means of achieving the objective of the *Integration Programme for 2021-2030* and improving measure coordination, especially at local level.

Employees of social welfare centres constitute a professional group with intricate knowledge about the situation of the Roma. Their experience can be a valuable source of knowledge about the situation of local communities, effective methods of activating this group or barriers relevant to the integration process. Since the present strategy departs from the formula of temporary improvement in the material situation in favour of developing effective mechanisms, LGUs along with social welfare centres, as units subordinate to LGUs, may apply for subsidies for activities going beyond individual, unit-based assistance. A particularly recommended measure is to draw up roadmaps for the local Roma community, taking into account their situation in terms of education, employment, housing, etc., which could support the integration process in the medium and long term. The tasks included in local strategies and agreed with a Voivode's Plenipotentiary and the Ministry of the Interior and Administration will be given priority in the process of financing measures in the different years. By this, the Ministry means to encourage LGUs to plan measures aimed at the community and local development in a more strategic manner.

Projects in this area might include measures tested during previous editions, e.g.: employment of community mediators, employment of the Roma (or people from Roma backgrounds) by social cooperatives, mediation, 'work in exchange for payment of rent debt' projects, etc.

4.3.4. Area of intervention: Systemic tasks

Ministry of the Interior and Administration

The Ministry of the Interior and Administration carries out systemic tasks, including in particular:

- a scholarship programme for gifted Roma pupils,
- a scholarship programme for secondary school Roma pupils,
- a scholarship programme for Roma students,
- postgraduate studies on the Roma community with a scholarship scheme for students,
- training programme for RSMs and learning support teachers assisting Roma pupils in education (in cooperation with the Ministry of National Education),
- other tasks, referred to below and in point 4.6.2 with regard to the use of 2% of the special-purpose reserve funds.

Compared to previous programmes, the novelties include:

- extending the scope of postgraduate studies currently offered under the name 'The Roma in Poland – history, law, culture, collaboration, social integration instruments, ethnic stereotypes' to include a methodological component related to teaching bilingual and bicultural students, as well as classes on counselling,
- a scholarship scheme for students of the above postgraduate studies, with the aim of encouraging those working with the Roma, especially teachers and employees of social welfare centres, to improve their qualifications,
- a scholarship scheme for Roma pupils at secondary school level, taking into account the specific needs of vocational education,
- the scholarship scheme for Roma students was extended to include measures aimed at greater integration of Roma students and, at the same time, setting them up as 'role models' in local Roma communities,
- support from counselling and guidance centres.

In addition to the aforementioned systemic tasks, the Ministry of the Interior and Administration may use the special-purpose reserve funds to commission the implementation of tasks aimed at the social integration of the Roma through e.g. carrying out research, preparing materials, studies, analyses, conferences, training, etc., with regard to various aspects of the Roma community's situation in Poland, especially the areas where there is a clear lack of information, such as poverty of Roma children, situation of disabled children, the problem related to adoptions of Roma children, participation in the education system, situation on the labour market, etc.

Ministry of National Education

The Ministry of National Education carries out the following systemic tasks:

- co-financing of educational applications submitted to Voivodeship Offices (e.g. co-financing of school integration and educational activities, including daycare centres for children and young people in the form of: workshops, thematic events promoting multiculturalism and equal treatment, etc.; school supplies – purchase of textbooks for secondary school pupils, etc.), integration and educational trips, holidays for children and young people, activities promoting vocational education among Roma youth, etc.,
- technical cooperation with the Ministry of the Interior and Administration on the problem of diagnosing Roma pupils and identifying their special educational needs in order to reduce the percentage of Roma pupils in the special education system, within the framework of its statutory tasks,
- technical cooperation with the Ministry of the Interior and Administration on in-service teacher and school counsellor training with regard to Roma pupils as bilingual and bicultural students, within the framework of its statutory tasks,
- supporting the Ministry of the Interior and Administration in the scope of in-service training of RSMs and learning support teachers assisting Roma pupils in education.

Voivodes

In order to enhance the statutory obligation of coordinating the actions of government administration bodies on the territory of voivodeships⁵⁴), Voivodes will engage in coordinating the *Integration Programme for 2021–2030* and initiating tasks for the benefit of this group through the intermediary of Voivodes' Plenipotentiaries for National and Ethnic Minorities who implement tasks for the benefit of the Roma minority. This will take place by implementing the following systemic tasks:

- organising regular meetings (at least twice a year) with representatives of various LGU agencies, schools, social welfare centres, centres, cultural institutions, etc., in whose remit Roma live and local NGOs; the objectives of these meetings should include activating LGUs to participate effectively in the *Integration Programme for 2021–2030*, diagnosing the needs of the local Roma community in the context of its integration with the inhabitants of the given LGU, planning adequate measures, discussing needs, sharing good practices, monitoring the implementation of the *Integration Programme for 2021–2030* on an ongoing basis, etc. provisions for the costs of such meetings should be made in the budgets of voivodes,
- organising regular training meetings (at least twice a year) for RSMs and learning support teachers; every year, the Ministry of the Interior and Administration will communicate a framework scope of training indicating priority topics (prepared in cooperation with the Ministry of National Education and LGUs) to voivodeship offices; the topics of training meetings will also include problems

⁵⁴Article 22(1) and (2) of the Act of 6 January 2005 on national and ethnic minorities and on the regional language.

diagnosed in the voivodeship indicated by RSMs, learning support teachers, LGUs or the Ministry of the Interior and Administration and Ministry of National Education; invited experts, appropriate for the training topic, as well as representatives of the Ministry of the Interior and Administration and Ministry of Education may take part in the training as lecturers,

- regular monitoring of the activities financed under the *Integration Programme for 2021–2030*, daycare centres run by non-governmental organisations, particularly with regard to daycare centre agendas.

The above solutions, which are innovative compared to previous strategies, will enable active dialogue and working cooperation between Voivodes' Plenipotentiaries and the local level, the latter being critical for the integration of the Roma community, and timely response to problems as they occur. Organising training meetings for RSMs and learning support teachers will allow them to achieve a relatively standard level of competence nationwide and at the same time will enable Voivodes' Plenipotentiaries to monitor problems on a current basis. The meetings will be financed from the budget of the *Integration Programme for 2021-2030* on the basis of applications filed by voivodeship offices (excluded from assessment by the Voivodeship Commissions referred to in point 4.6.3.).

