



Civil society monitoring report on implementation of the national Roma integration strategies in Luxembourg

Focusing on structural and horizontal
preconditions
for successful implementation of the strategy

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**Civil society monitoring report
on implementation of the
national Roma integration strategy
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Although the Roma Civil Monitor pilot project, as part of which the report was prepared, is coordinated by CEU, the report represents the findings of the authors and it does not necessarily reflect the views of CEU. CEU cannot be held responsible for any use which may be made of the information contained therein.

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LIST OF ABBREVIATIONS

| | |
|--------|---|
| CCDH | Advisory Committee for Human Rights |
| CEFIS | <i>Centre d'Etude et de Formation Interculturelles et Sociales</i> |
| CES | <i>Conseil économique et social</i> (Economic and Social Council) |
| CET | Center for Equal Treatment |
| CNE | National Council for Foreigners |
| CoE | Council of Europe |
| ECRI | European Commission against Racism and Intolerance |
| FRANET | Multidisciplinary research network of the EU Agency for Fundamental Rights |
| NAP | Multi-annual National Action Plan on Integration and Fight against Discrimination |
| NGO | Non-Governmental Organisation |
| NRCP | National Roma Contact Point |
| NRIS | National Roma Integration Strategy |
| OECD | Organisation for Economic Co-operation and Development |
| OLAI | Luxembourg Reception and Integration Agency |
| RED | Racial Equality Directive |

EXECUTIVE SUMMARY

According to the Council of Europe, the number of Roma in Luxembourg is estimated to be about 300 (CoE, 2012). Most of the Roma living in Luxembourg came in as asylum seekers from the Balkans or the Eastern Europe, being registered based on their nationality and not their ethnicity. There were no Sinti, Travelers or Roma living there before the World War II, according to Luxembourg National Roma Contact Point (NRCP). There are no ethnically disaggregated data available and no self-declared Roma. Due to lack of data on Roma living in Luxembourg currently, is it unclear how many are Luxembourgish citizens, how many asylum seekers, or applicants for international protection. Currently, there is no Roma-focused, nor Roma-led NGO in Luxembourg.

Despite all these, Luxembourg has developed a National Roma Integration Strategy (NRIS), yet with no actions or measures addressing specifically the needs of Roma. A NRCP was established as well. The measures included in NRIS coincide with the ones in the national integration policies, which addresses all citizens of non-Luxembourgish nationality, and is developed taking into consideration its overall population, as well as its diversity – more than 170 different nationalities live in Luxembourg. It is of concern that with such a generalized integration policy, the integration process of certain groups might become “invisible”; their needs, identity, and existence, as part of a community, might be disregarded.

It may not be necessary to develop an individual strategy for a group of 300 people, but mechanisms that ensure that a relatively small minority group, such as Roma, benefit from the national integration policies should be in place. Thus, the question remains – what are the ways to monitor the integration process in such a diverse country?

Governance and overall policy framework

The Luxembourg NRIS was not developed based on the needs of the Roma living there. The representative of the NRCP stated that Roma who were asked to participate in a need assessment regarding their living situation in Luxembourg have refused to answer. The Roma living in Luxembourg continue to be invisible in the public sphere and this is not benefiting them nor the mainstream society. While still questioning whether or not a NRIS is necessary considering the local context, it is clear that there is an immediate need for Roma to voice their opinion, as part of the society, with a focus on preserving their cultural and historical heritage which can contribute to Luxembourg’s diversity. It is necessary to develop ways to assess the impact of the mainstream policies for “invisible” communities, such as Roma.

Anti-discrimination

Luxembourg has a strong social control which has led to considerably diminished public expression of hate speech. There are many other forms of discrimination, which can go unnoticed because such cases are not reported. Small, marginalized communities, such as Roma, run the risk of being the subject of these forms of discrimination if the reporting tools are inaccessible due to lack of information or difficulties (language, technical skills, etc.) or if there is no support provided to pursue justice in court. There is a need for an easier and more effective path to denounce discrimination.

