

ERRC SUBMISSION TO UN COMMITTEE ON THE ELIMINATION OF RACIAL DISCRIMINATION (AUGUST 2019)

Written comments of the European Roma Rights Centre concerning the **Czech Republic** for consideration by the United Nations Committee on the Elimination of Racial Discrimination, at its 99th Session (5-29 August 2019)

Parallel report to the United Nations Committee on the Elimination of Racial Discrimination

For consideration when compiling Concluding Observations on the Czech Republic during its 99th session (5-29 August 2019)

Submitted by

European Roma Rights Centre (ERRC)

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Introduction

1. This written submission outlines key issues of concern with regard to the Czech Republic's implementation of the Convention on the Elimination of All Forms of Racial Discrimination (hereinafter the "CERD Convention"). These key issues of concern are the following: a. general legal framework on discrimination; b. housing, adequate living conditions and forced evictions; c. discrimination in education; d. discrimination in employment; and e. involuntary sterilisations.
2. The purpose of this joint submission is to inform the Committee on the Elimination of Racial Discrimination (hereinafter the "Committee") of legislation, policies and practices implemented by the Czech Republic which violate the CERD Convention. We are also recommending the Committee to remind the State Party that, when acting upon the Committee's recommendations, it has to take into consideration the entire body of UN human rights jurisprudence (rather than looking at separate treaty-based bodies) and respect all the obligations it has assumed by ratifying numerous UN human rights treaties.

General legal framework on discrimination and hate crimes

3. While discrimination is prohibited on the grounds of race, ethnicity, nationality, gender, sexual orientation, age, disability, and faith, the submitting organisations are concerned that there is no legislation specifically addressing cases of multiple and intersectional discrimination. They are also concerned about the lack of case law specifically addressing multiple discrimination. The Czech courts have issued very few final decisions. Moreover, case-law in the field of equal treatment is often inconsistent; in 2012, the Czech Supreme Court held that discriminatory intent is essential both in cases of direct and indirect discrimination, however, subsequent case law has not been consistent on the matter.
4. Alleged victims of discrimination, as well as potential victims, face several obstacles when claiming violation of their right to equal treatment due to barriers in accessing redress. The Office of the Public Defender of Rights (Czech Ombudsperson) can provide independent methodological assistance to victims, conduct research and publish independent reports and make recommendations. However, her mandate is limited and she is not entitled to represent victims of discrimination in court proceedings. The law allows for legal entities established or active in the field of protection against discrimination to provide legal assistance to victims, but this is far from sufficient. The Czech Anti-discrimination Act does not regulate *actio popularis* (public actions) that would make it possible to file a legal action in discrimination cases with higher numbers and unknown identities of victims (e.g. in cases of discrimination in advertising, systemic

discrimination, etc.). Free legal aid is granted only to people with proven limited financial resources

Recommendations:

The ERRC makes the following recommendations to the Czech Government:

- Adopt legislation specifically addressing multiple discrimination;
- Facilitate access to justice for victims of discrimination; and
- Adopt legislation to allow for *actio popularis* (public actions) in cases of systemic discrimination, of discrimination in advertising and other similar situations.
- Adopt legislation to compensate the victims of forced sterilizations.

Housing, forced evictions and adequate living conditions

5. The Czech Republic has a history of racial discrimination in terms of access to housing and exercise of housing rights, including patterns and practices of forced eviction concerning Roma and deepening segregation of housing on an ethnic and social status basis. For the last 20 years, legal tenancy protections have been broadly eroded for all renters. Excluded segments of the population, Romani people in particular, have found housing of last resort in so-called “residential hotels” where they do not have rental contracts, are not registered as local residents, and frequently pay exorbitant rents for small rooms or flats with common cold-water sanitation facilities. It is very easy for the occupants of “residential hotels” to be evicted; as a result, those for whom this housing is the only option find it almost impossible to settle because they are more or less constantly searching for affordable accommodation and moving frequently to different parts of the country. Conditions for their social inclusion and stability are not being arranged.
6. Frequent changes during the period at issue to the government policies subsidizing the housing of such persons and allowing local governments to curtail such benefits have made this precarity even more intense. According to Štěpán Ripka of the Platform for Social Housing in the Czech Republic, which is part of the European homelessness network FEANTSA, a very dramatic recent (2015-2018) drop in the amount of public funding disbursed as housing support has coincided with legal provisions adopted in 2017 enabling municipalities to designate whole territorial areas as ineligible for certain forms of housing support (officially “OOP”, but referred to informally as “benefit-free zones”). Other legal developments include provisions enabling municipalities to expel residents found guilty of having committed three misdemeanours (a power that rests entirely with local misdemeanour commissions).

