Intersectionality in education: Policies targeting Romani people in Catalonia

By

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Abstract

Education is an important aspect that has been documented by researchers as being vital to Romani people for increasing access to quality jobs and achieving social mobility. Romani women and other vulnerable groups, such as the Romani LGBTQ+ and the Romani people with disabilities, among others, have bigger barriers to accessing, continuing, and finalizing education stages. This thesis is a comparative policy analysis that examines how intersectionality is understood and implemented in the Roma Strategic Frameworks of the EU, Spain, and Catalonia in the education area. The Intersectional Feminist Policy Analysis guided the analytical process of this research along with the perspective of intersectionality, Romani feminisms, and decolonial studies, focusing on specific analytical dimensions: objectives, actors, and funding of the strategies. The findings suggest that, despite the mention of including an intersectional approach in all the strategies, mostly only gender (in binary terms) and age were considered. This research contributes to debates on education policy design and it provides policy recommendations for future strategies targeting Romani people. By using an intersectional and feminist approach, this thesis emphasizes the importance of including all Romani people in the design and implementation of the strategies.

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Para el abuelo, la tieta Anto, y el Gordo.

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List of Abbreviations

AACC – Autonomous communities

CoE – Council of Europe

EC – European Commission

EP – European Parliament

EU – European Union

DTASF – *Departament de Treball, Afers Socials i Famílies*

DGDFSS – *Dirección General de Diversidad Familiar y Servicios Sociales*

DGSS – *Dirección General de Servicios Sociales*

FRA – Fundamental Rights Agency

FSG – *Fundación Secretariado Gitano*

NRCP – National Roma Contact Point

RSF – Roma Strategic Framework

Introduction

Pedro, a Romani[1] activist who did not study when he was young because it was 'not a thing' in his family, was the first person in my family to access and graduate with a university degree. He was encouraged by Barbara, who has been his wife for more than 30 years. His professional life is mostly thanks to his education and different specializations he did afterwards and throughout the years. His jobs helped support the family, and his example encouraged me to access university. From my family, I am the first to graduate with an MA. This is rather an unrepresentative experience among Romani people and their education; however, it is a lived history that paved the way for this research focus to be grounded on the topic of education.

At first glance, this situation can be interpreted as Roma's fault; however, it is important to understand this within broader structural contexts. Romani families face inequalities in education because of poverty, lack of resources, discrimination, etc. These situations, along with negative experiences, can lead to a loss of motivation or dropout, not because Romani families misunderstand the potential of education but because the education system fails to support Romani students throughout their learning process. Acknowledging this complexity is key to reshaping the narratives of blame on Romani people and redirecting it towards institutions.

In the European Union (EU), there are tools, such as the EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020-2030[2], to increase the wellbeing of Romani people. This strategy set guidelines for Member States to develop their own national and

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[1] "The reference to 'Roma', as an umbrella term, encompasses a wide range of different people of Romani origin such as: Roma, Sinti, Kale, Romanichels and Boyash/Rudari. It also encompasses groups such as Ashkali, Egyptians, Yenish, Dom, Lom, Rom and Abdal, as well as traveller populations, including ethnic Travellers or those designated under the administrative term *gens du voyage* and people who identify as Gypsies, Tsiganes or Tziganes, without denying their specificities." (Directorate-General for Justice and Consumers, 2020). The term Roma and Romani will be used indistinctly.
[2] From now on EU RSF (EU Roma Strategic Framework)

regional plans. In this sense, Spain at the national level and Catalonia at a regional level developed their own plans[3]. Both follow the EU RSF but adopt different objectives and actions adapted to their contexts.

Romani people in Spain face multiple inequalities in different areas, such as employment, housing, healthcare, and education. Despite the positive progress in education, Romani people are still disadvantaged, with Romani women being the most affected. School absenteeism, dropouts, illiteracy, the digital divide, and school enrollments are the main challenges for Romani people. The enrollment of Romani students in different levels gets progressively lower throughout the education stages. Almost 100% of Romani students are enrolled in primary school; however, the number drops to 1.9% at 24 years old. It is worth noting that the situation of Romani LGBTQ+ people or Romani people with disabilities is not researched enough or evaluated. This poses the risk that their needs can further be neglected, consequently reproducing hierarchies, invisibility, and inequalities, not only in the education system but also in their lives.

This thesis aims to understand how an intersectional approach is reflected in the European, Spanish, and Catalan Roma Strategic Frameworks in the education area. This research follows which vectors of intersection were considered, how the policy can be more inclusive, and how the needs of Romani people are addressed in the policy. I am a Roma woman who faced multiple discrimination because of different vectors of oppression and social norms; I understand my privilege in accessing a post-university-level degree, and with this research I intend to provide insights for future RSFs and education policies to increase the access of all Romani people to education.

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[3] National Strategy for Roma Equality, Inclusion, and Participation 2021–2030 (from now on Spanish RSF) and the Comprehensive Plan for the Gitano Population in Catalonia (from now on Catalan RSF).

This research utilizes Critical Policy Analysis (CPA) to analyze the three RSFs from the EU, Spain, and Catalonia. Specifically, the Feminist CPA developed by McPhail and revised by Kanenberg et al. (2019) guided the analysis of this research along with the perspective of intersectionality, Romani feminisms, and decolonial studies. The existing body of research on Romani policies focused on education does not usually consider a broader intersectional analysis, understanding broader as not only considering ethnicity, gender (mostly cis women), and class, but also other vectors of oppression. Since there are no studies that consider parallelly the three RSFs, this research fills that gap by offering a novel comparative critical policy analysis that systematically measures the (lack of) intersectionality of the strategies from three different geographical levels.

The analysis and comparison of the three strategies presented here is based solely on the strategies from an intersectional approach, without considering the politics of how the text was designed, the power structures involved in it, or the writing process. Additionally, it is beyond the scope of this research to measure the effectiveness of the strategies. These strategies would need systematic evaluation since their effectiveness and efficacy are not transparent. Notwithstanding these limitations, this thesis opens paths for future research on how certain actors are involved, exploring their standpoints, how they make compromises, etc.

The next section, provides the theoretical framework of this research, based on intersectionality, Romani feminist movements, CPA, and decolonial studies. Chapter 1 provides an overview of the current situation of Romani people in education in Spain. Chapter 2 explains the European, Spanish, and Catalan Roma Strategic Frameworks. The third chapter provides a comparative analysis of the strategies focusing on specific analytical dimensions: objectives, actors, and funding. Chapter 4 provides a summary of the main findings. Chapter 5 provides informed policy recommendations, and following, the conclusions of this research.

Romani feminist and decolonial perspectives to education policies

This section provides the theoretical framework and literature review of this research. The theories and scholars mentioned in this chapter are fundamental to understanding how intersectionality was developed in academia and how the Romani feminist movements embraced the concept and adapted it to their context. It then proceeds to explain critical and decolonial perspectives in education policies and the education system. Finally, the chapter explains the importance of decolonizing the education system and curricula to understand how white and non-inclusive perspectives in education can influence the experience of non-white students.

Intersectionality, Romani women's identity, and the Romani women's movement

Kimberlé Crenshaw, a lawyer and scholar, coined the term 'intersectionality' to refer to the multiple categories of discrimination that Black women were experiencing. The term was first created– but not defined– by the Black feminist movement, a movement that inspired Romani women to create their own movement. The Romani women's movement was established by different Romani women, activists, and scholars that introduced gender in the male-centered movement as well as in the mainstream women's movement.

Crenshaw's (1989, 1991) neologism demonstrated how a single-axis framework leads to treating race and gender as separate categories of experience; therefore, it helps identify sexist and racist discrimination that increases social inequalities. To demonstrate how intersectionality works, she analyzed different plaintiffs of Black women in USA courts. She found that, in cases of race discrimination, discrimination was based on sex or class privileges,

and, in cases of sex discrimination, race and class was the focus. Consequently, this focus marginalizes those who experience multiple categories, such as race and gender, and empowers those who are more privileged. Courts were singularly pointing out either women's Blackness or gender, but never both. When the judges dealt with women´s experiences, sex was the central aspect, treating white and Black women at the same, and, when Blackness was in consideration, Black women were discriminated against because only experiences of Black men were accepted. To better understand intersectionality, Crenshaw (1989) exemplified the term by using an intersection in traffic:

> "Discrimination, like traffic through an intersection, may flow in one direction, and it may flow in another. If an accident happens in an intersection, it can be caused by cars traveling from any number of directions and, sometimes, from all of them. Similarly, if a Black woman is harmed because she is in the intersection, her injury could result from sex discrimination or race discrimination" (Crenshaw, 1989, p. 149).

The roads represent systems of oppression symbolizing a specific axis of discrimination, such as ethnicity, gender, class, age, etc. The intersection of the roads represents how those axes of discrimination overlap, creating a point where multiple systems of oppression come across. Black and marginalized women are located in the intersections where more traffic occurs, being at risk of injury. The example illustrates how Black women can be discriminated against similarly and differently than white women's and Black men´s experiences. The limitation of the single-axis framework is that Black women experience a double marginalization: they are Black and women at the same time, among other categories of experiences. Despite Crenshaw coining the term and its frequent use nowadays because of different understandings and uses of the word in several contexts, it is important to contextualize the history of Black feminism where the term begins. Crenshaw's concept will be important for the analysis of educational policies targeting Romani people. Applying an intersectional approach is important because

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Romani people face overlapping disadvantages such as Romani women because of their gender and ethnicity, making their experience more complex, Romani LGBTQ+ because of the intersection of their gender, sexual orientation, identity expression, etc. or Romani people with disabilities.

One of the earliest examples of Black feminism is Sojourner Truth's speech "Ain't I a Woman" (2017/1851), delivered at the Women's Convention in Ohio that highlighted how her experience as a Black woman and slave did not fit the established conceptions of womanhood based on white, privileged women. Truth was one of the pioneers of Black feminism, creating a path to further articulations of the movement in the nineteenth century, such as the National Association of Colored Women in 1880, who fought for Black women's suffrage since white women excluded the experiences of Black women (Lange, 2015) under the slogan "Lifting as we climb." Another well-known example is The Combahee River Collective, created in the 1970s, whose statement and call to action emphasized how race, gender, sexuality, and class are interconnected; they saw capitalism as the key actor that perpetuates oppression, and they advocated for Black women's liberation, arguing that it would lead to all people's liberation, among others (The Combahee River Collective Statement, 1977/2017). The Black feminism movement was an important source of inspiration for the Romani feminism movement. Black and Romani women's experiences regarding discrimination were similar since both were shaped, at least, by gender, ethnicity, and class (Kóczé et al., 2018), resembling experiences of marginalization, invisibility, and disadvantage in terms of employment and discrimination (FRA, 2023; 2024).

Crenshaw's discussion of intersectionality is centered on how race and gender overlap, but as Kóczé and Popa (2009) point out, it has limited attention to class. Usually, feminist intersectional theories posit race, class, and gender as the main categories of discrimination;

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however, in the EU, those categories have different statuses in legal and policy debates. Class is not recognized as a ground for discrimination under EU law (Kóczé & Popa, 2009). To demonstrate, Article 19 of the Treaty on the Functioning of the European Union (2012) combats "discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation," and Article 21 from the EU Charter of Fundamental Rights (2000) states that any type of discrimination "based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited." The Treaty and the Charter include a broad list of different categories of oppression, but they do not explicitly include class–the Charter includes 'social origin' but not class–, creating potential harm for those socioeconomically marginalized since class is seldom considered in current policy analysis of unequal treatment. Social policies, influenced by ideologies, pressure groups, economic factors, among others, aim to enrich human well-being, and meet basic human needs. The history of (European) social policies can be traced back to nineteenth century, addressing issues such as poverty and child labor (Geyer, 2000). According to Mooney (2000), "[c]lass is both central and marginal to social policy" (p. 156). One the one hand, it is central because class is the main effect of policy decision since the aim is to improve society's life and, therefore, foster equality; and, on the other hand, it is marginal because it often remains implicit and excludes other categories.

Kóczé and Popa (2009) include Romani people in the intersectionality framework, where different marginalized groups or communities can benefit from it in different contexts, such as policies. Kóczé offers two major dilemmas that Romani women activists are challenged with when examining the crossroads of sexism and racism: intra-differentiation and exposing intra-group hierarchies (Kóczé & Popa, 2009, pp. 20-21). The first dilemma is encountered once women's gender is acknowledged as a system of oppression, leading to different needs from

those of Romani men, and further differentiation is activated. The differentiation shows how Romani women's experiences in terms of ethnicity and gender are different; however, further discussion is needed regarding the extent of which categories of oppression should be considered in the analysis of intersectionality. The second dilemma, exposing intra-group hierarchies, confronts Romani women activists that consider intersectionality important. In some cases, and mostly for some topics such as early marriages, Roma communities can see this issue linked to loyalty to the Roma community: some Romani male leaders claim that Romani women will choose between their ethnicity and their gender, treating those categories of discrimination as separate. These dilemmas derived from the experiences of Romani women, contributed to the emergence of the movement: since Romani women's political needs were excluded from the mainstream women's movement and from the Romani movement, Romani women gathered together to advocate for their needs and rights in different parts of Europe in different years. Intersectionality, articulated by Romani women activists, "[is] centered on the idea that the categories of race/ethnicity, gender, and class are ubiquitous and thus constantly overlapping in the lives of Romani women. They should be incorporated systematically into analyses and policy responses that seek to improve the position of Romani women" (Kóczé & Popa, 2009, p. 23).

The fact that local, national, and/or intragovernmental institutions do not recognize class as a category of discrimination does not imply that individuals are unaffected by it; "poverty and social exclusion intensify the level of discrimination experienced by Romani women" (Kóczé & Popa, 2009, p. 25). There is an urge and need to include class, other categories of discrimination, and factors into the analysis that lead to disadvantages to understand Romani women's experiences from different perspectives and respond accordingly; otherwise, it will lead to more inequalities and silencing experiences from less visible markers. Intersectionality

for Romani women created a path to start their own movement and a language to speak about their experiences.

The Romani Women's Movement was created in different parts of Europe to include Romani women's issues, their voices, and experiences in the Romani and women's movement. It was grounded on the '*personal is political*' statement assembled by the so-called "second wave" feminists in the 60s and 70s (Jovanović et. al., 2015). The movement was created by different actions; however, they were consolidated mostly by three different organizations: The International Romani Women's Network (IRWN), the Joint Roma Women Initiative (JRWI), and the Romani Women's Initiative (RWI) (Izsak, 2008; Jovanović et al., 2015; Schultz & Bitu, 2019).

The IRWN was established after a meeting with Romani and non-Romani women from about twenty European countries. Their main goal was to participate and lobby in an intergovernmental conference, where they introduced a report about the access of Romani women to healthcare. The organization had different challenges, mostly lack of resources and a solid strategy; barriers that made IRWN a participant rather than an agenda-shaping player (Izsak, 2008).

The JRWI was launched in 1999, and it was part of the Open Society Institute. The organization achieved to increase human rights for women, gender equality, and empowerment focusing on policy development, and crafting cooperation and relationships between Romani women and mainstream women's rights movements. According to Izsak (2008), a meeting where both organizations met to discuss some "sensitive issues" (i.e., virginity tests, arranged marriages, etc.) was the milestone of the movement. The outcome of the meeting was a statement signed by 26 Romani women from 10 different countries, where, for the first time, Romani culture was separated from patriarchal practices within the Roma community. JRWI and IRWN shared

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the same goal: to challenge the domination role of Romani men in the Romani movement, the same people who accused Romani women of splitting the Romani movement, since some Romani activist were not considering Romani feminist as Roma –Romani feminist had to choose between being Roma or feminist (Jovanović et. al., 2015).

Another organization that also cooperated in the spread of the Romani women's movement was the RWI, a "semi-autonomous project of the Network Women's Program from 1999 to 2006" (Schultz & Bitu, 2019, p. 29-30). They worked at the local, national, and transnational level, building the base of the Romani women's movement in Central and Eastern Europe. One of the major contributions for the Romani women's movement was the "Roma Women's Forum," where, for the first time, Romani women could use their own voices to present their own policy agenda to organizations such as the World Bank and the EC, among others (Schultz & Bitu, 2019). The organizations and the actions from the Romani women activists made the movement visible and it allowed new alliances with other Romani as well as European organizations to create intersectional change.