In voivodeships where there are not many RSMs and/or learning support teachers employed to assist these pupils in education, it is possible to organise such meetings jointly for more than one voivodeship on the basis of an arrangement between the offices and/or to delegate RSMs and or supporting teachers (or teachers interested in these topics) to a training held in a different voivodeship. In justified cases, when it is not possible to organise training meetings in the proposed form, other forms of training are possible.

Systemic tasks will be implemented using funds earmarked in part 83, part 43 and part 30 of the State budget.

4.4. Measures and corresponding indicators⁵⁵⁾

The *Programme* defines phenomena that are significant for estimating the process of Roma integration as 'measures', whereas indicators used in the *Programme* have been designed on the basis of statistical and education data from the NCPH'02, NCPH'11 and the School Education Information System and on the basis of data derived from the implementation of the Integration Programme for 2014-2020.

⁵⁵⁾ In this document the term 'measure' indicates a phenomenon that should be analysed due to its significance for the process of social and civic integration of Roma, whereas the term 'indicator' specifies its value that is measured and variable in time.

Measures (E1-E10 and M1))	basic indicator	assumed average annual indicator 2021–30	target indicator to be achieved in 2030
<i>and calculation mode of basic and/or target indicator</i>			
EDUCATION			
E1. Number of Roma children in pre-school education covered by the <i>Integration Programme</i> for 2021–2030			
<i>Average annual number of children in pre-school education under the Integration Programme for 2014–2020 in the years 2015–2019: 174+218+171+169+109=841/5=168; average annual indicator and target indicator on the basis of the NCPH'11 – average per year class</i>	168	300	3,000
E2. Number of Roma pupils applying for scholarships at secondary school level			
<i>Average annual number from MSWiA data for the years: 2014–2019: 66+51+57+67+53+52=346/6=58</i>	58	80	800
E3. Number of Roma pupils applying for scholarships			
<i>Average annual number from MSWiA data for the years: 2014–2019: 59+37+34+41+40+42=253/6=42</i>	42	60	600
E4. Number of employed RSMs			
<i>Number employed as of January 2020 – 87 persons; data on the number of Roma pupils in 2014–2019 from the School Education Information System: 2,273+2,359+2,348+2,370+2,239+1,962=13,551/6=2,258; given the assumption that one RSM should not have more than 20 pupils/families under their care, the number of persons employed should increase to the target value of 113 RSMs</i>	87	2.6	113
E5. Total number of persons covered by <i>Intervention Area I: Education</i> under the <i>Integration Programme</i> for 2021-2030			
<i>Average annual number of persons that benefited from educational measures in the years 2015–2019 (sets of textbooks and school equipment, extra-curricular activities, preschools, scholarships, music classes): 7,075+11,589+841+604+9,035=29,144/5=5,829</i>	5,829	6,000	60,000
E6. Number of participants covered by health education			
<i>Average annual number of persons that benefited from health measures in the years 2015–2019: 1,604+1,510+881+1,061+1,113=6,169/5= 1,234; the basic indicator E6 is equal to 21% of basic indicator E5, this percentage share should be maintained with respect to health measures</i>	1,234	1,300	13,000
E7. Number of participants covered by safety education measures			
<i>15% of E5 basic indicator;</i>	-	874	8,740
E8. Number of participants covered by pro-vocational education measures			
<i>Average annual number of Roma benefiting from measures improving professional qualifications under the Integration Programme for 2014–2020 in 2015–2018: 178+282+158+187=805/4=201. The target indicator was calculated on the basis of the average annual number of Roma pupils in the EIS in 2014–2019: 2,273+2,359+2,348+2,370+2,239+1,962=13,551/6=2,258/12 (grades 1–8 of primary school and 1–4 of secondary school)=188; assuming that pro-vocational education should cover at least two year classes (e.g. grade 7–8) this gives an average annual number of 2x188=366 persons, the target numbers being: 3,660 persons</i>	201 persons	366 persons	3,660 persons

HOUSING

M1. Number of Roma covered by *Area of intervention II Housing*

Average annual Number of Roma covered by housing measures in 2015–2019:

$514+385+452+515+425=2,291/5=458$

458

500

5,000

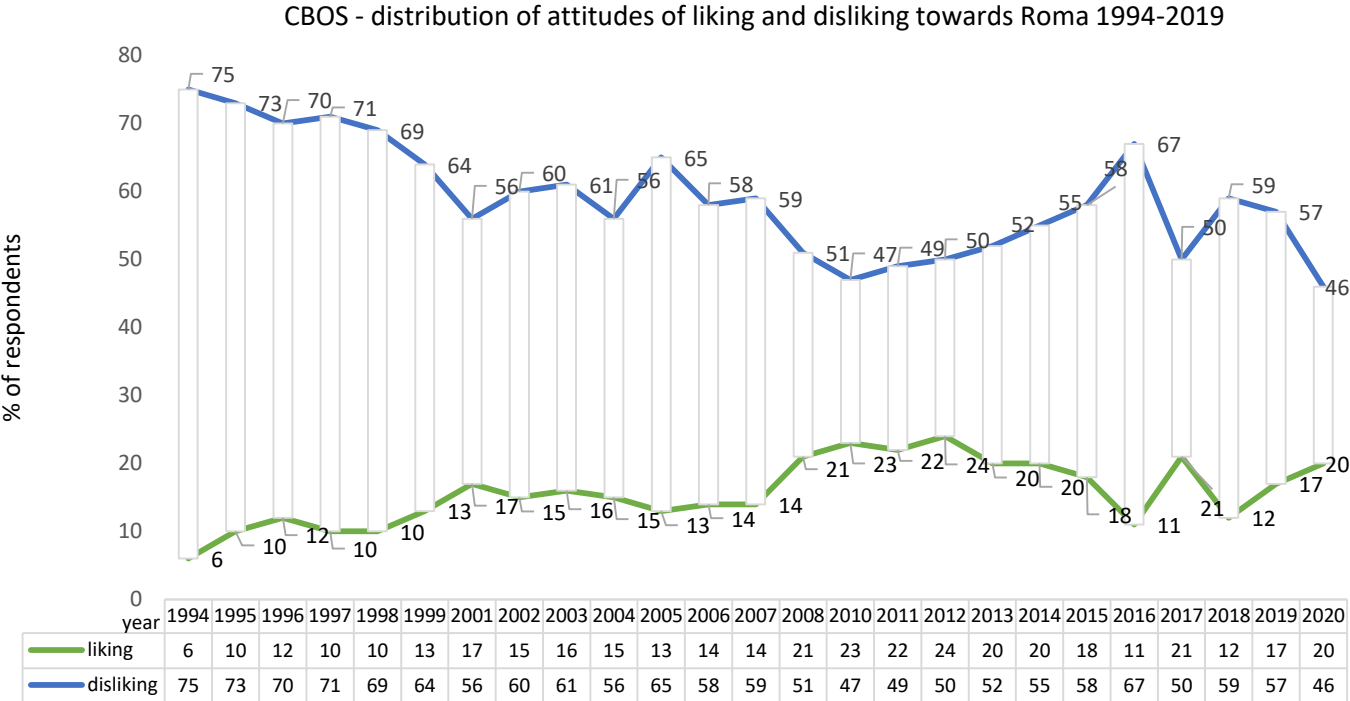
4.5. Important dimensions of the *Integration Programme for 2021-2030*