Addressing antigypsyism

There are many ways to address antigypsyism, and Luxembourg, even without adopting related legislation, just through social control and mainstreamed legislation, is contributing to preventing reprehensible acts. But, in case of a small community, such as Roma, the promotion of its role models, is crucial.

INTRODUCTION

In 2011, the EC launched a call to the Member States to address the situation of Roma integration more effectively, through national strategies.¹ In January 2012, Luxembourg submitted its National Roma Integration Strategy (NRIS) to the EC.² The NRIS was elaborated by the Ministry of Family, Integration and the Greater Region, and it is in fact an integrated set of policy measures within Luxembourg's social inclusion policies, not a strategy as such. Except for some preliminary remarks regarding the definition of the target group – the Roma, the NRIS does not include any reference to the situation of Roma in Luxembourg or any specific measures. There are no Roma targeted actions included in the NRIS and no related budget proposals exclusively for Roma. Practically, the NRIS is a compilation of the measures regarding education, health, housing, employment and discrimination included in the Luxembourg's mainstream social integration policies, for any person of non-Luxembourg nationality, who is residing legally in Luxembourg.

Considering all the above and the fact that there are no official data concerning the persons of Roma origin in Luxembourg,³ it is very difficult to estimate the change that NRIS brought for Roma in Luxembourg.

There is one important demographic aspect that should not be ignored, namely, the very specific multicultural context of Luxembourg. As per 2018, the total population of Luxembourg was 602.000, out of which 288.200 (47.9%) are foreigners, representing around 170 nationalities. There is no official national data about the size of Roma minority in Luxembourg, but the estimation of the Council of Europe (2012) mentions an average of 300 Roma. According to the interview conducted with the representative of the National Roma Contact Point, there are no indigenous Roma living in Luxembourg. All of them have arrived in Luxembourg either through 1970s bilateral work agreements, or as asylum seekers due to the socio-political evolution in the Balkans in 1990, 2000, 2010. There is no Roma organization in Luxembourg.

In conclusion, NRIS although is a separate document, is an integrated set of policy measures within the Luxembourg's social inclusion policies, without any specific measures or programs for Roma. The only concern is that both NRIS and the national social inclusion/integration policies fail to measure the impact on the situation of Roma in Luxembourg.

This monitoring report aims to present the signs of progress in the implementation of the NRIS in Luxembourg from the perspective of an individual researcher. The report relies on data collected from field and desk research. Since there are no recent official data on the situation of Roma in Luxembourg, this report is mainly based on desk research of reports, analysis, strategies, action plans issued by The Luxembourg Reception and Integration Agency (OLAI), The European Commission against Racism and Intolerance (ECRI), FRANET, European Commission, OECD, etc. Additional information is available in the local media and the internet (i.e. *Chachipe* blog⁴).

During the development of this report, there have been interviews and e-mail exchanges with the NRCP, OLAI, Centre for Equal Treatment, several non-profit organizations in

¹ Communication "An EU Framework for National Roma Integration Strategies up to 2020", COM(2011)173 of 5 April 2011.

² National Roma Integration Strategy in Luxembourg available at: https://ec.europa.eu/info/sites/info/files/roma_luxembourg_strategy_fr.pdf

³ The lack of ethnically disaggregated data is due to Article 6 of the Law of 2 August 2002 on the protection of persons regarding the processing of personal data. The law of August 02, 2002 was modified on 2007, (law of June 27, 2007).

⁴ <https://romarights.wordpress.com/about-us/>

Luxembourg. There were no interviews with local Roma due to time limitations and difficulties in reaching them out.