Romani people in policies: Equality and the urge to include a Romani feminist perspective

The start of the 2000s brought changes in the EU legal framework, adopting Directives that aimed equal treatment regardless of one's person ethnicity, gender, belief or religion, disability, etc. To achieve equal treatment, it is necessary to understand the term equality and the challenges it poses. This will be useful to understand how European, national, and local RSFs work, since their aim is to combat antigypsyism and achieve equality between the Romani people and the mainstream population. In addition, the Romani women's movement as well as the Romani feminist perspective is explained to understand why an intersectional framework is necessary to implement a decolonial and anti-racist perspective and achieve equality, combat

antigypsyism, and consider other vectors of oppression, such as age, sexual orientation, disability, etc.

Since the implementation of the Equality Directive 2000/78/EC[4], the Race Equality Directive 2000/43/EC[5], and the Council Directive 2004/113/EC[6] for Gender Equality in the 2000s, Europe and its antidiscrimination laws rapidly changed to promote equality in all their governmental bodies and policies to combat discrimination and to promote a just society. The Employment Equality Directive aims to create a framework "for combating discrimination on the grounds of religion or belief, disability, age or sexual orientation as regards employment and occupation, with a view to putting into effect in the Member States the principle of equal treatment" (Directive 2000/78/EC, Art. 1). The Racial Equality Directive's purpose is to declare a framework "for combating discrimination on the grounds of racial or ethnic origin" (Directive 2000/43/EC, Art. 1). Lastly, the Directive on Gender Equality aims to create a framework "for combating discrimination based on sex in access to and supply of goods and services" (Directive 2004/113/EC). This directive fights indirect and direct discrimination based on sex, it includes protecting women during pregnancy and maternity and declares (sexual) harassment as discrimination based on sex. Member States are responsible to implement the directives in their respective national laws, abolishing any that go against the directives.

The Directives were built up according to the EU's responsibility and commitment to human rights and fighting discrimination as signed in the Treaty of Amsterdam in 1997. This Treaty updated the Maastricht Treaty, the Treaty on European Union, which founded the EU,

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[4] Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation
[5] Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin
[6] Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services

established the euro, and created the EU citizenship (European Union, 1992). The Treaty of Amsterdam's objectives were to promote economic and social progress in terms of employment and sustainability, create the EU identity at an international level, make their rights stronger, and set the EU values such as freedom, justice, and security, as well as the EU law (European Union, 1997).

Because of disadvantages between ethnic minorities and majorities of different states, the Council of Europe established in 1995 the Framework Convention for the Protection of National Minorities (Council of Europe, 1995), a multilateral policy document that aims to protect national minorities. Since there are multiple ethnic minorities and each of them has different needs, the Framework opted to have common principles and objectives to guide Member States when protecting national minorities. The document does not provide a "national minority" definition; however, I understand the term as referring to a non-homogeneous group of people that lives in particular EU countries for generations and differs from the majority/dominant population of each state in terms of ethnicity, language, culture, tradition, etc., such as Hungarians in Romania, Russians in the Baltic States (Estonia, Latvia, and Lithuania), or the Roma, Sinti, or Travellers. The Convention recognizes that human rights also include the protection of national minorities; it protects language, education, and participation rights, among others, and States are obliged to incorporate the necessary measures to achieve equality and monitor their results (Treaty No. 157).

Fredman (2002) provided an in-depth analysis on the concept of equality and its definition. She states that the term that has long been discussed, and its meaning changes depending on the context. It is also captured on legal forms such as international and national human rights documents that contain a chapter or a section dedicated to equality. Equality is usually understood as equal treatment; 'likes should be treated alike' as Aristotle claimed; however,

this logic only perpetuates inequalities since difference is usually equivalent to inferiority. Equality and freedom ideologies proposed a new vocabulary for feminists and other minority, disadvantaged groups to advocate for their needs and rights. Fredman (2002) explains that equality poses four problems: 1) When should two individuals consider alike? 2) the problem of the substance; 3) the need to find a comparator; and 4) treatment of difference.

The first problem is treating every distinction as discriminatory; that is, for example, a woman from an ethnic minority group should not be considered automatically as different and, therefore, inferior. The second problem regarding substance refers to a scenario where if two individuals are alike and should be treated equally, that means that they can be both treated equally bad or good. One can level down the situation by removing the benefit from the privileged group and making both groups be at a lower point, or one can level it up to extend the benefit from the privileged group, equalizing and making the groups be at a higher point. The fact that for equality there is a constant need for a comparator constituted the third problem. The last problem of the traditional equality framework is that only those who are 'alike' can be treated equally; therefore, ensuring equality when two parties are different is virtually impossible. However, Fredman's understanding of equality does not consider how multiple vectors of oppression intersect and embraces Western notions of equality leading to epistemic injustices.

Romani feminist activists fought and continue fighting for the inclusion of an intersectional, Romani feminist perspective in policy-making processes, such as in the previously mentioned Roma Women's Forum; even so, the inclusion of Romani women or the Romani feminist perspective in the policy-making process is still either invisible or non-existent. Gender equality and equality between Romani people and *gadje* has been a central topic among Romani feminist activists to spread knowledge and foster social change. European policies

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started to acknowledge intersectionality, and ethnicity and gender are mostly recognized; nevertheless, "Romani women's activism and theoretical work can stimulate [the] European political/policy agenda to apply intersectionality as methodology in their work" (Jovanović et al., 2015, p. 7). Fighting for equality within the Romani feminist movement means putting forward Romani voices, advocating for Roma women to be heard and understood in our own terms.

Critical and decolonial perspectives on education policies

This section situates the purpose of Critical Policy Analysis (CPA) in this research. I will then go on to explain education policies and end with a decolonial perspective, which is necessary to dismantle colonial discourses that hierarchize knowledge as well as teacher-student relationships and emphasize students' agency.

Fischer (2016) compares critical and interpretive policy analysis to define CPA. On the one hand, interpretive policy analysis "seeks to uncover or discern what social actors think or believe they are doing when they do it and the purposes and motives underlying those activities" (p. 96). The goal of the researcher is to get inside the situation and discover the logic of it by gathering objective and subjective data to evaluate the statements and actions that actors take. On the other hand, critical interpretive policy analysis includes statements and actions, which are reflexively examined in "the larger systems of meaning of which they are part" (Fischer, 2016, p. 96), and it aims to explore and evaluate policies. The unit of analysis is policy arguments, and the core value is that society is always changing; in this sense, CPA can situate the tensions of the policies and examine the meaning in an evolving context rather than using quantitative and objective data to evaluate and analyze social phenomena that could be considered fixed (positivist approach). Apple (2018) claims related to education policies that CPA "is grounded in the belief that it is absolutely crucial to understand the complex

connections between education and the relations of dominance and subordination in the larger society—and the movements that are trying to interrupt these relations" (p. 276).

What is Education policy?

Education policy refers to principles, laws, and measures taken to influence and guide the educational system. That includes the creation of curricula, learning objectives, and methodologies, as well as ensuring equality and opportunities for students. The policies can be developed by intergovernmental, national, and local governments, or private institutions. The main goal is to create a framework in which actors can implement the guidelines to promote inclusion and access to education, ensure quality and competencies, and create an educational system that helps growth. As defined by Trowler (2003), educational policies are "a specification of principles and actions, related to educational issues, which are followed, or which should be followed and which are designed to bring about desired goals" (p. 95). However, as he states, this definition is limiting since it views policy as a static rather than a dynamic process. The reasons why policy is a dynamic process are the created conflicts among the policymakers, the openness of the policy that leads to different interpretations, and the implementation of the policy and others' opinions about how it should be interpreted (Trowler, 2003). The outcome will be a policy that reflects a "micropolitical process and 'muddling through'" (Trowler, 2003, p. 98), aiming to, for instance, fostering equality by providing equal access to education or implementing sexual education policies in the curricula but not making them mandatory for students, as it is the case in some Member States of the EU (Directorate-General for Employment, Social Affairs and Inclusion & Picken, 2020).

Decolonizing educational policies

A growing number of scholars are focused on evidence-based education as a path to ensure high-quality education. Evidence-based education refers to teaching methods that are supported

scientifically and that are effective. It uses data and empirical evidence to plan, implement, and evaluate educational programs as well as improve teaching styles. Despite the attempt to improve the quality of the educational journey and teaching methods, Shahjahan (2011) states that academics that believe in evidence-based education are unconsciously reproducing colonial discourses from the American-European era in three different ways: by civilizing education, by promoting colonial hierarchies of knowledge, and by following a neoliberal education. Shahjahan (2011) uses an anti-colonial theoretical framework to dismantle how power and knowledge intersect with colonial domination that leads to the perpetuation of colonialism in educational policies and to examine sites of resistance from the oppressed point of view.

Regarding the first way of perpetuating and reproducing the colonial discourse, Shahjahan (2011) observes that defenders of the evidence-based education aim to reimagine education into the 'scientific revolution' since there is the need to discipline it and, as a result, civilize it. 'Scientific revolution' is the antonym of 'chaos,' and, in the colonizer view, the discourse of chaos was used to achieve domination among the colonized; the same will happen with evidence-based policies: scholars and researchers believe that the current method of teaching is failing; therefore, a new procedure should be considered. From this discourse, evidence is taken as neutral, policies as objective, and science as the ultimate truth: "this policy narrative is underpinned by the idea that if educators do not take evidence into account in making decisions […], the field will lag behind other professions in terms of respectability and accountability" (Shahjahan, 2011, p. 187). This sentence can lead us to the second form of imposing colonialism in the educational policies.

The fact that scholars urge the use of scientific-based research in education as if it were, for example, medicine because if not, it will "lag behind," creates different colonial and knowledge

hierarchies. Colonizers created, promoted, and reproduced a "monoculture of the mind to maintain control over knowledge production" (Shahjahan, 2011, p. 189). Some of the scientific-based research is usually static, fixed; it takes for granted 'evidence' as standard, in this sense, colonial since it assumes a way of knowing and banning others. Consequently, colonial research methods pose colonizing effects. For example, the educational system of Catalonia (as well as other autonomous communities (AACC) from Spain) tests students' 'basic skills,' that is, Catalan, Spanish, English, mathematics, technology, and science. The information regarding the aim for the families of the students that have to conduct the exam is:

> "The results of the test complete and enrich the different sources of information available to the school to identify in each student the degree of achievement of the skills and knowledge. They will allow each school – making use of the autonomy granted by the Education Law of Catalonia (LEC) – to enhance its strengths and correct its weaknesses [7]" (Departament d'Educació i Formació Professional, 2024).

The fact that Catalonia is examining specific "basic skills" of students and the schools reinforces knowledge hierarchies because it ranks the performance of schools and students, and it evaluates what the education system considers as "basic skills," while pushing other skills aside.

The third problem of the evidence-based education movement is that it is an essential component of the world imperial system supported by a neoliberal agenda rooted in the colonial past (Shahjahan, 2011). Educational policies are becoming tools to serve global economic demands, using economic knowledge and praising traditional efficacy and efficiency values to promote productivity and control. In this sense, education evolved into a global commodification in which the curricula, classes, courses, and exams or tests are products that

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[7] Translated by the author.

are being sold to the market to determine which one is better in imperial values, such as the 'basic skills' test from Catalonia. Consequently, students become servants of the system; they are trained according to those values that serve capitalism. However, more research is needed to evaluate the extent of colonizing practices within evidence-based education policies in Spain, as it has not been the main focus of this research.

Freire (1970/2005) in "Pedagogy of the oppressed" explains the relationship between teachers and students and critiques the traditional way of teaching, proposing another model that 'liberates' the oppressed—the students. The classic way of teaching is referred to as "banking concept of education" (Freire, 1970/2005, p. 72), a model that places students as passive, empty actors that are meant to be filled with the teacher's knowledge, the one exercising power. The students are expected to memorize everything, making the teaching process mechanical and noncritical. Consequently, it perpetuates hierarchies and power dynamics, objectifying and dehumanizing students since they cannot have the space for thinking critically or questioning the given knowledge. Freire (1970/2005) discusses how education can dehumanize or humanize individuals in education, the reason why he proposes the "problem-posing model" (Freire, 1970/2005, p. 79). He states that this model gives agency back to the students by encouraging critical thinking, forging a conscious person, and placing students and teachers as having knowledge that can be exchanged. This creates a more just system empowering individuals to defy oppression. In line with CPA, Freire's analysis provides the foundations to critically examine education policies since it points to the underlying value systems that maintain power relations. Freire's work, along with the FCPA (explained in the next section), questions dominant structures that perpetuate inequalities. On the one hand, Freire highlights the professor-student relations and the education system itself; on the other hand, FCPA emphasizes the need for policies that include an intersectional approach. Both works can

improve current education policies in terms of minorities and marginalized groups and create a space to change their experiences.

Research methodology: Intersectional Feminist Policy Analysis

The following chapter includes a detailed explanation of the used research methods, in this case, the Feminist Critical Policy Analysis that Beverly A. McPhail developed in 2003 as a critique of the persistent gender-neutral approach that policies adopt. Since different developments have been made in policy analysis methods and feminist theory, this research also includes a revised model to situate that framework in a contemporary context. The FCPA builds upon the same foundations of CPA, deepening its understanding by adding the intersectional and feminist perspective. In this sense, FCPA explores how meaning is forged, centered in intersectionality, the lived experiences of people, and the vectors of oppressions they embody, to fight for a just society and equality.

The FCPA was constructed as a critique of the general policy analysis frameworks, which entail "identifying, examining, explaining, and understanding the content, causes, and consequences of public policies" (Dye, 1998, as cited in McPhail, 2003). Policy frameworks are used to systematically analyze a policy with a set of questions. Historically, public policy and its process-making have been a field innately political and dominated by, generally, white men who lacked a gender lens to analyze policies. The FCPA attempts to include a gender perspective, considering the multiple standpoints of feminists and acknowledging that "there can be no single feminist framework as there are multiple 'feminisms'" (McPhail, 2003, p. 44).

The main goal of the framework is to make women visible and end sexist oppressions of women in policy through a model based on action. This framework is very much political, compared to the historical neutral, based on objectivity and rationality, which reinforced men's privilege and position in society. This framework attempts to include men as well and expose the bias to achieve policies that are more inclusive for men and women. The values that the framework

follows encompass the perspectives of different feminist approaches; as a result, the plan of action "requires a 'both/and' rather than 'either/or' perspective" (McPhail, 2003, p. 45). It contemplates that women have multiple identities, despite their gender, having other categories of discrimination and oppression such as race or ethnicity, nationality, sexual orientation and identity, class/castes, religion, ability, age, weight, and height, among others. Nevertheless, these categories should be considered contextually, paying attention to the economic, political, and social contexts of women.

The framework also considers the language used in a policy. Usually, a gender-neutral language hides women and makes the policy mostly targeted to men. For this reason, gender should be visible when it is relevant for the policies; however, from this practice, other complexities arise, such as what categories should be included, when one should use them, and how. The present research analyzes the inclusion of different categories to understand to what extent the policies include, implicitly or explicitly, the different axes of oppression that the Romani people encounter.

This framework contains different questions[8] that can be used to systematically analyze policies with a gender lens. It considers that the list of questions is uncompleted, that it serves as a starting point, and that questions may be relevant depending on the analyzed policy. Consequently, different scholars collectively wrote a revised version of McPhail's framework, contemplating a contemporary location including "privilege, oppression, and intersectionality," called Intersectional Feminist Policy Analysis (IFPA) (Kanenberg et al., 2019). The aim of this revised model is to make gender and different categories of oppression in situated contexts visible through a list of questions that arise various complexities.

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[8] The list of questions can be seen at the end of McPhail's article.

In McPhail's framework, different themes were analyzed, such as Equality, Special Treatment or Protection, Materiality and Symbolism, among others. In the revised version, the scholars studied additional themes that are more relevant or consequential nowadays. The themes added are Patriarchy/Gender policies, Oppression, and Integrating Intersectionality.

The first theme revised of McPhail's framework is "Patriarchy/Gender policies" (Kanenberg et al., 2019, p. 9). In this section, they discuss gendered policies, that is, policies whose aim is to bring women's and men's experiences into the policy cycle. Policies have different impacts on men and women, usually under a cisnormativity and binarity of gender approach, promoting and reinforcing the patriarchal system at a state and societal level. To improve gendered policies, it is necessary to address patriarchy and its relation to men (including cisgender/sexual and transgender/sexual people), since patriarchy affects everyone. Not doing so will reproduce social gender norms, roles, and binary oppressions.

