



SHADOW REPORT

WESTERN BALKAN

BOSNIA AND HERCEGOVINA

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11. INSTITUTIONAL SET UP

Bosnia and Herzegovina (BiH) has established a complex, multi-tiered institutional framework for Roma inclusion, reflecting the country's broader constitutional and administrative structure. Responsibilities are distributed among institutions at the state, entity, Brčko District and local levels. The framework includes institutions and bodies with advisory, policy-making, coordination, financing and implementation mandates.

The institutional architecture is formally extensive; however, its effectiveness continues to be affected by fragmented responsibilities, complex intergovernmental coordination, uneven implementation at local and entity levels, limited institutional capacity, gaps in Roma participation and the absence of an adopted strategic framework for Roma inclusion covering the period 2026–2030. The previous Action Plan for Social Inclusion of Roma and Roma Women 2021–2025 expired on 31 December 2025. In April 2026, the Ministry for Human Rights and Refugees (MHRR) and institutions of Republika Srpska were still working to harmonise positions and finalise the new Action Plan.

State-level institutional framework

The Ministry for Human Rights and Refugees of Bosnia and Herzegovina (MHRR) is the principal state-level institution responsible for coordinating Roma inclusion policies. Its responsibilities include coordinating the preparation of strategic documents, facilitating cooperation among competent institutions, administering Roma-related programmes and grants, monitoring implementation, and cooperating with domestic and international partners.

The MHRR performs both policy-coordination and implementation functions. Its responsibilities concerning national minorities, including Roma inclusion, are primarily carried out through the Department responsible for the Protection of Minority Rights and Cooperation with National minorities, religious communities and non-governmental organisations.

The National Roma Contact Point serves as a central coordination and communication mechanism for Roma integration at the state level, including cooperation with relevant domestic institutions and international partners. During the reporting period, this function was performed by Assistant Minister Kemo Sarač. This information should be reconfirmed immediately prior to publication to ensure that the officeholder remains current.

Advisory and representative institutions

Several parliamentary bodies have mandates concerning the rights and interests of national minorities, including Roma:

- The National Minorities Council of the Parliamentary Assembly of Bosnia and Herzegovina;
- The National Minorities Council of the Parliament of the Federation of Bosnia and Herzegovina;
- The National Minorities Council of the National Assembly of Republika Srpska.

These bodies provide opinions, recommendations and proposals concerning the protection of national minority rights. Their practical influence, however, depends on the extent to which competent executive and legislative institutions take their recommendations into account when developing legislation, policies, budgets and implementation measures.

Decision-making and policy institutions

At the state level, the Council of Ministers of Bosnia and Herzegovina adopts strategic documents and policy decisions relevant to Roma inclusion and determines important institutional and financial conditions for implementing state-level commitments.

In addition to the MHRR, several state-level institutions have mandates relevant to Roma inclusion, including:

- Ministry of Civil Affairs of Bosnia and Herzegovina;
- Ministry of Security of Bosnia and Herzegovina;
- Ministry of Justice of Bosnia and Herzegovina;
- Ministry of Finance and Treasury of Bosnia and Herzegovina;
- Gender Equality Agency of Bosnia and Herzegovina;
- Labour and Employment Agency of Bosnia and Herzegovina;
- Directorate for European Integration of Bosnia and Herzegovina.

Their mandates cover areas including education, labour and employment, access to justice, security, gender equality, public finance and European integration. Effective Roma inclusion therefore requires sustained inter-institutional cooperation between the MHRR and these institutions, and the systematic integration of Roma-related priorities into sectoral policies and budgets.

At the sub-state level, important responsibilities are held by:

- The Government of the Federation of Bosnia and Herzegovina;
- The Government of Republika Srpska;
- The Government of Brčko District of Bosnia and Herzegovina.

These authorities are responsible for translating state-level commitments into entity- and district-level policies, programmes, budgets and implementation measures. Given the constitutional distribution of competencies in BiH, effective Roma inclusion requires coordinated action across all levels of government.

Roma Advisory Board at the Council of Ministers BiH

At its 100th session, held on 26 January 2026, the Council of Ministers of Bosnia and Herzegovina adopted a new Decision on the Establishment of the Roma Advisory Board. The Board was established as a professional, advisory and coordination body responsible for considering, initiating, monitoring and providing recommendations on issues relevant to improving the socio-economic and political position of Roma in Bosnia and Herzegovina.

The new Decision builds on the Roma Advisory Board mechanism established in 2002 and confirms its role as the principal institutional mechanism for Roma participation in the development and monitoring of public policies. The Board brings together representatives of relevant state- and entity-level institutions and Roma representatives, providing a formal platform for dialogue and cooperation between public authorities and Roma communities.