7. **Continuing forced evictions, especially of Roma, in some cases related to whole neighbourhoods:** Forced evictions from housing, especially of Roma, in the Czech Republic are a long-standing concern of UN mechanisms reviewing the Czech Republic. The concluding observations of the CESCR from 2014 express concern that evictions may be carried out even if they render tenants homeless. CESCR recommends that the Czech Republic review its legislation and practices so they can comply with the international human rights standards, and that remedies are effectively provided to those affected by eviction.¹
8. **Reductions to the value of housing benefits that are disproportionate to the need for them:** The Czech Republic has several forms of housing benefits. One is a top-up for rent costs, primarily benefiting persons whose income is not sufficient to meet rent costs, for example workers and lower middle-class families in certain urban areas, and the other is a form of support for persons who have no housing, i.e., extremely excluded persons. Both forms of housing support have been curtailed in terms of their value, the latter dramatically so. Romani people are disproportionately affected by this change.
9. **Local authorities designate areas as ineligible for housing benefits:** The explicit justification for allowing municipalities to designate certain addresses as ineligible for housing benefits has been to combat the exploitation of poor people, as the owners of residential hotels previously took advantage of the lack of any ceiling on the housing benefits to charge exorbitant rents, since the state was picking up the tab (restrictions have since been imposed). There is no question that Romani people are disproportionately represented among residential hotel occupants and the municipalities that have instituted these bans see them as a way to rid their territories of the mostly Romani people who draw such benefits. Among the leading proponents of the measures has been Liana Janačková, Mayor of the Mariánské Hory Municipal Department of the City of Ostrava, who has been attempting for a decade or more to expel the entire Romani community from her municipal department and has been vocally racist about that aim.
10. Municipalities began announcing implementation of these OOP measures in early 2018. As of November 2018, over 80 municipalities have implemented an OOP or have announced an intention to do so. The city of Kladno first designated the entire city as an OOP before rescinding that decision. Legal action against the OOP framework, justified in human rights terms, has been initiated by a group of Czech senators, as well as by victims, and the joined complaints are currently pending with the Constitutional Court. There are concerns that it may take the Court years to rule on the issue.

¹ CESCR, 2014, para. 17.

- 11. Intensifying racial segregation in housing:** The Czech Republic relies on a survey carried out by the sociological research consultancy of Ivan Galal, first carried out in 2006 and most recently updated in 2015, to define “socially excluded localities”. According to the 2015 data, 95,000-115,000 persons live in an identified 606 “socially excluded localities” in 297 municipalities. These have 700 “residential hotels” in them. The total number of excluded localities has more than doubled since 2006, when it was 310 localities with 60,000-80,000 inhabitants. The most-affected regions are in the north and east (Moravskoslezský, Ústecký, Karlovarský and Olomoucký Regions), including cities such as Ostrava, Karvina and Usti nad Labem. While some “socially excluded localities” are rural communities, generally without significant Romani representation, the majority were urban ghettos. Most persons living in “socially excluded localities” in both 2006 and 2015 were Romani. Compared to 2006, in these localities there is now a general increase of poor people irrespective of ethnicity, “often unemployed people whose life situation essentially replicates the situation of the Roma population (debt, low education, etc.)”. Older persons are under-represented (7%, as against 24% in the wider population), but are increasing in percentage. In 2015, an enormous increase in the number of people living in residential hotels was identified compared to 2006. Thus, as of 2008, “housing in other forms” (i.e., including in residential hotels) was accessed by 7,115 adults and 3,912 children (11,027 people in total) who received a housing supplement, and as of December 2014, a total of 28,600 beneficiaries of housing allowance, including 47,500 people, were already living in “other forms of housing”. Of these, 27,000 lived in residential hotels. Among the beneficiaries of the housing supplement living in “another form of housing”, a total of 7,300 were caring for a minor child, of which 2,700 were living in residential hotels.
12. The share of the unemployed in socially excluded localities is on average about 80-85 %. Unemployment is higher in these ethnically segregated localities and in rural locations with a shortage of jobs. The highest average unemployment was reported by municipalities in the Moravskoslezský, Ústecký, Karlovarský and Olomoucký Regions. Most employment in these areas is “short-term or uncertain in duration” and generates very low earnings. The majority of adult inhabitants of these localities has achieved nine years of schooling at the most and there is evidence that the level of their education has fallen over the past two decades.
13. Deepening residential segregation aggravates educational segregation: “Around 22% of current pupils in socially excluded localities – a total of between 3000 and 3500 pupils --

