

Lessons from Slovakia's Comprehensive Approach

Assessing the feasibility of designing and implementing integrated territorial programs targeting marginalized Roma communities



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Introduction

The Open Society Foundations (OSF) within the program Making the Most of EU Funds for the Roma commissioned this study in 2012 to examine the experience of implementing the Comprehensive Approach in Slovakia in the 2007-2013 EU funds programming period, to draw lessons and assess the feasibility of designing and implementing integrated territorial programs to target marginalized Roma communities in the EU member states and pre-accession countries within the programming period 2014-2020.

The study was authored by two Slovak Governance Institute staff members, Ctibor Košťál and Andrej Salner, and two contributing experts, Marek Hojsík and Zuzana Poláčková. The latter experts were directly involved in various points of design and implementation of elements of the Comprehensive Approach and were able to contribute a many valuable insights on the program. This was all the more important because there is very little published information and evaluation on this policy.

The authors were assisted by SGI researcher Michaela Farenzenová. Several reviewers¹ contributed useful comments on a draft in May and June 2013.

Executive Summary

Marginalized Roma communities represented one of the four so-called horizontal priorities of Slovakia's National Strategic Reference Framework, key document for accessing the European Union's Structural Funds in the 2007-2013 programming period.

The objective of the horizontal priority was to increase employment and level of education of members of marginalized Roma communities and improve their living conditions.

To achieve this objective, Slovakia adopted an integrated territorial program under the name Comprehensive Approach to the Development of Roma Communities.

Its philosophy was to target a set of localities with local development strategies connecting several activities or projects in a logical sequence to contribute to the development of the marginalized Roma community in the given locality.

This study collects lessons from the implementation of Comprehensive Approach, drawing on:

- review of government documents and evaluations,
- interviews with representatives of the Office of the Plenipotentiary of the Government for Roma Communities responsible for the formulation and implementation of the Comprehensive Approach in Slovakia, ministries managing Operational Programs, municipalities and experts who provided assistance in the area of EU funds carried out between March and June 2013,
- personal experience of two of the experts who had participated in the design of the original logic of the Comprehensive Approach before 2007 and management and implementation of the ESF in Slovakia between 2010 and 2012.²

Implementation of the Comprehensive Approach to use the EU Funds for the benefit of Roma inclusion in Slovakia substantially differed from its original design. This concerned mostly the coordination of the Operational Programs and their institutional relationship with the coordinator of the Comprehensive Approach, technical assistance provided to municipalities/microregions and procedures for the selection of programs and projects.

Modifications in the design of the Comprehensive Approach during the implementation phase carried out at the national level had a negative effect on the quality of planning at the local level. These changes along with weak coordination and uncertainty negatively affected participation, reduced the complementarity of proposed interventions and upset the logic of the interventions. This in turn reduced the quality of the projects generated that were supposed to make up the Comprehensive Approach.

The lessons learned from the implementation and lack of results of the Comprehensive Approach in Slovakia in the programming period 2007-2013, which was seen

¹List of reviewers is included at the end of the report.

²The lead authors of the assessment were independent and ensured independence of the assessment.

by many policymakers within the European Commission as a European pilot in territorially targeted use of EU funds, can improve programming and implementation of various integrated territorial approaches in the upcoming programming period 2014-2020 and social inclusion and regional development policies of EU member states.

Based on the findings of the assessment³, there are three groups of recommendations concerning new programming of Structural Funds in the context of territorial targeting:

Section II.2:

- **Continuity** over the political cycle is necessary; this presumes a broad political (partisan) consensus on strategy.
- Various levels of public administration (national government, regions, municipalities and their representative associations) and other stake-holders (professional groups teachers, employers, health professionals; NGOs; academics, church officials) must be consulted in the design of the Comprehensive Approach.
- Approval of integrated development strategies prepared with credible technical assistance could **replace evaluation process** within managing authorities of specific operational programs (project proposals included in approved integrated development strategy should be entitled for support and not compete for it).
- **Availability of funding** should be guaranteed for approved development strategies.
- Territorially targeted program should bring clear benefits to the target territory such as strong technical assistance and easier project selection and implementation processes such as block grants, unit cost standards, lump sum administration, etc.

Section III.1.

Territorially targeted programs should be based on **well developed**, **participative strategies**.

Section III.1., Section III.5.:

Formal partnership and participation requirements need to be **supported by other interventions** such as mediation in order to deliver their expected outputs and outcomes.

Section III.2:

If programs focus explicitly on marginalized Roma communities they should be accessible also to **others in life situations similar** to those of marginalized Roma.

Section III.3:

Territorial targeting appears to have significant benefit over sectoral targeting and should be considered as an **alternative in allocating funding** from the structural funds and other grant funds.

Section III.4:

Territorial scope in a territorially targeted program should be at or above municipal level.

Section III.6:

Expert and **technical support** must be provided from very early planning phases of local development strategies in order to ensure quality of approved LSCAs.

Section III.8:

Such a complex intervention should ideally be managed by a competent entity with a clearly defined authority over financial resources, responsible also for methodological aspect, overall content and strategy. In the implementation phase it should act as a specific operational program or a joint intermediary body for several operational programs (to be able to negotiate with Operational Programs).

- Institutional structures, human resources and managerial documents must be **prepared in advance** to develop an integrated strategy.
- Intervention logic and indicators must be developed before implementation begins. A clear monitoring and evaluation framework must be established before the launch of the policy.

II. Background and context

1. The Task and Methodology

The purpose of this evaluation was to draw lessons from the Slovak experience with designing and implementing a territorially targeted program aimed at marginalized Roma communities, the Comprehensive Approach in the 2007-2013 programming period. The comprehensive approach aimed to target geographic areas of poverty and segregation of Roma, drawing funds from multiple operational programmes.

The Comprehensive Approach in Slovakia was not implemented as originally planned. The planning stage was carried out in full, selecting 152 localities (including a very small number of microregions), which applied to a call with their complex local programme. But funding for the programmes was later not made available in a way that would allow comprehensiveness so there are no successes in implementation to follow. The assessment has nonetheless drawn potentially useful lessons from the planning process itself and the failure of the implementation, done primarily at the national level.

The assessment included a review of available national level documentation and desk review of 152 approved complex local development strategies, key events in the Comprehensive Approach planning and implementation were analysed and discussed with the stakeholders involved (governmental and municipal officials, consultants, local NGOs and others). Additionally, we analyzed all available approved strategies and reviewed a few of these local strategies and projects developed by municipalities (if available) in greater detail.



The following table reviews key evaluation questions which were to be answered by the present study, operationalized in testable hypotheses and methods to gathering and analyzing information to provide answers. Section III of the report is structured according to the evaluation questions in Table 1.

Table 1 - Evaluation questions set by Open Society Foundations and Hypotheses/Approach and Methodology proposed by the authors

Question	Hypotheses/Approach	Methodology
1. What advantages can integrated territo- rial programmes offer for Roma inclusion?	1. Quality participative programming approach can bring benefits in and of itself even where implementation fails – the process of formulation and the existence of a Local Strategy increases the likelihood needs of marginalized Roma communities are reflected in mainstream planning documents. 2. Integrated territorial programme can better reflect the complex and interconnected needs of a marginalized Roma community than sectoral programming.	Review selected Local Strategies, interview stakeholders involved in their drafting including municipal officials, local activists and outside consultants. Review mainstream strategic documents in the same localities.
2. What kind of "explicit but not exclusive" targeting of an integrated territorial programme fulfils the following criteria: 1. offers a good balance between developing mainstream services and targeting marginalised Roma communities for the design of the programme, and 2. ensures support of key national and local level stakeholders for the smooth implementation of the programme?	Programmes need to be targeted and named in a way that minimizes negative responses of the majority.	Overview of theoretical framework for territorial targeting.
3. What fields - sub-categories of early childhood development, education, employment, health, housing - can be developed effectively and efficiently within an integrated territorial programme rather than e.g. within sectoral programmes?	Certain topics within territorial targeting would not be included by municipalities if not required as part of comprehensive approach. Conditionalities set at national levels could lead to improved results of Roma inclusion.	Review selected Local Strategies, interview stake- holders involved in their drafting including munic- ipal officials, local activists and outside consult- ants. Review mainstream strategic documents in the same localities. Produce a dependencies table showing interde- pendence (sequencing) between certain meas- ures.
4. What territorial unit fulfils the following criteria: 1. offers a good balance between developing mainstream services and targeting marginalised Roma communities for the design of complex local programmes, and 2. offers existing structures for the design and implementation of complex local programmes?	Certain territorial units are efficient for territorial targeting in view of administrative structures, community characteristics and local capacity.	Analyze available benchmarks for service provision. Literature reviews, good practice policies reviews. Interviews with local officials.
5. What mechanisms ensure the participation of Roma in the design and implementation of complex local programmes?		Review of literature on participatory plan- ning approaches. Interviews with lo- cal Roma and pro-Roma NGOs consult- ants involved in programme preparation.
6. What technical assistance provided for the local level by the national level ensures the design and implementation of quality, equality-oriented complex local programmes and projects?	Technical assistance provided by the Slovak government was effective in assisting good planning.	Interview with officials from ministries that encountered the most problems with the programmes. Analysis of state-provided technical assistance. Identify what, if any technical assistance was provided for those strategies considered to be of good quality according to analysis above.
7. What selection procedures and criteria ensure the design and implementation of quality, equality-oriented complex local programmes and projects? What procedures can ensure iteration between local level needs and national level policies?	Selection procedures originally envisaged for the Slovak comprehensive approach were well designed but not implemented appropriately.	Review selection procedures designed and used. Analyze why some strategies were not approved.
8. What coordination mechanisms ensure the implementation of an integrated territorial programme, including structure of the operational programmes, structure of the budget and institutional set up?	Failure of Slovak comprehensive approach of- fers lessons on implementation mechanisms.	Analyse reasons for failure of implementation of Slovakcomprehensiveapproachanddrawlessons

2. Design and implementation of Comprehensive Approach in Slovakia

Comprehensive Approach began as an innovative idea of targeting structural funds at marginalized Roma communities during the 2007-2013 programming period. Its designers intended it as a reaction to the fragmentation of efforts aimed at Roma inclusion, lack of coordination in the use of structural funds for Roma inclusion, as well as the fact that in Slovakia's first, shortened 2004-2006 programming period after the country's accession to the EU, funds failed to reach the most marginalized communities.

The discussion was initiated in 2005 by Klára Orgovánová, who was then the Plenipotentiary of the Slovak Government for Roma Communities, as continuation of the so called "Comprehensive Development Program of Roma Settlements" adopted by the Slovak government in 20024, which included concentrated multi-sectoral governmental grants and expert assistance in the initial (planning) phase for 52 municipalities. In September 2005, The Office of the Plenipotentiary of the Government for Roma Communities (OPGRC)5, succeeded in negotiations with Ministry of Construction and Regional Development (MCRD)⁶, as the coordinating body for Common Strategic Framework at the time and was awarded the 24-month project "Administrative capacity building at the Office of the Plenipotentiary of the Government for Roma Communities" funded from the Operational Program Basic Infrastructure (OP BI).7

The objective of the project was to actively involve the OPGRC in preparations for the 2007-2013 programming period and also included support for creating, building and strengthening local partnerships with high absorption capacity for EU funding in the new programming period.

The project significantly strengthened the OPGRC's administrative capacity - 11 new experts focused on the inclusion of Roma communities and on preparation and implementation of projects financed by structural funds were employed. Five of them worked directly in three regions of Slovakia with the highest concentration of marginalized Roma communities (Prešov, Banská Bystrica and Košice) and six in the office in Bratislava.