The Board's key responsibilities include:

- monitoring public policies and measures affecting Roma communities;
- participating in the development and review of Roma-related policies and strategic documents;
- monitoring the implementation of Roma inclusion measures and commitments;
- identifying gaps, challenges and priorities in the implementation of Roma inclusion policies;
- initiating measures and providing recommendations to relevant institutions;
- reporting on progress and shortcomings in Roma inclusion; and
- facilitating communication and cooperation between public institutions and Roma communities.

The new Advisory Board consists of 18 members, with equal representation of state institutions and Roma civil society: nine representatives of state institutions and nine representatives of Roma non-governmental organisations.

The equal numerical representation represents a potentially important mechanism for strengthening Roma participation in state-level policymaking and provides a formal framework for dialogue between public institutions and Roma civil society.

However, the adoption and implementation of the new institutional arrangement have raised serious concerns regarding **transparency, inclusiveness and the meaningful participation** of Roma in decisions concerning their representation. The Decision establishing the new Advisory Board was adopted without prior consultation with members of the existing Roma Advisory Board or with relevant representatives of Roma civil society and communities. This approach undermines the principle of meaningful participation of minorities in decision-making processes that directly affect them and raises concerns regarding the transparency and inclusiveness of the decision-making process.

In addition, concerns have been raised regarding the treatment of members of the previous Roma Advisory Board under the new arrangement, including allegations of unequal and discriminatory treatment based on their affiliation. Four members of the previous Board challenged the Decision through an appeal submitted to the Ministry for Human Rights and Refugees of Bosnia and Herzegovina and a complaint to the Institution of the Human Rights Ombudsman of Bosnia and Herzegovina. The outcome of these proceedings will be relevant for assessing the legality, fairness and institutional legitimacy of the new arrangement.

The new institutional framework also needs to be assessed against longstanding concerns expressed by Roma civil society regarding the independence and legitimacy of Roma representation. Previous appointment arrangements raised questions as to whether Roma representatives were selected through a transparent and participatory process and whether Roma communities and organisations had a genuine opportunity to influence the selection of those representing them. These concerns remain particularly relevant under the new system, as numerical parity alone does not guarantee meaningful participation.

The principle of “nothing about us without us” requires more than the formal inclusion of Roma representatives in advisory structures. Roma representatives should be selected through a transparent, inclusive and independent process, have a clear and independent mandate, and be

accountable to the Roma communities and organisations they represent. Their participation should enable them to influence policies and decisions, rather than serve merely as a formal consultation mechanism.

Implementation institutions and partners

Implementation of Roma inclusion measures is distributed among institutions operating at the state, entity, Brčko District, and local levels. The MHRR and its Department for Protection of Rights and Cooperation with National and Other Minorities perform central executive and coordination functions. Sector-specific programmes are implemented by relevant institutions and grant recipients.

Employment

Employment-related programmes and measures are implemented primarily through:

- the Federal Employment Institute;
- the Employment Institute of Republika Srpska; and
- the Employment Institute of Brčko District of Bosnia and Herzegovina.

These institutions implement active labour-market measures and targeted employment programmes relevant to Roma. Their effectiveness depends on adequate and predictable financing, coordination with the MHRR, reliable Roma-disaggregated data, effective outreach, and monitoring of employment retention and sustainability rather than only the number of subsidised placements.

Housing

Housing interventions are primarily implemented through local self-government units, in cooperation with the MHRR and other competent authorities. In Brčko District, relevant responsibilities are also exercised through the competent including:

- Department of Displaced Persons, Refugees and Housing Issues;
- Department for Physical Planning and Property Affairs.

Local authorities have a central role because many housing interventions are implemented at municipal level. Their capacity to implement projects depends on access to state and international funding, municipal co-financing, administrative capacity, availability of land and planning documentation, resolution of property relations and coordination with higher levels of government.

Healthcare

Healthcare measures are implemented through competent entity- and district-level institutions, including:

- the Ministry of Health and relevant public health institutions in the Federation of Bosnia and Herzegovina;
- the Ministry of Health and Social Protection and relevant public health institutions in Republika Srpska; and
- the Department for Health and Other Services of the Government of Brčko District of Bosnia and Herzegovina.

These institutions are responsible for integrating Roma-related priorities into health policies and implementing measures aimed at improving access to healthcare, preventive services, health information and, where relevant, health insurance and primary healthcare.

Education

Education is particularly fragmented because competencies are distributed among the state, entities, cantons, Brčko District and local educational authorities. The Ministry of Civil Affairs has a coordination role at state level, while education policies and implementation are primarily within the competence of entity, cantonal and district authorities.

This highly decentralised structure creates significant challenges for consistent planning, financing, implementation and monitoring of Roma education measures. It also requires stronger coordination to ensure that Roma inclusion commitments are implemented consistently across the country.