4.5.1. A tool for combating discrimination

The reduced scope of adaptation mechanisms in this culture, which would allow it to efficiently adapt to the reality of the modern world and to function in it effectively and as a community, places this minority in a group that enjoys the least liking and reinforces, mainly negative, stereotypes. However, such perception of Roma is evolving and since the beginning of the 1990s it has improved significantly in Poland (Figure 32). It appears that the regular, albeit slow, trend of improvement in the perception of this group is a result of the inclusive measures undertaken by the State in the last two decades, particular at local community level.

A stable ‘positioning’ of the Roma within the scope of State policy through the implementation of integration strategies since 2001, civic activation through the activity of Roma non-governmental organisations, adding RSMs to the list of official professions in Poland, and, most importantly, RSMs starting to work in schools, led to positive changes in the approach of the majority population to the discussed ethnic group. Considering the above, it may be assumed that the stereotypical perception of a given minority may evolve and improve when both an appropriate integration policy and an appropriate information policy are carried out. Changes in the perception of Roma over the last three decades are illustrated on the graph below:

Figure 33. Distribution of attitudes of liking and disliking with respect to Roma in Poland in 1994–2019 according to CBOS (own elaboration)



Measures taken in previous strategies with respect to improving safety and anti-discrimination measures did not arouse interest among their participants. It seems that the most efficient method of combating discrimination is increasing social awareness of the majority group with regard to cultural

diversity – the possibility to refer to the historical tradition of a Polish Commonwealth of Many Nations is not insignificant here.

Therefore, the present strategy does not define the phenomenon of discrimination as a separate area of intervention but treats the principle of non-discrimination and the human rights protection perspective as a general rule and objective guiding the entire *Programme*. This stems from the assumption that acts of discrimination are complex in nature and require long-term measures, mainly in the field of education. All measures taken by the State, also outside this strategy, should contribute to the elimination this phenomenon which destroys the civic community and providing education and knowledge to the Roma community and to the majority society is the most effective tool possible to protect individuals and the whole group from discrimination. The broadly defined civic education will serve this purpose. Of great importance will also be educational measures targeted at officers by the National Police Headquarters under the policy of raising awareness on human rights protection and non-discrimination against members of the Roma community as well as monitoring information concerning hate crimes and the number of convictions for hate crimes perpetrated against people from the Roma community, reported by the National Police Headquarters and the Ministry of Justice.

When discussing the discrimination phenomenon, one should not forget intra-group discrimination which exists in relations between individual Roma groups in Poland and sometimes impedes the organisation of joint undertakings for Roma and their effectiveness as well as discrimination against women and girls among this group. The Roma themselves pointed to the need of combating intra-group discrimination during the evaluation carried out in 2011⁵⁶). It is necessary to strive to eliminate these negative phenomena when planning measures, all the more so, as existence of prejudice against representatives of other Roma groups is not identified in these communities as a discrimination phenomenon.

4.5.2. A tool for ensuring increased participation

Regional level

In addition to the mechanism of Roma participation at central level, mentioned in the Introduction, this strategy continues the solutions from previous years of participation (with the right to vote) of Roma community representatives in Commissions for Application Evaluation appointed every year in Voivodeship Offices.

Local level

In order to increase the scope of Roma participation in decision making processes under this strategy, the Ministry of the Interior and Administration will organise consultation meetings in subsequent years – independently from the above-mentioned entities – financed from the special-purpose reserve, dedicated to the implementation of the *Integration Programme for 2021-2030*, with the participation of local Roma community representatives and/or Roma implementing bodies/beneficiaries of measures in view of evaluating the effectiveness of measures at local level, of cooperation with LGUs and Voivodeship Offices, swift diagnosis of arising problems and/or the necessity to reformulate measures so that they respond to challenges that appear.

⁵⁶Programme for the Integration of the Roma Community in Poland for the period 2014-2020, p. 89.

The mechanisms described above have been functioning for years, however, efforts must be made to improve them where necessary. However, there is still an opportunity to increase Roma participation by promoting the inclusion of representatives of this community in various decision-making and consultative bodies operating outside the scope of the *Integration Programme for 2014–2020*, such as: Voivodeship Public Benefit Activities Councils, Voivodeship Employment/Labour Market Councils, commissions operating at municipal/city/voivodeship councils, Social Dialogue Councils, interdisciplinary teams, parents' councils at schools, etc. However, promoting representatives of this community solely on the basis of ethnic premises should be avoided – instead people with relatively better education, experience in socially useful work, an understanding of the need for integration and personal predispositions should be promoted. Roma participation in such bodies may bring a variety of benefits – it enhances their group participation, improves the group's image among the majority community and allows individuals to acquire new skills, thus contributing to weakening a certain monopoly of leaders.