The activities of the project were focused primarily on:

- Development of Local Strategies of Comprehensive Approach (LSCA), which were considered to be the main precondition for the implementation of the Comprehensive Approach in communities/micro-regions; the process of the LSCAs' preparation was open to participation and encouraged all local stakeholders to be involved (promoted by regional offices of the OPGRC and external facilitators);
- Publishing a compendium of model projects and good practices with potential for future replication;
- Promotion of the Comprehensive Approach model in all strategic documents of the 2007-2013 programming period (National Strategic Reference Framework, operational programs and other documents).

Among other results of the project, pilot LSCAs for 14 micro-regions were developed for territorially targeted implementation of the EU funds within the upcoming 2007-2013 programming period. In addition to the detailed strategy and links between the solutions to problems, the documents also included a project pipeline formulated specifically for the needs of each micro-region. The micro-regions were selected primarily in Prešov, Košice and Banská Bystrica regions.⁸ The 14 pilot micro-regional LSCAs consisted altogether of 114 municipalities.

⁴Resolution of the Government of the Slovak Republic No. 357/2002 on the Government's Priorities toward Roma Communities in 2002, Comprehensive Development Program of Roma Settlements, and Field Social Workers Program (April 10, 2002).

⁵ Part of the Office of the Government of the Slovak Republic at that time.

⁶ The MCRD was the National Coordinating Body for EU Funds in Slovakia and Managing Authority for OP TA at that time.

⁷The project budget was 311,100 EUR (however only 181,500 EUR were actually spent by the end of the project).

⁸ As additional support to these regions, the OPGRC regional offices had prepared Regional Strategies of Social and Economic Inclusion of Marginalized Roma Communities. Representatives of all key stakeholders, NGOs and focus groups from marginalized Roma communities participated in the regional strategies' development. The regional strategies had been published and were to become the main reference framework for design of LSCAs at the lower (micro-regional or municipal) level.

The Office of the Plenipotentiary defined the following criteria for the selection of pilot micro-regions:

- Percentage of population living in marginalized Roma communities;
- Ability and willingness of local municipalities and other stakeholders to be actively involved in the problem-solving process;
- The existence of a Plan of Economic and Social Development or any other development document approved by the local council;
- Scale and urgency of the problems related to education, employment, housing, technical infrastructure, access to public services and health of the inhabitants;
- Presence of an active civic association or other local leader(s);
- Level of segregation of the marginalized community.

To provide for an integrated approach there was a condition in place that all LSCAs had to include at least five projects focusing on at least two of the mandatory areas of development (housing, employment, education, health) and at least one optional area of development (activities related to community development, culture, environment were not eligible for EU structural funds and authorities and stakeholders in the territory were required to look for other sources of financial support). The activities and interventions were required to be sequenced logically (e.g. where soft training interventions were combined with infrastructure investments the future staff were to be trained in time to be ready when the facility is put into operation), reflecting the local conditions of each specific micro-region.

Additionally, in 2007 the scope of the OPGRC's grant scheme was extended, making community planning activities eligible for funding; all municipalities with marginalized Roma communities (not included in the pilot micro-regional LSCAs) were invited to apply for small-scale grants aimed at preparation of new LSCAs. Together with the financial assistance the OPGRC was also offering technical assistance with the participatory process of the LSCA preparation. The support was meant to be a tool to encourage municipalities to work on the drafting of LSCAs

and prepare for the implementation of the comprehensive approach in their communities after the beginning of the new programming period. Some 25 additional municipalities were supported during the first year of the call.

During 2006 and 2007 OPGRC successfully introduced the Comprehensive Approach principle into all strategic documents related to use of EU Funds between 2007 and 2013, including the National Strategic Reference Framework 2007-2013 (NSRF).9 Six of the 13 operational programs of the new programming period were requested to allocate a specific budget for the implementation of the Comprehensive Approach: Education (OP E), Employment and Social Inclusion (OP E&SI), Environment (OP Env), Competitiveness and Economic Growth (OP C&EG), Health (OP H) and the Regional Operational Program (ROP). The aggregated indicative allocation for the Comprehensive Approach was 200 million EUR, according to the NSRF. The OPGRC was formally appointed as coordinator of the Horizontal Priority Marginalized Roma Communities in the 2007-2013 EU Funds' programming period in Slovakia, which included Comprehensive Approach as a specific implementation tool. The OPGRC was intended to coordinate specific managing authorities and provide them with methodological guidance in implementation of the respective operational programs in the interest of Roma inclusion and proper implementation of the Comprehensive Approach in territories with developed local strategies.

The OPGRC was therefore responsible for providing municipalities and micro-regions with technical assistance in elaboration of high-quality LSCAs, their approval for support (by a special inter-ministerial committee), development of specific projects, in accordance with LSCAs' objectives, technical assistance for successful LSCAs and implementation of projects, as well as monitoring and evaluation of the Comprehensive Approach. Managing authorities of the respective operational programs were responsible for launching specific calls for the submission of specific projects covered by the LSCAs, their evaluation, contracting, administration, funding and monitoring. The managing authorities were supposed to execute these tasks in close cooperation with the OPGRC.

⁹ The NSRF was the key reference document for the EU Funds implementation in the programming period 2007-2013; it was submitted by each Member State for approval by the EC. The document includes a high-level strategy on the spending of the EU Funds during the programming period, the linkage between EU priorities and Member State's national reform program, the structure of operational programs, etc. The Slovak NSRF in English is available at: www.nsrr.sk/download.php?FNAME=1209486553. upl&ANAME=NSRR_anglicka_verzia.doc.

The cooperation procedures, as well as specific financial allocations for the Comprehensive Approach from respective operational programs were not part of the NSRF or other strategic documents, but instead had to be agreed individually between each managing authority and the OPGRC. The bilateral agreements were, however, not specific enough to ensure effective implementation of the Comprehensive Approach as originally intended. They included only indicative allocation from every operational program, ¹⁰ specification of the operational program's priority axes and measures relevant for the Comprehensive Approach and general commitment to launch specific calls for project proposals for municipalities/micro-regions with approved LSCAs and to involve the OPGRC in the drafting of the calls and evaluation and selection of projects.

Table 2 - Main differences between the plan and execution in the selection process and implementation of the Local Strategies



Plan	Reality
Operational programs to include eligible activities necessary for implementation of the LSCAs.	The LSCA elaboration had to accommodate limitations of the operational programs and selected priority axes and measures.
Selection of at most seven territories per year to implementing the comprehensive approach. Selection procedure and calls for LSCAs organized every year.	Selection of 152 LSCAs in two calls for proposals (within the first call two territories were selected, during the second call 150 territories were selected).
Selection of LSCAs based on quality, prepared in a participatory way with the support of technical assistance by the OPGRC and involvement of local community and local stakeholders.	The existence of LSCA strategic document was not required at all. The applicants were required to submit only application forms including a set of project intents, no information about the development strategies was required. The selection criteria were based primarily on the formal requirements.
Provision of extensive free-of-charge technical assistance to the selected territories ensuring the quality implementation of the specific measures and projects.	No technical assistance provided in the field.
Strategies financed by open calls for project proposals organized via the relevant operational programs ensuring correct sequencing in implementation of the selected strategies.	Inability to ensure sequencing of specific calls for proposals and in implementation of the strategies selected.
The process of LSCA approval guarantees the quality of project intents included. Project intents included in approved LSCAs entitled to support from respective operational programs.	Low quality of projects submitted to the managing authorities of respective operational programs (or even ineligible projects). The selection criteria for the project proposals submitted under the calls designed for the comprehensive approach in specific operational programs, are equally strict as within any other calls for project proposals. Many of projects were eliminated from calls merely on not meeting formal criteria of proposals.
If a project proposal which is part of an approved local strategy does not meet the required quality criteria of the specific operational program, the proposal may be resubmitted until it is granted.	No possibility for the project proposal re-submission exists.

¹⁰ Moreover, it was not specified, whether the agreed amount represents only the EU contribution, or the amount of grants (EU plus Slovak State budget contribution), or value of projects (EU, Slovak State budget contribution and beneficiary's co-financing), or amount of eligible expenditures. The discussions on the actual amount of the allocation for the Comprehensive Approach dominated the political discourse after 2010 when the Comprehensive Approach became a subject of criticism by politicians, media, activists and NGOs. Other problems of the implementation of the Comprehensive Approach, perhaps even more important, were ignored.

The reality of implementation of Comprehensive Approach is well reflected in an overview of actual funds spent from the horizontal priority Marginalized Roma Communities as of May 2013. Of the indicative allocation to individual OPs amounting to almost 180 million EUR less than 20% has been contracted and only a little over 4% actually spent on projects, according to the OPGRC's monitoring.

Table 3 - Allocations, contracting and spending for the Comprehensive Approach (LSCSs) as of May 2013

Operational program	Indicative allocations for Comprehensive Approach			Contracted Projects			Actually spent from allocation	
Operational program	source	M EUR	% from total	num- ber	M EUR	% from allocation	% from total	%
Regional operational program*	EU	85.0	47.5	0	0.0	0.0	0.0	0.0
OP Employment and social inclusion**	EU	26.5	14.8	17	7.5	28.3	1.4	5.3
OP Education	EU + state budget	17.0	9.5	19	2.1	12.4	0.6	3.5
OP Environment	EU	22.9	12.8	3	1.1	4.8	0.0	0.0
OP Competitiveness and Economic Growth	EU + state budget	16.5	9.2	41	18.4	111.5	0.0	0.0
OP Health	EU + state budget	11.2	6.3	9	6.5	58.0	5.5	49.1
Total		179.1	100.0	89	35.6	19.9	7.5	4.2

Source: OPGRC

* The data on number of contracted projects from the ROP reported by the OPGRC has became a matter of controversy, which came to dominate public debates on the Comprehensive Approach in Slovakia and overshadowed other important issues. Due to serious delays in launching the LSCA by the OPGRC, the ROP Managing Authority decided to launch a call within Measure 1.1 (infrastructure of education) and Submeasure 4.1.c (regeneration of sites) independently from the OPGRC. Several municipalities with project intents for these measures in the approved LSCAs, applied for, and some actually received, support from these calls. However, the OPGRC has never recognized such projects as contribution to implementation of the LSCAs and does not include them to the monitoring of the Comprehensive Approach. The ROP Managing Authority, on the other hand, refused to launch additional identical calls exclusively for municipalities with approved LSCAs.

The ROP argued with a risk of duplicity between granted projects and LSCA project intents, ineligible or ineffective content of some LSCAs' project intents, which could not be funded by the ROP anyway, and that their projects supported from the general calls should be included into the Comprehensive Approach implementation. An analysis prepared by the ROP's Managing Authority and approved to the Slovak Government showed, that within launched general calls, 13 projects submitted by municipalities with approved LSCAs, which are part of Comprehensive Approach, of aggregated value 10.1 millions EUR from Measure 1.1 and 33 projects of aggregated value of 24 millions EUR from Sub-measure 4.1.c have been approved and funded by the end of 2010¹¹. After inclusion of these projects, the allocation and contracting figures would be as reported in Table 4.

¹¹ Ministry of Agriculture and Rural Development (2011). Informácia o realizovaných projektoch Regionálneho operačného programu 2007-2013 zameraných na riešenie problematiky marginalizovaných rómskych komunít. Resolution of the Government of the Slovak Republic No. 41/2011 (19 January 2011).