are educated in strongly ethnically homogenous environments.”² Recent EU MIDIS II data comparing the situation of Roma between 2011 and 2016 indicated that Czech Republic had not made progress in tackling segregation in education during the period (MIDIS II does not track housing or residential segregation). In the period 2011-2016, the percentage of Roma who had health insurance in the Czech Republic dropped from 92%-79%.³

14. The concluding observations of CERD from 2015 expressed concern at the residential segregation of Roma. CERD additionally expressed concern that some municipalities refuse to rent municipal housing to Roma which reinforces this segregation⁴. The concluding observations further expressed concern at the absence of legislation or policy on social housing and the fact that Roma continue to be denied access to adequate housing, particularly social housing⁵. CERD recommended that the Czech government adopts a social housing law and establishes a comprehensive social housing system with a particular focus on Roma and ethnic minorities in general.⁶ *No progress has been made on this issue in the interim; on the contrary, indirect racial discrimination – the design and implementation of general, seemingly neutral policy measures, which have a disproportionately disadvantageous impact on Roma – has been refined.*
15. **Intensive securitization and social control measures with a degrading impact on the effective exercise of housing rights.** The legacy of the communist era can clearly be felt in the exclusion of certain types of persons from qualifying as residing in a municipality depending on their type of rental contract. Powers for municipalities to issue limited bans on residency have recently been strengthened. Some municipalities have initiated social control measures attempting to ban sitting in public on other than outdoor furniture designed for that purpose and designated them as applying only to localities mostly inhabited by Romani residents; these have been struck down by the courts.
16. **Threatened/Ongoing Evictions, Skautská and Dělnická Streets, Poruba district, City of Ostrava.** The organization Awen Amenca has identified Romani families living in regular rental housing on Skautská and Dělnická Streets in the Poruba district, City of Ostrava,

² G.A.C. spol. SRO, “Analýza sociálně vyloučených lokalit v ČR”, May 2015, pp.11-13.

³ European Commission, “COMMISSION STAFF WORKING DOCUMENT Roma integration indicators scoreboard (2011-2016) Accompanying the document Communication to the European Parliament and the Council Midterm review of the EU framework for national Roma integration strategies”, SWD(2017) 286.

⁴ CERD, 2015, Para. 11.

⁵ CERD, 2015, Para. 15(b)

⁶ CERD, 2015, Para. 16(b)

who are among several hundred people currently threatened with eviction from approximately 10 apartment buildings, owned by a private housing provider company called “RESIDOMO”, that have been slated for redevelopment into a large home for senior citizens featuring adjunct services including a gallery and shops, etc. The majority of the 80 families who have fixed term rental contracts are Romani. The families, which include 160 children, have lived in the buildings for up to a decade. Those who have lived in the buildings for more than a decade have unlimited rental contracts.