The existing (municipal, poviats, voivodeship) strategies for solving social problems should be an important instrument supporting the inclusion process. In areas inhabited by Roma such strategies should refer to that community and take into account its specific problems with an impact on the entire local community.

4.5.3. Specific groups subject to support

The *Integration Programme for 2021-2030* identifies particular groups subject to support on account of their specific needs and integration potential: Roma women and girls, young Roma people, children, Roma school mediators and learning support teachers.

Roma women and girls

Both lessons learned from previous strategies and the experience of other European countries, as well as conclusions from performed evaluations, indicate that Roma women are more motivated to take up integration measures and in practice play the role of a conveyor belt motoring changes in the Roma environment. At the same time, they are a group exposed to intersectional discrimination on the grounds of their ethnic origin, gender, low social and economic status as well as the patriarchal model of Roma culture. Thus, Roma women should be provided with particular support under the current integration programme. This can be done, among others, by financing conferences, training, workshops and exercises for women and girls of Roma origin aimed at strengthening the broadly-understood potential of women and girls in all areas of community life as well as providing the appropriate tools and skills for smooth functioning in the modern world. Particular attention should be paid to limiting and preventing the phenomenon of early marriage and motherhood which reduces secondary education perspectives of Roma girls and thus pushes them out of the labour market. According to the FRA survey 20% of Roma respondents in Poland indicated this phenomenon as the reason for abandoning education after the age of 16.

In terms of providing support to Roma girls and children at central level, the Ministry of the Interior and Administration cooperates with the Voivodes' Plenipotentiaries cooperate with Voivodes' Plenipotentiaries for Equal Treatment.

Support for young Roma people

One of the most important tasks under the *Programme* should be maintaining young Roma people in the education system, at least until the age of 18. Projects addressed to this group and related to increasing knowledge and planning a career path will be treated as a priority. Tasks with an integration value will be viewed particularly favourably, e.g. those linked with the idea of voluntary work for the benefit of Roma children and young people or voluntary work by Roma young people for the benefit of others.

Roma children

Ensuring quality education for Roma children forms the basis for improving the situation of the Roma community. Projects addressed to pupils, particularly those concerning development of cognitive functions and those with particular integration value, will be treated as a priority.

Roma school mediators and learning support teachers

RSMs have proved to be one of the most effective instruments in bringing about a change in the approach of Roma to the institution of schooling and formal education. The greatest changes were noted at primary school level. Secondary education still requires considerable efforts. Mediators should therefore be provided with regular training and the possibility of ongoing information exchange with public administration bodies. This will be the objective of the systemic tasks planned for this group. First of all, it is necessary to achieve an increase in the number of mediators employed in LGUs with a high number of Roma origin pupils. A situation where the activity of one mediator covers a group of approximately 100 pupils is ineffective. It is also necessary to improve the way how the increased grant for educational needs of Roma pupils is spent – the model in operation for many years at Bydgoszcz City Hall is a desirable example of appropriate use of subsidy funds: the total amount is transferred to schools attended by Roma pupils and appropriated on the basis of a plan elaborated by school head teachers in collaboration with RSMs.

This strategy assumes the need to provide incentives for LGUs to increase the number of RSMs employed in those localities where the number of pupils is relatively high (mainly large cities). The target model solution seems to be for a mediator to take care of no more than 20–25 pupils and therefore 20–25 families, as the situation of Roma pupils in terms of education is largely conditioned by their family's attitude towards education. That is why RSMs also work partly with the families of Roma pupils. Furthermore, regardless of whether a mediator is employed by a single school, they should carry out their duties in all schools attended by Roma, based on an agreement between schools.

The current situation requires introducing a degree of nationwide standardisation to mediators' duties, as both Voivodeship Plenipotentiaries and RSMs themselves signal operational differences that sometimes limit the effectiveness of the mediators' work. One of the tasks of RSMs – who act as mediators between the school and home environment – is working with parents of pupils and increasing their awareness of the need to create conditions allowing children to study at home. In previous years, training sessions organised for RSMs and learning support teachers resulted in developing a model for the scope of RSM and supporting teacher duties, which requires widespread (re)introduction. The scope of the said duties forms an Appendix to the *Integration Programme for 2021–2030*.

However, when organising training sessions, one must take into account the conclusion from the evaluation: *Evaluation of support aimed at the Roma community in Poland under OP KED and other*

implemented programmes targeting the Roma ordered by the Ministry of Family, Labour and Social Policy concerning training sessions for RSMs which indicates the necessity for RSMs to participate not only in training attended by homogeneous Roma groups but also in various generally available courses and professional training sessions.

This strategy draws particular attention to the need of continuing to provide training for learning support teachers, teachers and school counsellors working with Roma pupils on the topic of educating bicultural and bilingual children, the specificity of the Roma community, etc.

4.6. Implementation system of the Integration Programme for 2021-2030

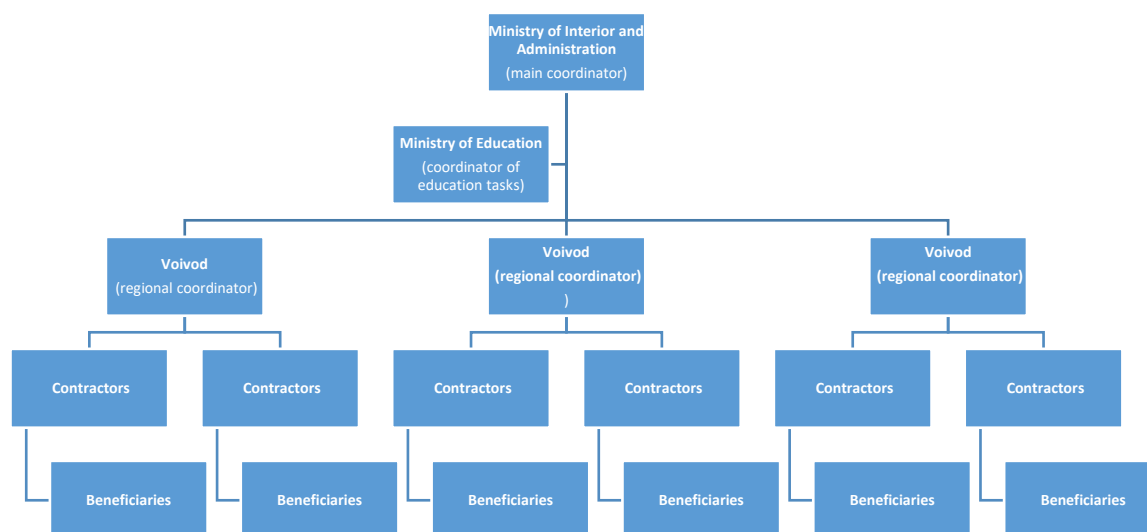
4.6.1. Programme coordination and management