Therefore, the next inquiry is the concept of oppression. Frye (2019) emphasizes the roots of the word oppression coming from "pressed," so that "the experience of oppressed people is that the living of one's life is confined and shaped by forces and barriers that are not accidental or occasional and hence avoidable, but are systematically related to each other in such a way as to catch one between and among them and restrict or penalize motion in any direction" (p. 3). In this sense, women are oppressed by different barriers and obstacles that make them vulnerable due to the tensions they are living in. Nevertheless, the tensions, barriers, and obstacles are specifically designed to guarantee the access of a few in order to guarantee privilege and power, excluding minorities (women, trans* people, ethnic minorities, etc.), non-able bodies, and non-white people. In this matter, an intersectional approach is necessary to understand the experiences and the systems in which oppressed groups live, which is the last theme they revised and added to McPhail's framework.

The IFPA includes a set of intersectional questions in different themes: Intersectional Identities, State-Market Control, Equality, Special Treatment/Protection, Gender Neutrality, Context, Language, Equity/Rights and Care/Responsibility, Material/Symbolic Reform, Role Change and Role Equality, Power Analysis, and Other. Each category has different questions that assess the specific topic. The integration of an intersectional approach helps this thesis in exploring, analyzing, and recognizing the different identities of the Romani community as well as monitoring the inclusion of those in the policies targeting Romani people in three different ambits: EU, Spain, and Catalonia.

Chapter 1: Current situation of Romani People in education in Spain

"[...] Somos atropellados constantemente; no nos dejan un momento tranquilos ni en las poblaciones ni en el campo; nuestros hijos no reciben la debida educación, porque no son admitidos en ninguna parte sólo por el hecho de ser gitanos, y por el motivo más insignificante y que muchas veces desconocemos somos tratados inhumanamente, no teniendo quien nos proteja ni nos defienda. [...]" (1930, as cited in Catalá (2015))[9].

This section explains the current systematic barriers that Romani people face in education. Education for Romani people is key to improving their lives, increasing their opportunities in education and in the labor market, and achieving a better quality of life. Romani people face discrimination in the education system; moreover, their socio-economic situation poses a disadvantage to accessing, graduating, and continuing different educational stages.

Romani people in Spain face significant levels of social exclusion compared to other marginalized groups and the non-Romani population. Estimates suggest a Romani population in Spain of between 725,000 and 750,000, although official state data is lacking. In 2018, over half of the Romani population was categorized as severely socially excluded, impacting various aspects including employment, health, housing, and education (Hernández Pedreño et al., 2019). This section provides an overview of the actual situation of Romani people and the different intersectional challenges they face not only in terms of entering education but also continuing their educational path, among others.

There are several causes that affect Roma education and contribute to education inequality between the Roma community and mainstream society. According to a comparative analysis between 2013 and 2023 from Spain regarding education (Fundación Secretariado Gitano

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[9] "We are constantly run over; they do not leave us a quiet moment either in the towns or in the countryside; our children do not receive proper education, because they are not admitted anywhere just because they are Roma, and for the most insignificant reason and which we often do not know are treated inhumanely, not having who protects us or defends us" – Translation by the author.

(FSG), 2023), the first cause of inequality is poverty and social exclusion in which Roma people live, hindering educational success due to insufficient income, low educational level of members from the household, and less educational resources (lack of books and internet connection). These factors limit their access to education, reinforcing cycles of poverty, and reproducing their exclusion.

Regarding childhood education, almost 91% of Romani kids were enrolled during the 2022-2023 academic year, compared to the 98% of non-Roma kids (FSG, 2023), potentially linked to a lack of childhood education services near their house (Plataforma de Infancia, 2024). It is also worth noting that the rate of child poverty of Romani people is 86.5%, compared to 28.7% in the mainstream population (FSG, 2023).

In primary school, almost 100% of Romani students between 6 and 12 years old are enrolled. However, scholar absenteeism among the Romani students is continuous: 13% of the Romani students miss classes without justification (1-4 days per month), with Romani men being more likely to miss classes compared to Romani women (13.3% and 8.2%, respectively). In addition, Romani students repeat different courses, for example, in the third and fifth years of primary school, 77,6% of Romani kids access the course with the ideal age (8 years old), and only 59.2% of Romani kids attend the fifth course of primary school with the ideal age (10 years old) (FSG, 2023).

The Secondary Obligatory Education (ESO) is mandatory from 12 to 16 years old, and in this stage the percentage of Romani people that are enrolled starts decreasing progressively. Most of the Romani students that drop the mandatory stage of education are between the ages of 15 and 16 –only 53.7% of Romani students are enrolled; however, between the ages of 12 and 14, more than 90% of Romani students are in school (FSG, 2023).

Almost 63% of Romani students do not complete this stage of education, compared to 4% of students from the mainstream population. The difference is significant compared with data from 2012, where almost 65% did not complete the ESO; despite the progress of almost 2% in ten years, the number of non-graduated Romani students from mandatory school is still significant. The drop-out rates are highly connected with the times a student must repeat the academic year and a non-inclusive environment (FSG, 2023). The school enrollment rate after the age of 16 is progressively lower by age. Only 34.3% of Romani students aged 17 are enrolled in education, and the numbers lower, achieving only 1.9% of Romani students enrolled at the age of 24.

Despite the inequalities that Romani people face in education and the lower numbers after post-mandatory stages, different measures have been implemented to address these difficulties targeting Romani people. For example, there is the scholarship PIPG for post-mandatory students in Catalonia, which helps provides financial support. Although the economic help can be low, it contributes in a significant manner to students, for example, transportation or school material. Another measure is positive actions in universities, where most public universities reserve a number of positions for different people such as victims of domestic violence or terrorist acts, people with disabilities and Roma.

Chapter 2: The Roma Strategic Frameworks

This section will explain the three most recent Roma strategic frameworks in the EU, Spain, and Catalonia, which operate at different institutional and geographical levels of policy making. The EU RSF is effective on a supranational level, while the Spanish and the Catalan readjust and execute policies at national and regional level, respectively. The EU RSF for Romani inclusion started back in 2005, with the Decade of Roma Inclusion 2005-2015, also known as the 'Roma Decade.' It was the first framework, created in cooperation with eight Member States from Central and Southeast European countries, which aimed to "monitor progress in accelerating social inclusion and improving the economic and social status of Roma across the region" (OHCHR, 2004, p. 3). Since then, the EC repeatedly encouraged Member States and local institutions to create their own RSFs in different years, setting guidelines in various areas to combat antigypsyism and create a just and equal society.

EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020-2030

In 2020, the EC launched a communication announcing the new EU Roma Strategic Framework for equality, inclusion, and participation, a 10-year plan as the initial contribution to the 2020-2025 Action Plan against Racism (Press Corner, 2020). The new RSF replaces the EU Framework for National Roma Integration strategies up to 2020, that aimed to combat socioeconomic exclusion with a focus on health, education, employment, and housing, relevant areas that significantly impact the lives and well-being of Romani people. The latter strategy is compounded by six sections: introduction, objectives, actions, promoting Roma equality, participation, inclusion, and conclusions. The seventeen-page document aims to provide a framework to continue tackling antigypsyism while promoting Roma participation, inclusion, and equality.

The framework states that there has been progress, mostly in education, since school-leaving rates have decreased, and the number of Romani kids enrolled to childhood education have increased as well as the number of years spent in compulsory education; on the other hand, the segregation of Roma students increased. No progress has been achieved in employment as well as Roma NEETs[10]. Despite improvement in the poverty-risk rates of Roma, the situation in medical services, segregated housing, and access to housing is still maintained. At the same time, "antigypsyism, hate crime, trafficking in Roma, in particular women and children continue to be a matter of high concern" (European Commission, 2020b, p. 2).

Objectives

The new strategy implemented results from evaluations of the previous framework, consultations with stakeholders[11], and analysis of previous measures and their effectiveness to promote equality, socio-economic inclusion, and participation of Romani people. It also contributes to other EU initiatives, such as the EU Anti-Racism Action Plan, the Sustainable Development Goals, and the EU Agenda 2030. The strategic framework sets objectives and targets at the EU level; however, Member States are the ones responsible for implementing the national strategic frameworks and cooperating with the European institutions.

The new strategy included three horizontal objectives to the four sectoral objectives (health, education, employment, and housing) that compounded the last strategy; those are equality, socio-economic inclusion, and participation; therefore, the new strategy has seven objectives. The strategy states that an intersectional approach is considered and recognizes that not all Roma are socially excluded. The EU RSF claims that in order to achieve those objectives, it is

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[10] Not in Education, Employment or Training.
[11] NRCPs; national, local, regional and municipal authorities, other entities such as services providers–education, health, social; non-governmental and (international) civil society organizations; academics; Roma integration experts; citizens; representatives of religious groups; and business associations (SWD/2020/530 final, 2020, pp. 48-49)

necessary to measure the progress through quantitative measures. Table 1 shows the main objectives of the EU RSF. To achieve these objectives, actions are needed at both the EU and national levels with the involvement and help of civil society and stakeholders in the development of the national strategic framework.

	Fight and prevent antigypsyism and discrimination
Horizontal objectives	Cut the proportion of Roma with discrimination experience by at least half.
	Decrease the proportion of general population who feel uncomfortable having Roma neighbors by at least a third.
	Reduce poverty and social exclusion to close the socio-economic gap between Roma and the general population
	Cut poverty gap between Roma and general population by at least half.
	Cut poverty gap between Roma children and other children by at least half
	Promote participation through empowerment, cooperation and trust
	Capacitate and engage at least 90 NGOs in EU-wide coordinated Roma civil society monitoring.
	Ensure participation of Roma NGOs as full members in national monitoring committees.
	Double proportion of Roma who file a report when they experience discrimination.
	Encourage participation of Roma in political life at local, regional, national and EU levels
Sectoral objectives	**Increase effective equal access to quality inclusive mainstream education**
	Cut gap in participation in early childhood education and care by at least half
	Reduce gap in upper secondary completion by at least one third
	Work towards eliminating segregation by cutting at least in half the proportion of Roma children attending segregated primary schools
	Increase effective equal access to quality and sustainable employment
	Cut employment gap by at least half.
	Cut gender employment gap for Roma by at least half
	Cut gap in NEET rate by at least half.

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Improve Roma health and increase effective equal access to quality healthcare and social services
Cut life expectancy gap by at least half
Increase effective equal access to adequate desegregated housing and essential services
Reduce gap in housing deprivation by at least one third
Cut gap in overcrowding by at least half
Ensure that at least 95% of Roma have access to tap water

Table 1 - Objectives of the EU RSF for equality, inclusion and participation for 2020-2030 as in the document, excluding the minimum progress that should be reached by 2030 and the latest available data.

Common but differentiated approach

The framework proposes a "common but differentiated approach" (European Commission, 2020b, p. 6), meaning that, when developing the national strategic framework, all Member States should include common features, and those states that have larger Romani populations should include additional and targeted commitments. On the one hand, Member States from the EU will develop an RSF that tackles issues that are present in every state, and, therefore, progress can be achieved equally in the Union; on the other hand, those Member States that should include specific features will contribute to achieving progress at the EU level in an equitable manner.

The common characteristics that should be included are: a stronger focus on equality, particularly in fighting antigypsyism and discrimination; promoting political, economic, and cultural participation to achieve a full sense of belonging; reflecting the different needs and diversity of Romani people in terms of different categories of oppression (age, sexual orientation, disability, gender, etc.); explicitly targeting Romani people but not exclusively; and improving qualitative and quantitative data collection as well as monitoring and reporting. The additional features that should be included, depend on the specific national contexts;

however, it should consider the size of the Romani population of each Member State, where Roma live and how (rural, urban, segregated, mobile…).

The framework states that in those countries where the Roma population is above 1%, equality and inclusion are as important as fundamental rights, and meaningful economically. Since large numbers of the Romani population are of school-age and the future labor force, they can contribute to the socioeconomic progress of the state:

> "Progress in socioeconomic inclusion for the Roma has the potential to reduce labour and skills shortages in times of adverse demographic developments and reduce social expenditure. Investment in better education and upskilling of a previously excluded labour force can positively affect productivity growth. Ensuring that Roma people can deploy their potential to contribute to the economy and society in general will lead to better social and economic outcomes for all" (European Commission, 2020b, p. 9).

The minimum commitments and features are not the only requirements for the development and implementation of Roma national strategies. It should also include a set of measures to monitor progress as well as set out a plan of how financial support will be invested. The indicators to measure the progress were developed by the European Union Agency for Fundamental Rights (FRA), and Member States are asked to make reports every two years and make them public. To achieve a successful development and implementation of the national RSFs, the EU provides tools, such as guidance for policy planning and implementation, emerging challenges, and promoting Romani art, culture, and history, as well as financial and methodological support from the EC, FRA, equality bodies, national human rights institutions, and national statistical institutes.

EU Actions

The fourth section of the framework is related to the EU actions. The EU RSF restates that the responsibility is on the Member States; however, actions and support from the EU will complement states' efforts to achieve the objectives.

To ensure antidiscrimination and individual rights, the EC claims that the first and most important step is to effectively enforce the legal framework; it also considers the "explicit but not exclusive" approach, so the legal reforms will not only benefit Romani people but also other groups that are in similar positions or have similar experiences. The EC bases their actions on different already existent directives and treaties, such as the Racial Equality Directive, the EU Anti-Racism Plan, and the Council Framework Decision on Racism and Xenophobia. They also include the significance of countering online hate speech, working with different IT companies to fight online discrimination.

The actions involving the Commission in terms of participation, inclusion, and diversity are mostly related to inclusion, communication, influence, and engagement with national Roma platforms. The framework underlines the importance and encourages Member States to recruit and select Romani people in workplaces, as the Commission is committed to this goal. The EC carries out different meetings with civil society at the EU level as well as with international organizations, and it will launch a reformed system, based on previous evaluations of the Roma Civil Monitor project, to monitor and report effectively. At the same time, the European Roma Platform is expected to gain influence to encourage exchange and cooperation. The Platform refers to the National Roma Platform, a space for consultations, managed by National Roma Contact Points (NRCPs). To combat antigypsyism, the Commission will make campaigns against stereotypes, disinformation, and hate speech, among others, and, along with UNESCO, a campaign will be set to tackle hate speech in media and promote positive narratives about

Romani people. In addition, using an intersectional approach, a communication campaign against gender stereotypes will be rolling to raise awareness of multiple discrimination against Romani women. The framework also includes a section to externalize the efforts to combat antigypsyism beyond the EU. The Western Balkans region also commits to the EU RSF and adapts it to their national and local levels.

National Strategy for Roma Equality, Inclusion, and Participation 2021-2030

For the last ten years, public policies targeting Romani people were focused on social inclusion, as in the National Strategy for the Social Inclusion of the Roma Population in Spain 2012–2020. From the 2020s, Spain adopted the "National Strategy for Roma Equality, Inclusion, and Participation 2021–2030," a new framework that incorporates the new EU RSF, as well as evidence and experience from the previous one, aiming to achieve the EU goals and is aligned with the Sustainable Development Goals. The National Roma Strategy enhances mainstream policies and will complement them with targeted policies, following the "common but differentiated" approach that the EU RSF proposed.

Some progress has been made since the last strategy, such as increased visibility and recognition, improvements in commitment from different national institutions regarding better communication, and clarity. However, Romani people continue to face multiple disadvantages, for example, high-risk poverty, school segregation, health and housing, and the digital divide, while the results from the last strategy were limited on these topics. The inclusion, recognition, rights, and participation of the Romani people have been on the public political agenda and lead to the creation of governments and institutions, such as the State Council of the Romani people and the Institute of the Romani Culture which are helping actors to be involved in the policies (Dirección General de Diversidad Familiar y Servicios Sociales (DGDFSS), 2021a).

Spain's National Roma Strategy (2021 - 2030)

The strategy aims to promote an inclusive and equal approach; to fight against any type of discrimination; increase inclusion and participation; combine mainstream and targeted policies; improve communication and exchange between national and local institutions, AACC, and local civil society; have a focus on vulnerable groups; intersectionality; and improve knowledge regarding the situation of Romani people. According to the National Roma Strategy, including a gender perspective transversally is not enough; for this reason, it set different specific objectives to improve Romani women's lives (DGDFSS, 2021a, p. 12).