GOVERNANCE AND OVERALL POLICY FRAMEWORK

Mainstreaming Roma inclusion across ministries and other national level public authorities

Luxembourg has a National Roma Integration Strategy (NRIS) and a National Roma Contact Point (NRCP) within the Ministry of Family and Integration and the Greater Region. The NRIS (2012-2020) was submitted to the EC in 2012, without any input from any Roma organization or individuals living in Luxembourg, even though, at the time, there was a non-profit organization *Chachipe*,⁵ very active on reporting on Roma rights infringements in Luxembourg and Balkans (the origin of most Roma in Luxembourg). *Chachipe* expressed its disagreement about not being invited to participate in the elaboration of the NRIS and submitted its contribution and feedback both to the Ministry in charge and to the EC.⁶ Unfortunately, there is no sign that this contribution had any impact on the NRIS. It is unclear if the *Yenish*⁷ community was consulted in the elaboration of the NRIS.

In 2013, the Ministry of Family, Integration and Greater Region issued a *Concept Paper on the National Roma Integration Strategy – Final Report*.⁸ Its aim was to analyze the integration situation of Roma ethnics who are legally living in Luxembourg and “to deepen its reflection on the implementation of its national Roma integration strategy, thanks to the participation of the Roma population”.⁹

The development of the *Final Report* and thus the participation of the Roma ethnics was possible with the help of the representatives from several organizations and institutions: OLAI, Red Cross, CARITAS, etc. During the time when Roma were migrating from Balkans or Eastern Europe to Luxembourg, in 1990s and 2000s, to seek asylum or international protection, these organizations were among the first in charge to provide support and facilitate their integration.

As the *Final Report* mentions, only one family out of ten accepted to participate and answered the survey, under anonymity. The refusal is explained in the report either by the integration/assimilation of the Roma in the mainstream society or the fear/shame of being associated with the negative image of the Roma in society. There is one general recommendation in this report: “It would be useful at first, to think of ways of making known their (Roma) existence, culture and history within not only the mainstream population, but also within public and private organizations and to possibly include such a campaign in a wider European framework on minorities.”¹⁰ Unfortunately, there are no indications if such actions took place.

As it was specified in the Introduction, NRIS does not contain targeted measures and programs for Roma, nor there are specific budgetary allocations. The NRIS overlaps with the national social integration policies.

⁵ The NGO’s blog: <https://romarights.wordpress.com/about-us/>

⁶ <https://romarights.files.wordpress.com/2012/01/chachipe-commentaires-stratc3a9gie-rom-3001121.pdf>

⁷ *Yenish* or *Lakerten* is a group of people that are included, according the definition of the Council of Europe, under the generic term of “Roma”. They live in Luxembourg as well as in other European countries.

⁸ Available at: https://mfamigr.gouvernement.lu/content/dam/gouv_mfamigr/le-minist%C3%A8re/attributions/solidarit%C3%A9/document-reflexion-strategie-nationale-integration-roms.pdf

⁹ *Idem*.

¹⁰ *Idem*.

For example, for the period 2010-2014, The Luxembourg Reception and Integration Agency (OLAI),¹¹ has implemented the Multi-annual National Action Plan on Integration and Fight against Discrimination (NAP) 2010-2014 aiming at organising the reception of the newcomers, facilitating their integration process, focusing on: "reception, integration, combating discrimination, and monitoring migration on the basis of data and studies".¹² Compared with NRIS, this Plan had an allocated budget, well-defined stakeholders as well as action plan, monitoring and evaluating mechanisms defined. Because it is an integration plan for newcomers, it includes activities related to education, housing, preparing for the labor market, etc.

There have been several evaluation reports of the NAP and some of the most important recommendations call for: "a data collection system to assess the situation of persons with migration backgrounds";¹³ "a set of indicators, target values, a timetable and an authority or person responsible for their implementation"¹⁴ to assess the impact of the various measures, the level of goals achievement and fine-tuning the action plan. In the NAP, as well as in the evaluation reports, Roma are not mentioned at all. There are no local or regional actions or programs targeting directly Roma or any information that Roma are among their beneficiaries.

Since the submission of NRIS in 2012, there are no publicly available monitoring or progress reports regarding the NRIS. The only available information are the Strategy's assessments of 2012 and 2014 done by the European Commission.^{15, 16} As the NRIS is in fact an integrated set of policy measures promoting equal access, one recurrent general recommendation in both assessments was: "Measuring the impact of the equal treatment approach on the situation of Roma people." There is no indication of who may be responsible to measure the impact and in which way.