The principal coordinator of the *Integration Programme for 2021-2030* is the Minister of Internal Affairs and Administration. The coordinator of educational tasks financed from part 30 of the State budget is the Minister of National Education. Individual Voivodes act as regional coordinators. The implementing bodies of tasks under the Programme are the following:

- LGUs and units subordinated to LGUs (social welfare centres, schools, culture centres, etc.),
- voivodeship offices,
- NGOs,
- legal persons and organisational units operating pursuant to the regulations on the relationship between the State and the Catholic Church in the Republic of Poland, the relationship between the State and other churches and religious associations and the guarantees of freedom of conscience and religion, if their statutory goals include the activity of public benefit,
- social cooperatives,
- higher education institutions,
- business associations,
- educational institutions,
- research institutes,
- labour market institutions,
- institutions involved in research and commemoration concerning victims of totalitarian regimes,
- other entities involved in actions aimed at social integration.

The final beneficiaries of the *Programme* are Roma and non-Roma communities (Polish citizens in general).

Figure 34. Governance structure of the Integration Programme for 2021-2030



The entities participating in the implementation of the *Integration Programme for 2021-2030* at central administration level – within their respective competencies – MSWiA, MEN, MKDNIŚ, MRPiPS as well as Government Plenipotentiary for Equal Treatment, MF, MS and NPH; participants at regional level: voivodes and Voivodes’ Plenipotentiaries for national and ethnic minorities as well as Voivodeship (Capital City) Police Headquarters. The scope of duties is presented in the table below:

Figure 35. Scope of duties of entities participating in implementation of the *Integration Programme for 2021–2030*:

No	Participant	Scope of duties
1	Ministry of the Interior and Administration	<ol style="list-style-type: none"> 1) General coordination and supervision of the implementation of the <i>Integration Programme for 2021-2030</i> in all intervention areas 2) Annual publication of information on the mode of procedure when assigning grants from the <i>Integration Programme for 2021-2030</i> for each subsequent year of its operation 3) Making the final decision with regard to approximating funds for the implementation of the <i>Integration Programme for 2021-2030</i> nationwide 4) Managing funds allocated to the administration of the <i>Integration Programme for 2021-2030</i> in the years 2021-2030 5) Implementing systemic tasks financed from part 43 of the State budget 6) Elaborating an annual report on the implementation of the <i>Programme</i>, prepared on the basis of voivodes’ reports, and publishing on the website 7) Monitoring and evaluation of the <i>Integration Programme for 2021-2030</i> 8) Initiating cooperation with other ministries, in particular MEN, MRPiPS and MKDNIŚ, in the scope of Roma-related topics

		9) Promoting the <i>Integration Programme for 2021-2030</i> .
2	Ministry of National Education	<ol style="list-style-type: none"> 1) Implementing systemic tasks 2) Preparing and signing contracts/agreements for the implementation of grant applications financed from part 30 of the State budget on the basis of a decision approved by the Ministry of the Interior and Administration and forwarding the list of signed contracts/agreements to the DWRMNIE and Voivodes' Plenipotentiaries 3) Forwarding data from the School Education Information System on Roma students enrolled in the given year, the amount of the increased school education part of the general subsidy obtained by LGUs for additional tasks for the benefit of Roma pupils as well as other statistical data on education described in the <i>Integration Programme for 2021-2030</i> to the MSWiA 4) Cooperation with the MSWiA when planning measures for the benefit of RSMs and learning support teachers assisting Roma children in education and other entities engaged in the education of Roma pupils 5) Ongoing cooperation with the MSWiA and other entities in the scope of implementing the <i>Integration Programme for 2021-2030</i>
3	Voivode / Voivodeship Office/ Voivode's Plenipotentiary	<ol style="list-style-type: none"> 1) Publishing and communicating information on the call for applications under the <i>Integration Programme for 2021-2030</i> 2) Appointing the Competition Committee, evaluating applications, forwarding aggregated information on applications that received a positive opinion and are to be financed from part 83 and part 30 of the State budget for acceptance to the DWRMNIE with electronic copies of such applications in accordance with the procedures laid down in the Act of 17 February 2005 on computerisation of activities of entities performing public tasks (using the electronic Public Administration Services Platform – ePUAP); when the Minister of the Interior and Administration signs the decision on appropriating the funds under the <i>Programme</i> – immediately forwarding applications financed from part 30 to the Ministry of National Education and the application for disbursing funds from part 83 to the Ministry of Finance 3) Signing contracts/agreements with bodies implementing the tasks, settling the balances concerning the tasks and reporting 4) Implementing assigned systemic tasks 5) forwarding an aggregated report on the implementation of tasks on the territory of the Voivodeship in the past year to the MSWiA (by the end of February each year) 6) Ongoing cooperation with the MSWiA in the scope of implementing the <i>Integration Programme for 2021-2030</i>