The strategy is structured in three levels: dimensions or axes, strategic lines, and objectives. The axes are social inclusion, equality of opportunities and non-discrimination, and participation and empowerment. Each axis has strategic lines equivalent to the EU RSF. In the social inclusion axis, the strategic line is compounded of education, employment, housing and essential services, health, and poverty, social exclusion, and the digital divide. The equality of opportunities and non-discrimination axis includes antigypsyism and non-discrimination, equality between women and men and violence against women, and promoting Romani culture. The participation axis comprises participation of the Romani people and the Romani associative movement (DGDFSS, 2021a, p. 14). The objectives refer to specific quantifiable goals that represent tangible goals, and they were created (see Table 2, 3, 4) considering the actual situation of Romani people, explained in the first chapter of this thesis. In addition, the Spanish RSF includes action guidelines for the AACC.

Social inclusion axis

The results from the last Spanish RSF shows progress; however, it cannot be considered a transformative change. It is also important to assess how Covid-19 affected vulnerable groups, especially Romani people, and how the digital divide exposed the inequalities among the

Romani population. The social inclusion axe covers a set of actions carried out by the general state administration at the national level. In this section, the actions of the different strategic lines will be briefly summarized to have an overview of the strategy's goals.

The actions of the general state administration regarding education will focus on the creation of economic programs, training for professors, attempts to improve the situation of Romani women in education as well as leveling the discrepancies with the mainstream population, fighting against bullying and antigypsyism, including the Roma history and culture in the curricula, and increasing access to online education.

In terms of employment, a priority is given to the youth, and actions will be focused on the NEETs population, working along with the 'Youth Guarantee Plan Plus 2021 - 2027 of decent work for young people.' To impact the general Roma population's lives, the general state administration will create a sensibilization campaign with the business sector to end stigmatization. In addition, the institution will cooperate with the Spanish Women's Institute to include Romani women onto the labor market. Special attention is also given to the street commerce and the digitalization.

The objectives of housing are concerned with guaranteeing essential services and adequate housing. Social housing will be available for vulnerable groups (including the Roma); they will start plans to rehabilitate the most deteriorated neighborhoods and end housing discrimination. Similarly, in health, efforts are to promote healthy habits, including dental, sensitize health professionals, and counter Covid-19 effects. Interestingly, in this section, disabled people are mentioned; however, it promises that actions will be created in another strategy: "National Disability Strategy" 2022-2030 (DGDFSS, 2021a, p. 43). Finally, in the poverty strategic line, the actions' focal point is to reduce poverty risk or situations of poverty by combining a redistribution approach along with employment activation policies.

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The following Table 2 shows the objectives of the Social inclusion axis, divided by its strategic lines:

Table 2 - Objectives of the social inclusion axis. From: National Strategy for Roma Equality, Inclusion and Participation 2021-2030, pp. 15-16.

Social inclusion axis	
Strategic line	**Objectives**
Education	Increase the schooling and participation of Roma in the entire Early Childhood Education (<6 years), especially in the first cycle from 0 to 3 years.
	Reduce school segregation in the different educational stages and in any of its forms.
	Eradicate illiteracy and increase the training and education of adult Roma.
	Reduce discrimination against Roma in the educational sphere.
	Increase the academic success of Roma students of both sexes in the compulsory educational stages.
	Increase the number of Roma students of both sexes in post-compulsory stages of study.
	Reduce the digital divide among Roma people.
Employment	Increase the employment rate of Roma.
	Reduce job insecurity and discrimination against Roma.
	Reduce the rate of Roma youth who neither work, nor study, nor train (16-30 years).
	Increase the empowerment, participation and activation of Roma women in the labor market.
	Skilling and upskilling Roma who engage in street commerce.
Housing and essential services	Guarantee access to essential services for Roma and improve the basic equipment and quality of housing.
	Reduce discrimination in access to housing.

Health	To improve the health status and reduce social inequalities in terms of health of the Roma population, with a special focus on Roma children and women. To reduce the discrimination in the health system against Roma.
Poverty and social exclusion and digital divide	Reduce the risk of poverty and social exclusion among Roma. Reduce the risk of child poverty among Roma and break the intergenerational cycle of poverty. Improve access to economic and social benefits. Reduce the digital divide among Roma.

Equality of opportunities and non-discrimination axis

The equality of opportunities and non-discrimination axis refers to the dimension that will fight for increased access to different areas of life, combat antigypsyism and discrimination, and create a just path for using private and public services and goods. Since the Roma population is one of the most marginalized groups in Spain, their situation is reflected in almost all spheres, such as housing, health, education, perception of the mainstream population, etc. The discrimination suffered by the Roma is not well documented due to the majority of them not trusting Spanish security organizations. The fact that they do not report discrimination does not mean that it does not happen; in this sense, the strategy encourages actions to foster official complaints. At the same time, it acknowledges that Romani groups that suffer multiple discrimination, such as Romani women, Romani LGBTQ+, Romani people with disabilities, and migrant Romani people (DGDFSS, 2021a, p. 53) are in a more vulnerable position.

In this axis, fighting against antigypsyism and discrimination is transversally adopted. The actions of the general state administration regarding the strategic line of antigypsyism and non-discrimination is focused on implementing positive action plans, strengthening already existent organizations and institutions that fight discrimination, updating the legal framework –

achieved in 2022 with the so-called Zerolo law (Ley Zerolo, 2022), whose aim is to guarantee and promote equality rights and non-discrimination – and sensitizing public administration's professionals, media, and all public and private sectors. In addition, because of the lack of data, there is ongoing debate regarding the collection of ethnic data in Spain.

The gender equality strategic line acknowledges the multiple discrimination of Romani women, mostly by the intersection of "poverty, social exclusion, sex, and structural and institutional antigypsyism" (DGDFSS, 2021a, p. 60). To achieve change, the general state administration will implement affirmative plans for Romani women as well as awareness raining campaigns against stereotypes, equality, and violence against women. Additionally, tackling violence against women is challenging to monitor and counter because of the lack of data.

The last strategic line from this axis is the Promotion and Recognition of the Romani culture. The actions are centered on the diffusion of the Romani history and culture, including it in the school curricula, teacher training programs to familiarize them with the topics, and try to declare the Romani culture as cultural heritage. All these actions attempt to create a positive image and narrative of the Romani culture, history, and art, aiming to end discrimination and prejudices.

Table 3 shows the objectives of the Equality of opportunities and non-discrimination axis, divided in its own strategic lines:

Equality of opportunities and non-discrimination axis	
Strategic line	**Objectives**
Antigypsyism and non-discrimination	Reduce antigypsyism, including stigmatization, intersectional and multiple discrimination, hate crimes and hate speech, and antigypsyism.

	Increase the capabilities of victims of discrimination and antigypsyism in the exercise of their rights, guaranteeing their assistance, guidance and specialized support.
Gender equality and Romani women's empowerment	Improve the living conditions of Roma women and reduce the gaps between Roma men and women, in particular in access to resources, and fight against stereotypes.
Promotion and recognition of the Romani culture	Promote the knowledge and dissemination of Roma history and culture in order to favor recognition and reconciliation.

Table 3 - Objectives of the equality of opportunities and non-discrimination axis. From: National Strategy for Roma Equality, Inclusion and Participation 2021-2030, p. 16.

Participation and empowerment axis

The last axis is a key element in the framework, that addresses its limitation due to the insufficient participation of Romani people, or its representative entities. This translates into the lack of representation of Romani people in different areas, such as political, social, economic, and civil (DGDFSS, 2021a, p. 71). For this reason, the actions to carry out will be devoted to Romani people's participation in different spheres through affirmative action plans or special measures.

The actions will be centered on making Romani people part of the decision-making processes, including the public policy cycle and others. There will be the creation of consultancy groups in different AACC compounded by several Romani organizations to build a participative network and influence the actions of the strategy. The ultimate goal is to establish a network between Romani organizations, governments, civil society, businesses and academic spheres.

The following table (Table 4) displays the three objectives of its strategic line:

Participation and empowerment axis	
Strategic line	**Objectives**

	Increase the presence of the Roma civil society in the cycle of public policies.
Participation of the Romani people and the Romani associative movement	Promote the establishment of civil society organizations coordination mechanisms to facilitate their participation in public policy processes and citizen participation, guaranteeing the representation of these organizations in all their diversity.
	Increase and strengthen the entities of the Roma civil society working with women and young people to guarantee their participation.

Table 4 - Translation by the author of the objectives of the participation and empowerment axis. From: National Strategy for Roma Equality, Inclusion and Participation 2021-2030, p. 16.

Comprehensive Plan for the Gitano Population in Catalonia (PIPG)

As a response to the National Roma Strategy and as a demand for it, Catalonia, as an AACC, also created its own plan to combat antigypsyism. The plan, called the Comprehensive Plan for the Gitano Population in Catalonia, is the fourth plan that continues the previous one from 2014 to 2016. The Catalan government started the Catalan RSF in 2005 to improve the social status and lives of Romani people in Catalonia. The latest Catalan RSF referred to 2017 - 2020, and, because of Covid-19, the Catalan government extended its application until 2022 (ACORD GOV/80/2022, 2022). Since 2022, they are preparing the elaboration of a renewed Catalan RSF.

The focal point of the last strategy is to develop measures and actions that are centered on improving Romani people's lives. Consequently, the strategy is based on the European and Spanish RSFs; it includes Romani people in the elaboration of the plan together with results of previous research and evaluations. It also targets to increase cooperation and communication between national, regional, and local authorities.

Objectives

The objectives of the Catalan RSF are divided into four basic and twelve specific objectives. They are based on voices of Romani people and "actions recognized by the international scientific community for the social impact they generate in the fields of education, labor, health and housing" (Departament de Treball, Afers Socials i Famílies (DTASF), 2018, p. 43).

The basic objectives are to define specific policies for action that improve Romani people's lives based on scientific evidence; develop strategies to implement successful actions; ensure equality for Romani people in high situations of poverty or risk-of-poverty; and promote the Romani culture as part of the Catalan culture. The twelve specific objectives are centered on increasing the school rates of Romani people, their academic success, and the levels of education for adult Romani people; improving their access to the labor market as well as their qualifications; improve the access to housing services; improving Romani's health situation and their social image; promoting the Romani culture and its values; taking into account the situation of Romani women; and ensuring participation.

Expected results and actions

The actions of the Catalan RSF are divided into different areas aligned with the EU RSF, such as education, housing, employment, health, participation, culture, and Romani women, and others related to justice, media, and migrant Romani people in Catalonia, among others. Each area includes expected results and its own measures and indicators. The general expected results are to research the actual situation of Romani people in general, and in education, to create the Catalan Institute of the Roma population (ICPG), a department of Romani Studies with working groups, and legal and administrative processes.

In terms of education, the expected results are to increment the school enrollment rates of children's and post-mandatory education by carrying out informative sessions with Romani families, supporting Roma NGOs and schools that promote enrollment, and creating kindergardens in neighborhoods with a high number of Romani people. To reduce the absenteeism and school dropout rates, the strategy will implement the School Promotion Project, include Romani history and culture in school curricula, and give visibility to Romani educated people as role models. Another objective is to equip future professors with the necessary knowledge and sensitivity, editing the curricula of four public universities to include formation on Roma related topics.

Upon finishing education, the Catalan RSF wants to ensure access to the labor market. In this regard, the expected results are to incorporate Romani people in the labor market through facilitating their access, creating new professional profiles, guaranteeing social benefits to marginalized groups, forming Romani people in IT knowledge, and supporting Romani people who work in street commerce.

On housing, the first objective is to end Romani slums, by relocating Romani families to social housing, and concentrating resources to tackle emergency cases. On the one hand, to relocate Romani people from slums to social housing can improve their wellbeing by ensuring a safe, sanitary, and stable house. On the other hand, it can reproduce social marginalization by segregating the Roma families into one area/building. However, the paradox comes in if the aim is to relocate them separately. In this sense, the families/community would be fragmented.

Regarding health, the expected results are to increment the number of Romani children and families who follow healthy habits through education and informative sessions; increase the number of times Romani children and women visit different doctors such as dentists, pediatricians, and gynecologists through the creation of "health agents" by Romani women

(DTASF, 2018, p. 58) and the formation of Romani families in general health, among others; and to respect the Roma needs in the management of different situations such as disease or death. To engage critically with this, the use of "health agents" can foster trust between institutions and Romani people. However, Romani people cannot access doctors such as dentists or afford healthy habits, not only because of their ethnic background but because of their class position. Without a clear understanding of the paradoxes and nuances that the objectives pose, when trying to address challenges that Romani people face, then the objectives itself are a symbolic act instead of leading to transformative change.

The expected results in terms of culture are to promote and enhance the Romani language and its learning through Romani courses; promote the Romani history and culture through different celebrations on key days such as the 8th of April (International Romani day) and make visible Romani role models through their participation in media, lectures or conferences.

To end with gender inequalities as well as to tackle issues about young Romani people, the first expected result is that all actions from the Catalan RSF will improve the situation of the Romani women and youth. The actions will be composed of the creation of a group that tackles issues related to Romani women, informative sessions about violence against women, and including the feminism and sexual diversity of the Romani people in universities; another expected result is the incrementation of participation of Romani youth and women in different spheres such as politics, social, and scientific through conferences and support.

Migrant Romani people that live in Catalonia are also considered in the Catalan RSF. The expected results are related to the improvement of the European Romani people's lives in general and to increasing their participation in the political, social, and scientific spheres, not only from the migrant population but also from the Romani population in general, through the

creation of specific groups that works on this issue, sensitizing people about the topic, and take actions related to underage Romani homeless migrants.

To end police discrimination, the expected results are to increase the cooperation and communication of police and Roma organizations as well as Romani representatives through meetings between the Catalan police, mediators, school promoters, and Roma organizations and train future police officers from the Public Security Institute of Catalonia about the Romani people and non-discrimination practices. On the other hand, regarding justice, the expected results are to improve the formation and labor insertion of Romani people from prisons as well as guarantee their access to the evangelist church from a neighborhood called *Filadèlfia*.

Finally, concerning media and local entities, the expected results are to end stereotypes in media and improve the image of the Romani community and to follow through the implementation process.

Chapter 3: Intersectional Analysis of the Policies

This section examines the strategies from an intersectional approach, assessing their differences and similarities, arguing that, despite the inclusion and visibility of Romani women in the strategies, it is necessary to expand the intersectional approach, giving visibility to other categories of oppression and their combination, which affects their lived experiences, as well as increasing the efforts to include Romani women to end the gender gap. The analysis is guided by the IFPA (Kanenberg et al., 2019), a revised version of McPhail's Feminist Policy Analysis (2003).

EU Roma Strategic Framework for Equality, Inclusion and Participation for 2020-2030

This section analyzes the objectives, the actors, and the funding of the EU RSF, focusing on intersectionality to understand how this strategy impacts all Romani people's lives.

Objectives

The EU RSF sets seven objectives: three horizontal and four sectoral. The horizontal objectives are related to equality, inclusion, and participation, and the sectoral correspond to education, employment, health, and housing. Each section includes one to four objectives and targets. While the EU's institutions (e.g., EC, CoE, EP) are the most powerful organizations in this three-level hierarchy (European, national, and regional/local), the EU RSF lacks specificity and a broader understanding of intersectionality, and it only targets Roma as a group. The power and knowledge that the EC has, can efficiently improve the situation of Romani people; however, after twenty years of frameworks targeting Romani people since the Roma Decade, the progress is limited.

The RSF is a document that provides general information on how Member States should proceed with their own national RSFs. Since the EU is composed of twenty-seven countries, a limitation of the framework is the broadness of the guidelines. Compared to the Spanish and the Catalan strategies, the European is shorter and it gives general information for the Member States. However, it provides an overview of instructions that countries should follow, also considering those who have a higher Romani population. Since it is a general document, its targets and objectives fall on the same line. For instance, there are no objectives regarding primary and secondary education or political participation. On the other hand, while diversity is restated in terms of the multiple identities of Romani people, such as gender, sexual orientation, citizen status, ability, etc., there is little mention of them in the whole strategy and no objectives for most of them.

The objectives of the EU RSF lack an intersectional approach because most of them are not addressed to specific groups but to the general population of the Roma community. Out of the eighteen objectives, only five of them specify a category of oppression, such as age in education and gender in employment. On the one hand, the education objectives are focused on two educational stages, pre-school (0-6 years old) and upper secondary school (16-19 years old), divided by age. However, there are no objectives that focus on primary and secondary school, and post-mandatory education, and there are no objectives addressing women (or other marginalized groups). On the other hand, the employment objectives address the gender gap and the Roma NEETs (16-24 years old), e.g., cut the gender gap or NEETs rate. However, none of them consider other vectors of oppression or the combination of them, failing to consider the needs of all Roma, even though the EU RSF considers an intersectional approach.