Strategic coordination and Roma participation

The preparation of the Action Plan for Social Inclusion of Roma and Roma Women 2026–2030 has demonstrated both the existence of formal consultation mechanisms and the continuing challenges concerning the quality and influence of Roma participation.

The MHRR initiated consultations for the new Action Plan in April 2025, with participation of state institutions, civil society organisations and Roma organisations. The consultation process covered key areas including education, employment, housing, healthcare and discrimination, as well as youth, violence against women, media, and the green and digital agendas.

However, formal consultation does not in itself guarantee meaningful participation. Roma civil society organisations and representatives have raised concerns that Roma participation should extend beyond the submission of comments and should provide genuine opportunities to influence priorities, measures, indicators, financing and implementation arrangements.

Meaningful participation should therefore include Roma experts, Roma-led organisations, women, young people and representatives of diverse Roma communities throughout the preparation, adoption, implementation, monitoring and evaluation of Roma inclusion policies.

Status of the Action Plan 2026–2030

The previous Action Plan for Social Inclusion of Roma and Roma Women 2021–2025 expired on 31 December 2025. The proposed Action Plan for 2026–2030 was placed on the agenda of the Council of Ministers for its 100th session on 26 January 2026. However, the official record of the session confirms the adoption of the decision establishing the Committee for Roma but does not record the adoption of the proposed Action Plan.

The process remained unresolved until April 2026.

The continued absence of an adopted Action Plan creates a gap in strategic continuity following the expiry of the 2021–2025 framework. It also complicates multi-year planning, financing, implementation and monitoring of Roma inclusion measures. This is particularly significant given that Roma inclusion measures are implemented across different levels of government and require coordinated institutional and financial commitments.

The institutional challenge is therefore not simply the existence of a strategic document, but the ability of the authorities to establish a functioning framework with clear responsibilities, measurable indicators, adequate financing and effective mechanisms for Roma participation and independent monitoring.

Overall assessment

The formal institutional architecture for Roma inclusion in Bosnia and Herzegovina remains broad and includes relevant institutions at the state, entity, Brčko District and local levels. However, the distribution of responsibilities across multiple levels of government continues to create challenges for effective coordination, consistent implementation, strategic continuity and adequate financing.

The adoption of the new Decision on the Establishment of the Roma Advisory Board by the Council of Ministers in January 2026 represents an important step in strengthening the institutional framework for Roma participation. The new Board provides a formal mechanism for Roma representatives to participate in the development and monitoring of public policies and establishes equal numerical representation of state institutions and Roma civil society. However, concerns regarding the transparency and inclusiveness of the process through which the new Board was established, including the absence of prior consultation with the existing Board and relevant Roma civil society representatives, raise questions about the meaningfulness and legitimacy of Roma participation.

The experience of preparing the Action Plan for Social Inclusion of Roma and Roma Women 2026–2030 further demonstrates that the existence of formal consultation mechanisms does not necessarily ensure meaningful Roma participation. Roma participation should extend beyond the submission of comments and provide genuine opportunities to influence priorities, measures, indicators, financing and implementation arrangements.

At the same time, the expiry of the 2021–2025 Action Plan without the timely adoption of a successor framework has created a gap in strategic continuity. The continued absence of an adopted Action Plan for 2026–2030 complicates multi-year planning, financing, implementation and monitoring of Roma inclusion measures across the different levels of government.

Institution/body	Role and description	Key concern in 2026
Ministry for Human Rights and Refugees of BiH (MHRR)	Principal state-level institution responsible for coordinating Roma inclusion policies, preparing strategic documents, administering programmes and monitoring implementation	Concerns regarding transparency, interinstitutional coordination, meaningful Roma participation, and the absence of an adopted Action Plan for 2026–2030
Council of Ministers of BiH	Responsible for adopting strategic documents and major policy and funding decisions related to Roma inclusion	The Action Plan for Social Inclusion of Roma and Romani Women 2026–2030 was not adopted at the session held on 26 January 2026 due to one opposing vote
Advisory Board for Roma	Principal mechanism for Roma participation in policy development and monitoring; composed equally of institutional and Roma representatives	The selection procedure for Roma representatives was changed without consultation. Four Roma representatives resigned, complaints were submitted to the Ombudsman, and annulment of the decision was requested
Parliamentary national minority councils	Provide opinions and recommendations on minority rights at the state, Federation of BiH, and Republika Srpska levels	Their recommendations remain non-binding, and their practical influence on policy and budgetary decisions is limited
Entity and Brčko District governments	Translate state-level commitments into entity- and district-level policies, budgets, and implementation measures	Republika Srpska issued a negative opinion on the Action Plan, despite the reported incorporation of more than 95% of its submitted comments
Sectoral implementation institutions	Employment, health, education, and housing institutions implement Roma inclusion measures within their areas of competence	Fragmented responsibilities and the absence of an updated strategic framework may disrupt coordination, financing, and implementation
Local self-government units	Implement a substantial share of Roma inclusion projects, particularly in housing and access to local services	The non-adoption of the Action Plan may restrict access to state and international funding mechanisms
Roma civil society organizations	Represent community interests, provide expertise, participate in consultations, monitor policies, and advocate for accountability	Roma organizations report that participation in developing the Action Plan was largely formalistic and did not ensure meaningful influence over policy content