		<ul style="list-style-type: none"> 7) monitoring implementation of individual projects and their control, settling the balances concerning the tasks and substantive checking of task performance 8) organising training for the potential applicants under the <i>Integration Programme for 2021-2030</i> 9) actively assisting in the preparation of tasks under the <i>Programme</i>, their implementation and settlement their balances 10) monitoring the implementation of the <i>Integration Programme for 2021–2030</i> on the territory of the voivodeship 11) promoting the <i>Integration Programme for 2021-2030</i> on the territory of the voivodeship, particularly in the media 12) dissemination of locally developed good practices.
4	Task implementing body	<ul style="list-style-type: none"> 1) Timely submission of the application and its correction, if necessary, in consultation with the Voivodeship Office 2) Task implementation and reporting on its completion 3) Participation in the <i>Programme’s</i> evaluation 4) LGUs are obliged to consult planned activities with representatives of the local Roma community 5) Upon receiving the MSWiA decision of division of funds, task implementing bodies publish the information on funds received on the websites of the office/organisation and in social media (if they have social media accounts) and inform local media about tasks that are being performed in order to promote measures under implementation, in line with point 4.6.6. of this document.
5	Ministry of Culture, National Heritage and Sport	<ul style="list-style-type: none"> 1) Supporting tasks related to Roma culture and annually forwarding information concerning financing of tasks associated with Roma culture 2) Ongoing cooperation with other ministries, Voivodeship Offices and other entities in the scope of implementing the <i>Integration Programme for 2021-2030</i>
6	Ministry of Family, Labour and Social Policy	<ul style="list-style-type: none"> 1) Ongoing cooperation with the MSWiA and other entities in the scope of implementing the <i>Integration Programme for 2021-2030</i>
7	Institution(s) managing ESF+ funds for Roma activation	<ul style="list-style-type: none"> 1) Implementing inclusive measures addressed to the groups at risk of social exclusion, including Roma, carried out with the framework of ESF+ funds and annually forwarding data concerning these measures to the DWRMNIe.
8	Government Plenipotentiary for Equal Treatment	<ul style="list-style-type: none"> 1) Including women and girls from the Roma community in the tasks performed 2) Ongoing cooperation with other ministries, Voivodeship Offices and other entities in the scope of policy with regard to the Roma
9	Ministry of Finance, Development Funds and Regional Policy	<ul style="list-style-type: none"> 1) Mobilisation of the special-purpose reserve for the implementation of the <i>Integration Programme for 2021-2030</i>

10	Ministry of Justice	<ol style="list-style-type: none"> 1) Annually reporting data to the DWRMNiE concerning the number of convictions relative to hate crimes 2) Ongoing cooperation with the MSWiA and other entities in the scope of implementing the <i>Integration Programme for 2021-2030</i>
11	National Police Headquarters	<ol style="list-style-type: none"> 1) Annually reporting data on hate crimes to the DWRMNiE 2) Taking measures targeted at officers, within the framework of the policy of raising awareness on human rights protection and non-discrimination against members of the Roma community, and also measures aimed at efficient prosecution of hate crimes and forwarding information to the DWRMNiE on this subject 3) Ongoing cooperation with the MSWiA and other entities in the scope of implementing the <i>Integration Programme for 2021-2030</i>
12	Human Rights Protection Plenipotentiaries of Voivodeship Police Commanders	<ol style="list-style-type: none"> 1) Cooperation between Human Rights Protection Plenipotentiaries of Voivodeship Police Commanders and Voivodes' Plenipotentiaries for National and Ethnic Minorities, also when organising training sessions, training, conferences, etc.

4.6.2. Budgeting for the Integration Programme for 2021-2030

The implementation of the *Integration Programme for 2021-2030* will be financed from national public funds from the State budget. The basis for financing the *Integration Programme for 2021-2030* are funds from the special-purpose reserve of the State budget (part 83 of the State budget) which is at the disposal of the minister competent for religious denominations and national and ethnic minorities in the amount of PLN 10,000 *per annum*, funds from part 43 of the State budget in the amount of PLN 700,000 *per annum* and funds from part 30 of the State budget in the amount of PLN 700,000 *per annum*.

Figure 36. Funds from the State budget earmarked for the implementation of the *Integration Programme for 2021-2030*

source of financing	disposing entity	part	item/ heading	annual plan (PLN thousands)	plan of the entire <i>Programme</i> (PLN thousands)
State budget – special-purpose reserve	minister competent for religious denominations and national and ethnic minorities	83	14	10,000	100,000
State budget	minister competent for religious denominations and national and ethnic minorities	43	budget heading(s) in subsequent years depending on planned systemic tasks	700	7,000

State budget	minister competent for education	30	801	700	7,000
TOTAL				11,400	114,000

The full cost of the *Programme* throughout its entire duration borne by the State budget will amount to PLN 114,000 PLN.

The special-purpose reserve shall be divided in compliance with Article 154(1) of the Act of 27 August 2009 on public finances in connection with Article 18(2)(10) of the Act of 6 January 2005 on national and ethnic minorities and on the regional language.

LGUs' own contribution is a further source of *Programme* financing – its share should amount to 15% of the total cost of tasks. Funds from the increased school education subsidy dedicated to the educational needs of Roma students represent an important complement to educational measures under the *Integration Programme for 2021–2030*; these funds are not included in the *Programme's* budget but may form the LGUs own contribution if they are allocated directly to the educational needs of Roma pupils. For task implementing bodies other than LGUs obtaining a grant is not conditional upon having an own contribution.

Projects will be financed in the form of special-purpose grants for financing or co-financing tasks implemented under the *Integration Programme for 2021–2030* on the basis of contracts or agreements.

On the basis of the annual decision of the Minister of the Interior and Administration on the appropriation of special-purpose grants for the implementation of tasks under the *Integration Programme for 2021–2030* in the given budget year, voivodes submit applications to the Minister of Finance for disbursement of the above-mentioned special-purpose reserve. These applications, generated electronically in the State Budget Services Computer System TREZOR are subject to co-approval by the Ministry of the Interior and Administration. Appropriate budget parts are increased as a result of the appropriation of the special-purpose reserve. Voivodes in charge of spending funds on the territory of the voivodeship conclude contracts and agreements with task implementing bodies on the implementation of individual tasks.

Funds for the implementation of the *Integration Programme for 2021–2030* transferred under the above-mentioned agreements or contracts to task implementing bodies may be used to cover expenditure that is in line with the adopted objectives and within the established time framework for task implementation.