The objectives are mainly targeting Romani people, making them responsible for achieving their well-being, and not including other partakers that influence their lived experiences. Targeting Romani people implies putting responsibility for our assimilation and changing our

lives to follow the established white-cis norms, becoming a "universal individual" (Fredman, 2002, p. 9). Further, ending antigypsyism should not be the task of the Romani people, but of those that create and reproduce harming practices against Roma. Objectives, targets, and actions should include other actors of society, such as professionals, industries, state representatives, educational professionals, healthcare suppliers, etc. In this sense, the responsibility to improve the situation of Romani people can be balanced if all actors of society are included, mentioned, and targeted. For example, to increase equality, create a safer environment, and balance actors' roles, agency, and responsibility the objectives should addresses that a minimum percentage of professors must be sensitized or have knowledge about the Roma community to be aware of Romani students' situations.

The two horizontal objectives regarding fighting and preventing antigypsyism and discrimination refer to decreasing Romani people who felt discriminated against and the discrimination of the general population towards Romani people. However, it does not include objectives related to the promotion and awareness of Romani culture, history, and art; online discrimination; or the enforcement of anti-discrimination laws. The sectoral objectives regarding education do not include other stages of education. Another objective is to eliminate educational segregation in half in Member States with larger Roma populations, when the segregation of Romani students is based on ethnicity, being a form of discrimination and going against Article 21 of the Charter of Fundamental Rights; therefore, the objective is a violation of the EU's law. At the same time, the fact that this objective is only targeted to Member States with larger Roma populations dismisses other countries' school segregation.

The objectives related to employment include gender and youth groups. However, the targets are different for men and women when they should be equal to stop reproducing gender inequalities. For instance, the target for men is to ensure that 56% of Roma men are in paid work, while for women, to cut the gender employment gap, it is 45% (European Commission,

2020b). Additionally, related to youth, there is no specification of Roma men or Roma women, hiding the reality of Romani women.

There is only one objective related to health, limiting the improvement of Romani people's health. There are no objectives addressing the access to health or health resources; none are related to mental health (when, during and after Covid-19, Romani people informed their health status as bad and with depression and/or anxiety (European Commission, 2020b)).

Finally, related to housing, objectives tackle overcrowding, reducing house deprivation, and access to water, but none are related to ending house segregation or eviction. More interestingly, there are no objectives that target or include Romani people with disability(ies), citizenship status, religion, elderly Roma, etc. As stated in the European RSF, Member States are responsible for implementing objectives and measures targeting those groups.

Actors

The EU RSF was designed and published by the EU's Directorate-General for Justice and Consumers (DG JUST) in collaboration with other departments and multiple meetings with a long list of stakeholders. This section provides an overview of the actors involved and their roles, the steps taken to design the strategy, and the challenges they faced. It informs generally on the agency of civil society and Romani stakeholders and interrogates if an intersectional approach was considered during the consultations and design. The different actors are listed and categorized according to their roles.

The EU RSF was mostly designed by the DG JUST in charge of "EU policy on justice, fundamental rights, rule of law, consumer rights and equality" (Justice and Consumers, n.d.). Prior to the design of the European RSF, the EC consulted with different stakeholders, NRCPs, and EU and non-EU citizens (including Roma people), to gather relevant data for the design of

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the strategy. According to the European Commission (2020a), the members of the stakeholder

group are:

Category	Organizations
EU Umbrella Non-Roma Organizations	Amnesty International (AI), Armée du Salut, Churches' Commission for Migrants in Europe (CCME), Commission of the Bishops' Conferences of the European Community (COMECE), Eurochild, EUROCITIES, European Centre for Minority Issues (ECMI), Eurodiaconia, European Anti-Poverty Network (EAPN), European Foundation Centre (EFC), European Network Against Racism (ENAR), European Network on Statelessness (ENS), European Public Health Organization (EPHA), European Federation of National Organizations Working with the Homeless (FEANTSA), Habitat, International Step-by-Step Association (ISSA), Salvation Army
EU Umbrella Roma Organizations	European Roma and Travellers Forum (ERTF), European Roma Grassroots Organizations Network (ERGO Network), European Roma Information Office (ERIO), European Roma Institute for Arts and Culture (ERIAC), European Network on Social Inclusion and Roma under Structural Funds (EURoma), European Roma Rights Centre (ERRC), ternYpe International Roma Youth Network (TernYpe), International Romani Union (IRU), Open Society European Policy Institute (OSF), Phiren Amenca, Roma Entrepreneurship Development Initiative (REDI), Roma Education Fund (REF)
International Organizations	Council of Europe (CoE), United Nations Human Rights Office of the High Commissioner (OHCHR), OSCE Offices for Democratic Institutions and Human Rights (ODIHR), United Nations Children's Fund (UNICEF), World Health Organization (WHO)
Partners	European Free Trade Association (EFTA), Equinet, Fundamental Rights Agency (FRA)
EU Institutions	European Economic and Social Committee (EESC)
Academia/Research	Central European University (CEU)

Table 5 - Table created from the information available on Footnote 121 from the Commission staff working document (Directorate-General for Justice and Consumers, 2020, p.48).

In addition, "a Commission-internal Inter-Service Group (ISG) was set up for the preparation of the initiative. It was composed of several Commission services [12]" and met three times (European Commission, 2020a, p. 49).

On the one hand, the diversity of organizations in the consulting process ensures a multi-level approach, incorporating perspectives of different areas such as the participation of religious, housing-related, and arts- and culture-related bodies, among others. It improves the quality of the strategy itself by assessing the strategic lines with international and local organizations focused in different spheres. At the same time, by including human rights organizations such as AI, ECMI, ENAR, and ERRC, it underlines a human rights approach, promoting equality and justice.

On the other hand, the number of Romani organizations (12) consulted compared to the number of non-Roma organizations (17), international organizations (5), partners (3), EU institutions (1), and academic bodies (1) is smaller; the underrepresentation of Romani organizations is clear (12 Roma organizations compared to 27 non-Roma); however, only having a look at the quantitative data is insufficient to determine if the participation of Romani organizations was satisfactory. Despite the disclosure of the names of the organizations, there is no data on how many people participated, nor their ethnic background. In this sense, it is difficult to determine whether Romani voices were decisive or symbolic, nor the amount of power they had. Further investigations could analyze in depth the involvement of the actors in the design of the EU RSF since this research is unable.

The consultations with the diverse actors had five different forms. The first consultation activity took the form of an online open public consultation in 2017, where a questionnaire (translated

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[12] DG JUST, DG SJ, DG ECFIN, DG EMPL, DG HR, DG AGRI, DG MOVE, DG ENV, DG RTD, DG CNECT, DG JRC, DG REGIO, DG EAC, DG SANTE, DG HOME, DG NEAR, DG ESTAT, DG COMM, DG SG, DG REFORM, EEAS, and FRA (European Commission, 2020b, p. 50)

into all EU languages) was set for everyone to answer (internet connection and/or a device is not available to 56% of EU Roma households (FRA, 2020)). According to the EC (2020a), there were 240 answers, of which 75 were from citizens (the rest from NGOs, public administrations, and equality bodies, among others). It is worth noting that 202 respondents specified their ethnic background, of whom 91 were Roma and 101 were non-Roma. The respondents identified education as the main priority "(67% at European level and 76% at national level)" (European Commission, 2020a, p. 51). Out of twenty topics, the respondents claimed that providing "specific measure[s] for Romani women" is not a priority (10.3%), before providing "specific measure[s] to Roma youth" (8.7%) at the European level (Richardson et al., 2018, p. 27). Other vectors of intersectionality were not considered in the questionnaire, such as disability, sexual orientation, citizenship, etc.

The second consultation activity was workshops with Member States and enlargement countries in 2019 to share their views on the evaluation of the EU Framework. According to the European Commission (2020a), the EC had eight meetings with different organizations, three of them with Romani organizations (ERGO, Central Council for German Sinti and Roma, ERIAC, ERRC, REF, and REDI). The document also discloses the topics addressed in the meetings, and none were addressing Romani women; however, in terms of intersectionality, Romani children and youth and Roma diversity (term not explained) where addressed. The document does not dismantle how many Romani women, Romani people with disabilities, or queer Romani people participated in the meetings.

The third consultation activity was a four-session workshop in 2019 with 130 participants from national and international organizations and national and local representatives, among others, from which 35% self-identified as Roma (85 non-Roma and 45 Roma). One of the topics discussed was the diversity of Romani groups, considering "women, youth and children, EU mobile Roma, elderly people, LGBTI+ people, and people with disability, or refugees from

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Syria and migrants from South and Eastern Europe" (European Commission, 2020a, p. 54). However, in the EU RSF, as mentioned and analyzed in the previous section, these groups are not considered, missing an opportunity to embrace a broader intersectional approach and address equality and justice among all Romani people. After the workshop and constituting the fourth consultation activity, the EC had meetings with the different stakeholders to gather their feedback.

Finally, the last consultative activity was a roadmap aiming "to inform citizens and stakeholders about the Commission's work to allow them to provide feedback and to participate effectively in future consultation activities" (European Commission, 2020c, p. 1). The roadmap defines the context, the problem, the aim of the initiative, and the steps taken (meetings with stakeholders) in a clear and mostly transparent manner.

It is interesting to see that some of the topics discussed in the different consultation activities are not addressed in the EU RSF. The topics that were discussed in the meetings, workshops, and open consultancy were environmental justice and diversity; however, the EU RSF does not have either actions or objectives related to environmental issues. In relation to intersectionality, the EU RSF addresses Roma women, children, and youth, but other vectors of intersectionality besides gender (not in binary terms) and age are not considered. This leads to the conclusion that despite the meetings and the agency that Roma and non-Roma organizations have, the EC decided what topics were of utmost importance, dismissing other topics that the participant stakeholders would like to prioritize.

Funding

The EC has multiple funding programs, financing mechanisms that are non-reimbursable. The EU provides different financing instruments to support the implementation of the National RSFs and other programs that also contribute to the equality, inclusion, and participation of the

Romani people in Europe. This section provides an overview of the most promoted funding by the EC and their reaching scope.

As the EU RSF asserts, Member States are responsible for designing, developing, and implementing the national RSFs, this also includes the responsibility for the funds. In this sense, the EU is channeling the funds to the Member States to allocate them accordingly (shared management). Since the EU RSF embraces the 'explicit but not exclusive' approach, the programs that the EU promotes the most are the European Social Funds+ (ESF+), the European Regional Development Fund (ERDF), the Cohesion Fund, and the NextGenerationEU, among others.

The ESF+ are provided to Member States and at the EU level under the Employment and Social Innovation (EaSI). This fund supports employment, education, and social inclusion initiatives that aim to fight poverty, creating job opportunities and training, etc. On the other hand, other funding programs destined for the improvement of education are the Erasmus+, the ERDF, and the Structural Reform Support Programme (SRSP). The Erasmus+ funding supports organizations and individuals in the EU in relation to education, training, sports, and youth. The ERDF assists activities aiming at the modernization of education and training systems. Finally, the SRSP "can cover education and training reforms" (Donlevy et al., 2020, p. 52).

According to Donlevy et al. (2020), "ESF funding has provided the opportunity for education and training providers to address more disadvantaged and harder-to-reach groups, in all Member States and across all education sectors" including the Romani people (p. 196). However, the research also acknowledges that "older workers, the low-skilled, Roma, refugees and migrants, the long-term unemployed, and the disabled were all identified by multiple stakeholders on the EU and national level as insufficiently reached" (p. 116); "Roma or other minorities were often not seen to be successfully supported through the ESF" (p. 116); and a

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challenge to reach targeted groups (e.g., the Roma) was that some Romani people do not have identity papers; consequently, they are not eligible for ESF+ activities in several countries.

On the one hand, some of the ESF+ were successful in the development and implementation of initiatives that improve the situation of Romani people. However, on the other hand, as stakeholders claim, Romani people were not sufficiently assisted by the fund. Despite the different funding instruments, there is no clear or transparent document that provides an overview of the funds destined for projects related to Romani people or to mainstream population including the Roma. This hinders the evaluation or analysis of the EU funds for the EU RSF. A challenge to monitoring the 'explicit but not exclusive' approach is that it is very difficult to audit the impact of the economic aid to Romani people; therefore, one cannot verify whether the fund reached Romani communities, the percentage of Romani people reached, or if they also reached Romani women, Romani youth, Romani LGBTQ+ people, and/or Romani people with disabilities. Consequently, it is hardly possible to evaluate if the needs of more marginalized Romani groups, such as the previously mentioned, were addressed.

The lack of transparency raises concerns about the usage of the funds. In this sense, I am not positioning myself against EU funding since there are different successful initiatives that corroborate the practical use of the economic aid at the EU level, such as the ''Schools open to everybody" measure to include Romani children from Slovakia in schools or using ESF+ for scholarships to students from lower socio-economic backgrounds in Croatia. However, there is a clear need for monitoring and tracking EU funding to acknowledge to what projects the funds go and determine if the launched initiatives embrace an intersectional approach, including the most marginalized Romani groups.

National Strategy for Roma Equality, Inclusion, and Participation 2021-2030

This section analyzes the objectives, actors, and funding of the RSF focusing on intersectionality.

Objectives

The objectives are presented in the Spanish RSF, but the actions, measures, and the responsible parties to tackle the actions are in a separate document called "First State Operative Plan 2023-2026" (Operative Plan) (DGDFSS, 2021b). The Operative Plan follows the structure of the Spanish RSF in more detail, restating the established objectives, and each one displays the indicators, the measures, the actions, and the responsible party to carry them out; the budget is in separate documents, which are the annual reports for monitoring. This section provides an analysis of the objectives of both, the Spanish RSF and the Operative Plan, related to education to understand how an intersectional approach was understood and implemented in the strategy.

Objective 1: Pre-school education

The first objective is to increase the participation of Romani children in pre-school education. The indicators are divided in two stages: children from 0 to 3 years old (first stage of pre-school) and 4 to 6 years old (second stage and the maximum age before mandatory schooling). The goal for the 4 to 6 years old Romani children, divided by sex, is to maintain the numbers for male kids but increase with a 2% the number of female kids that are enrolled in pre-school education (98% of boys and 95% of girls) for the intermediate goal. This aims to equalize the percentage of female and male kids enrolled in pre-school education. On the other hand, there is no available data for 0 to 3 years old, but the final quantitative goal is to increase 5% of that data when available.

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The actions to increment the number of enrolled children in pre-school education are to develop plans to achieve the stated goal through the development of monitoring mechanisms and recommendations to school administrations, families, and Romani entities to promote this stage of schooling and carry out research to acknowledge the situation of pre-school. Another action is to develop and implement specific actions targeted to Romani people through three external plans not included in the Spanish RSF, which two of them specify explicitly the situation of Romani children. Furthermore, it included specific objectives and goals, following the "explicit but not exclusive" approach since it also mentions other marginalized groups, such as migrants. Despite the ambitious goals, according to the reports on progress from 2021 to 2023 (DGDFSS & Fresno, the right link, 2023; 2024), there has been no improvement at a national or autonomic level regarding the pre-school education.

<u>Objective 2: School segregation</u>

The second objective is to reduce school segregation in different education stages, to achieve a final goal of less than 15% of segregated children in schools, a difference of thirteen points regarding the available data from 2017. The measures are oriented to sensitize the education professionals and community to combat racial discrimination as well as segregation and to implement mechanisms to fight against them. The actions to sensitize educators do not target professors or non-teaching staff. Conversely, most of the actions are related to research and analysis of the situation and to monitor the AACC's laws regarding education without segregation.

To implement mechanisms that fight segregation, the only action proposed is to identify, select, and disseminate successful experiences. Raising awareness on good practices without the development and implementation of mechanisms to fight local segregation does not lead to transformative change against racism and discrimination. According to the monitoring reports

(DGDFSS & Fresno, the right link, 2023; 2024), there has not been progress in terms of segregation in education. Additionally, the Spanish law of equal treatment and no discrimination (Ley 15/2022, 2022) defines school segregation as a form of discrimination, based on ethnic or racial origins. Similar to the EU level, Spain is dismissing the law and aggravating the situation of Romani children in schools.

Objective 3: Illiteracy

The third objective is to end illiteracy and to increase the training of adult Romani people. The quantitative goal is to decrease illiteracy from 13.8% to 8% for Romani women and from 5.6% to 4% for Romani men. The established goal contains a difference of 4% between Romani women and Romani men, where the most affected are Romani women, reinforcing gender inequalities. The objectives are not ambitious enough; therefore, the gender gap in education is maintained in spite of reaching the indicators.