12. EDUCATION

Access to education

Roma children in Bosnia and Herzegovina continued to face substantial barriers to education during the 2025/2026 reporting period. According to available information, despite some increase in enrolment in compulsory education, Roma children continue to experience significantly lower participation and higher dropout rates than children from the general population. The main barriers include poverty, limited access to preschool education, discrimination, insufficient transportation and educational support.

The most recent available data continue to show a substantial education gap between Roma children and the general population. According to UNICEF and other international sources, approximately 69.3% of Roma children are enrolled in primary education, compared with 98% of children in the general population. At secondary level, only around 23% of Roma children are enrolled, with the rate falling to approximately 18% among Roma girls. Participation in early childhood education remains particularly low, at below 2% among Roma children.

These figures are broadly consistent with the findings cited in the previous shadow report, which estimated primary-school enrolment among Roma children at approximately 75–80%, while secondary-school enrolment was estimated at 25–30%. Other data presented in that report indicated that 69% of Roma children attended primary school and 23% attended secondary school, while participation among Roma girls was lower, at 67% in primary education and 18% in secondary education. The continued use of the 69% and 23% figures by UNICEF, OSCE and other international actors indicates that more recent comprehensive data disaggregated by ethnicity and gender are still not available. It is therefore not possible to reliably determine whether Roma enrolment rates increased or decreased during the 2025/2026 school year.

The European Commission's Bosnia and Herzegovina Report 2025 confirms that enrolment rates of Roma children in compulsory education have increased, but that dropout remains a serious concern. The report also notes that Roma remain the most vulnerable and disadvantaged minority in the country due to persistent stereotypes, prejudice, discrimination and anti-Gypsyism. Although education is not formally segregated on ethnic grounds, Roma children continue to face barriers to equal participation and there is still no systematic provision of education in or of the Romani language, with the exception of an elective Romani language subject introduced in Tuzla Canton. The report also highlights the limited public awareness of Roma culture within the education system.

Access to preschool education remains one of the most significant structural barriers. Recent UN and OSCE statements published in 2026 continue to report that less than 2% of Roma children participate in early childhood education, placing Roma children at a disadvantage even before entering compulsory schooling. The extremely low participation in preschool education contributes to disparities in school readiness, language development and subsequent educational outcomes.

The UNICEF Situation Analysis of Children and Youth in Bosnia and Herzegovina 2025 similarly confirms that Roma children continue to have substantially lower participation at all levels of education. It identifies administrative barriers, including difficulties related to birth

certificates and other documentation, as factors affecting enrolment and retention, and stresses the need for targeted financial and academic support to improve educational continuity.

Socio-economic conditions remain a major factor influencing school attendance and completion. Roma families continue to experience high levels of poverty and inadequate housing conditions, which can affect children's ability to attend school regularly, access learning materials, complete homework and remain in education. The lack of affordable or accessible transportation is particularly relevant for children living in Roma settlements located far from schools. In some areas, families also face difficulties covering school-related costs, including transportation, school supplies, meals and other educational expenses.

Frequent migration of Roma families to Western European countries continues to affect educational continuity. Children may interrupt their education when families migrate and face difficulties reintegrating into the education system upon return. This is particularly relevant in communities with high levels of seasonal or repeated migration and can contribute to absenteeism, repetition of grades and early school leaving. Recent evidence from Tuzla, for example, identified frequent migration to EU countries among the factors contributing to school dropout among Roma children.

Early marriage remains another important barrier, particularly for Roma girls. Recent OSCE reporting notes that early marriage in some Roma communities can lead children to assume adult responsibilities prematurely and can significantly reduce their educational and economic opportunities. Roma girls face additional and intersecting barriers related to gender, ethnicity and socio-economic status, resulting in particularly low participation in secondary education.

Discrimination and the lack of culturally responsive education also remain concerns. While formal ethnic segregation in education is not reported, Roma children may experience discrimination, social exclusion and negative stereotypes within and around the education system. The limited presence of Roma language, culture and history in curricula can further weaken the sense of belonging of Roma pupils and limits opportunities for other children to learn about Roma culture and history. The lack of systematic and sustainable institutional mechanisms, including Roma teaching assistants and mediators, also remains a concern.