Table 4 - Allocations, contracting and spending from ROP for municipalities with approved local strategies awarded in general calls as of May 2013

Operational	Indicative allocations for Comprehensive Approach			Contracted Projects			
Operational program	Source	M EUR	% from total	number	M EUR	% from allocation	
Regional opera- tional program	EU	85.0	47.5	46	34.1	40.1	
Total		179.1	100	135	69.7	38.9	

** At the beginning of 2012 the SDF launched a national project on field social work in Roma communities with overall budget of 30 millions EUR for 2012-2015. The national project is being implemented also in municipalities with approved LSCAs. As the national project is more effective and efficient and less administratively demanding in comparison to individual (demand-driven) projects with achieving the same goals,

the LSCA project intents on field social work are to be materialized through national project. The SDF agreed with the OPGRC that a share of the national project's budget spent in municipalities with LSCAs will be included in the figures on spending and contracting for the Comprehensive Approach. The present table, however, does not includes the data on the national project, yet.

III. Findings and lessons learned

1. Integrated territorial approach and Roma

What advantages can integrated territorial programmes offer for Roma inclusion?

Given the shortcomings in implementing the originally planned complex approach we tried to gather evidence on whether the planning processes for local strategies were seen by local actors as beneficial even in the absence of direct benefits from projects supported.

We encountered several municipalities where some respondents said they saw benefits from the planning exercise itself. One was for the city of Banská Bystrica and a respondent involved with drafting several strategies in the region said this was characteristic of other localities, too. In the Eastern Slovak municipality of Petrovany the mayor also viewed as useful the participative planning carried out with the assistance of an NGO active in the community,

People in Need. He cited benefits with respect to the identification of activities with the input of local Roma in public gathering, which were highly attended.

In several other localities where little or no actual funding was received on the basis of an approved Local Strategy and the process of drafting was not participative respondents reported that they saw no benefit to the planning process of the strategy. In general these were localities where the Local Strategy was designed either by outsiders or by municipal staff with limited input from other stakeholders. It correlated with a narrow view of local strategies as instrument to gain access to specific funding opportunities without a broader context.

In this sense it is useful to distinguish between **two kinds of strategies** among those approved:

1. well elaborated strategies usually building on earlier strategic planning and 2. de facto bare local strategy applications containing a list of projects but lacking logic and details.

In the central Slovak region of Banská Bystrica there was a planning activity which preceded the formulation of local strategies - carried out by the Office of the Plenipotentiary for Roma Communities. A steering group of over 30 regional stakeholders facilitated by two large NGOs - Partners for Democratic Change Slovakia and CEPA - Priatelia zeme formulated a regional strategy of Roma inclusion for 2007-2013 in Banská Bystrica and related Action Plans.

There was evidence in several localities from respondents that the existence of a well formulated strategy directly influenced and stimulated interest in formulation of a Local Strategy.

We expected an integrated territorial programme to better reflect the complex and interconnected needs of a marginalized Roma community than sectoral programming.

First support for this hypothesis comes from the content of actual programming documents - while a coherent strategy existed based on best available statistical data (Roma Atlas) for the Local Strategies, the coverage of Roma issues and understanding of problems by managing authorities of respective OPs was limited.

One key respondent involved directly with managing the Horizontal Priority explicitly reported a tendency within several key managing authorities to see the Horizontal Priority as unnecessary and unfair because "Roma were entitled to the same benefits as all others" from mainstream programs. A program targeted specifically on Roma was then seen as discriminating against non-Roma.

Given the variance observed in the quality and complexity of Local Strategies, it appears that such an integrated program can (but does not always automatically) reflect well the needs of a marginalized community. Mainstream programming often does this poorly.¹²

Additional evidence on failure of sectoral programming to match the needs of Roma communities comes from the evaluation of ESF projects carried out by UNDP¹³ as part of their initiatives in monitoring policies affecting marginalized Roma.

Evaluators found that projects declared as fulfilling the horizontal priority of marginalized Roma communities were disproportionately directed to regions with fewer Roma and those Roma communities were less poorly off. In addition many projects simply did not reach the communities they claimed to benefit.

In this context territorial projects were clearly promising in terms of addressing complex sets of interconnected problems faced by Roma communities as discussed in later chapter (albeit not effective due to implementation issues in the Slovak context).

2. Roma targeting and mainstreaming

What kind of "explicit but not exclusive" targeting of an integrated territorial programme fulfils the following criteria:

1. offers a good balance between developing mainstream services and targeting marginalised Roma communities for the design of the programme, and 2. ensures support of key national and local level stakeholders for the smooth implementation of the programme?

To provide an actionable answer to this evaluation question first requires us to clarify what is a good balance between developing mainstream services and targeting marginalized communities.

An answer based on a human rights argument can be postulated, relying on international obligations (fundamental rights), constitutional rights and other legal rights.

This could be used to determine what balance a society should seek.

Empirically it is clear that many mainstream programmes benefit marginalized Roma less than other citizens due to exclusion (the argument can be made e.g. for higher levels of education, expensive medical care, old age pensions).

On a more practical level we need to deal with perceptions of programmes.

¹² This holds for some of the programs as presented and proposed at time of writing for the 2014-2020 programming period.

¹³ Hurrle et al., 2012

In some localities respondents reported levels of hostility such that local deputies (non-Roma) a priori refused to support participation (incl. co-financing) for any program benefiting the Roma. The rationalizations reported were either pure negative attitude ("Why should we help them if no one has helped us?") or even instrumental perceptions ("If we build 'them' houses, even more will come.")

Slovakia also saw extensive debate on the headline figures of horizontal priority funding, which arguably affected the public debate and subsequent policies towards marginalized Roma. Very often the arguments based on the officially declared (but clearly not delivered) 200 mil. EUR figure was given as justification for not providing additional programmes for Roma communities.

This raises the counterfactual question of whether programmes should be targeted and named without reference to ethnicity, using other characteristics related to exclusion and poverty to target programmes. A debate in programming for 2014-2020 broke out on how explicitly Roma should be named in programs targeted at them without a conclusive answer.

Slovak government tried to do this in 2011-2012 through a proposed Law on Excluded Communities, which worked with a non-ethnic socio-economic definition of geographic communities and would enable public administration to target funds for exclusion without ethnic identification, which presents legal and practical complexities at the moment. However, the law has not been passed.

Unless there is clear justification for exclusive targeting, application of purely ethnic criteria can miss other individuals living in similar conditions to marginalized Roma (non-Roma poor) - in part due to stigmatization.

There was evidence in some localities of what could be conceptualised as a parallel system of public services for Roma created through Roma-helping projects where for instance field social workers funded by the European Social Funds or local "Roma watch" members 14 from Social Development Fund took on various roles on behalf of local government vis-a-vis marginalized Roma.

In some localities these staff members delivered mail, handled all official communication with Roma, etc.

The dilemma of Roma targeting or mainstreaming is widely discussed. Some experts suppose that labelling initiatives or policies targeting marginalized Roma populations by ethnically neutral terms (for example "marginalized populations (including Roma)") can be better accepted by stakeholders (politicians, public administration and various institutions) and the broader public and consequently more successful, than if they are explicitly labeled as Roma targeted. Such opinion can be supported by experience of one representative of the OPGRC (and statements of some municipal representatives - see above in this chapter). She said that some representatives of other ministries and managing authorities had considered the Comprehensive Approach as "something extra for Roma"; negative attitudes towards the Roma and perceptions of the Comprehensive Approach as an unjustified advantage given to Roma could influence their personal engagement in implementing the Comprehensive Approach implementation.

There is little evidence from our research that explicit ethnic labeling of the Comprehensive Approach contributed in a significant way to its shortcomings. Experience from other policies and initiatives targeting Roma but having ethnically neutral labels (e. g. field social work, activation works) shows that the mainstream population, stakeholders and institutions are able to decode the non-ethnic proxies (such as "marginalized populations") as Roma-targeted (with all negative consequences such as resistance, segregation and stigmatization of these initiatives and policies).

Moreover, experience with other past policies in Slovakia (mostly the welfare reforms in 2003-2004) provide a strong argument for explicit Roma targeting. Social redistribution of wealth through welfare is not equal toward Roma and non-Roma and the ethnicity is among substantive factors in access to mainstream measures in social services, employment services, community development, education and other fields. Among target needy populations, these are often less accessible and available to Roma than non-Roma in similar situation.

¹⁴ Civic watch or Roma watch projects funded by several programs (ESF, national grant scheme) usually involve hiring Roma assistants. Their role often goes far beyond public security and they serve as assistants to local government on various issues concerning the Roma community and even facilitators of communication between the Roma and local government.

Therefore it is worth considering a "Gadje mainstreaming" logic in line with the 2009 Integrated European Platform principle of "explicit but not exclusive targeting". Such logic means to design and label integrated territorial policies of social inclusion as explicitly and primarily targeting marginalized Roma populations, but open also for any non-Roma facing similar living circumstances. For example social service primarily introduced in a territory because of presence of marginalized Roma, but provided also for marginalized non-Roma. Otherwise there is a risk that social service will be provided primarily to non-Roma and due to limited capacity or other real or apparent reason will not be accessible to non-Roma (for example nurses for elderly persons or other social services in many municipalities in Slovakia, which are used almost exclusively by non-Roma). If Roma-targeting would lead to even higher inequalities and exclusion of a few non-eligibles, or generate disproportionate operational costs (for example for testing individual eligibility), the measures should be available to all potential beneficiaries in targeted territory.

Slovakia has seen practical application of "Gadje Mainstreaming" - inclusion of non-Roma in programs designed with the marginalized Roma community in mind but equally available to all people in life situations similar to those of marginalized Roma. The government in 2004 introduced a measure that provided children from families classed as being in material need **free school lunch**. The measure was arranged in such a way that in schools where in the given period at least half of all children came from families in material need, all children received free lunches without additional administrative burden. This reduced stigmatisation and also provided a shared benefit to all pupils at schools with many poor children.¹⁵

3. Integrated territorial approach and sectoral approach

What fields - sub-categories of early childhood development, education, employment, health, housing - can be developed effectively and efficiently within an integrated territorial programme rather than e.g. within sectoral programmes?

Our original hypothesis was that certain areas of assistance within territorial targeting would not be included by municipalities if not required as part of comprehensive approach.

Evidence supporting this hypothesis came from several respondents both within municipalities and those who helped prepare Local Strategies. They said that many local governments were primarily interested in infrastructure projects - in many cases ones where marginalized Roma had little benefit beyond what other local inhabitants would receive or even less.¹⁶



¹⁵ There was evidence in the context of other research that this had the unintended consequence of making "poor" schools even more attractive to other poor people, who may otherwise have problems meeting the narrow legal definition of material need. ¹⁶ This is the case of e.g. projects supporting reconstruction of health infrastructure (local health facilities), school infrastructure or projects for "revitalization" of areas of municipalities without a higher share of Roma.

Table 5 - Municipal projects by area of support

	ESF financed					(infra		nanced based pro	ojects)		
		yment and I inclusion	Education	Regio	nal opera	tional pro	ogram	Health	Envi	ironment	Entrepreneurship
	Employment	Social work		Schools	Social infrastructure	Culture	Settlements Regeneration		Water management	Waste management	En
Number of pro- ject proposals under specific operational pro- gram	32	98	75	76	53	3	44	37	2	37	5
Number of pro- ject proposals under specific fund		205					2	57			

Source: Authors' calculations based on Strategies provided by the OPGRC.

VIn the context of interviews with stakeholders a lot of evidence emerged on interdependence of certain types of interventions on others. Clearly this is no universal set and there is strong dependence on local circumstances and national legislation and policies.¹⁷

We identified six broad areas of intervention where we studied interdependence presented in the table below.

Table 6 - Interdependencies between fields of inclusive interventions

Notes: X = no systematic interdependence between domains, - = not applicable

¹⁷ For example the dependence of economic sustainability of social housing on residents having income from work may not hold in countries where unemployment benefits are higher or costs of social housing are otherwise subsidized, which is at present not the case in Slovakia.