The Minister, who is the principal coordinator of the *Integration Programme for 2021–2030* and at the same time disposes of the special-purpose reserve earmarked for its implementation, may dedicate up to 2% of special-purpose reserve funds for ordering performance of tasks that are essential for appropriate achievement of *Programme* objectives (e.g. conducting research, preparing materials, studies, analyses, conferences, meetings, elaborations, etc. on various aspects of the situation of the Roma community in Poland, particularly in areas where there is a clear lack of lack of information or areas mentioned in the list of systemic tasks assigned to the Ministry of the Interior and Administration). The Minister of the Interior and Administration may also decide not to divide part of the special-purpose reserve funds in order to dispose of them during the budget year and thus have the possibility to intervene in sudden situations (in such a case the application in the TREZOR system is generated directly by the DWRMNIÉ).

4.6.3. Mechanism of applying for grants for task implementation

Special-purpose grants will be transferred to task implementing bodies under contracts or agreements executors through the intermediary of voivodes or directly by the Minister of the Interior and Administration.

Mode of proceeding with regard to applications concerning the areas of the *Integration Programme for 2021–2030: Education, Housing, Innovative Projects*

1. Applicants submit the applications concerning the implementation of tasks from the areas specified in Chapter 4.3. to the appropriate voivodes. If the scope of the task covers more than one voivodeship – the competent authority is the Voivodeship Office of the voivodeship where the applicant has its seat. If the application covers one voivodeship, but different to the one where the applicant has its seat, the applicant applies to the voivode competent for the location of task implementation.
2. The voivode has the right to call upon the applicant to complement or correct their application following a detailed examination of applications by voivodes' plenipotentiaries taking into account the current needs, measures implemented during previous integration programmes, the applicant's activity and resources, etc.
3. Voivodes prepare evaluation criteria⁵⁷⁾ and appoint Voivodeship Commissions that include representatives of: the Voivodeship Office, the Board of Education and representatives of the Roma community from the territory of the voivodeship concerned. Members of the Voivodeship Commission representing the Roma community abstain from voting when proceedings concern applications in which their participation is envisaged. A representative of the Ministry of the Interior and Administration may take part in sessions of the Commission and has the right to vote.
4. The Voivodeship Commission operates according to the principles set out in Article 15(2c)–(2f) and (2j) of the Act of 24 April 2003 on public benefit and volunteer work (Polish Journal of Laws of 2020, item 1057).
5. The Voivodeship Commission selects applications within the limit amounts specified by the Minister of the Interior and Administration that are to be financed from the special-purpose reserve and part 30 of the budget.
6. Applications that have not been supplemented and/or corrected before the date of the first session of the Voivodeship Commission shall be left unexamined.
7. Following the session of the Voivodeship Commission, voivodes forward Voivodeship Commission protocols and the list of applications recommended for financing or co-financing from the special-purpose reserve and part 30 of the budget to the Ministry of the Interior and Administration.
8. Voivodes submit applications concerning training meetings for RSMs and learning support teachers to the Ministry of the Interior and Administration, in line with the provisions set out in points 4.3.4. and 4.5.3. of the *Integration Programme for 2021–2030*. These applications are not subject to evaluation by Voivodeship Commissions. On account of the small number of RSMs in certain voivodeships, it is possible to organise training meetings for people from different voivodeships (including learning support teachers) on the basis of an agreement between individual Voivodeship Offices concerned. The map showing mediator employment, presented in point 1.1.4., Figure 25, should be helpful when determining the geographic scope of the training

⁵⁷⁾ Should take into account the criteria specified in Article 15(1) of the Act of 24 April 2003 on public benefit and volunteer work.

meetings.

9. The Minister of the Interior and Administration takes the decision on the grant amount for tasks implementation, but is not bound by the opinion of the Voivodeship Commission.
10. Upon obtaining information from the Minister of the Interior and Administration, voivodes forward applications to be co-financed from part 30 (one original copy) to the Ministry of National Education without delay, with the Commission minutes, certified true to the original, and submit a request without delay to the Ministry of Finance, Development Funds and Regional Policy to release the financial means from the special-purpose reserve.
11. Voivodes sign contracts relative to support and/or delegating implementing tasks and/or agreements with applicants financed from the special-purpose reserve.
12. The Ministry of National Education signs contracts or agreements with applicants for funds from part 30 of the State budget on the basis of the Minister of the Interior and Administration decision on the appropriation of funds under the *Programme*.

Mode of proceeding with respect to the systemic tasks of the Ministry of the Interior and Administration

1. Applicants submit applications relative to systemic tasks to the Minister of the Interior and Administration.
2. The DWRMNIÉ employees evaluate the applications in terms of whether they satisfy the formal requirements.
3. Following the detailed examination of each application, the Minister of the Interior and Administration may call upon the applicant to supplement or correct it within a set deadline.
4. Applications that have not been supplemented and/or corrected by the set deadline shall be left unexamined.
5. The Director of the DWRMNIÉ appoints the Systemic Applications Evaluation Commission under the Ministry of the Interior and Administration that issues its opinion on submitted applications.
6. The Commission issues its opinions on the content of the applications.
7. The Minister of the Interior and Administration takes the decision on the grant amount for systemic tasks implementation, but is not bound by the opinion of the Commission.
8. The Minister signs contracts relative to support and/or delegating task implementation.

The time schedule for submitting applications, Voivodeship Commission sessions, Systemic Applications Evaluation Commission sessions, Minister of the Interior and Administration decisions on financing tasks, as well as application form models and the reporting form model will be published every year on the website of the Ministry of the Interior and Administration.

Model application forms for grants from the *Integration Programme for 2021-2030* will be specified every year in the appendix to the information of the Ministry of the Interior and Administration on the detailed principles of grant appropriation under the *Programme* for a given year.

4.6.4. Monitoring

The Ministry of the Interior and Administration and voivodes monitor the progress of the *Integration Programme for 2021–2030* on an ongoing basis and examine its implementation in each individual year.