This objective contemplates two measures: to develop and implement programs to guarantee a diverse education considering the needs of the Romani people and to develop education programs for adult Roma to complete basic education. Regarding the first measure, the actions are to promote already existing online educational tools as well as training (such as "Aula Mentor"), and monitoring mechanisms. The actions of the second measure are similar to the first. On the one hand, this turns out as a cheaper alternative for the educational path. On the other hand, the digital divide between Romani people and the mainstream population is large: 26% of the Romani population in Spain does not have devices to access the Internet, and 23% have difficulties accessing it (DGDFSS, 2021a). Additionally, there are no specific actions targeting Romani women.

Objective 4: Discrimination in education

The fourth objective is to reduce discrimination against Romani people in education. The goal is to almost reduce it by half, from 26% to 15%. The actions of this objective are intended for the sensibilization of the school community and professors, by publishing and disseminating documents and training professors about antigypsyism and discrimination. Despite the ambitious goal, there are no actions that encourage Romani students to report discrimination at school. Since the law of equal treatment and no discrimination (Ley 15/2022, 2022) was implemented in 2022, perhaps the moment in which the Operative Plan was written did not have the opportunity to include this action, and for future this should be developed.

Objective 5: Academic success

The fifth objective is to increase the academic success of Romani women and men and to decrease the number of Romani students who drop out, who face "early school failure" (DGDFSS, 2021, p. 17b) and increase the number of enrollments. This objective is the one that contains more actions, such as improving the participation of Romani families in schools, including the history and culture of the Romani people in school curricula, disseminating already existing materials about the Romani culture and history in compulsory education, and actions destined to train professors through a specific program about Romani students, their situation, and how to tackle it, among others. These are positive actions that can improve the situation of Romani people in education and achieve academic success, through a sense of belonging, recognition, and cultural and historical inclusion in schools and textbooks. However, since the Spanish RSF states that it considers an intersectional approach, actions are not destined directly or indirectly to the inclusion of Romani people with disabilities or Roma LGBTQ+, among others. For example, just some of the didactic material for schools includes some Romani women as role models or learning units, but none of them include the presence or existence of Romani LGBTQ+ or Romani with disabilities.

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Objective 6: Post-mandatory education

The sixth objective is to increment the number of Romani women and men in post-mandatory and superior stages of education. The actions are oriented to implement an "Aula Mentor," previously mentioned, and there is a special focus on Professional Training. However, there is no mention of programs offering support for university, and there are no actions specifically addressed to Romani women, when the percentage of Romani women in higher education is 2.8%, compared to the 4.6% of Romani men (FSG, 2019, as cited in DGDFSS, n.d, p. 19).

Objective 7: Digital divide

The last objective is to reduce the digital divide among the Romani students. The actions to combat the digital divide are aligned with the Digital Education Action Plan from the EU. However, the priorities of this plan are to make a better use of technology in the education system, develop competences and skills related to digital transformation, and improving education (European Commission, 2018). Additionally, the youth population is the only vulnerable group mentioned. The priorities of the plan, along with the lack of intersectionality, are addressed to a specific group that does not have difficulties accessing digital tools or equipment. In this sense, this objective that intends to relocate resources is not targeting Romani people or marginalized groups; therefore, it is not following either the "explicit but not exclusive" approach or the targeted measures to impact Romani people.

Actors

The actors for the Spanish RSF are part of the strategy governance, understood as a multilevel governance, which implies the coordination between State administration, AACC, and local organizations; and the participation of the Roma community, both Roma organizations, mediated through the State Council of the Romani People and the Romani people (DGDFSS, 2021a). This section analyzes the actors of the multilevel governance to understand their roles

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and power dynamics and assess how an intersectional approach is considered in terms of power and roles. The same will be done for the Operative Plan 2023-2026.

There are four key mechanisms for the strategy: The Inter-fund Committee, the Technical Cooperation Group on Romani people, the State Council of the Roma People, and the Interministerial Commission. The Inter-fund Committee is composed of representatives of the Spanish NRCP, the ESF+, and the ERDF at the national level. The Technical Cooperation Group on Romani people, in charge of annual reports, is compounded by state Social Services, the Spanish Federation of Municipalities and Provinces –entity that comprises city halls, deputations, etc.– and representatives of the NRCP. The State Council of the Roma People is a consultative group formed by several state ministries and Romani organizations with different thematic groups. Finally, the Interministerial Commission are directive centers in charge of monitoring and evaluating the objectives of the strategy.

In this sense, state administrations hold most of the decision-making power, in charge of funding distribution, policy formulation, and power distribution. According to the First Vice President, in the last online available act of the plenary in February 2024, "the State only channels the funds" (DGSS, p. 7); however, the term 'only' goes beyond just channeling, as it will be discussed in the next section related to funding. Concerning the State Administration, the Operative Plan counts on thirteen ministries with one or more directive centers. Each directive center is responsible for developing the actions of the Operative Plan, as well as participating in different meetings between State administration and the Council of the Roma people.

Relating to the Romani community, the Council of the Roma people and its organizations are, as stated in the Spanish RSF, a "consultative organ" (DGDFSS, 2021a, p. 81), meaning that they do not hold decision-making power. In the same act mentioned above, the Second Vice

President wonders "what is the role of the Council [of the Roma people] if its opinion is not taken into account" (DGSS, 2024, p. 4), regarding a procedure in relation to a transaction of funding that was approved because a law made it possible, even if the Council was against the procedure. This assertion provides an overview of the power that the Council has. Since it is considered a consultative organ, their role is to advocate and negotiate different aspects of the strategy, such as projects, funding, and results; however, the state administrations –mostly non-Romani people– take the final decision. At the same time, there was the creation of a specific working group in the State Council of the Romani people focused on education (Secretaria de Estado de Derechos Sociales, 2022), which is composed of two Romani women's NGOs, an NGO focused on education, national Romani NGOs, and a private federation. This working group is operative from 2022 to 2026.

The Operative Plan 2023-2026 provides the stages in which the actors were involved in designing the plan. It consisted of six steps: 1) setting the plan, 2) inter-ministerial meeting, 3) program sheets and bilateral meetings, 4) writing the first draft, 5) consultancy, and 6) writing the final version. The Roma community was only considered in the fifth step, along with the State administration and the Technical Cooperation Group with AACC. Again, only as a consultative organ. Having a singular meeting with the council as a consultative organ suggests a lack of active engagement or superficial engagement, despite the meetings they have throughout the year.

On the other hand, it is worth noting the agency that the Roma community has. Despite not having decision-making power, their work on advocacy, local actions, and fighting against discrimination as well as making Romani people visible provides political influence and directs resources towards the Roma. Romani actors should not be only a 'consultative organ' but an active player in decision-making, influencing objectives, indicators, and goals of the strategies. At the same time, the work that Roma NGOs do on research, monitoring, and evaluating

processes provides updated data and information about the situation of Romani people. De Certeau (1984) distinguishes strategy and tactics, the former being authorities who create order and control, and the latter being individual/collective improvisation acts. The subjugated might fight and subvert the imposed dominant order by performing modest, everyday actions of "making do" with what is available. The Roma community has limited participation and influence in decision-making, relegating their position to a symbolic role, reproducing hierarchical structures where the state controls Romani issues without their full active participation in decision-making.

Funding

This section analyzes the funding that the Spanish RSF receives to develop and implement the strategy and the different actions. One of the limitations of this section is the limited public information regarding the destination of the funds, presented below.

On the one hand, the Spanish RSF receives funding from the Spanish government, then allocates a budget to different departments that redirect it towards strategies, actions, and plans. The amount assigned for the Spanish RSF is 2.000.000€ –for 2024 and similar throughout the years– which is divided among the different AACC and Ceuta and Melilla according to the number of Romani people living in the regions. For instance, the AACC that received more funding from the State are Andalusia (38.04%), the Valencian Community (12.39%), and Catalonia (11.75%) (*Plan De Desarrollo Gitano*, n.d.).

Moreover, AACC must co-finance with at least two-thirds; for example, if Andalusia receives 760.800€, they should provide at least 507.200€, creating a total budget of minimum 1.268.000€ for the Andalusian RSF (without further EU funds). In sum, in 2023, the State General Administration, along with the AACC, destined 75.400.000€ (24.2 million from the State, and 51.2 million from AACC) (DGDFSS & Fresno, the right link, 2024). From the total

funding, the strategic lines that received more funding are employment, poverty, social exclusion, and digital divide, and education (15.7M, 14.4M, and 11.8M respectively) (DGDFSS & Fresno, the right link, 2024).

The AACC are in charge of the distribution of the funds. According to the report on the list of "co-financed projects of integral social intervention for the attention, prevention of marginalization, and insertion of the Romani people in the 2024 fiscal year" (Ministerio de Derechos Sociales, Consumo, y Agenda 2030, 2024), the budget was destined mostly to local city halls to fund actions of the local/regional RSFs related to socioeconomic and cultural inclusion and participation, and only three of them were explicitly related to Romani women and girls in Andalusia and Madrid.

On the other hand, Spain also receives funding from the ESF+ and the NextGenerationEU Fund. In 2023, ESF+ in Spain provided 9.036.183€ and NextGenerationEU 2.184.514€ (DGDFSS & Fresno, the right link, 2024). Regarding AACC, ESF+ provided a total of 5.641.911€ and NextGenerationEU provided 269.245€. According to Presencia Gitana Asidiajú callí et al. (2024), the actions of the plan depend on some of funding from ESF+ and other European funds, and sometimes, civil society has difficulties accessing these funds.

The next graph provides a clear overview of the measures and the funding from 2021 to 2023:
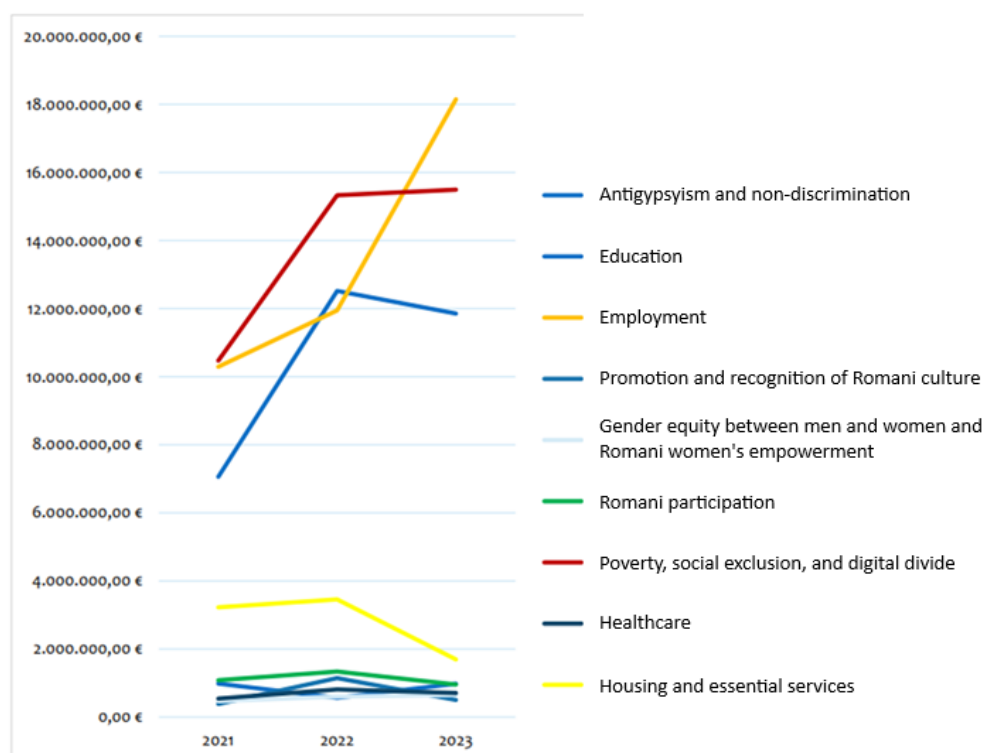
Figure 1 - Funding invested in specific measures to Romani people, based on strategic line and year (2021-2023). Translated by the author from DGDFSS & Fresno, the right link, 2024.

According to the graph, education received less than 2.000.000€ in three years, more likely to have received around 1.000.000€ throughout the years. Similarly, gender equality between Romani men and Romani women and Romani women's empowerment received around or less money than education. This shows that little is invested in both education and intersectionality; however, it is important to acknowledge that at least half a million euros are being invested in intersectional (gender (binary) equality) initiatives and projects. On the other hand, since there is no strategic line or mention of people with disabilities or LGBTQ+ in the women's strategic line, it is hardly difficult to determine if actions or initiatives were specifically targeting these groups. Equality between men and women is understood in an essentialist approach, as gender binarity. I would not like to suggest that women's rights are not important. I am claiming that other genders should be consider to embrace a broader intersectional approach as well as other vectors of oppression such as ability, sexual orientation, citizenship, etc.

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The funding that Spain receives is not enough to address all the challenges that Romani people face in Spain. Insufficient resources can reinforce national and regional inequalities by not providing enough funding to develop the Spanish RSF, its actions, and initiatives. At the same time, the existing funding creates a hierarchy of priorities, some strategic lines are funded and others neglected, such as the investment of education and gender equality compared to employment or poverty, social exclusion, and digital divide. Paradoxically, little is invested in education compared to employment in spite of the RSFs claiming education as vital in finding a 'good' job and escaping poverty or risk-of-poverty. On the other hand, since this strategy was the first one to adopt a specific strategic line for women's rights, equality, and empowerment, perhaps in the future years or in the next strategies this line will receive more funding and hopefully include not only women but other genders and other vectors of discrimination that reproduce disadvantages.

Catalan Roma Strategic Framework

The Catalan RSF contains four objectives, and, similarly to the Spanish RSF, it also includes the measures, the indicators, the actions, and the responsible parties for implementation. It follows the European and Spanish RSFs; however, the objectives are focused on a local level to guarantee localized progress. Despite its end of implementation in 2022, after the Catalan government provided a two-year extension because of Covid-19, there is no public evaluation of the impact of the Catalan RSF in the Catalan context nor a new Catalan RSF. This section provides an analysis of the objectives, actors, and funding of the Catalan RSF.

Objectives

This section analyzes each objective of the education strategic line of the Catalan RSF.

Objective 1: Pre-school education

The first objective is to increase the number of Romani students in pre-school education. The quantitative indicator is set to enroll twenty-five Romani children from 0 to 6 years old. The actions include informative sessions for Romani families and professors; to support at least six Romani NGOs and schools that encourage Romani families to enroll their children; and to open pre-schooling institutions in neighborhoods considered of priority attention (areas that are not specified in the document). The responsibility is on local entities and departments of the Catalan government.

According to the Catalan statistics, from 2020 to 2024, around 8% of the population is between 0 and 9 years old (IDESCAT, 2024). Since in Catalonia there are approx. 80,000 - 90,000 Romani people (DTASF, 2018), there should be around 6,800 Romani children between those ages; therefore, the indicator to enroll 25 Romani children is not ambitious enough. At the same time, the indicator is set regardless of the gender, ability, or citizenship status. By not including an intersectional approach, it evades responsibility to increment the schooling of more Romani children.

Regarding the actions, they are intended to inform Romani families and professors to encourage the families to enroll their children and to support schools and NGOs to facilitate the task. At the same time, opening children's schools in priority areas can lead to school segregation since those areas are usually inhabited by immigrants, Romani people, and other people with common socioeconomic backgrounds.

Objective 2: Drop-out and absenteeism

The second objective is to reduce school drop-out rates and absenteeism by implementing the School Promotion Project, successful educational actions in schools, including the Romani history and culture in school curricula, and the participation of evangelical churches. This objective includes a more intersectional approach since it involves religion institutions and the

participation of its members to promote the enrollment of Romani people in schools. However, it does not include actions or objectives specifically destined for marginalized groups such as Romani women, Romani people with disabilities, or the Romani LGBTQ+. Similarly, the new Catalan school curricula (DECRET 175/2022), which set the study plans for compulsory education in Catalonia, does not incorporate the history and culture of Romani people specifically but only terms such as interculturality and diversity. Additionally, it considers a gender perspective when talking about women, but not intersectionality. There has been documented that Romani people in Catalonia follow the evangelical religions and for most of them, it is an important part of their lives providing support (Marfà i Castán, 2010). The fact that it includes the evangelical church to promote education is an action that can lead to successful impacts. However, since there is no evaluation of the plan, ethnographic research is needed to analyze or evaluate the impact of it.