	Early Childhood Education and Care (ECEC)	Education (incl. adults)	Employment	Health	Housing and infrastructure	Social services (incl. field social work and community social work)
ECEC	-	Parents need to be educated on benefits of ECEC to ef- fectively increase enrolment and attendance	Depending on upfront costs employment or income from employment may be required to cover cost of pre-school.	Health issues are one of the key limiting factors of pre-school attendance of children from marginalized Roma communities even where there is enrolment. Effectiveness of ECEC interventions may rest on health and health education interventions.	ECEC related to housing interventions in the context of accessibility if housing is too far from available facilities transport infrastructure is required.	Functioning social services are prerequisite to ECEC participation. Field social workers need to help with enrolment and help support attendance and quality of ECEC.
Education (incl. adults)	Effectiveness of primary education interventions strongly depends on quality of ECEC.	Interventions for children may depend on intervention with adults teaching on benefits of education for children and various practical aspects.	X	Health issues are one of the key limiting factors of school attendance of children from marginalized Roma communities. Effectiveness of primary school interventions may rest on health and health education interventions.	Ability of children to participate depends on housing infrastructure. Lack of facilities hinders preparedness of child for school (hygiene, place to do homework).	Functioning social services are a prerequisite to primary and secondary education participation. Field social workers need to help with enrolment and help support attendance and quality of education.
Employment	In interventions focusing on employment of women availability of ECEC may be a prerequisite to labor force participation.	Second chance education and retraining interventions both on job-specific skills and habits may be required to enable effective participation in labor force.	-	Health interventions may affect the effectiveness of employment interventions.	Some issues related to infrastructure (hygiene, transport) may affect effectiveness of employment interventions.	Assistance with financial literacy may affect incentives to take on work and ability to participate.
Health	Х	Adult education interventions and also interventions with children may have synergies with health interventions (they can be provided within educational facilities and within educational activities).	Х	-	Housing infrastructure, hygienic and transport infrastructure may influence outcome of health interventions.	Social services may be required or beneficial for outcome of health interventions.
Housing, infrastructure	X	These interventions may need to work in parallel (e.g. to ensure accessibility of new housing). Another area is possible synergies with adult education - e.g. to educate people on maintaining housing stock, formal procedures, rights, etc.	In the present policy framework often the sustainability of new housing depends on beneficiaries having paid work to cover payments.	X	-	Housing and infrastructure interventions are dependent on interventions in social services in a number of ways.
Social Services	Х	Х	Effectiveness of social services interventions may be affected by availability of employment.	Х	Access to social services may be affected by hous- ing and transport infrastructure.	-

The table above, compiled by the authors on the basis of interviews with local government officials and other stakeholders, shows that each of the key fields of early childhood education, education - adult, primary and secondary, employment, health, housing and infrastructure and social services has different levels of interdependence but depends on or can synergically benefit from parallel intervention in at least two (but in some cases five) other broadly defined fields.

In particular human capital interventions aimed both at children (ECEC and education) and adults (adult education, employment) need to be developed in parallel with numerous other fields of intervention.

These are therefore clearly very well suited to be developed as part of integrated territorial programs. Clearly there is strong local variation but the table above can serve as general guide.

We hypothesised that conditionalities set at national levels could lead to improved results of Roma inclusion.

Based on indications from the interviews we conducted and our analysis we believe that setting national conditionalities for eligibility may lead to improved results but only if several conditions are met:

- programs must be simple and accessible for municipalities and other relevant recipients this has not been the case in the 2007-2013 programming period, where there was significant administrative burden and little clarity in planning calls in advance relevant to approved strategies,
- where there is limited local capacity or willingness to assist inclusion of Roma the state or other outside actors such as NGOs can successfully step in through mediation and technical assistance activities to support local programming and participation in broader interventions,
- programs must have low administrative burden and sensible time profile of payments
 administrative procedures should be unified across programs...

Interestingly there was **no consensus on the appro- priate levels of co-financing** and whether and to what extent cofinancing is a key limiting factor reducing interest in Structural Funds. Several respondents noted co-financing as a barrier¹⁸ but several others, including a mayor, argued for greater co-financing to make sure resources are not being wasted. The potential waste was seen both at national and EU level and at the level of local resources - that municipalities were willing to apply for irrelevant interventions if they bore no burden of co-financing.

4. Territorial scoping

What territorial unit fulfils the following criteria:

- 1. offers a good balance between developing mainstream services and targeting marginalised Roma communities for the design of complex local programmes, and
- 2. offers existing structures for the design and implementation of complex local programmes?

We hypothesized that certain territorial units are efficient for territorial targeting in view of administrative structures, community characteristics and local capacity.

In regards to territorial planning, in Slovakia programming may be carried out at the municipal level, microregion or administrative self-governing region.

Clearly we found that the size of municipalities makes a huge difference with respect to capacity. In Slovakia average municipalities are very small and this often determines their very limited administrative capacity.

The initial design of Comprehensive Approach was very much based on the theory of territorial planning. It encouraged municipalities to join bigger units and to act as a member of micro-regional networks. Despite an initial effort, none of the total number of 152 supported local strategies of comprehensive approach was submitted by a micro-region.

The reason behind the low interest of the municipalities in the formalized micro-regional cooperation is a managerial complexity of the system of formalized micro-regional cooperation and issues of legally mandated authority in Slovakia. Several mayors told us in interviews that any decision made at a microregional level (including decisions related to project implementation) requires a consensus of all involved municipalities. For legal reasons in most cases this involves approval by municipal deputies. Reaching such consensus is time-consuming and complex and municipalities are reluctant to contribute their human or financial resources to micro-regional structures. Legally municipalities have exclusive authority in some areas of development in the territorial approach and cannot pass it to a micro-region.

In Hungary a different form of territorial approach was implemented using micro-regional

structures for planning, though allowing municipallevel intervention as part of the plan.

The initial design of the territorial approaches policies in both countries had many similarities (development based on the approved strategy, massive technical assistance present in the targeted regions, allocation of financial resources needed for strategy implementation), Slovak Comprehensive Approach required an additional stage of approval of individual project proposals even if they were already approved as part of strategies. Both competition and administrative complexity limited the numbers of approved projects from the Local Strategies (the original intent was, that if the strategy is approved, the operational programs should be required to provide sufficient financial resources for measures within the strategy).

Box 1 - Hungary's Most Disadvantaged Micro-Regions Program (Leghátrányosabb Helyzetű Kistérségek Felzárkóztatási Programja - LHH)

The LHH program was designed as the main instrument within the structural funds in the 2007-2013 programming period for reducing regional disparities in Hungary.

Based on Hungary's National Development Plan I (2004–2006), the most disadvantaged micro-regions received per capita funding exceeding the national average. However, this additional funding turned out insufficient to counterbalance negative socio-economic trends. Some micro-regions, settlements, or social groups obtained resources below the average.

Based on the experience from 2004-2006 period, the Hungarian government decided to create a new program based on strict geographic targeting. Unemployment is a chronic feature of the most disadvantaged Hungarian micro-regions, education services are poor quality and the amount of personal debts accumulated by the population has risen significantly. These problems affect the Roma population in particular, contributing to their segregation and discrimination.

In the autumn of 2007, the government designated the 33 most disadvantaged micro-regions (total population in these regions represents 10% of the national population and some 30% of the Roma population) on the basis of their economic, social, and infrastructure coverage indicators and decided that these regions need to be developed through a complex and comprehensive program including variety of measures. Three independent operational programs contributed funds to finance such a comprehensive program: Regional Operational Program (ROP), Social Renewal Operational Program (SROP) and Social Infrastructure Operational Program (SIOP).

The financial resources were allocated in advance of implementation of the specific micro-regional strategies. Based on the quality of each micro-regional strategy, the LHH program indicates the potential financial allocation for each micro-region. The financing of a specific project/measure of the strategy was based on negotiation between the donor and micro-region without direct competition. This ensured financing for the strategies and the micro-region was able to control the sequencing of financial assistance.

Even though Roma inclusion was one of the main conditions of the LHH program and the involvement of Roma was mandatory, the program was meant as a territorial program, not primarily and explicitly focused on Roma inclusion.

LHH proved to have capacity to channel significant financial resources to the most disadvantaged micro-regions and generate a number of Roma inclusion projects.

In 2010 Cohesion Policy Strategic Report published by the EC, the LHH program was recognized as good practice in Roma inclusion policy.

Source: "Where the Paved Road Ends, Regional Disparities and Roma Integration Report on the Interim Results of the Most Disadvantaged Micro-regions Program (Hungary)", OSI, Budapest, March 2011.

The efficient scale also varies sectorally and depends on the legislative framework:

Education

For education the appropriate territorial unit varies by level of education. In the preschool system intervention must be at the level of municipality. Depending on size of municipality, primary education may be local or micro-regional. In some Slovak localities the nearest primary school is in another municipality and the municipalities must cooperate in provision and ideally in financing. This is even more true for ISCED 2 since some municipalities only have schools for grades 1-4 (ISCED 1). For post-secondary education including adult education (and second chance education at primary level) the appropriate territorial scale is often sub regional (in the Slovak case at level of administrative districts) or regional.

Interventions in the area of methodological guidance (provision of learning materials) must also be addressed outside the scope of territorial programs - sectorally at national level.

Employment

For initiatives aiming better employment and employability the appropriate territorial unit depends on the type of the intervention, the target group of the intervention or the economic situation of the region where the intervention is implemented.

Activation works¹⁹ are a key measure aimed at increasing employability of marginalized Roma. According the current legal framework, only municipalities and self-governing regions are allowed to utilize this measure. The impact of activation work on the employment and employability increase is questionable, also, this measure is not considered to be a part of employment policy, it is introduced as a part of the social assistance framework. The same is true for the majority of the social assistance measures financed by the state budget (e.g. field social work).

In the context of territorial scoping, the ability to meet certain conditions in employment and employability interventions oriented on the open labor market seems to be more important than exact definition of the territorial unit size. Based on experience from implementation of the ESF, these conditions include:

- case-management approach in social services provided as close as possible to the client,
- coordination of retraining and vocational education programs with the local labour market (either local, micro-regional or regional level),
- availability of jobs within accessible distance that the participants are or can become qualified for.

After meeting the above listed criteria, the initiatives with the objective to improve employability and employment may be equally effective regardless of whether they are organized at the local, micro-regional or regional level. However, given the current socioeconomic situation of marginalized Roma communities, the initiatives aiming better employment and employability should certainly cross the borders of Roma community territories.

Housing and Infrastructure

Housing and technical infrastructure intervention aimed at Roma inclusion **must be planned and implemented primarily at the local level**, as they must be part of general municipal policies in this field. Taking into consideration high financial costs and long-standing effects of such interventions, they are the object of traditional spatial planning of municipalities.

On one hand they are an opportunity for planned Roma residential integration and "Gadje mainstreaming", i. e. non-Roma population benefiting from interventions primarily targeting Roma bringing support for Roma inclusion policies and supporting cohesion among all inhabitants of a municipality (for example technical infrastructure for Roma settlement built through the non-Roma parts of the municipality, where the inhabitants will have opportunity to connect to it; on the other hand in practice if the infrastructure is planned and built for the "whole" municipality as a mainstream policy, usually, often the Roma parts of the municipality are excluded with various justifications).

Municipal social housing is perceived as especially sensitive and non-Roma often prefer not to have Roma as close neighbors. However, strict anti-discriminatory and anti-segregational conditions of various grant schemes for social housing procurement (municipalities are generally fully dependent on external funding in social housing procurement as the budgets are above possibilities of municipal budgets)

¹⁹ According to Act No. 5/2004 Coll. on Employment Services, as amended and Act No. 369/1990 on Municipality Governance, as amended.

can support residential desegregation. Smart strategies of municipal social housing should be supported promoting social and ethnic mix, ladder-type housing systems and targeting various residents unable to procure private housing on their own. Concentration of Roma in ethnic neighbourhoods within the inner municipalities' areas or housing dispersed among non-Roma population must be upon individual decision of particular families and individuals concerned by the policy. **Social housing must be supported by complementary social services** (field social work, participatory housing management and other "soft" measures, making the housing intervention's impact sustainable).