The NRCP is part of the Ministry of the Family, the Integration and the Greater Region.¹⁷ This Ministry covers a vast social policy area addressing:

- Family,
- Senior citizens,
- Disable persons,
- Solidarity,
- Integration,
- Volunteering,
- The Greater Region.

¹¹ The Luxembourg Reception and Integration Agency (OLAI) is a public agency under the auspices of the Ministry of Family, Integration and Greater Region. It is in charge of implementing the Greater Duchy of Luxembourg's reception and integration policy. See: <http://www.olai.public.lu/fr/index.html>

¹² Plan available at: https://mfamigr.gouvernement.lu/content/dam/gouv_mfamigr/le-minist%C3%A8re/attributions/solidarit%C3%A9/document-reflexion-strategie-nationale-integration-roms.pdf

¹³ ECRI, 2012.

¹⁴ <http://ces.public.lu/content/dam/ces/fr/avis/educ-forma/2014-integration.pdf>

¹⁵ Assessment 2012 available at: https://ec.europa.eu/info/sites/info/files/assessment_luxembourg_national_strategy_2012_en.pdf

¹⁶ Assessment 2014 available at: https://ec.europa.eu/info/sites/info/files/assessment_luxembourg_national_strategy_2014_en.pdf

¹⁷ See: <https://mfamigr.gouvernement.lu/fr/le-ministere.html>

The Solidarity division includes a series of aids and services addressing various social challenges ranging from homelessness to psycho-therapeutic support (see in the figure below the structure of the Solidarity division).



The structure of the Solidarity division, Ministry of the Family, the Integration and the Greater Region

The NRCP office goes under the Solidarity division. It is interesting to know why the NRCP is under Solidarity division and not under Integration, although it is responsible of an integration strategy and most Roma in Luxembourg have a migrant background. The only information publicly available regarding the attribution of the NRCP representative is “among others, communication with the European Commission regarding the actions achieved within the national strategies”. The NRCP is not in charge of implementing the NRIS, but in order to communicate the progress of the NRIS’s implementation, NRCP has to be involved in NRIS’s monitoring and evaluation. NRCP should also be in charge of coordinating research/studies on the situation of Roma in Luxembourg, which can contribute to adjust the NRIS to the needs of its target group.

The representative of the NRCP has mentioned in an individual interview that there is no data about Roma in Luxembourg, and there is no information regarding how and where Roma live, as they do not live in segregated areas or settlements.

NRCP said that Roma have never expressed interest in providing any information, and there were cases when they did not want to assume Roma identity, i.e. the case of the *Ashkali* group – as mentioned in the 2013 Concept Paper.¹⁸ She continued by saying that it was hard to explain to the EC the fact that no monitoring or impact evaluation can be done, due to lack of data and community participation. NRCP has mentioned that if Roma would like to set up an NGO this would be a very easy procedure, as most other nationalities have done it. The affirmations of the NRCP representative reinforce the need for a study regarding the situation of Roma in Luxembourg currently and an information campaign regarding their opportunities to present and preserve their cultural heritage.

In conclusion, public authorities are confronted with a lack of information regarding the situation of Roma in Luxembourg and it is difficult to imagine that the Roma community is aware of NRIS or NRCP. To a certain extent, Roma were, and possibly still are, subjects to the national integration policies.

¹⁸ Available at: https://mfamigr.gouvernement.lu/content/dam/gouv_mfamigr/le-minist%C3%A8re/attributions/solidarit%C3%A9/document-reflexion-strategie-nationale-integration-roms.pdf

Promoting empowerment and participation of Roma

There is no information available on the existence of Roma self-empowered initiatives in the fields of arts, culture, women and youth movement, etc. The NRIS does not include any reference to Roma empowerment and participation. As mentioned previously, Roma did not participate in the elaboration of the NRIS. However, NAP includes a series of actions regarding the participation in the democratic process, support for the active participation of the immigrants to the cultural and artistic life, associations, etc. The lack of information regarding the status of Roma in Luxembourg makes it impossible to estimate at least how many of them are potentially directly impacted.