17. Since 2018, the residents with fixed-term rental contracts began receiving new forms of rental contract extensions indicating that their rental contracts will not be renewed when they next lapse. Some families’ contracts lapsed as of September 30 and October 31. Deadlines seen include November 30, December 31, and reportedly also January and February. RESIDOMO reportedly declines to communicate with persons whose contracts have lapsed. At the same time, RESIDOMO has begun asserting that some tenants have debts on utilities payments in ways that are highly manipulative and disconnected from reality (i.e., randomly attempting to collect on bills that should have been paid by the property owner and were not from the tenants themselves, even though the tenants paid their deposits for the services to the landlord), as well as treating two- or three-day delays in rent payments as rental default. These are reportedly very new developments.
18. It is taken as a given that these families face eviction. This is true to such an extent that several key larger NGOs in Ostrava began speaking of “resolving individual cases”, treating the evictions as imminent and given. Awen Amenca assisted some of the Romani families threatened with eviction in taking injunctive action against the municipal authorities, arguing their positive obligations to prevent homelessness. As a result of that action the city reportedly ceased communicating with Awen Amenca and the families involved.
19. The families fear having to relocate and being forced to commute long distances to their current places of employment and schools. Their children attend school locally in arrangements that were only recently desegregated as a result of the processes following from the ECtHR judgment in D.H. and Others v. Czech Republic. They fear that if they move elsewhere, their children will end up in segregated schools again.
20. Awen Amenca and many other observers report that it is very difficult for Romani tenants to negotiate regular commercial rentals such as these in Ostrava in particular. As such, the families are at heightened risk of being compelled to rely on predatory ghetto housing providers such as the residential hotels.
21. The Government’s Strategy is clearly misconceived, as exemplified by their assertion that “In housing, the key lies in social work to prevent loss of housing and to pass on the skills needed to maintain housing ...” Rather than work with tenants on their “skills”, however, the state should work to prevent municipalities from engineering evictions and benefit-free zones, and work to prevent property developers from engaging in discriminatory

practices. The people described above who face eviction are not persons who need “social work” to acquire the “skills needed to maintain housing”. They are, however, of Romani origin, which seems to be the main factor motivating their eviction.

22. According to the findings of the forthcoming Second Roma Civil Monitor report on the Czech Republic undertaken by the Centre for Policy Studies at Central European University, it is local governments that decide on land use, what areas will be targeted for “development” and which communities will bear the brunt of those decisions, whether to provide social housing to the vulnerable or whether to make it impossible for welfare recipients to live on their territories. It is primarily local governments that establish the schools, hold their managements to account, or choose to turn a blind eye to the bullying, ethnic and social segregation as well as the early tracking of Roma children into dead-end manual labour jobs (see below). It is local governments that institute employment measures that keep welfare recipients in dead-end manual labour, and it is local governments that decide to bring in collections agents and escalate the insolvency of those who owe them unpaid fees (see below). As currently designed, **national policies to eliminate social exclusion generally hinge entirely on the willingness of local administrations to participate**. National authorities remain wary of antagonizing their local counterparts for fear of losing votes. Consequently, antigypsyism and discriminatory practices go largely unaddressed by the authorities.

Recommendations:

The ERRC makes the following recommendations to the Czech Government:

- Ensure that any evictions that do take place are a means of last resort, and are carried out in accordance with both national and international law, including ensuring that those evicted have access to effective remedies against forced eviction;
- Engage meaningfully with representatives of the Roma community and local NGOs actively to seek solutions that fully satisfy the right to adequate housing;
- Introduce adequate social housing policies without further delay, namely; adoption of legal provisions for social housing, which would detail the role of the state and municipalities, target groups and minimal standards of social housing;
- Ensure funding schemes for the provision, reconstruction or construction of new social housing premises, in adequate scale and under conditions which meet the expectations of municipalities and civil society;
- Ensure vulnerable Roma do not lose their eligibility to social housing. Test the use of socially innovative measures, specifically housing-led approaches, and social rent agencies and programmes of housing. Introduce eligibility criteria that could be met by vulnerable Roma; and

- Develop and implement policies to address the vulnerabilities of persons with respect to security of tenure that take into consideration individual needs and characteristics.

Discrimination in education

23. More than a decade after the European Court of Human Rights (ECtHR) announced its judgment in *D.H. and Others v the Czech Republic*, very little progress has been made in securing non-discriminatory access to education for all children and establishing an inclusive system of education, irrespective of social status, ethnicity or disability. In September 2014, the European Commission initiated infringement proceedings against the Czech Republic, due to ongoing discrimination of Romani children in the Czech Republic in the field of education and non-compliance with relevant anti-discrimination EU law.
24. The existence of schools with high Roma populations, as confirmed by the state's qualified estimates, is an indicator of ethnic, spatial and social status segregation within the school system. To date the authorities do not adequately monitor the impact of its education policy on Roma. Roma access to education and support for their needs largely depends on whether they live in social exclusion, on their *de facto* segregation from preschool onward, and on attitudes towards the Roma as such, which are overwhelmingly negative.
25. It has been pointed out by several UN bodies (including the CERD Committee) that, in addition to segregation of children with disabilities and Romani children misdiagnosed with mental disability, Romani children are also educated separately from their peers in mainstream elementary schools. In many towns and villages there are schools known as "Roma schools", which are made up almost exclusively of Roma pupils while a few hundred metres away there are usually other schools which are attended by other pupils, the vast majority of who are non-Roma.
26. These segregated settings within mainstream education are usually caused by three main factors; residential segregation (the catchment area of a school is identical to that of the Roma neighbourhood/settlement); unwillingness of "non Roma elementary schools" to enrol Romani children; and enrolment and transfers of non Roma children to different catchment areas with "non-Roma schools".
27. Roma remain disproportionately educated as disabled, **and while the number of Roma incorrectly enrolled in education for children with disabilities is declining, the number of Roma attending mainstream primary schools with non-Roma is not growing.** Non-Roma parents sometimes pressure schools to maintain ethnic segregation, and establishers and principals resist this pressure randomly. Nowhere is ethnic desegregation or the prevention of ethnic discrimination a driving force behind either policy or practice.