The task implementing bodies under the *Integration Programme for 2021-2030* are obliged to prepare a financial and technical report presenting the outcomes of implemented tasks. The Ministry of the

Interior and Administration, Ministry of National Education and Voivodeship Offices may also request the implementing body, at any time during task implementation, to produce documents relative to the task, information on work progress and/or outcome and/or perform and independent control of task implementation.

By the end of February each year, voivodes forward an aggregated report to the Ministry of the Interior and Administration on implementation of tasks on the territory of their respective voivodeships in the past year.

Research results and reports prepared by independent experts, non-governmental organisations and other institutions may also be used in evaluating implementation of objectives of the *Integration Programme for 2021-2030*. On the basis of the above documents the minister competent for religious denominations and national and ethnic minorities shall prepare annual reports on conducted monitoring of the implementation of the *Integration Programme for 2021-2030*.

On the basis of analysing information gathered in the process of monitoring and evaluating measures taken under the *Integration Programme for 2021-2030* as well as annual evaluation of the degree of achievement of its outcome, the values of measures associated with individual objectives for implementation of the *Integration Programme for 2021-2030* shall be calculated. This will allow to modify the methods and means used for implementing objectives, if necessary.

Yearly analyses prepared on the basis of the voivodes' reports will be published on the website of the Ministry of the Interior and Administration.

Integration Programme for 2021-2030 implementation reports are of a budgetary and descriptive nature. The descriptive part should take into account, among others, the number of participants in individual project, also the split according to gender and age (age groups of ten years) and the value of indicators corresponding to each measure of the *Programme*.

Every year, apart from the above-mentioned task implementation reports, the LGUs participating in the *Integration Programme for 2021-2030* provide Voivodeship Offices with the following data concerning the education of Roma pupils:

- information on the number of Roma pupils and pupils reported in the School Education Information System, amount of increased school education subsidy funds and their utilisation
- number of employed RSMs and learning support teachers
- average grades from the last school year of Roma pupils under the care of a RSM from each stage of education
- number of pupils starting to attend general education secondary schools, technical education secondary schools and vocational schools.

Voivodes' Plenipotentiaries and the Ministry of National Education send the above data to the Ministry of the Interior and Administration. Voivodes' Plenipotentiaries send data on the average grades of Roma pupils to the Ministry of the Interior and Administration in the form of an average for each LGU and an average for the voivodeships. Gathering educational data in this way will allow the diagnosis and monitoring of the education situation and planning appropriate education measures in subsequent years of the *Integration Programme for 2021-2030*.

Model reports on implementation of the *Integration Programme for 2021-2030* for entities executing tasks (LGUs, entities subordinated to them or non-governmental organisations) and regional coordinators (voivodes' plenipotentiaries) will be set out annually in the appendix to the information

of the Ministry of the Interior and Administration on the detailed principles of grant appropriation under the *Programme* for the given year.

Models of financial tasks reports financed under part 30 of the State budget will be specified by the Minister of National Education.

4.6.5. Evaluation

In order to verify the quality of the implementation of the *Integration Programme for 2021-2030*, its effectiveness and coherence, the Ministry of the Interior and Administration orders an evaluation to be performed, covering various stages of its implementation:

- mid-term, in the course of the implementation of the *Integration Programme for 2021-2030*, however no later than in 2026, in particular if:
 - monitoring demonstrates any departure from initially set objectives
 - any proposals to amend the *Integration Programme for 2021-2030* have been submitted
 - recommendations from the evaluation study of the *Programme for the Integration of the Roma Community in Poland for 2014–2020* indicate the need to modify or supplement measures included in the *Integration Programme for 2021-2030*
 - conditions created by existing social policies, listed in the part entitled ‘Social Policy’, undergo a significant change and exert a negative impact on the economic situation of Roma families
 - the results of the NCPH’21 provide data concerning Roma that diverge significantly from the data from NCPH’11
- at the end of the implementation of the *Integration Programme for 2021-2030* (*ex post* evaluation)
 - in the last year of its implementation.

Performance of the aforementioned evaluation will be financed from part 43 of the State budget.

The aim of the mid-term evaluation will be to allow for the introduction of necessary modifications, support important measures and/or limit/eliminate insufficiently effective measures as well as review the appropriateness of indicators against the published NCPH’21 results.

The objective of the final evaluation performed in the last year of the *Integration Programme for 2021-2030* will be to examine the effectiveness of the measures and to diagnose the situation which will form the premise for taking the decision whether the measures for the benefit of the Roma community in Poland should be continued. Implementing bodies who performed more than 5 tasks under the *Integration Programme for 2021-2030* are obliged to participate in an evaluation study.

4.6.6. Promotion

The Ministry of the Interior and Administration shall publish information about the implementation of tasks under the *Programme* on its website. Voivodes’ Plenipotentiaries shall publish information on projects implemented in respective voivodeships on Voivodeship Offices’ websites.

The task implementing bodies under the *Integration Programme for 2021-2030* shall present information that task implementation was co-financed or financed from the funds of the Minister of the Interior and Administration grant under the *Programme for Social and Civic Integration of the Roma Community in Poland for 2021-2030* in a visible and generally accessible place. They shall also publish this information without delay on their official website and on their social media pages (if any).

Moreover, to increase the recognisability of the *Integration Programme for 2021-2030*, and also to draw attention, particularly at local level, to the needs and challenges of the Roma community and also to promote solutions to problems and the need for integration between different social groups, it is recommended that implementing bodies prepare short information materials about the tasks they have completed and send them to the local media for possible use.

The analysis of the presence of topics pertaining to national and ethnic minorities shows that it is a marginal subject for nationwide media and is much more attractive for local media. The suggested short information materials may enhance the interest of local television stations and printed media in the challenges the local Roma community faces, the activity of local authorities/local non-governmental organisations and the transfer of funds from the central level as well as the benefits derived by the local community as a result of measures taken in view of improving the situation of this most marginalised group.

List of appendices

1. Brief Historical Outline: The Roma community in Poland
2. National and international legal framework and strategic documents
3. List of evaluations of measures targeting the Roma community and other reports
4. Framework scope of activity of the Roma school mediator and learning support teacher assisting the education of Roma children