An action that reduced all non-Luxembourgish nationals' political participation was the referendum held on 7 June 2015 on the right of "foreigners" to vote in national elections.¹⁹ The results were negative.

Another opportunity for public participation is The National Council for Foreigners (CNE).²⁰ The Council is an advisory body with 34 members who are representatives of foreigners, refugees, the main trade unions and civil society. Its objective is to report annually to the Government on the integration of the foreigners. There are certain eligibility criteria for the members, and ethnicity is not considered.²¹ Roma can run, if fulfilling all the criteria, based on their (non-Luxembourgish) nationality.

The lack of an organized form of representation at any level makes the participation and the empowerment of Roma difficult.

Guarantees for the effectiveness of programs with the largest budgets

The NRIS has no allocated budget and there are no Roma targeted programs. According to the NRCP, if Roma are non-Luxembourgish nationals, they have access to the same integration programs, like everyone else, through NAP, financed with European and national funds.

There have been three evaluation reports of NAP done by ECRI,²² the University of Luxembourg and *Conseil économique et social* (CES)²³ with multiple recommendations ranging from changes on the institutional setting, content, indicators system, evaluation, stakeholders' responsibility, etc. Most of them were not put into practice. None of the evaluation reports referred in any way to Roma. In 2017, a new multi-annual national plan was supposed to be adopted, but there is no official information publicly available about it.

The challenge with the multi-annual action plans, coordinated at the national level, with limited leverage at the local level, is that is very difficult to evaluate their outcome, let alone impact for various groups, especially small communities, like Roma, in the absence of ethnically disaggregated data.

¹⁹ <http://luxembourg.public.lu/en/actualites/2015/06/07-referendum/index.html>

²⁰ http://www.olai.public.lu/en/relations-nationales/organismes_consultation/conseil-nat-etrangers/index.html

²¹ <http://data.legilux.public.lu/file/eli-etat-leg-memorial-2011-236-fr-pdf.pdf>

²² ECRI, 2017.

²³ Available at: <http://ces.public.lu/content/dam/ces/fr/avis/educ-forma/2014-integration.pdf>

ANTI-DISCRIMINATION

Implementing the Racial Equality Directive

Luxembourg has transposed the Racial Equality Directive (RED) into the law on Equal Treatment of 28 November 2006, but its Constitution establishes the right to equality only for the Luxembourgers. At the national level, there is a strong social control, which has led to considerably diminished public expression of hate speech. There are several institutions in Luxembourg in charge of fighting against discrimination, but there are limitations affecting their effectiveness. The equality body in Luxembourg, the Center for Equal Treatment (CET) cannot receive complaints about discrimination, according to their status. Furthermore, “neither the CET nor the Ombudsperson can represent victims of discrimination in the courts. As a result, there is no procedure enabling all victims of discrimination to assert their rights easily”.²⁴

One of the recommendations of the European Commission against Racism and Intolerance from 2014 referred to reappointing the Special Commission by the National Council for Foreigners, with attributions regarding the receipt of racial discrimination complains. Unfortunately, reappointment for such a Commission was not considered.

The Luxembourg authorities intend to bring together in the same location the CET, the Ombudsperson, Ombudsman Committee for Children’s Rights and the Advisory Committee for Human Rights (CCDH) under the “House of Human Rights” to potentially increase the cooperation among them.

A report of *Le Centre d’Etude et de Formation Interculturelles et Sociales* (CEFIS)²⁵ mentions in 2010 that 26 per cent of Luxembourgers do not want a Roma neighbor.

It is worth mentioning that after 2012, no reports on human rights, discrimination or racism in Luxembourg specify anything about Roma.

Educational and residential segregation

In Luxembourg, there is no evidence of school or residential segregation. The NRCP mentioned during the interview that there are no Roma settlements, no mapping of the Roma communities and there is no ethnically disaggregated data on access to social housing or education of the Roma. A very limited stock of social housing and the high cost of housing determined the Government to initiate a fund for renting subsidies for low-income households.