At the same time, there are examples of positive interventions. Roma mediators, teaching assistants and community-based initiatives have demonstrated potential to improve communication between schools and Roma families, support enrolment and attendance, and help prevent dropout. However, these mechanisms are not sufficiently institutionalised or consistently available across Bosnia and Herzegovina. Sustainable funding and stronger coordination between education authorities, social services, local governments and Roma civil society organisations are therefore needed.

Preschool education

Access to preschool education remained extremely limited for Roma children during the 2025/2026 reporting period. The most recent available data indicate that approximately 1.5% of Roma children participate in preschool education. More recent information published in 2026 by the United Nations, European Union and OSCE continues to describe Roma participation in early childhood education as below 2%, confirming that Roma children remain among the groups most excluded from early childhood education in Bosnia and Herzegovina.

However, there are still no comprehensive and regularly updated official data disaggregated by ethnicity and gender that would allow for a reliable assessment of changes in Roma preschool enrolment during the 2025/2026 reporting period. The continued lack of such data represents a significant obstacle to monitoring progress, identifying disparities and assessing the effectiveness of measures aimed at improving Roma children's access to early childhood education.

The extremely low participation of Roma children is particularly concerning when compared with participation among children in the general population. UNICEF reported in 2025 that approximately 43% of children aged 3–5 in Bosnia and Herzegovina participate in preschool education. The contrast with the estimated participation of less than 2% among Roma children demonstrates the continuing and significant structural gap in access to early childhood education.

During the reporting period, investments were made to improve preschool infrastructure and increase overall capacity. In 2025, UNICEF and the European Union supported the rehabilitation of nine preschool facilities in different parts of Bosnia and Herzegovina, with the aim of improving the quality and safety of facilities and, in some locations, creating additional preschool places. While such investments represent positive developments, there is no evidence that the expansion of general preschool capacity has resulted in a comparable increase in Roma children's participation.

According to information from partner organisations, Roma families continue to face multiple barriers to accessing preschool services. These include poverty and the inability to cover associated costs, insufficient information about available programmes, transportation difficulties, geographical distance from preschool facilities, inadequate support to families, and the limited availability of preschool services in or near Roma settlements. These barriers are compounded by the broader socio-economic exclusion experienced by many Roma families.

The very low level of participation in preschool education also has implications for Roma children's subsequent educational trajectories. Limited access to early childhood education can affect school readiness, language development, socialisation and the acquisition of basic learning skills, potentially contributing to the educational disadvantages that Roma children experience later in primary and secondary education.

Positive initiatives aimed at reaching children who remain outside mainstream services have also continued. UNICEF has expanded integrated early childhood development services, including home-visiting programmes, to municipalities across Bosnia and Herzegovina. Such community-based approaches have particular potential to reach children from marginalised families who are not accessing formal preschool services. However, these interventions need to be systematically linked with targeted measures for Roma inclusion and implemented in close cooperation with Roma communities and Roma civil society organisations.

School attendance and dropout

School attendance and dropout continued to represent major concerns for Roma children during the 2025/2026 reporting period. The European Commission's Bosnia and Herzegovina Report 2025 confirms that enrolment rates of Roma children in compulsory education have increased, but that too many Roma children still drop out of school. The report also identifies Roma as the most vulnerable and disadvantaged minority in Bosnia and Herzegovina and highlights

persistent discrimination, anti-Gypsyism and social exclusion as factors affecting their access to education.

However, no new comprehensive numerical data on school dropout among Roma children were available for the 2025/2026 reporting period. The lack of reliable and regularly updated data disaggregated by ethnicity and gender makes it impossible to determine the current dropout rate or to assess whether the situation has improved or deteriorated compared with the previous reporting period. The UN, EU and OSCE also highlighted in 2026 that insufficiently disaggregated data on Roma communities remain a significant obstacle to accurately assessing inequalities and monitoring progress.

Available data nevertheless demonstrate a substantial gap in educational participation. While primary school attendance in the general population is approximately 98%, only 69.3% of Roma children are enrolled in primary education. At secondary level, participation among Roma children falls to approximately 23%, including only 18% of Roma girls. These figures indicate that the transition from primary to secondary education represents a particularly significant point of exclusion and that Roma girls face additional barriers to continuing their education.

According to UNICEF, school attendance among Roma children remains sporadic at best, reflecting the cumulative impact of poverty, discrimination and limited access to educational support. The persistent gap between Roma children and the general population suggests that increasing initial enrolment alone has not been sufficient to ensure regular attendance, completion of compulsory education or successful transition to secondary education.

The factors affecting school attendance and dropout identified in previous reporting periods remain relevant during 2025/2026. These include poverty and financial difficulties, inadequate housing conditions, family responsibilities, illness, bullying and discrimination, early marriage, child labour, long distances to schools, and frequent migration of Roma families to Western European countries. For children from poorer households, the costs associated with transportation, school materials, clothing, meals and other school-related expenses can create additional barriers to regular attendance.