Planning and implementation of Roma housing policies on micro-regional or regional level can increase the risk of conserving or even strengthening residential segregation of Roma, as it can lead to consensual and coordinated massive segregation of Roma or other vulnerable groups from a whole (micro-)region in areas remote from all municipalities in the territory.

Health

According to the WHO the right to health care has four main elements: availability, accessibility, acceptability and quality. According to the Slovak Health Policy Institute accessibility of health system is the most recognized aspect and is in the focus of Slovak political leaders. It includes four dimensions: non-discrimination, physical accessibility, affordability and information accessibility. Based on some of the interviews with mayors in more remote areas accessibility of health care is a problem for both the majority and minority.

At the same time they recognize a significant lack of prevention and information in Roma communities confirmed by earlier research.²¹ Limited accessibility of health services goes hand in hand with accessibility of other services such as social services and education. In poor settlements and neighborhoods the mobility of people is very low. Discrimination of Roma is also present via limited access to service/working hours and segregation in hospitals (isolated rooms).

The main shortcoming in regard to Roma participation in the health system is not related to infrastructure and its accessibility but more to the lack of education and awareness. There is very little trust between health professionals and marginalized Roma who then do not use the existing infrastructure. There is also a significant administrative burden for poor people in access to health care. Ministry of Health tried to implement a system of 30 field health care assistants who will work with the communities on fostering prevention programmes and provide primary services and education to local people but the program stopped operating due to lack of financial continuity.²²

Local Strategies of Comprehensive Approach in some municipalities included reconstruction of health infrastructure. One of the mayors described the project of health infrastructure upgrading as very successful and highlighted the fact that the local Roma themselves identified the need to invest in such reconstruction. In another municipality, the mayor said they were not successful in gaining support for health infrastructure due to insufficient resources in the OP but their initial aim was to motivate local Roma to see the doctor more often by rebuilding the local health care center and making it more comfortable (easier access, bigger waiting rooms, etc.).

Existing infrastructure of primary health care system covers all geographical areas and therefore any program/project interventions **should focus on the local level with clear target on inclusiveness of provided services**. Meanwhile, it is desirable to put more focus on prevention and education in regard to health and lifestyle of Roma communities using the tried health care assistance program or other interventions.



²⁰ See: www.hpi.sk/hpi/sk/view/2384/zabezpecenie-dostupnosti-zdravotnej-starostlivosti-a-moznosti-jej-regulacie.html.

²¹ For more see: ec.europa.eu/health/ph_projects/2004/action3/docs/2004_3_01_manuals_sk.pdf.

²² Ibid.

5. Roma participation

What mechanisms ensure the participation of Roma in the design and implementation of complex local programmes?

Slovakia has a rich history of civic engagement and participation on the national level going back to the 1990s post-planned economy transition period. Municipal reform in late 90s brought about changes in core authorities of local governments as well as new opportunities for civic engagement. Since then, several participatory tools have been implemented successfully in some Slovak localities and some mechanisms are continuously being used.

The use of participatory budgeting process in budget drafting seemed well received among local elites as it involves the local stakeholders in decision making and gives voice to various interests.

The number of civic associations in Slovakia is high and community based organizations are growing in size. Participation and civic activism has increased in the area of community development in Slovakia within the last decade (Bútora et al., 2011).

Municipalities and other key actors often use public hearings to discuss key issues with the public.

Also people file petitions on all kinds of issues and at all levels of the decision-making process. They are seen as a commonly used tool for expressing opposition to draft policies. At the same time, public review of drafted policies and legislation boomed recently with the use of social media and launch of online tools that make support to public comments easily accessible (Bútora, 2011).

In accordance with the theoretical concepts of participation of vulnerable groups (Estrella, 2000) as well as findings from the field, the participation process needs to include three main factors:

- building of partnership or enhancing the existing one,
- consultation/mediation of conflicts in order to reach a consensus,
- moving beyond the leadership role of the mentors and building their capacities.

However participation in communities with significant marginalized Roma population is limited by several barriers. The partnership principle exercised on the national level in the programming and implementation of operational programs is based on EC's requirements and does not function properly in the Slovak context.²³ One of the reasons is a **lack of positive historical experience with policy design using the partnership approach**. Partnership is therefore usually viewed as a formality and has no added value for the actual inclusion of other stakeholders in policy design.

Initially, we hypothesized based on our previous experience with Local Strategies of Comprehensive Approach that participative approaches were successfully implemented in some Slovak localities.

Information from local stakeholders shows that on the local level the partnership principle does not contribute to participatory strategic planning and implementation of policies much like on the national level.

There are, however, several factors that enhance the application of the partnership principle and contribute to participation of Roma communities in strategic planning.

Past experience with partnership helps later. In general, any participative activities that occurred in the past seem to have a positive impact on the inclusion of various groups in strategic planning. As identified in some of the interviews with mayors and activists, previous experience with inclusion of Roma on the local level is a precondition for their involvement in agenda setting, via strategic documents such as comprehensive local programmes. In other words, exercising various participative community-based activities, i.e., sports tournaments, cultural events, education activities etc. support participation in strategic planning.

Structural factors also play a role in the overall success of the process. The **use of pre-existing networks on the local level proved to be crucial** for more effective planning. This entails local as well as national NGOs, civic associations, informal groups and church institutions. For example, one of the mayors pointed out the importance of activities of the national NGO People in Need in local Roma communities. Their involvement helped the municipality to identify the needs of Roma

²³ Grambličková, M., Mojžiš, M., Zamkovský, J.: Uplatňovanie princípu partnerstva: účasť mimovládnych organizácií na kontrole fondov EÚ v programovacom období 2007 – 2013. Bratislava, Priatelia Zeme-CEPA 2011.

communities as the Roma were more open to collaboration and identified their project preferences. At the same time, large municipalities that built partnerships in the past are able to involve Roma in strategic planning more easily. For example, the city of Banska Bystrica has supported community initiatives and built a community foundation. According to several interviews the strategic networks built helped improve strategic planning with the inclusion of a variety of stakeholders.

In less inclusive environment it is **useful to involve outside consultations** to help set up terms for cooperation. For example, the need for bridging between municipality and Roma community was evident in the city of Martin where the NGO Cultural Association of Roma in the Slovak Republic stepped in and helped with inclusion of a poorly represented segregated community.

The municipality did not intentionally exclude the local Roma but it lacked a relevant counterpart in the community. The involvement of an outside Roma NGO helped the local community to select representatives who cooperate with the municipality, build capacity and increase trust in mutual interactions. The cooperation also brought about a spillover effect as the city set up the so called "Roma Watch" to improve public safety and the Guards have been also responsible for coordination of various other activities involving the community.

Political participation of Roma community seems to be one of the indications of Roma participation in design of strategic documents. In localities that were in scope of our research Roma are politically underrepresented with only a limited number of local council members coming from their communities. Some of the interviewees stated that political under representation of Roma on the local level is linked to clan culture within communities. Clan disputes lead to the loss of decisive majority for election of Roma representatives. At the same time, Roma participating in local politics are often local entrepreneurs and anecdotally include even usurers, pursuing their own interests rather than those of the Roma community (see e.g. Jurová, 1998 or Scheffel, 2013).

Formal requirements in design and implementation are insufficient for securing Roma participation and need to be accompanied by other interventions in order to deliver expected outputs and outcomes.

Mediation between majority and minority seems to be an important mechanism for enhancing participation on the local level and building of mutual trust. At the same time, such interventions are crucial for fostering change in municipalities that are lacking leadership and participation is not considered as option for further development. Such interventions are also necessary in poor neighborhoods with low chance of civic engagement as well as in localities with dysfunctional local government.

In general, localities where some of the following conditions are met could benefit from mediation:

- unsuccessful use of participatory tools in the past; municipality tried to involve minorities in design of strategies, however they failed,
- segregation; in segregated localities with lack of interactions between majority and minority,
- dysfunctional local government with no participatory planning and evaluation,
- lack of interactions among stakeholders in general lack of know-how and experience.

In order to provide sustainable participation it is crucial to build local capacities and to use participatory planning in all areas of public policy. None of the localities falling under the scope of our research used participatory planning as to achieve consensus and wide acceptance of their policies. However, all mayors understood the importance of a comprehensive approach and its benefits. We have also identified strong leaders (mayors) who try to create an inclusive environment in the planning process. For example, two mayors described the process of acquiring relevant information on the content of future projects from the local Roma community.

Although they did not fully include Roma in strategic planning and design of policies they tried to collect relevant information.

Nevertheless, municipalities and their leaders lack know-how in using participatory planning and evaluation which is often replaced by selecting tools inappropriate for the given purpose.

6. Technical assistance

What technical assistance provided for the local level by the national level ensures the design and implementation of quality, equality-oriented complex local programmes and projects?

The original Comprehensive Approach model, which has never been implemented, included provision of technical assistance for municipalities/micro-regions by the OPGRC in three phases:

- **1.** 1. technical assistance for eligible municipalities/micro-regions in **elaboration of a local strategy including project intents** necessary to carry out the LSCA's activities and achieve the LSCA's goals,
- **2.** 2. technical assistance for municipalities/micro-regions with approved local strategies in **developing full project proposals** as required by specific operational programs (managing authorities) based on the project intents contained in the approved strategies,
- **3.** 3. technical assistance in **project implementation** for municipalities/micro-regions with project approved proposals.

The assumption behind such extensively designed technical assistance was that support in several phases of the project cycle²⁴ would bring about socio-economic change also in those regions and communities, which are understaffed and lack local capacities to drive developmental endeavors, meanwhile building their capacity for further development (future projects).

However, in reality, the role of the OPGRC in the implementation of the Comprehensive Approach remained extremely limited: the OPGRC was not providing technical support in LSCA elaboration, project development or project implementation. Instead, its activities were limited to dissemination of information on the activities of the operational program (launching of calls, evaluation of submitted project proposals) and monitoring of implementation of the approved LSCAs.²⁵ The main reasons why the OPGRC's role changed were:

political and personnel discontinuity (after elections and government change in 2006 the Plenipotentiary and key staff in her office involved in the Comprehensive Approach

- design were replaced; according to several interviewees, the new leadership had no ownership and commitment to piloting the Comprehensive Approach),
- lack of staff capacity (most of the technical assistance staff focused on development of managing documents and other administrative tasks),
- lack of expert capacity (most of the new technical assistance staff lacked experience in strategic planning, local Roma inclusion policy-making, project development and implementation),
- perceived lack of integrity in project selection (according to several interviewees, some municipalities opted for paid project writing consultants over the free OPGRC technical assistance because they were promised higher chance of project approval due to consultants' clientelistic connections).

In consequence, without external help many municipalities were not able to elaborate a meaningful local strategy following the first call for support within the Comprehensive Approach launched by the OPGRC at the end of 2008;²⁶ only four LSCAs were submitted by municipalities and two were approved. After this, the call was cancelled and the process of Comprehensive Approach implementation was suspended for about a year; however during this time the managing authorities continued to implement their respective operational programs (launching calls, evaluation of project proposals, contracting and implementation). Many municipalities faced dilemmas whether to continue to seek support within the Comprehensive Approach (which at that time still seemed an easier way to access EU funds) or to pursue other opportunities within operational programs' calls for individual projects.