Objective 3: Professors and professionals

The third objective is to guarantee that professors and education professionals that work with Romani people are sensitized. The positive change compared to the European and Spanish RSFs is that the objective is targeting professors and education professionals, and not Romani people. The actions are destined to train professors and restructure the employee workforce to guarantee a successful intervention with Romani students and encourage interculturality in all stages of education, including post-obligatory and higher education such as universities.

Objective 4: Post-obligatory education

The last objective is to increase the number of Romani students in post-obligatory and university studies, achieving the enrollment of twenty students. Despite the similarity with the sixth objective of the Spanish RSF, the actions are mostly different from it. In this objective, the priority are affirmative actions to access university and continue education in university,

over the age of 25-year-old. The indicator is not divided by gender, nor does it include other vectors of oppression, and the actions are not considered intersectional.

Actors

The Catalan RSF is an initiative of the Social Rights and Inclusion Department of the Catalan government. This department also contributes to other initiatives such as fighting for social cohesion, the Òmnia project related to promoting Information and Communications Technology (ICT) to everyone, and strategies to sensitize, prevent, and detect gender-based violence, among others. Regarding the Catalan RSF, the government created in 2005 the Interdepartmental Commission of the Comprehensive Plan of the Romani people (*Comissió Interdepartamental del Pla integral del poble gitano*) and the Advisory Council for the Romani people (*Consell Assessor del Poble Gitano*), organs that contribute to the design, implementation, and evaluation of the strategy. This section analyzes the actors that contributed to the creation of the Catalan RSF to understand their role, power dynamics, and the use of an intersectional methodology in the process of elaborating the plan.

The Interdepartmental Commission of the Comprehensive Plan of the Romani people is responsible for creating the Comprehensive Plan of the Romani people in Catalonia, along with the Advisory Council for the Romani people. The Interdepartmental Commission is a coordinative organ in charge of "the decision-making, on an interdepartmental scale, of the circumstances and needs that affect the attention of the Roma people of Catalonia" (DTASF, 2018), composed of different departments aligned with the plan and one representative of the Catalan Institute of Women. On the other hand, the Advisory Council for the Romani people is a consultative organ where Romani people and Romani NGOs work together to address Romani people's needs and the issues that the Catalan government considers relevant. It is composed of the president of the Welfare and Families' Department (now Department of Social

Rights and Inclusion), two vice presidents–one of whom must be Roma– and more than fifteen representatives of Romani NGOs, young Romani people, and Romani women (DECRET 102/2005; DECRET 143/2012). In contrast to the State Council of Romani people at the national level, in Catalonia, there is no uploaded plenary of the Interdepartmental Commission nor the Advisory Council for the Romani people.

Prior to the elaboration of the Catalan RSF, the government had six in-person meetings with Romani people in Catalonia to acknowledge their needs and proposals, and then it opened an online call to collect proposals to improve the situation of Romani people in four areas: education, healthcare, employment, and housing (Direcció General d'Acció Cívica i Comunitària, 2017). This action helped to understand the main concerns of Romani people in Catalonia, attempting to guarantee participation of most of the Romani people in the entire region. However, there is no public record of the meetings, the results, or the number of people who participated in consultations.

The lack of published acts of plenaries or meetings raises concerns about institutional transparency. It prevents the public from acknowledging the Romani NGOs and other participants as well as understanding the power dynamics between each other. It makes tracking the discussed topics, decisions, and agreements very difficult for people, especially for Romani people, who it might concern the most. Since they are part of the Department of Social Rights and Inclusion, the documents should be uploaded because they belong to the Catalan government, which follows the "Open Government" (*Govern Obert*) whose objective is to "make visible, accessible and understandable any information, document or data of public interest that is in the hands of public administrations" (Generalitat de Catalunya, n.d.). Transparency is key to verifying their participation and actions and if Roma are being taken into consideration. At the same time, it contributes to questioning accountability. It is

challenging to verify whether the participation of the Advisory Council for the Romani people is influential or symbolic.

On the other hand, according to DTASF (2018), the participation of Romani people has been key in the elaboration of the plan. As the strategy claims, at least seventeen Romani people helped with the elaboration of the strategy, meeting on eight different occasions. However, since there is no record about the people who participated, it is difficult to assess whether Romani women, Romani LGBTQ+, or Romani people with disabilities participated or the topics they addressed.

Despite the participation of different Romani people, it is important to note that, from a report evaluating the conditions of life and the Catalan RSF, the outcomes in relation to gender equality and LGBTQ+ issues are that Romani people are in favor of gender equality in education and employment; but they prefer "traditional gender roles, although lower in the case of young people"; and there is a "high degree of disagreement that homosexuality is made public," that is, they consider that homosexuality should be private (Daleph & Departament de Drets Socials i Inclusió, 2025, p. 27). In spite of the report, it should be noted that not all Romani people think the same, and that efforts to include more Romani LGBTQ+ actors in the consultative organs as well as in the decision-making processes are necessary to combat gender inequality and LGBTQ+phobia.

Funding

The Catalan RSF does not include a section on funding or budget as the Spanish RSF does, or any mention or reference to it as in the European one. Also, there are no reports on the progress or evaluation of the strategy despite its finalization after Covid-19. According to the Report on Proposal for a Provision (Direcció General de Pressupostos, 2018), the funding used to implement the actions was from the department's budget in charge of the specific actions;

therefore, it did not suppose an incrementation of the initial budget. In addition to the Catalan government budget, the strategy also received funding from the state (General State Budget and the Personal Income Tax (IRPF)[13]). This section analyzes the information available related to the funding that the Catalan RSF received for the implementation of its initiatives and projects.

Despite the lack of documents from the Catalan government and the Department of Labor, Social Affairs, and Families (responsible for the Catalan RSF), other documents from the state provided the necessary information. The funding that Catalonia received from the General State Budget is of 235.000€. According to the Ministerio de Derechos Sociales, Consumo, y Agenda 2030 (2024), AACC must co-finance with at least two-thirds. In this case, the Catalan government must contribute at least with 156.666,67€; however, there is no clear information from the Catalan government. On the other hand, the funding coming from IRPF at the Catalan level is 95.669,005€; however, Catalonia -neither the Basque Country- did not specify the quantity invested in actions or initiatives directly destined for Romani people (DGDFSS & Fresno, the right, 2024). According to this data, the funding that Catalonia received and had for the implementation of the actions of the Catalan RSF is approximately 487.335,675€, without counting any other fund.

However, the approximation cannot be validated since official documents and reports are missing. On the one hand, it restates the lack of transparency, considering that the Catalan government operates under an 'Open Government' approach, as mentioned before, failing its own mission and values. On the other hand, and similarly to the Spanish RSF related to funding, it is very difficult to assess the impact of the funding targeting Romani people, not only in terms of whether the funding and/or projects and initiatives impacted Romani people, but also

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[13] Tax that all Spanish citizens must pay to sustain the public expenditure.

whether it had an impact on Romani women, Romani LGBTQ+ people, Romani people with disabilities, young Roma, etc., and to what extent.

However, finding the initiatives and projects that civil society launched to improve the educational situation of Romani people can help understand its impact and the target people of the projects, despite not being able to dismantle the amount of funding invested. For example, FSG with the project *Promociona[14]* in Catalonia in the 2019-2020 academic year, 155 students benefited from it, from which 54% were boys/men and 46% girls/women funded with state budget, European funds, private funding, and others (FSG, 2021), and RTransform[15], with 80% of Erasmus+ funds and 20% of co-founding (RTransform, 2023). These are two projects that aim to improve the educational situation of Romani people in Catalonia, and despite not being able to trace the beneficiaries of the projects, one can see that, on the one hand, the projects are intersectional since the target is Romani women and girls, but on the other hand, there is no mention of other targets such as people with disabilities, LGBTQ+, etc.

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[14] Promote - Program that focuses on Romani students graduating from the ESO.
[15] Project that aims to complete the basic education of Romani students, with a focus on Romani women and girls.

Chapter 4: Main findings of the comparative policy analysis

After the comparative policy analysis of the objectives related to education, the actors that contributed to the design of the RSFs, and the funding mechanisms that made initiatives and projects possible, this section provides differences and similarities of the strategies, patterns, and an extensive section on the intersectional approach considered and implemented in the strategies. This section is divided into different subsections to summarize the main findings of the previous chapter. A complete analysis of the strategies is provided in the previous chapter.

The objectives of the strategies: are they ambitious enough?

This section provides a summary of the main findings of the objectives of the three RSFs.

The objectives of the EU RSF consider only one education stage (pre-school), but it does not include other important education stages, such as primary and secondary levels, when the highest dropout rates and absenteeism happen. The goals set for Romani men and Romani women are unequal, reproducing gender gaps and inequalities; however, this argument is further explained in the upcoming subsection related to intersectionality. Additionally, there is also a lack of objectives related to the promotion of Romani history, culture, and art, and a lack of commitment related to healthcare since there is only one objective in it. Finally, the main target of the strategy is Romani people, not considering other partakers, such as professors, coordinators, directors, etc.

The Spanish RSF encourages Romani people to finalize education, for example, retaking education through the "Aula Mentor" initiative, and encouraging them to enter professional training (shorter than university with obligatory internship– experience in the labor market). It also aims to achieve an equality between the number of Romani boys and girls enrolled in pre-

school education. Finally, Romani people, in cooperation with the Spanish ministry, created and promoted didactic materials to include Romani history and culture in primary and secondary schools.

On the other hand, according to DGDFSS & Fresno, the right link (2023; 2024), there has been limited or no progress related to pre-school education and school segregation. Despite the goal of educating professors on the situation of Roma, the actions are not aligned to the goal, missing an opportunity to create safer and more understandable environments in schools. Last but not least, the digital divide is considered in the strategy; however, the action plan intended to be used does not mention Roma, other marginalized groups, or intersectionality.

The objectives of the Catalan RSF trace steps for Romani people above the age of 25 years old to access university through the University Access Group (*Grup d'Accés a la Universitat (GAU)*), encourage Romani families to be involved in their children's education, and include the evangelic church to promote enrollment. One aspect worth noting, and different from the EU and the Spanish RSF, is the inclusion of actions directly targeting training for professors on the situation of Romani people. On the other hand, some actions make Romani people responsible for carrying them out, such as the School Promotion Project. Despite the good intention of the initiative, the school promoters are Romani people in charge of being a mediator between the school and the Romani family. Lastly, there is a lack of a broader intersectional approach, touched upon later.

The actors: symbolic or decisive participation?

This section summarizes the main findings of the EU, Spanish, and Catalan RSFs in relation to involved actors.

Prior to the design of the EU RSF, the EC had multiple consultative activities to receive Roma and non-Roma people's feedback, opinions, and inputs to create the existing strategy. In these meetings, multiple Romani organizations participated, along with non-Roma organizations. In addition, the EC, to a greater or lesser degree, transparently documented the process by publicly sharing a roadmap, reports of the consultations, publishing the results of the survey, etc.

However, despite the inclusion of Romani organizations, the number of them compared to the non-Roma organizations is considerable. It is hard to assess the role that Romani organizations had because the reports do not document the decision-making power of the actors. Moreover, the discussion of the meeting is documented, and it suggests that Roma NGOs provided topics that the DG JUST did not include in the strategy, such as Roma LGBTQ+ and Roma people with disabilities.

The Spanish RSF provide transparency related to the process and the consultations. During this, the State Council of the Roma People is included. However, Romani people are considered a consultative organ rather than a decision-making actor. In addition, as the strategy displays, the State Council of the Roma People was consulted one time, prior to the end of the process.

Romani citizens of Catalonia were consulted to provide their opinions and give inputs before the elaboration of the strategy. During the process, The Interdepartmental Commission of the Comprehensive Plan of the Romani people and the Advisory Council for the Romani people were consulted. The Interdepartmental Commission does not include Romani people, but the Advisory Council for the Romani people does. However, the latter is a consultative organ that does not have decision-making power.

The Catalan RSF lacks transparency on the meetings and consultations they had in comparison with the EU and the Spanish RSFs. There are no public documents of the plenaries or sessions between the Interdepartmental Commission of the Comprehensive Plan of the Romani people

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and the Advisory Council. This goes against the Catalan government's approach of "Open Government," failing to communicate transparently between citizens and institutions.

Funding mechanisms: an opaque glass

This section provides a summary of the main findings related to the funding mechanisms that the three strategies employed.

The EC has different funding mechanisms that encourage member states to apply, granting funding for Roma-specific initiatives and mainstream projects, following an "explicit but not exclusive" approach. With this intention, the funding that the EC provides to member states and organizations uses "good practices" to prove that the funding is useful to develop such initiatives.

On the other hand, the EC holds power because they are responsible for distributing the EU funds. In this sense, they grant a selected amount of money to specific projects, allowing or neglecting the development of them. This makes Romani and pro-Roma organizations dependent on the funding and actions they can implement. As Donlevy et al. (2020) stated, stakeholders claimed that "older workers, the low-skilled, Roma, refugees and migrants, the long-term unemployed, and the disabled" were inadequately reached (p. 116). In addition, there is a lack of transparency related to the projects that were funded, the amount destined to the projects, and the targets groups.

The funding provided by the state for the Spanish RSF is public. However, this amount (2.000.000 euros) is not enough for the AACC to develop the local/regional RSFs since it is divided among all AACC, Ceuta, and Melilla. As Figure 1 shows, little is invested in education and equality between Romani men and Romani women. However, the Spanish RSF has a specific strategic line to end inequalities between Romani men and women, and initiatives are

being funded. Perhaps in the following years and in new RSFs, this strategic line will gain more importance, power, and funding.

Similar to the Spanish and European strategies, the Catalan RSF's funding lacks transparency as well. However, since the strategy is implemented locally, searching different initiatives helped in understanding the impact of the funding, which not only boosts Romani people in school but also considers Romani women in the projects. In addition, documents from the Spanish RSF provided some information about the funding used by Catalonia.

Intersectionality

The EU RSF incorporates an intersectional approach that acknowledges some categories of discrimination, such as gender and/or age – for instance, only ciswomen, children, and youth – but not the combination of more than two vector of discrimination, excluding sexual orientation, (dis)ability, or citizenship status. According to Kanenberg et al. (2019), the act of not using the existing systems of categorization "would not serve the current goal of bringing more and more people into a state of recognition and inclusion by the state" (p. 9).

The EU RSF states that an intersectional approach is used; however, this is presented as marginally, and there is no explicit mention of using intersectionality transversally. Despite the framework stating that "[i]t takes an intersectional approach, sensitive to the combination of ethnicity with other aspects of identity[...]" (European Commission, 2020b, p. 2), there is a homogenization of the Roma people, and intersectionality is only mentioned, rather than tackled or in motion. For example, the objectives only consider one category of discrimination (besides ethnicity), either age in education or gender (men or women) regarding employment.

It is stated that the responsibility to include specific groups is on the Member States and their national strategic frameworks: "Roma children, women, young people, older Roma, or those

with disabilities, EU mobile citizens, non-EU nationals, stateless Roma" (European Commission, 2020b, p. 8). Since the EU strategy is the basis of national RSFs, addressing other groups can foster the inclusion of specific groups in the national RSFs. For instance, including specific objectives and actions for non-EU or stateless Romani people, LGBTQ+ Roma, and people with disabilities. Additionally, the European strategy advises Member States "to consider the common basic principles of Roma inclusion" (European Commission, 2020b, p. 10), principles that only include the gender dimension; however, only specifying (cis)women.

At the same time, the EU RSF understands intersectionality mostly as gender, meaning only Romani (cis)women, reproducing binarism since, for instance, objectives are targeted to Romani men and Romani women exclusively. There is no inclusion of other genders, and even if there is a lack of research or data on Romani people who identify with other genders, it does not mean that they do not exist. LGBTQ+ Romani people can be scared of identifying publicly as such because of the lack of visible referents and because of the discrimination they can suffer; for instance, Romani lesbian women faced intra-group and extra-group discrimination, that is, from their community and family and from the mainstream society (Aguilera, 2023). Their visibility in the EU RSF is key to fostering equality, promoting their participation in social, economic, and political life, and achieving their socio-economic inclusion, the main goals of the EU RSF. Despite the mention that all Romani groups should be included, but without specific objectives related to their inclusion, equality, or participation, it is clear that not all Roma are targeted.