Frequent migration continues to be an important factor affecting educational continuity. Children whose families repeatedly migrate may interrupt their schooling and face difficulties when re-entering the education system after returning to Bosnia and Herzegovina. Such interruptions can result in prolonged absenteeism, difficulties in following the curriculum and an increased risk of early school leaving.

Roma girls face additional and intersecting barriers. Early marriage and the assumption of family and household responsibilities can result in girls leaving education prematurely. The 2026 joint statement by the UN, EU and OSCE notes that early marriage in some Roma communities can lead girls and boys to assume adult roles prematurely and reduce their educational and economic opportunities.

The lack of transportation and educational assistance, reported by partner organisations during the 2025/2026 period, further affects regular school attendance. Children living in Roma settlements located at a considerable distance from schools may face difficulties reaching school consistently, particularly where families cannot afford transportation. The absence or insufficient availability of teaching assistants, Roma mediators and other forms of

individualised educational support can further increase the risk of absenteeism and dropout among children who require additional assistance.

Discrimination and the lack of an inclusive and culturally responsive educational environment also remain relevant. The European Commission notes that, although education is not formally segregated by ethnicity, there is still no systematic teaching in or of the Romani language, except as an elective subject in Tuzla Canton, while awareness of Roma culture remains limited. Such shortcomings can affect Roma children's sense of belonging and contribute to their marginalisation within the education system.

Quality of education

The quality and inclusiveness of education available to Roma children remained a concern during the 2025/2026 reporting period. While the European Commission's Bosnia and Herzegovina Report 2025 does not identify formal ethnic segregation of Roma children within the education system, it confirms that Roma continue to face significant barriers to equal participation in education. Roma remain among the most vulnerable and disadvantaged groups in Bosnia and Herzegovina, with persistent discrimination, prejudice and anti-Gypsyism affecting their social inclusion and access to equal opportunities.

The previous shadow report documented concerns regarding the placement of Roma children in separate classes or educational programmes that did not provide the same opportunities and resources as mainstream education. No evidence was provided during 2025/2026 demonstrating that these concerns have been comprehensively addressed. At the same time, available evidence suggests that the issue should be understood more broadly as one of unequal access to quality and inclusive education, rather than as systematic formal segregation of Roma pupils.

A significant remaining gap concerns the recognition of Roma language, history and culture within the education system. The European Commission reported in 2025 that there is still no systematic teaching in or of the Romani language in Bosnia and Herzegovina. Tuzla Canton remains the only identified example where Romani has been introduced as an elective school subject. Public awareness and knowledge of Roma culture also remain limited.

The limited presence of Roma language, history and culture in curricula has implications for the inclusiveness and relevance of education for Roma children. It also means that non-Roma pupils have limited opportunities to learn about Roma history, culture and contributions to the society of Bosnia and Herzegovina. Introducing Roma-related content into curricula in a systematic, age-appropriate and non-stereotypical manner would contribute to combating prejudice and anti-Gypsyism and to creating a more inclusive school environment.

Teacher capacity also remains an important concern. The broader education system continues to face weaknesses in systematic teacher professional development and in the monitoring of education quality and learning outcomes. The European Commission has noted the absence of a mechanism to systematically monitor the quality of education inputs, outputs and outcomes and has called for stronger and more comprehensive teacher training. These systemic weaknesses have particular implications for children who require additional support to overcome socio-economic, linguistic or other barriers to learning.

Roma children may require targeted educational and social support to achieve equal learning outcomes. This includes Roma teaching assistants and mediators, individualised learning support, assistance with communication between schools and Roma families, and measures to address absenteeism and the risk of early school leaving. European education guidance also identifies cultural mediators, parental and community involvement, support in the learner's mother tongue and intercultural education as important measures for improving educational outcomes among Roma learners.

The broader context of ethnic discrimination and segregation within the education system also remains relevant. The OSCE Mission to Bosnia and Herzegovina continues to identify ethnic discrimination and segregation in schools and classrooms as a concern and works with education authorities to address practices such as “two schools under one roof” and other educational practices that reinforce ethnic divisions. Although these practices are not specific to Roma children, their continued existence demonstrates the broader structural challenges to achieving an inclusive, non-discriminatory education system in Bosnia and Herzegovina.

Activities implemented by Roma civil society organisations to promote Roma language, culture and history remain valuable but are generally project-based and insufficient to compensate for the limited institutional presence of Roma content within the formal education system. Sustainable progress therefore requires education authorities to move beyond sporadic initiatives and integrate Roma history, culture and language into education policies, curricula and teacher training.