Two years later, in 2010 the OPGRC launched a modified call for support within the Comprehensive Approach. The new call did not include a requirement to submit the LSCA in the form of a strategic development plan, but only a list of project intents.²⁷ This resulted in the submission and approval of 150 "LSCAs". These often contained fragmented, irrelevant and inadequate project proposals.²⁸ In addition the budgets were often unrealistically high (possibly as consequence of consultancy fees hidden in project budgets) and were likely to be later rejected by managing authorities.

Analysis (LSCA elaboration), planning (project development) and implementation by municipalities/micro-regions supported by the technical assistance; and monitoring, evaluation and adaptation (mainstreaming) by the OPGRC.
 Paradoxically, most municipalities/microregions with approved LSCAs are required to regularly submit empty monitoring reports to the OPGRC, as no projects are being implemented within their LSCAs.

Table 7 - Number of project proposals in the approved local strategies

	2 project proposals in the local strategy			. , , .
152	34	42	37	39

Source: Own calculations based on data from the OPGRC.



Lack of appropriate technical assistance was one of the main causes of failure of the Comprehensive Approach. Municipalities formulated and the authority responsible for the coordination of the Comprehensive Approach approved poor quality Local strategies and projects. Subsequently, the respective managing authorities did not support the proposed projects (as they were of low quality or ineligible for support) or they supported them, but without any impact on inclusion of marginalized Roma.

Competent technical assistance should ideally both help potential beneficiaries develop effective solutions to identified problems and represent and advocate for aggregated needs and interests of municipalities/micro-regions toward operational programs. A high-quality LSCA prepared with the help of credible technical assistance can replace process of evaluation of proposals at a managing authority and therefore contribute to simplification of EU funds implementation (projects included in a successful LSCA should not compete for support, but be entitled to support automatically, as they are part of integrated strategy and were evaluated within the LSCA's evaluation).

The following table presents rough estimates of the extent of technical assistance needed in various phases of the project cycle. Such estimates are difficult to make by nature but the table may be helpful in designing technical assistance in other interventions.

²⁶ The LSCAs developed at the end of the previous programming period for 14 micro-regions and 25 municipalities (see Part II) could not be used for the purpose of the call (instead, LSCAs in a new template and with different requirements were to be submitted). In the 2008 call, LSCA had to include at least three project intents (for at least one "soft" ESF and at least two "hard" ERDF interventions).

²⁷The minimal number of project intents was reduced to two (for at least one "soft" ESF and at least one "hard" ERDF interventions).

²⁸ As example, the LSCA submitted by Prešov (third largest town in Slovakia with several thousand marginalized Roma living in several urban ghettos) was approved as a set of only two project intents - field social work (which had been performed in Prešov since 2003) and reconstruction of afternoon art clubs building (the so-called Elementary Art School), which included among its pupils only a few Roma, coming from middle-class families.

Table 8 - Functions of Technical Assistance and Required Capacity in Various Phases of the Project Cycle

Project Cycle Phase	Problems	Role of Technical Assistance	Estimate of Capacity Required (range)
	Participative needs as- sessment	methodological guid- ance, mediation, com- munity planning, involve- ment of Roma and NGOs	2 – 5 days per project
Project planning	Project effectiveness	transfer of knowledge, innovations, idea generation	2 – 3 days per project
	Project drafting	project generation facil- ity, capacity building, learning by doing	4 – 6 days per project
Project awarding	Project proposal evalua- tion by various operation- al programs with differ- ent rules, requirements and priorities	advocacy, participation in operational programs' managerial documents drafting	n/a (intervention on the program level)
	Project management and administration	supervision, learning by doing, capacity building	2 - 5 days per month of project duration
Project implementation	Verejné obstarávanie	legal services	3 – 5 days per month of project duration
	Prekážky optimálnej implementácie	legal services, mediation	2 – 5 days per month of project duration
Monitoring and	Participatívne monitoro- vanie	facilitation, methodology	1 day per month of pro- ject duration
evaluation	Zber údajov	provide technical and legal know-how	2 – 5 days per month of project duration

Source: Estimates by authors based on PGF experience and ESF implementation in 2007-2013 programming period.

7. Quality assurance

What selection procedures and criteria ensure the design and implementation of quality, equality-oriented complex local programmes and projects? What procedures can ensure iteration between local level needs and national level policies?

Strategies must be developed in an iterative process to clearly articulate an intervention logic with a clear expected results chain. The selection process can serve to develop programmes gradually.

To deliver any added value in comparison with the implementation of individual demand oriented projects, the comprehensive approach should bring certain benefits for the targeted territory. It could be (in accordance with the initial design) the coordination of the relevant project calls in operational programs in order to allow correct sequencing for the implementation of the local strategies; the possibility to guarantee sufficient financial allocation for all project intents approved in the selected local strategies

or a possibility to organize open calls for proposals, in which it would be possible to update and resubmit project proposals until they meet the required criteria.

The need to periodically reassess progress and objectives must be built into the process along with support for period reviews.

Coordinating authorities must either limit support to localities with sufficient planning and implementation capacity to meet the required complexity or provide the capacity through various forms of technical assistance and ideally, help build capacity for future programmes and projects.

Comprehensive approach was designed as a new tool to deliver individualized assistance to the territories with a presence of marginalized Roma communities. The intention was to design a policy, which would allow a tailor-made approach implemented with a long-term perspective rather than a "one size fits all" solution for socio-economic inclusion.

Given this aim, the initial plan for the comprehensive approach policy implementation was to select a maximum seven territories each year. By the end of the programming period 2007-2013, the total number of territories involved (either individual municipalities or micro-regions) would have reached a maximum of 50.

The initial selection criteria for participating territories focused on the quality of the local strategy, prepared in a participatory way, describing the interdependencies between the proposed interventions, fulfilling the given conditions (primarily the minimum number of the projects and areas solved) and considering also the measures focused on the non-Roma population and improving relationships between the majority and minority.

The initial plan, as presented to the EC in 2007, was to provide the selected territory with massive technical assistance to ensure the quality of implementation of the approved local strategy and build the local capacity in the area of structural funds administration. This was considered to be one of the key preconditions for the successful implementation of the comprehensive approach strategy.

According to the initial plan, the size of the technical assistance provided by the OPGRC was budgeted for a maximum of 50 territories added gradually over the period of seven years.

Although the initial design of comprehensive approach policy has never been officially amended or replaced, personnel changes, lack of institutional memory and lack of political will at the OPGRC meant the design was significantly diminished, misunderstood and devastated. According to the mayors interviewed, the initial strategy of comprehensive approach was sensible but its implementation did not bring the expected benefits. Instead it imposed an administrative burden and various complications in the selected territories.

The individual approach to the specific local comprehensive strategies and the flexibility in its changes was to be ensured by the limited number of territories where this innovative policy would be implemented. The small group, gradually extended every year, would allow the coordinator to monitor and correct the policy. It would also allow an intense presence of quality technical assistance in the territories.

8. Implementation structures

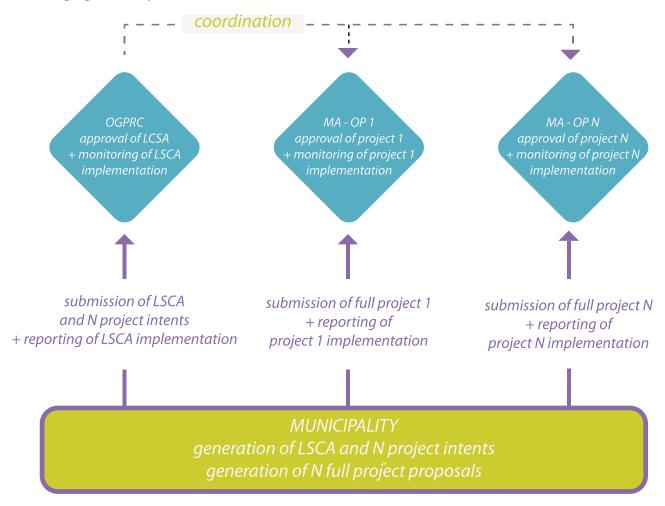
What coordination mechanisms ensure the implementation of an integrated territorial programme, including structure of the operational programmes, structure of the budget and institutional set up?

Slovakia's Comprehensive Approach was, according to an OPGRC officer, an "alien element in the EU Funds' system" introduced by a specific segment of the public administration. There was little broad-based ownership of this concept. It was originally promoted by the EC without support of politicians and bureaucrats in Slovakia. There was a clear lack of political will to implement this approach and after the departure of the political leader who initiated it there was no strong champion for it within government.

The implementation was therefore from the beginning subject to a struggle for control over the financial allocation, sometimes tainted by the actors' personal agendas.

The coordinator, OPGRC, as part of the the Office of the Slovak Government at that time, have carried whole responsibility responsibility for implementation of the Comprehensive Approach, but had no effective control over actions of managing authorities of respective operational programs (which draft and launch calls, evaluate and award submitted project proposals and administer, monitor and evaluate their implementation).

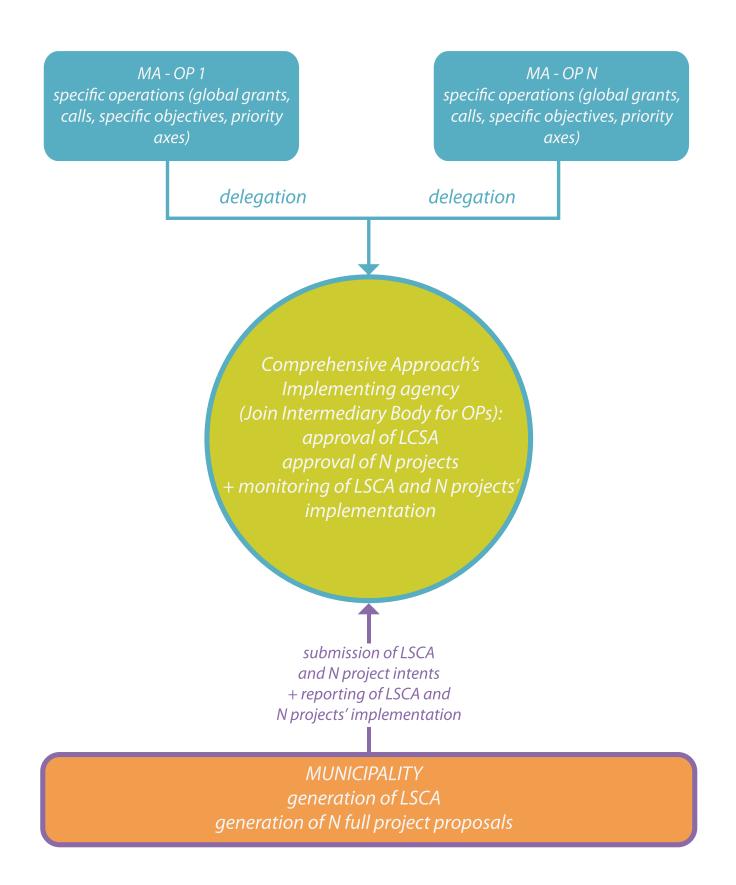
The OPGRC attempted to run a de facto separate operational program managed by distinct managing authorities and to be funded from their budgets (the OPGRC in position of managing authority, but without the powers of a managing authority):



The OPGRC's coordination role had to be funded from OP Technical Assistance at time, when the OP TA did not exist yet.

An intervention of this scope would need prepared institutional structures, skilled personnel and strategic and managerial documents before the launch of the Comprehensive Approach Implementation; it is now clear this should ideally be a separate legal entity (to be an equal partner in negotiations among OPs).

If the territorially targeted programme is not part of a separate OP, then it is necessary that specific OPs include the Comprehensive Approach's needs (Comprehensive Approach first, specific OPs after - Comprehensive Approach's components must be eligible under specific OPs). There must be concrete and binding financial allocations and formal relations of control between Comprehensive Approach coordinator and OPs.