Based on information provided by *Chachipe* about the treatment of the travelers by the campsite managers, the ECRI report of 2012 specifies: “ECRI recommends that the Luxembourg authorities combat any discrimination against Roma on the part of campsite managers”. Currently, there is no information available regarding the existence of any abuse of this kind. The NRCP mentioned in the interview that there are no travelers/caravan dwellers in Luxembourg, and there is no housing build illegally.

Discriminatory behavior by police, misconduct by prosecutors or courts

There are no recent pieces of evidence of police discriminatory behavior and brutality, ethnic profiling or “over-policing” or misconduct by prosecutors or courts towards Roma. However, in 2011, a letter has been addressed to Mr. Martin Sehnayr, Head of Cabinet of Vice-President Viviane Reding Commissioner for Justice, Fundamental Rights, and Citizenship, by *Chachipe*. The subject of the letter was “Discriminatory practices of the

²⁴ ECRI, 2017.

²⁵ Available at: <http://www.cefis.lu/resources/RED14.pdf>

Luxembourg police against Roma migrants from the new member state",²⁶ in which concerns were expressed regarding the mistreatment of Roma migrants by the Luxembourg police, as part of a targeted campaign to deter Roma migrants from entering Luxembourg.

Chachipe was denouncing "the unjustified arrests, unjustified confiscation of the money obtained through begging, routine body searches and alleged beatings of Roma under arrest" of Romanian Roma arrived in Luxembourg. The abuses reported were documented starting in 2005, with police reports, media articles, public campaigns, etc. There is no information available regarding the effects at national or European level (except ECRI) of the actions reported by *Chachipe*.

In its report in 2012 ECRI specified: "ECRI recommends that the Luxembourg authorities ensure that the criteria for implementation of Article 342 of the Penal Code on organized begging are clearly defined. It strongly recommends them to ensure that Roma are not stigmatized or unfairly targeted by any measures taken by the police to combat organized begging".²⁷

Several non-Roma organizations have mentioned, during the interviews, that currently there are persons begging on the streets of Luxembourg and they are allegedly Roma from Romania, but there is no evidence or information regarding their interaction with the local police.

It must be mentioned that begging is legal in Luxembourg, except organized begging (*mendicité en reunion*), prohibited under article 342 of the Luxembourg Penal Code.

²⁶ Available at: <https://romarights.files.wordpress.com/2011/07/letter-eu-commission-240211.pdf>

²⁷ ECRI, 2012.

ADDRESSING ANTIGYPSYISM

Institutional settings for fighting discrimination and addressing antigypsyism

Concerning fighting discrimination, racism and hate speech, Luxembourg has the necessary institutional settings, and there is an interest in improving it. Both European Directives, 2000/43/ EC and 2000/78/EC, have been transposed in the national legislation and the criminalization for the racism in the Penal Code was modified through the law of 19 July 1997. There is an institutional setting, but there are limitations affecting their efficiency, as mentioned in the anti-discrimination sections.

The social control of Luxembourg society over the public display of hate speech coming from the politicians and media is very strong. Therefore, generally, the citizens do not openly engage in hate speech either. Anti-discrimination actions were included even in the NAP. However, the ECRI report of 2017 mentions that *"The Centre for Equal Treatment (CET) cannot receive complaints of discrimination [...] neither the CET nor the Ombudsperson can represent victims of discrimination in the courts. As a result, there is no procedure enabling all victims of discrimination to assert their rights easily."*²⁸

Roma people are not recognized as a national or ethnic minority in Luxembourg. It has to be mentioned though that there are no national or ethnically recognized minorities. Antigypsyism is not officially recognized by the State as a specific form of racism against Roma and there is no institutional setting specifically to prevent or address antigypsyism.