Discrimination and segregation

Discrimination against Roma children in education remained a concern during the 2025/2026 reporting period. Available evidence indicates that Roma children continue to face prejudice, stereotyping, bullying and discriminatory treatment in and around schools. The European Commission's Bosnia and Herzegovina Report 2025 identifies Roma as the most vulnerable and disadvantaged minority in the country and notes that persistent stereotypes, prejudice, discrimination and anti-Gypsyism continue to hinder their full social inclusion and equal access to opportunities. ([enlargement.ec.europa.eu](https://enlargement.ec.europa.eu/enlargement.ec.europa.eu))

The previous shadow report documented reports of bullying, discriminatory treatment, placement of Roma children in separate classes and, in some cases, difficulties or barriers to enrolment. Information received from partner organisations during 2025/2026 indicates that discrimination and social exclusion remain relevant concerns. However, there is insufficient recent evidence to establish the extent to which practices involving the placement of Roma children in separate classrooms or programmes continue to occur systematically.

It is important to distinguish between formal segregation of Roma children and the broader problem of ethnic segregation within the education system. The European Commission reported in 2025 that education in Bosnia and Herzegovina is not formally segregated on ethnic grounds in relation to Roma children. Nevertheless, the country continues to face broader structural problems of ethnic segregation and division in education, including the continued existence of the “two schools under one roof” system in some parts of the country. The OSCE Mission to Bosnia and Herzegovina continues to work with education authorities to address ethnic discrimination and segregation in schools and classrooms. ([enlargement.ec.europa.eu; bih.osce.org](https://enlargement.ec.europa.eu/bih.osce.org))

At the same time, the absence of formal segregation does not eliminate the risk of unequal treatment of Roma pupils. Roma children may experience exclusion through less visible forms of discrimination, including low expectations, social isolation, bullying, unequal access to extracurricular activities and educational support, or inadequate responses to discriminatory incidents. Such practices can negatively affect children's attendance, educational achievement, sense of belonging and willingness to remain in education.

Language and cultural differences also require particular attention. The previous shadow report noted cases in which the separation of Roma children was reportedly justified by language differences rather than by an individual assessment of educational needs. No evidence was available for 2025/2026 demonstrating that such practices have been systematically eliminated. At the same time, the lack of systematic education in or of the Romani language remains a concern. The European Commission reported in 2025 that there is no systematic provision of education in or of the Romani language. In this regard, Tuzla Canton has introduced Romani as an elective subject; however, the subject has not yet been effectively implemented in practice.

The limited recognition of Roma language and culture within the formal education system can reinforce exclusion and does not adequately support an inclusive learning environment. (enlargement.ec.europa.eu)

Bullying and peer discrimination remain particularly concerning because they can contribute directly to absenteeism and early school leaving. Where schools lack effective mechanisms for identifying and responding to discrimination, Roma children and their families may be reluctant to report incidents or may lack confidence that complaints will result in effective action. Strengthening school-level prevention and response mechanisms is therefore essential.

The lack of reliable data remains a major obstacle to assessing the scale and nature of discrimination and segregation affecting Roma children. No comprehensive official statistics disaggregated by ethnicity and gender were available for 2025/2026 on the number of Roma children experiencing discrimination, bullying or segregation, the number of schools in which such incidents occur, or the outcomes of complaints and institutional responses. The lack of systematic monitoring also makes it difficult to assess whether existing anti-discrimination measures are effective.

Educational support

The provision of educational support to Roma children remained insufficient during the 2025/2026 reporting period. The previous shadow report identified poor implementation of the Action Plan on the Educational Needs of Roma and inconsistent provision of additional classes and other school-level assistance. Information received from partner organisations during 2025/2026 continued to indicate gaps in transportation, academic assistance and individualised support. The available evidence did not establish consistent implementation of these measures across municipalities and schools.

Targeted project-based interventions nevertheless provided financial, academic and career support. Roma Association “Euro Rom” Tuzla implemented two projects under the RARE Phase II programme, supported by the European Commission’s DG ENEST and the Roma Education Fund (REF).

The project SEC-BIH-03, “Supporting Roma Secondary School Students through Scholarships, Mentoring and Tutoring in Tuzla Canton”, supported academic performance and preparation for further education and employment. During the 2025/2026 school year, 690 monthly scholarship payments were made to Roma secondary-school students, alongside mentoring and tutoring. The project also promoted equal participation of Roma girls and boys.

The project TER-BIH-03, “Increasing Access and Participation of Roma Students in Higher Education in Bosnia and Herzegovina and Transition to the Labour Market”, provided 130 monthly scholarship payments during the 2025/2026 academic year. Students also received mentoring and individualised academic support, documented through individual student files.