The Spanish RSF also includes an intersectional approach in the objectives related to education and in the specific strategic line targeting gender inequalities between Romani men and Romani women. Different vectors of oppression are addressed, such as gender and age– and ethnicity. The category that is most used in education is age, since almost all academic stages are

considered (pre-school, higher education, and post-mandatory education). However, gender, similarly to the European RSF, on the one hand, is only considered in binary terms, only including Romani women and excluding others; and, on the other hand, gender is not always considered. For instance, the final goal to equalize the number of Romani girls and boys enrolled in pre-school education considers gender and age. Conversely, the objective related to post-mandatory education, while considering age, has no objectives that address the needs of Romani women (or other genders), and other objectives, such as erasing illiteracy do not consider either gender or age but a general approach.

The Catalan RSF includes different vectors of oppression, such as age, religion, and gender, albeit to a lesser extent. According to Daleph & Departament de Drets Socials i Inclusió (2025), Romani people consider that "homosexuality" should stay private. In order to protect Romani LGBTQ+ people's lives, it is of utmost importance to consider a broader intersectional approach that includes the diversity of Romani people and guarantees their rights. Likewise, Romani people with disabilities are not considered in the Catalan RSF. The future new Catalan RSF should also consider Romani people with disabilities to guarantee not only the protection of their rights but also a just society.

Evading responsibility?

The RSFs analyzed employ a multilevel governance. The EU, Spain, and Catalonia appear to transfer responsibility to the next (Figure 2); therefore, this section explains citizens' opinions regarding the extent of responsibility per institution, how it should be delegated, and an alternative model that creates an equitable accountability for institutions to create a more suitable approach.

The Public Consultation on the Evaluation of the EU Framework for National Roma Integration Strategies up to 2020 (Richardson et al., 2018) "was designed to collect the views of

stakeholders on the implementation period of the EU Framework for National Roma Integration Strategies (NRIS) up to 2020" (p. 3). In this survey, different questions were asked, such as "causes of social exclusion and discrimination, ways of addressing them and expectations for the future priority areas for action at European and national levels" (p. 3). This open consultation provides insights on what citizens think about the role of institutions in designing, developing, monitoring, and evaluating RSFs at the European and national (including local and regional authorities) levels.

Richardson et al. (2018) detected that, for the majority of respondents, the EU is a key player in supporting national and regional/local authorities in designing and implementing public policies. Approximately 60% of the participants (citizens, public institutions, NGOs, and think tanks) believe that because of the support of the EU, the situation of Romani people improved through EU funding and initiatives that have a positive impact at the national level.

However, the report also disclosed important regional differences in how responsibility is perceived. In the EU15[16] countries, 68.5% respondents believed that Member States could not improve the situation of Roma without the EU's support. In contrast, EU13[17] countries were more divided, and those from the Enlargement countries showed strong disagreement with the idea that national governments alone could bring effective change—almost 80% disagreed. Additionally, when considering the ethnic background, Roma respondents were more likely than non-Roma to believe that member states without the EU's support could tackle antidiscrimination and improve Romani people's lives, though even among Roma, the majority (57%) still favored EU involvement.

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[16] The first 15 countries that joined the European Union: Belgium, France, Germany, Italy, Luxembourg, the Netherlands, Denmark, Ireland, the United Kingdom, Greece, Spain, Portugal, Austria, Finland, and Sweden.
[17] The 13 countries that joined the EU after 1996: Czech Republic, Estonia, Cyprus, Latvia, Lithuania, Hungary, Malta, Poland, Slovakia, Slovenia, Bulgaria, Romania, and Croatia.

The majority agreed that both EU institutions and national governments must join efforts on anti-discrimination measures, such as executing EU anti-discrimination laws, promoting Roma history in education, and building stronger transnational relations. These answers suggest that responsibility should not be delegated downwards but rather shared in a coordinated and accountable governance model. After understanding that participants agreed on the cooperation between the EU and Member States to combat antidiscrimination, it is important to comprehend to what extent the RSFs analyzed in this research take responsibility, if the respondent's opinions were considered, and to what extent.

The EU encourages –does not enforce– the creation of National RSFs. At the same time, it states multiple times in the EU RSF that Member States are responsible for designing, implementing, and monitoring the National RSFs; that the EC can be used as a tool to design the national frameworks; and that the EC will help Member States according to their commitments to the strategy and its development (European Commission, 2020b). Spain, encouraged by the call of the EC, created different National RSFs throughout the years. The Spanish RSF also encourages the creation of Roma strategies at the regional and local level. The EC, who financed, disseminated and analyzed the survey regarding the future EU RSF, disregarded the opinions from it, and transferred the responsibility onto the Member States.

On the other hand, Catalonia also created its own RSF since Spain also encourages AACC to create their regional and local plans. Relating to education, and mentioned in different chapters of this research, they created the School Promotion Project –already working for 20 years. In this project, the responsibility of improving the lives of Romani people is not only relegated from Member States to AACC but also to the Romani people in charge of mediating between Romani families and schools and supervising Romani students and their participation in school

(attendance, homework, etc.). Most of the responsibility goes to Romani NGOs and Romani people, who have to create and apply for funding and develop and implement projects.

| EC | → | Member States | → | AACC | → | NGOs | → | Roma families |

Figure 2 - Transfer of responsibility. Own creation.

Chapter 5: Policy recommendations

This section provides policy recommendations for the three RSFs in a cross-cutting manner and for each of the strategies. Divided into themes, these recommendations offer insights for future RSFs, especially for the next Catalan RSF. The recommendations are developed according to the analysis and main findings of this research. These are important because they offer evidence-based insights, respond to current policy gaps, and can influence existing and future policies. They are targeting policymakers and stakeholders to advocate and incorporate a fair representation of all Romani people.

To realistically implement policy recommendations, they must be supported with concrete strategies, institutional responsibility, and proper financial allocation. This involves including them in the existing strategies, establishing clear roles and actions for relevant institutions, and ensuring administrative and political support at all levels of government. Their implementation also depends on available funding, qualified staff, and mechanisms that guarantee inter- and multi-institutional collaboration. To monitor and evaluate the impact of these recommendations, quantitative and qualitative methods should be used. Monitoring and evaluation should be transparent and public and include Romani people in all stages of the processes.

Cross-cutting recommendations

The cross-cutting recommendations highlight the fundamental improvements the strategies can implement. Four themes came across when analyzing the strategies: governance and transparency, education, intersectionality and inclusion, and gender equality.

Governance and transparency

Recommendation 1: Romani people and NGOs as equal partners (not consultant organs) and considered since the beginning and throughout the entire policy cycle.

Romani people should not be a consultative organ but have decision-maker power throughout the policy cycle to develop and evaluate policies that are targeting/affecting us.

Recommendation 2: Include a list of actions, responsible institutions, expected timelines, and funding.

This provides an overview of what to expect, who is in charge, when will the action take place, and how much funding is invested.

Recommendation 3: Improve the availability of transparent funding and accountability.

Sharing transparency in funding can provide an evaluation that the funding is being used for its indented purpose, complies with ethics, and builds trust between stakeholders and interested people.

Education

Recommendation 4: End school segregation since it is against the law.

All geographical levels analyzed have a law against discrimination and/or school segregation. Ending with it can improve the inclusion of Romani students and challenge stereotypes.

Recommendation 5: Promote Romani history and culture in school curricula. Special consideration in the curricula of those degrees related to pedagogy.

Including the Roma history and culture in school curricula can reduce Romani stereotypes; therefore, mitigate antigypsyism. Sensitizing educational staff should start in the education cycles that prepares future teachers (e.g., university degrees in pedagogy).

Recommendation 6: Include objectives for all education stages (from pre-school to post-mandatory education).

Addressing all education stages can increment the efforts in enrollment, continuation, and finalization of studies as well as the monitoring and evaluation.

Recommendation 7: Include objectives targeting professors, directors, and the school community to train them about Romani history and culture.

Training educational staff can prepare them to identify and react to discrimination and uphold intersectional equality among students.

Intersectionality and Inclusion

Recommendation 8: Include specific strategic lines for Romani LGBTQ+ people and Romani people with disabilities.

This can improve the visibility of Romani LGBTQ+ and Romani people with disabilities' situation and address their needs to include all Roma in the strategies and fight for their rights. A specific strategic line aiming to improve not only the well-being of Romani LGBTQ+ people and Romani people with disabilities but also their rights, is beneficial for these more marginalized groups. Incorporating a broader intersectional approach can benefit all Romani people and increase the sense of belonging in the community.

Recommendation 9: Produce research on Romani people using an intersectional approach that also includes Romani LGBTQ+ people, Romani people with disabilities, and other genders.

To ensure the efficacy of including objectives for Romani LGBTQ+ people and Romani people with disabilities, among others, research is necessary to understand their situation and theirs needs.

Gender Equality

Recommendation 10: Equalize goals to erase gender gaps in education.

By not equalizing the targeted goals between men and women, gender gaps remain, reproducing inequalities and disadvantages.

Recommendation 11: Foster affirmative and positive action measures, in particular for Romani women, girls, and other genders.

Although different scholars might be against positive and affirmative actions, I believe that these measures can help in achieving gender equality and encourage Romani women to access education. For example, scholarships, reserved places in universities for Roma, preparatory classes for Roma, etc.

Policy recommendations for the EU Roma Strategic Framework

The EU RSF represents a commitment to address inequalities and disadvantages that the Romani people face. It includes an "explicit but not exclusive approach," and it also embraces an intersectional approach. Despite the devotion to achieving a just and equal society, important gaps remain in its design, implementation, and scope of action. After providing an analysis of the EU RSF, I give policy recommendations for this strategy regarding objectives, actors, and design of the policy. The recommendations consist of the recommendation itself and a justification according to the analysis of this research, previously mentioned in the aforementioned subchapters.

Recommendation 1: Include objectives for all education stages, inclusive of primary and secondary school and post-mandatory education (university level).

The current objectives do not encompass all education stages, neglecting the importance of mandatory levels. The covered stages are pre-school and upper secondary education. Objectives are important to increase the enrollment in all other stages.

Recommendation 2: Include objectives destined for non-Romani people to ensure an equitable responsibility.

The objectives of the EU RSF are all destined for Romani people. However, including objectives for non-Romani people can balance accountability and create a more inclusive strategy. For instance, training professors, health professionals, managers, CEO, HR, etc., on Romani culture and history can build institutional awareness.

Recommendation 3: Include objectives related to the promotion of Roma history and culture, to fight online discrimination, and to end the digital divide.

The current strategy does not address the above-mentioned objectives. Ending stereotypes starts with the knowledge of Roma history and culture; consequently, it prepares users and can train AI to counter online discrimination. Additionally, access to the digital sphere increases participation from the Roma people.

Recommendation 4: Include more academics and consider what stakeholders shared on the Open consultation.

Regarding the actors, academics are key to the design and development of the strategy because of their expertise and knowledge. Since the EC had different meetings with stakeholders, the

diversity of topics should be included in the strategy, such as Roma LGBTQ+ people and people with disabilities, among others.

Policy recommendations for the Spanish Roma Strategic Framework

The Spanish RSF aligns and expands the requirement of the EU RSF to adapt the strategy into the national context. While also considering an "explicit but not exclusive approach" and an intersectional approach, there are important gaps to address. The policy recommendations consist of the action and a justification according to the analysis of this research.

Recommendation 1: Creation of didactic material for schools with the inclusion of Romani LGBTQ+ people and Romani people with disabilities.

Since there are didactic materials about the history and culture of Romani people for primary and secondary education, didactic materials that also includes the diversity of Romani people could give visibility and stop reproducing stereotypes, creating safer environments in schools.

Recommendation 2: Include national (Roma) LGBTQ+ associations and associations that work on fighting for people with disabilities in the policy process.

This can promote the inclusion of those marginalized groups as well as create a diverse strategy that addresses needs of all Romani people in a professional manner.

Policy recommendations for the Catalan Roma Strategic Framework

The Catalan RSF aligns with the requirement of the EU and Spanish RSF, and it adapts the objectives and actions into the regional context. As the EU and the Spanish RSFs, the Catalan

also has important gaps. This section provides policy recommendations and a justification according to the analysis of this research.

Recommendation 1: Include a strategic line targeting Romani LGBTQ+ people and Romani people with disabilities.

Since Daleph & Departament de Drets Socials i Inclusió (2025) stated that Romani people think that "homosexuality" should be private, a strategic line with objectives targeting Romani LGBTQ+ people and other responsible parties should be included as utmost importance. Their rights must be guaranteed and respected and keeping invisible their sexual orientation violates basic human rights.

Recommendation 2: Include Roma LGBTQ+ and Romani people with disabilities' associations in the policy cycle.

Including these voices can benefit the participation of all Roma in the design and implementation of the strategy; therefore, embrace a broader intersectional approach.

Conclusions

This research is a comparative policy analysis addressing three geographical areas (EU, Spain, and Catalonia). Using the perspective of intersectionality, Romani feminisms, decolonial studies, and Critical Policy Analysis, I analyzed systematically the strategies by artificially externalizing the objectives, the actors, and the funding of the strategies. The objectives of the three strategies suggest that those that attempt to encapsulate a larger scope, fail to include a more specific approach, hindering local experiences that can be shared transnationally and missing objectives that are important to the improvement of the Romani people's lives, such as the promotion of our culture, history, and art, and objectives related to healthcare. The objectives cannot be considered ambitious enough since some targets and ambits are missing. However, it is important to consider the different initiatives that impact Romani lives in a positive way, such as different education and training programs in Spain and Catalonia.

Romani people are considered a consultative organ rather than a decision-making actor. Consultations at some point in the process suggest that Romani people are given a symbolic role, meaning that we do not have decision-making power even in relation to policies, strategies, and actions that affect us directly. Romani people are kept out of the design of the strategies and consulted only throughout the process, while their feedback is rather marginalized. Despite the fact that the development of the strategies symbolically undermines the participation of the Roma, countless research has been developed by the Roma scholars, activists, and stakeholders that engage critically with the frameworks, such as this thesis, reclaiming agency through initiatives and everyday practices.

The funding of the three strategies lacks transparency since the information is insufficient or not available. This hinders to what extent the funding reached its aimed target, and more

specifically, Romani people, due to the "explicit but not exclusive" approach; it also makes it difficult to evaluate the impact of the funding.

This model of multi-level governance is scarce in improving the situation of Romani people. It creates hierarchies, and the responsibility is transferred downwards. There is a need to either create another type of governance or remodel the existing one so that it can build an equitable accountability for institutions. This will allow for a more suitable approach to consider and implement a broader intersectional perspective that includes Romani people and NGOs not as a consultative organ, but as equal partners in and throughout the policy cycle. For instance, the EC, instead of only channeling funds, could have a more active role in the design and implementation of the projects; in the Spanish context, institutions such as the State Federation of Lesbians, Gays, Trans, Bisexuals, Intersexuals, and more (FELGTBI+), the Spanish Confederation of People with Physical and Organic Disability (COCEMFE), and the Women's Institute should also be considered throughout the entire process, among others.

The main research question of this thesis was 'How is the intersectional approach reflected in the European, Spanish, and Catalan Roma Strategic Frameworks in the education area?' To guide the research, I used different sub-questions, such as what vectors of intersection were considered, how can the policy be more inclusive, and how are the needs of Romani people addressed in the policy. The three RSFs embrace an intersectional approach by considering mostly age and gender. Yet, gender is understood in binary terms, targeting only cis Romani men and Romani women. Other genders and vectors of oppression are not included, failing to ensure the visibility of those most marginalized and the protection of their rights. By excluding those groups, their voices remain unheard in decision-making processes, it perpetuates different layers of discrimination, and the homogenizing approach regarding Romani people. The strategies recognize the existence of Roma LGBTQ+ people and Romani people with

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disabilities; however, the objectives in the strategies address only the lives of cis Romani people.

The main limitation of this research is the focus only on the Romani strategies, without interviewing Romani people, activists, or researchers. In addition, this thesis excludes the politics of the text's creation, power structures, and the effectiveness of the strategies. Since the impact of the strategies is unclear, a more systematic evaluation is needed. This research paves the way for future studies that follow how certain actors are invited, how they express their opinions, or how they negotiate concessions.

These findings are of interest to policymakers and stakeholders that attempt to include a broader intersectional approach by not only considering age and gender, but also other vectors of oppression such as sexual orientation and disabilities. The insights gained from this thesis will be of assistance to policymakers, Roma NGOs, and stakeholders fighting for ethnic minorities' rights at the international, national, and local levels because this content offers a systematic analysis of the strategies with an intersectional and feminist approach.

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