28. One example of the kind of racist and sexist approach taken toward Romani girls in particular is the example of a “Project Day” that was held by a kindergarten class for six and seven-year-olds about the profession of “cleaning lady” in 2014. The project was funded by the Czech Government and the EU and a press release about it included photos of Romani girls cleaning their classroom after what were reportedly hours of instruction in cleaning techniques and vocabulary.⁷ Those who designed the project stated in the press release that such a profession is **“rather attractive for socio-culturally disadvantaged children (girls especially) given its low level of theoretical sophistication.”** This school is located in Ostrava and markets itself as a “school with room for all”; the press release materials are available on the school’s website and are meant to exemplify its practice of “inclusive education”.

Recommendations:

The ERRC makes the following recommendations to the Czech Government:

- The Government should take steps to dismantle the arrangements that result in Romani children’s segregation, including in special education, and ensure the realisation of the right to inclusive education for all children by taking concrete, targeted legislative and administrative steps within a reasonable timeframe to achieve these goals;
- The Government should amend the Education Act to ensure the right of all children to inclusive education, and enshrine the principle of inclusion to guide all system reforms. The law should also explicitly provide for the right to benefit from reasonable accommodations, individualised supports and establish the principle that children have a right to be educated in the least restrictive environment.
- All legislative and policy changes should be accompanied by the allocation of necessary financial and human resources. The Government must allocate adequate resources to fully implement measures to end segregated educational provision and ensure that mainstream education is accessible to all Romani children; and
- The Government should end segregation of Romani children in mainstream “Roma schools”. To achieve this aim, it should consider re-drawing catchment areas and adopt concrete plans of desegregation.

⁷ Gardoňová, Marcela, press release, “Projektový den v přípravné třídě – profese uklízečky”, 13 May 2014, available at <http://www.zsvizina.com/skola-s-mistem-pro-vsechny/>

Discrimination in Employment

29. The “community service” and opportunities for “socially purposeful jobs” as described in point 56 of the State report are another avenue for racial discrimination against Roma. According to the forthcoming findings of the Second Roma Civil Monitor report on the Czech Republic undertaken by the Centre for Policy Studies at Central European University, Czech employment policy fails to address racial discrimination in employment, and very little demographic data on employment disaggregated by ethnicity exist on which to base policy. The causal relationship between the perpetual under-education of Roma and their reduced employability has yet to be addressed by policy. Such persons are vulnerable to official labour market exploitation in tandem with their status as welfare recipients exactly through the “community service” and “socially purposeful job opportunities”, which for the most part do not lead to regular employment with benefits.
30. There are other deterrents to Romani people joining the regular labour market that affect them disproportionately compared to their percentage in the population. Many of the most socially excluded Romani people are also those most burdened by debts owed to municipalities housing and services. When municipalities engage collections agents to collect unpaid fees and fines, the amount of money owed by the debtor increases exponentially. Any wages officially reported to the state can be subjected to collections processes. This means the economically most rational option for many persons in debt is to either rely entirely on welfare, which cannot be subjected to collections, or to work informally without contributing into the social security system. Roma are disproportionately victimized by this “debt trap”.