If the information about the experiences of Roma currently living in Luxembourg is scarce, then their past is unknown as well. Their tragic experience from the World War II is not at all mentioned in the history books, due to lack of evidence. Luxembourg has officially recognized the Holocaust, but there is no official acknowledgment of the Genocide of the Roma.

*"As to possible Sinti or Roma victims, the U.S. Memorial Holocaust Museum in Washington estimates that around 200 Sinti or Roma were deported from Luxembourg. This number is sufficiently large to have left traces in German administration records and in the memory of the Luxembourgers. None exist, however, there is no evidence that these groups resided in the country during the war."*²⁹

Countering hate crime and hate speech against Roma, and antigypsyist rhetoric of politicians, public figures and media

There are no official statistics regarding the hate crime or speech against Roma, in Luxembourg. It is difficult to measure the size of the hate speech phenomena, in general, in Luxembourg as there are no official statistics. The ECRI report in 2017 mentions that: "... there were four convictions for hate speech in 2015 (3 in 2014, 2 in 2013, 2 in 2012, none in 2011 and 1 in 2010). The police recorded 28 cases of this type in 2015, 43 in 2014 and 29 in 2013. In 2014, the Minister of Justice stated that the figures did not necessarily reflect the scale of the phenomenon. It is indeed possible that many instances of hate speech were not reported to the authorities."³⁰ It has to be mentioned that these numbers do not refer to Roma specifically.

There is a NGOs initiative a website <https://stopline.bee-secure.lu> for anonymous reporting of illegal content. Through this website, a considerable increase in reporting potentially

²⁸ ECRI, 2017.

²⁹ Jolande Withuis & Annet Mooij (eds.), 2010. *The Politics of War Trauma. The aftermath of World War II in eleven European countries.*

³⁰ ECRI, 2017.

racist content was noticed: 309 reports in 2015, compared with just 28 in 2014. 79 cases were referred to the police.

There have been several campaigns on raising awareness of hate speech in media and internet among them: "Luxembourgish Netiquette: For respectful coexistence online," initiated in 2017 by the *Conseil de Presse* and BEE SECURE, or the one in the new school year in 2016. Other initiatives in the internet sphere are aiming to respond to the hate speech ("counter-speech"), to facilitate its denounce or to help the victims. Racial insults and defamation are included under the incitement to hatred, making them punishable by the court.

RECOMMENDATIONS

Governance and overall policy framework

- The Government, through OLAI, together with other partners from the civil society should initiate a campaign to raise awareness on the importance of public representation of small communities and support the establishment of a Roma organization.
- The National Roma Contact Point, together with OLAI and The National Council for Foreigners should initiate a study regarding the current situation of Roma in Luxembourg. This study can contribute to a better monitoring and evaluation, but also to a reformulation of the NRIS, based on the Roma current needs and aspirations.
- NRCP and OLAI should develop and make use of a system of indicators to measure the impact of the national social integration policies on Roma and other non-Luxembourgish citizens.

Anti-discrimination

- The Center for Equal Treatment should consider extending its responsibility in order to be able to receive discrimination complaints, conduct investigations and represent the victims in the court.
- Data collection should be done by the Ombudsman and CET, regarding the experiences of discrimination of the national Roma or the EU citizens of Roma ethnicity who are temporary in Luxembourg (i.e. Romanian Roma). This will contribute to a clearer image of the situation of Roma in Luxembourg, which otherwise seems to be out of the loop of the NRIS or national social integration policies.

Addressing antigypsyism

- The Ministry of Education should include in school curricula information about Roma culture and history in Luxembourg and Europe, taking in consideration that most of the Roma are of migrant background. This will contribute with new narratives to a new perspective on Roma of the mainstream society. At the same time, this can lead to empowering Roma, increase their self-esteem and identity.
- Research centers and museums, i.e. Centre for documentation and research on resistance,³¹ *Mémorial de la Déportation* or Musée National de la Résistance,³² which could develop and include sections on Roma genocide on the World War II.

³¹ <https://secondeguerremondiale.public.lu/fr/acteurs/fonares.html>

³² <https://musee-resistance.lu/en/welcome/>

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