IV. Conclusions and Recommendations

Comprehensive Approach to marginalized Roma communities in Slovakia as implemented in the 2007-2013 EU Structural Funds programming period failed in meeting its key objectives - achieving socio-economic change in the communities in need.

This assessment reviewed available documents and interviewed a cross-section of stakeholders involved in various aspects of designing and implementing the Comprehensive Approach to seek lessons and recommendations applicable to territorial targetting of funds

for marginalized Roma communities in the upcoming programming period in Slovakia and elsewhere in Europe.

The assessment has shown that while the implementation of Comprehensive Approach failed in many aspects, the idea of territorially targeting funds to promote social inclusion of Roma is sound and promising. At the same time there are many specific lessons from the effort, which can be applied to Structural Funds programming as well as other programs.

V nasledujúcej tabuľke sú zhrnuté kľúčové zistenia tohto hodnotenia, spolu s odporúčaniami formulovanými na základe týchto zistení:

Findings

Recommendations

Personal and policy discontinuity at the Office of Plenipotentiary of the Government for Roma Communities meant that the Comprehensive Approach to Roma Communities was not implemented in accordance with the original design but without formulating a clear alternative policy.

In consequence, various stakeholders in other parts of the public sector tried to impose their preferences in the policy. (Section II.2)

Operational programs were designed before the Comprehensive Approach and did not therefore include sufficient funding opportunities to implement the Local Strategies of Comprehensive Approach.

Project proposals based on those formulated in approved Local Strategies required additional approval from the respective operational programs. The number of projects approved was low due to the need to compete with projects from other municipalities.

Having invested in planning the local strategies, municipalities then lost motivation to pursue other parts of their proposed strategies. (Section II.2)

Continuity over the political cycle is necessary; this presumes a broad political (partisan) consensus on strategy.

Various levels of public administration (national government, regions, municipalities and their representative associations) and other stakeholders (professional groups - teachers, employers, health professionals; NGOs; academics, church officials) must be consulted in the design of the Comprehensive Approach.

Approval of integrated development strategies prepared with credible technical assistance could replace evaluation process within managing authorities of specific operational programs (project proposals included in approved integrated development strategy should be entitled for support and not compete for it).

Availability of funding should be guaranteed for approved development strategies.

Recommendations

The number of local strategies approved was much higher than initially planned. There was therefore insufficient support capacity for technical assistance.

For many territories the Comprehensive Approach ards, lur therefore finally did not bring any visible benefit. (Sec-

Territorially targeted program should bring clear benefits to the target territory such as strong technical assistance and easier project selection and implementation processes such as block grants, unit cost standards, lump sum administration, etc.

An integrated territorially targeted program can (but does not always automatically) reflect well the needs of a marginalized community. It appears to do so better if it is prepared in a participative manner and developed in detail. (Section III.1.)

tion II.2)

Territorially targeted programs should be based on well developed, participative strategies.

Application of principles of partnership and participation of Roma in design and implementation of complex local programmes is influenced by the existence of local networks as well as history of participative mechanisms on the local level. Formal participation requirements in design and implementation are not sufficient to guarantee Roma participation. (Section III.1, Section III.5)

Formal partnership and participation requirements need to be supported by other interventions such as mediation in order to deliver their expected outputs and outcomes.

Many mainstream programs may benefit marginalized Roma less than other citizens due to exclusion. On the other hand, application of purely ethnic criteria can miss other individuals living in similar conditions to marginalized Roma (non-Roma poor).

If programs focus explicitly on marginalized Roma communities they should be accessible also to others in life situations similar to those of marginalized Roma.

Non-explicit targeting of Roma does not prevent labelling and stigmatization effects. Explicit targeting of marginalized Roma can be non-exclusive and such "Gadji mainstreaming" can reduce administrative costs and improve vies on programs helping marginalized Roma. (Section III.2)

Significant dependencies exist between sectoral policies in education, employment, health and housing.

Sectoral projects in some domains cannot succeed without intervention in other domains. (Section III.3.)

Territorial targeting appears to have significant benefit over sectoral targeting and should be considered as an alternative in allocating funding from the structural funds and other grant funds.

Zistenia

In the Slovak institutional framework municipalities often constitute the appropriate unit to target interventions aimed at Roma inclusions. Micro-regions have been discredited due to inadequate legal framework and negative past experiences.

Territorial scope in a territorially targeted program should be at or above municipal level.

The Hungarian experience from its territorially targeted program shows that planning may take place at a higher level, targeting individual interventions at various levels as appropriate. (Section III.4.)

Lack of technical assistance, particularly in the phases of planning, led to approval of low-quality LSCAs and subsequently jeopardized further implementation of the Comprehensive Approach.

Expert and technical support must be provided from very early planning phases of local development strategies in order to ensure quality of approved LSCAs.

Low quality of project intents included in the approved LSCAs led to refusal of projects by operational programs. (Section III.6.)

The Comprehensive Approach lacked broad-based ownership among institutions and stakeholders involved in its implementation.

The responsibility of the OPGRC as coordinator of Comprehensive Approach was not accompanied with the requisite managerial powers to deal with the particular sectoral interests of various institutions involved in the implementation. (Section III.8)

Such a complex intervention should ideally be managed by a competent entity with a clearly defined authority over financial resources, responsible also for methodological aspect, overall content and strategy. In the implementation phase it should act as a specific operational program or a joint intermediary body for several operational programs (to be able to negotiate with OPs).

The Comprehensive Approach has not achieved its results because the institutional structure was not well prepared.

Institutional structures, human resources and managerial documents must be prepared in advance to develop an integrated strategy.

An intervention of this scope would need prepared institutional structures, skilled personnel and strategic and managerial documents before launch of the Comprehensive Approach Implementation.

The implementation of the Comprehensive Approach was seriously delayed. (Section III.8)

There was no consensus among Slovak institutions and stakeholders on expected inputs, outputs and outcomes of the Comprehensive Approach. (Section III.8)

Intervention logic and indicators must be developed before implementation begins. A clear monitoring and evaluation framework must be established before the launch of the policy.

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List of Interviews

(Most of the interviewees preferred not to be quoted by name.)

Experts in EU Funds (4)
Field Social Workers (2)
Heads of Municipal Offices (2)
Mayors (5)

NGOs (2)

Representatives of the Office of the Plenipotentiary of the Government for Roma Communities (2)

List of Reviewers

Alexandra Kucmanová, bývalá generálna riaditeľka Agentúry na podporu regionálneho rozvoja, ministerstvo pôdohospodárstva a rozvoja vidieka SR (2010 – 2012)

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Klára Orgovánová, Rómsky inštitút, bývalá splnomocnenkyňa vlády SR pre rómske komunity (2001 – 2008) Daniel Škobla, UNDP RBEC Bratislava

Martin Vavrinčík, ETP Slovakia, bývalý riaditeľ odboru sociálnej inklúzie, ministerstvo práce, sociálnych vecí a rodiny SR (2010 – 2012)

Annex 1 - List of approved Local Strategies

Name of Local Strategy	Municipality or Microregion	Region
Bystrany v blízkej budúcnosti	Obec Bystrany	KE
Sociálne začlenenie marginalizo- vanej rómskej komunity v regióne Jelšava	Mesto Jelšava	ВВ
Lokálna stratégia komplexného prístupu Bačkov	Obec Bačkov	KE
Komplexné zlepšenie podmienok života MRK prostredníctvom LSKxP v obci Bačkovík	Obec Bačkovík	KE
Komplexný program rozvoja mar- ginalizovaných rómskych komunít mesta Banská Bystrica	Mesto Banská Bystrica	BB
Lokálna stratégia rómskej komu- nity v obci Bátovce	Obec Bátovce	NT
Sociálna inklúzia občanov z MRK v obci Beladice	Obec Beladice	NT
Lokálna stratégia komplexného prístupu obce Belina	Obec Belina	BB
Zlepšenie životných podmienok a sociálneho statusu Marginal- izovanej rómskej komunity v obci Bežovce	Obec Bežovce	KE
Podpora rozvoja marginalizo- vaných rómskych komunít v meste Brezno	Mesto Brezno	BB
Lokálna stratégia obce Bystré	Obec Bystré	PO
Stratégia sociálnej inklúzie obce Bzovík	Obec Bzovík	ВВ
Zlepšenie vzťahov občanov s róm- skym obyvateľstvom	Obec Cabaj - Čápor	NT
Lokálna stratégia komplexného prístupu v obci Cernina	Obec Cernina	PO
Sociálna inklúzia marginalizo- vaných rómskych komunít v obci Cerovo	Obec Cerovo	BB
Lepší život MRK v Cigeľke – od plánov k realite	Obec Cigeľka	PO
Sociálna inklúzia marginalizo- vaných rómskych komunít v obci Čaňa	Obec Čaňa	KE
LSKP Červenica = Šanca pre kvalitnejší život	Obec Červenica	PO

Lokálna stratégia komplexného prístupu pre obec Čirč	Obec Čirč	PO
Stratégia sociálnej inklúzie príslušníkov MRK v meste Detva	Mesto Detva	BB
Stratégia komplexného prístupu riešenia MRK v osade Roškovce	Obec Doľany	PO
Komplexné riešenie zvýšenia kval- ity života rómskych občanov v obci Dolný Pial	Obec Dolný Pial	NT
Sociálna inklúzia marginalizovanej rómskej komunity v Dunajskej Strede	Mesto Dunajská Streda	TT
Realizáciou aktivít LSKxP k sociál- nej inklúzii MRK v obci Ďurkov	Obec Ďurkov	KE
Lokálna stratégia komplexného prístupu - vytváranie podmienok pre sociálnu inklúziu MRK v meste Fiľakovo	Mesto Fiľakovo	ВВ
LSKxP – Zdravá Gelnica	Mesto Gelnica	KE
Komplexný rozvoj obce Gemerský Jablonec	Obec Gemerský Jablonec	ВВ
Šanca pre hodnotnejší život	Mesto Giraltovce	PO
Komplexný rozvoj obce Hajnáčka	Obec Hajnáčka	BB
Hanušovská stratégia kom- plexného prístupu	Mesto Hanušovce nad Topľou	PO
Lokálna stratégia komplexného prístupu pre obec Hniezdne	Obec Hniezdne	PO
Stratégia integrácie príslušníkov MRK do spoločnosti v obci Hon- tianske Nemce	Obec Hontianske Nemce	BB
LSKxP v Hosticiach	Obec Hostice	BB
Sociálna inklúzia MRK v obci Hrabušice	Obec Hrabušice	KE
Lokálna stratégia komplexného prístupu v obci Hranovnica	Obec Hranovnice	PO
Podpora MRK v obci Hrnčiarska Ves - komplexný prístup	Obec Hrnčiarska Ves	BB
Lokálna stratégia komplexného prístupu v obci Hrušov	Obec Hrušov	ВВ
Lokálna stratégia komplexného prístupu v obci Huncovce	Obec Huncovce	PO
Lokálna stratégia komplexného rozvoja obce Chminianske Jakubo- vany	Obec Chminianske Jakubovany	PO
Riešenie problémov sociálnej inklúzie občanov z MRK v obci Choča	Obec Choča	NT