Discrimination in the provision of medical care

31. The statement at point 64 that “members of the medical profession abide by the principle of equal treatment” cannot possibly be stated as categorically true and is not categorically true. According to the forthcoming findings of the Second Roma Civil Monitor report on the Czech Republic undertaken by the Centre for Policy Studies at Central European University, the housing segregation endured by Romani people negatively impacts their mental and physical health due to the amount of time they spend in socio-pathological environments featuring long-term stress over financial solvency, the need to perform manual labour or other work that involves precarity and danger, and their inferior housing (see above) which lacks adequate heating, insulation, sanitation and ventilation and features indoor mould, infestations of various parasites (bedbugs, etc.) and overcrowding. Unfortunately, many medical providers refuse to register Roma patients.

The lack of medical care is one reason **Roma men live 19 years less than non-Roma men in the Czech Republic, and Roma women live 17 years less for than non-Roma women on average**. The situation is so extreme that in one recent case, a medical professional chose to preferentially serve the Romani patients in his area who were unserved by his colleagues, even at the cost of death threats from non-Romani patients.⁸

Involuntary sterilisations

32. The Czech Prime Minister met with the victims of forced sterilization and tasked the Justice Minister with handling the issue of their compensation, informing the victims that if they could convince enough members of Parliament to back legislation on the issue he would take it under consideration.⁹ The victims and their representatives reiterated their demand for a compensation mechanism not involving the courts to be established during the meetings of the “Working Group” on this issue and were repeatedly instructed by the State’s representatives that this was a demand they should abandon. During one of those meetings a lawyer from the Health Ministry expressed the view to the victims that what they had been subjected to was no different than any other medical malpractice, and that they were not due any special consideration, completely ignoring the human rights issues involved. Nobody but the victims themselves and their civil society representatives were inclined to argue in favour of compensating the victims during meetings of this “Working Group”.

Recommendations

Recommendations: The ERRC recommends the Government of the Czech Republic to undertake the following:

Access to Justice

- Grant compensation to all victims of coercive sterilisation in the Czech Republic irrespective of the date of sterilisation, ethnicity, nationality, disability or age;
- Ensure that the three-year statute of limitation, dating from the moment of sterilisation, will not prevent victims from bringing civil claims for damages;
- Ensure that all victims of involuntary sterilisation are provided with free legal aid and all potential litigation costs are covered; and

⁸ Votavova, Jitka, “Czech doctor prioritizes registration of Romani patients and receives hateful threats from non-Roma”, Romea.cz, 14 May 2019, available at: <http://www.romea.cz/en/news/czech/czech-doctor-prioritizes-registration-of-romani-patients-and-receives-hateful-threats-from-non-roma>

⁹ Dienstbierova, Kristina, “Czech PM meets with forced sterilization victims and their representatives about compensation”, 3 September 2018, available at: <http://www.romea.cz/en/news/czech/czech-pm-meets-with-forced-sterilization-victims-and-their-representatives-about-compensation>

- Amend/abolish problematic provisions of the Specific Medical Services Act concerning informed consent to sterilisation, particularly those allowing the sterilization of women with disabilities without their full and informed consent.

Transparency

- Make sure that any Commission for compensation includes independent experts and representatives from the Roma community and the disability community along with representatives of ministries and health services;
- Appoint an independent committee to conduct research into the full extent of harm caused by the practice of involuntary sterilisation, and support ongoing outreach to all potential applicants for compensation; and
- Establish clear procedural guidelines for following up on complaints of rights violations and strengthen administrative accountability mechanisms at hospitals.

Compensation

- Secure access to non-monetary forms of compensation such as artificial fertilisation, rehabilitation, etc.

Accountability

- Assign the Czech Foreign Ministry to undertake negotiations with the Slovak Government to provide redress for women sterilised in Slovakia prior to 1991; and
- Secure access, when necessary, to decision-making support to dispose of financial compensation and avail fully of other forms of redress for all Roma women, and particularly for Roma women with disabilities.

Discrimination & Access to Information

- Collect disaggregated data based on ethnicity, gender, disability and impairment type in healthcare;
- Consider the cumulative effects of multiple discrimination (ethnicity/gender/disability) suffered by Romani women in accessing healthcare, education and other areas;
- Recognise and react to intersectionality between vulnerability factors including gender, ethnicity and other status of women such as “rural” or “migrant”;
- Allocate budgets specifically to improve the situation of Romani girls and women, especially Romani girls and women with disabilities, in accessing healthcare and education; and
- Develop information and educational materials for persons with intellectual disabilities, particularly for Roma with disabilities, on their sexual and reproductive rights.