Lokálna stratégia komplexného prístupu v obci lhľany	Obec Ihľany	PO
Rozvoj rómskej komunity v obci Iňačovce	Obec Iňačovce	KE
Lokálna stratégia komplexného prístupu k riešeniu potrieb margin- alizovanej rómskej komunity v obci Jasov	Obec Jasov	KE
Nové Jurské v roku 2020	Obec Jurské	PO
Lokálna stratégia komplexného prístupu pre obec Kamenná Poruba	Obec Kamenná Poruba	PO
Lokálna stratégia komplexného prístupu pre obec Kamenná Poruba	Obec Kamenná Poruba	PO
Lokálna stratégia komplexného prístupu obce Kendice	Obec Kendice	PO
Lokálna stratégia komplexného prístupu Kojatice	Obec Kojatice	PO
Lokálna stratégia komplexného prístupu v Kokave nad Rimavicou	Obec Kokava nad Rimavicou	ВВ
Zlepšenie životnej úrovne MRK v obci Kolačkov	Obec Kolačkov	PO
LSKxP- Luník XI	Mesto Košice-Luník XI	KE
Lokálna stratégia komplexného prístupu v obci Krivany	Obec Krivany	PO
Lokálna stratégia obce Krížova Ves	Obec Krížova Ves	PO
Zlepšenie podmienok a kvality života rómskeho obyvateľstva v meste Krompachy	Mesto Kropmachy	KE
Lokálna stratégia podpora MRK v obci Krupina	Obec Krupina	ВВ
Projekt podpory sociálnej inklúzie príslušníkov MRK prostredníctvom zvyšovania ich vzdelanostnej úrovne	Obec Kuzmice	KE
Nové Letanovce- naša obec	Obec Letanovce	KE
Zlepšenie úrovne kvality života obyvateľom mesta Levoča ohro- zených sociálnym vylúčením pros- tredníctvom komlexného prístupu a partnerstva	Mesto Levoča	PO
LSKP=príležitosť krajšie žiť	Mesto Liptovský Mikuláš	ZA
Stratégia sociálnej inklúzie príslušníkov MRK v obci Litava	Obec Litava	ВВ

Rozvoj ľudských a materiál- nych kapacít v rámci sociálneho začleňovania MRK v obci Lok	Obec Lok	NR
Skvalitnenie životných podmienok pre MRK v obci Ľubica	Obec Ľubica	PO
Sociálna inklúzia marginalizovanej rómskej komunity v obci Ľubotín	Obec Ľubotín	PO
Zvýšenie sociálnej inklúzie margin- alizovaných rómskych komunít v meste Lučenec	Mesto Lučenec	ВВ
Lokálna stratégia komplexného prístupu v obci Lukov	Obec Lukov	PO
Lokálna stratégia komplexného prístupu Malá Domaša	Obec Malá Domaša	PO
Lokálna stratégia podpory MRK v obci Málinec	Obec Málinec	ВВ
Lokálna stratégia komplexného rozvoja v obci Malý Slivník	Obec Malý Slivník	PO
Spolu to dokážeme	Obec Markušovce	KE
Komplexnosť, nástroj podpory so- ciálneho začlenenia marginalizo- vaných rómskych komunít mesta Martin	Mesto Martin	ZA
Lokálnou stratégiou Komplexného prístupu k pozitívnym zmenám v kvalite života príslušníkov margin- alizovaných rómskych komunít v meste Medzev	Mesto Medzev	KE
Komunitný rozvoj a sociálna inklú- zia MRK v meste Michalovce	Mesto Michalovce	KE
Komplexné riešenie pomoci róm- skej komunite v Mikroregióne Ratková a okolie	Obec Ratková	BB
Zvýšenie zamestnanosti, vzdela- nostnej úrovne a rozvoj komunit- ného života príslušníkov margin- alizovaných rómskych komunít v obciach Mojmírovce a Svätopu- kovo	Obec Mojírovce a Svätoplukovo	NR
Lokálna stratégia komplexného prístupu Moldava nad Bodvou	Mesto Moldava nad Bodvou	KE
Sociálna inklúzia MRK v obci Mora- vany nad Váhom	Obec Moravany nad váhon	TT
Lokálna stratégia komplexného prístupu v obci Mučín	Obec Mučín	ВВ
Lokálna stratégia komplexného prístupu v obci Muľa	Obec Muľa	ВВ

Obec Muráň	ВВ
Obec Mýtne Ludany	NR
Obec Nálepkovo	KE
Obec Nitra nad Ipľom	ВВ
Obec Nitrianske Pravno	NR
Obec Olejníkov	PO
Obec Ostrovany	PO
Mesto Partizánske	TR
Obec Pečovská Nová Ves	PO
Obec Petrovany	PO
Obec Podhorany	PO
Mesto Podolínec	PO
Obec Poša	PO
Obec Pôtor	ВВ
Obec Prakovce	KE
Obec Prenčov	ВВ
Mesto Prešov	PO
Obec Radošina	NT
Obec Rakúsy	PO
Obec Rapovce	ВВ
	Obec Mýtne Ludany Obec Nálepkovo Obec Nitra nad Ipľom Obec Nitrianske Pravno Obec Olejníkov Obec Ostrovany Mesto Partizánske Obec Pečovská Nová Ves Obec Petrovany Obec Podhorany Mesto Podolínec Obec Poša Obec Pôtor Obec Prakovce Obec Prenčov Mesto Prešov Obec Radošina Obec Rakúsy

V Raslovciach na "valale" jahoda	Obec Raslavice	PO
Sociálna inklúzia marginalizo- vaných rómskych komunít v obci Rimavské Janovce a Pavlovce	Obec Rimavské Janovce	BB
Lokálna stratéga komplexného prístupu v obci Roztoky	Obec Roztoky	PO
Sociálna inklúzia marginalizovanej rómskej komunity v obci Rybany	Obec Rybany	TN
Komplexnosť a integrita riešenia problematiky MRK v meste Sabinov	Mesto Sabinov	PO
Lokálna stratégia komplexného prístupu Sačurov	Obec Sačurov	PO
Zlepšenie životných podmienok a podpora sociálnej inklúzie MRK v obci Slanec prostredníctvom LSKxP	Obec Slanec	KE
Sociálna inklúzia MRK v obci Smižany	Obec Smižany	KE
Lokálna stratégia komplexného prístupu v obci Snakov	Obec Snakov	РО
Lokálna stratégia komplexného prístupu Soľ	Obec Sol'	PO
Rozvojový program mesta Spišská Nová Ves: PROGRAM SYNERGIA 2010-2017	Mesto Spišská Nová Ves - lokalita Hájik a lokalita Podskalka	KE
Mesto Spišská Nová Ves - lokalita Hájik a lokalita Podskalka	Mesto Spišské podhradie	PO
Sociálna inklúzia obyvateľov MRK v obci Spišské Tomášovce	Obec Spišské Tomášovce	KE
Stratégia komplexného prístupu obce Spišský Hrhov	Obec Spišský Hrhov	РО
Lokálna stratégia komplexného prístupu v obci Spišský Štiavnik	Obec Spišský Štiavnik	PO
Komplexné riešenie rómskej komu- nity v obci Stará Kremnička	Obec Stará Kremnička	BB
Lokálna stratégia komplexného prístupu v obci Stráne pod Tatrami	Obec Stráne pod Tatrami	РО
Začlenenie príslušníkov MRK do života spoločnosti zvyšovaním ich možností na trhu práce	Mesto Stropkov	PO
Komplexné riešenie sociálnej situácie v obci Sveržov	Obec Sveržov	PO
Lokálna stratégia komplexného prístupu Svinia	Obec Svinia	РО
Zlepšenie podmienok MRK v obci Šarišské Michaľany	Obec Šarišské Michaľany	PO
Lokálna stratégia komplexného prístupu v obci ŠAROVCE	Obec Šarovce	NR

Lokálna stratégia komplexného prístupu Širkovce	Obec Širkovce	ВВ
Zlepšenie životných podmienok príslušníkov MRK v obci Švábovce prostredníctvom realizovania opatrení LSKxP	Obec Švábovce	PO
LSKxP Obce Švedlár	Obec Švedlár	KE
Komplexný rozvoj lokálnej stra- tégie v obci Tekovské Lužany	Obec Tekovské Lužany	NR
Lokálna stratégia komplexného prístupu Terňa	Obec Terňa	PO
V Toporci všetci spoločne	Obec Toporec	PO
Lokálna stratégia komplexného prístupu obce Torysa= šanca mať budúcnosť	Obec Torysa	PO
Zvyšovanie úrovne sociálneho života MRK v obci Turňa nad Bod- vou	Obec Turňa nad Bodvou	KE
Lokálna stratégia komplexného prístupu obce Ulíč	Obec Ulič	PO
Eliminácia prvkov marginalizácie v obci Vaľkovňa	Obec Vaľkovňa	ВВ
VARHAŇOVCE, komplexne riešiaca obec	Obec Varhaňovce	PO
neuvedené	Obec Vechec	PO
Cesta k rastu sociálnej inklúzie a zamestnanosti MRK vo Veľkej Lomnici	Obec Veľká Lomnica	PO
Rozšírenie prístupu k bývaniu a k zamestnaniu MRK v obci Veľké Teriakovce a jej časti Vrbovce	Obec Veľké Teriakovce	ВВ
Komplexný rozvoj obce Veľké Zlievce	Obec Veľké Zlievce	ВВ
Zlepšenie využívania služieb zdravotníckej starostlivosti a zlepšenie zdravotnej prevencie a sociálnej situácie MRK v obci Veľký Blh	Obec Veľký Blh	ВВ
Sociálna inklúzia marginalizo- vanej rómskej komunity vo Veľkom Mederi	Mesto Veľký Meder	TT
NEVO	Obec Víťaz	PO
Zlepšenie podmienok života MRK v obci Vojčice prostredníctvom LSKxP	Obec Vojčice	KE
Lokálna stratégia mesta Vráble	Mesto Vráble	NR

Zvýšenie vzdelanostnej úrovne MRK ako súčasť sociálnej inklúzie v meste Vranov nad Topľou	Mesto Vranov nad Topľou	PO
Podpora sociálnej inklúzie MRK v obci Vrbnica prostredníctvom LSKxP	Obec Vrbnica	KE
Lokálna stratégia komplexného prístupu obce Vtáčkovce	Obec Vtáčkovce	KE
Sociálna inklúzia MRK v obci Vyšný Hrušov	Obec Vyšný Hrušov	PO
Lokálna stratégia komplexného prístupu v obci Vyšný Mirošov	Obec Vyšný Mirošov	PO
Sociálna inklúzia marginalizo- vaných rómskych komunít v obci Závadka nad Hronom	Obec Závadka nad Hronom	BB
Lokálna stratégia komplexného prístupu obce Zbudské Dlhé	Obec Zbudské Dlhé	PO
Sociálna inklúzia MRK v obci Zlaté Klasy	Obec Zlaté Klasy	TT
Plnohodnotný život marginalizo- vaných rómskych komunít v meste Zvolen	Mesto Zvolen	BB
Sociálna inklúza MRK v obci Zvo- lenská Slatina	Obec Zvolenská Slatina	BB
Zlepšenie životných podmienok a podpora sociálnej inklúzie MRK	Obec Žehra	KE
neuvedené	Mesto Žiar nad Hronom	BB
Sociálna inklúzia marginalizovanej rómskej komunity v meste Žilina	Mesto Žilina	ZA

Annex 2 - List of abbreviations

EC - European Commission

ECEC - Early Childhood Education and Care

ERDF - European Regional Development Fund

ESF - European Social Fund

ISCED - International Standard Classification of Education

LB - Lola Bolargyi

LSCA - Local Strategy of Comprehensive Approach

MCRD - Ministry of Construction and Regional Development

NSRF - National Strategic Reference Framework 2007-2013

OPGRC - Office of the Plenipotentiary of the Government for Roma Communities

OP CaEG - Competitiveness and Economic Growths

OP E - Education

OP EaSI - Employment and Social inclusion

OP Env - Environment

OP H - Health

OP TA - Operational Program Technical Assistance

PGF - Project Generation Facility (part of the program Making the Most EU Funds for Roma)

ROP - Regional Operational Program

SDF - Social Development Fund

UNDP - United Nations Development Program

USAID - United States Agency for International Development

WHO - World Health Organization





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