Both projects included career-development activities, such as preparing CVs and motivation letters, practising job interviews and engaging with employers. The secondary-school project additionally provided information on occupations in demand and opportunities for practical work experience. This combined approach addressed financial and academic barriers while supporting preparation for the transition from education to employment. However, the figures represent monthly payments rather than the number of individual students supported, and do not by themselves establish improvements in educational completion or employment outcomes.

These interventions also illustrate the limitations of externally funded support. Access depends on project duration, geographic coverage and eligibility criteria, while the available information did not demonstrate a comprehensive and sustainable public system addressing Roma students’ support needs. Project-based assistance therefore remains valuable but cannot replace sustained provision by education authorities.

The European Commission’s Bosnia and Herzegovina Report 2025 notes that, despite increased enrolment in compulsory education, too many Roma children continue to drop out. This underlines the importance of support that enables children to attend regularly, progress and complete their education. Transportation is one practical barrier identified by partner organisations: children living far from schools face difficulties when transport is unavailable, unreliable or unaffordable. Free or subsidised transportation is therefore an important component of regular educational support.

School-level assistance also remains uneven. Roma teaching assistants and mediators are not consistently institutionalised or available throughout Bosnia and Herzegovina. Their role is particularly relevant to identifying attendance problems, providing individual support and maintaining communication with families. Effective dropout prevention requires early identification of children at risk, individual education plans where necessary and referrals to social protection, health and other services. Parental engagement should form part of this response, taking account of socio-economic difficulties, migration and previous negative experiences with institutions. Roma mediators and community organisations can help schools establish trust and maintain contact with families.

Language support represents a further gap. No significant progress in establishing structured support for children who speak Romani at home was identified during 2025/2026. The European Commission’s 2025 report also identifies the absence of systematic education in or of the Romani language. Developments concerning Romani as an elective subject in Tuzla Canton should be assessed by distinguishing formal curriculum adoption from actual classroom

delivery. Recognition within the curriculum alone does not establish that children have effective access to teaching.

Broader investments in early childhood education offer an opportunity to address exclusion at an earlier stage. UNICEF and the European Union continued to support preschool infrastructure and early childhood development services in Bosnia and Herzegovina. However, targeted outreach and enrolment assistance remain necessary to ensure that Roma children, whose preschool participation remains particularly limited, benefit from these investments.

Assessment of all these measures is constrained by incomplete monitoring. Comprehensive and regularly updated data disaggregated by ethnicity and gender are not available on access to educational assistance, transportation, teaching assistants and mediators, or support for children at risk of dropping out. These gaps limit the ability to determine which children are reached, where support is missing and whether interventions contribute to sustained attendance and successful completion.

Romani language

The introduction of Romani language education has seen an important institutional development during the reporting period, but this progress has not translated into practical implementation. Despite the adoption of a formal curriculum in Tuzla Canton, Romani language education has still not been introduced in practice in primary schools. As a result, Roma children currently do not have effective access to Romani language education in Tuzla Canton, and the right to learn and maintain the Romani language remains largely unimplemented within the formal education system.

Tuzla Canton remains the main example of institutional progress in this area. In October 2023, the Ministry of Education and Science of Tuzla Canton adopted a curriculum for “Romani Language with Elements of National Culture”, making Tuzla Canton the first canton in the Federation of Bosnia and Herzegovina to formally introduce Romani as an optional subject in primary schools. However, although the curriculum was adopted and implementation was envisaged from the 2024/2025 school year, the practical implementation of the decision has still not taken place in schools in Tuzla Canton.

This distinction between the formal adoption of a curriculum and its actual implementation is particularly important. While the adoption of the curriculum represents a positive institutional step compared with the situation described in the previous shadow report, the absence of teaching in schools means that Roma children have not yet benefited from this measure in practice. The measure therefore remains largely formal and has not yet resulted in meaningful access to Romani language education.

The OSCE Mission to Bosnia and Herzegovina previously welcomed the adoption of the curriculum as an important step towards a more inclusive and non-discriminatory education system. However, the continued absence of practical implementation demonstrates that the adoption of a policy framework alone is insufficient. Concrete administrative, financial and human-resource arrangements are required to ensure that the right to learn the Romani language can be exercised in practice.

The situation in Tuzla Canton also illustrates the broader limitations of Romani language education in Bosnia and Herzegovina. There is still no systematic provision of education in or

of the Romani language at the state-wide level, and Tuzla Canton has not yet developed an operational model that could serve as a basis for implementation in other education jurisdictions. Consequently, Roma children across Bosnia and Herzegovina continue to have highly limited and unequal opportunities to learn their mother tongue through the formal education system.

The lack of practical implementation raises concerns regarding the sustainability and institutional commitment to Romani language education. Key issues include the absence of clearly established mechanisms for organising classes, ensuring sufficient numbers of interested pupils, identifying and engaging qualified teachers, providing adequate teaching materials, and securing sustainable public financing. Without addressing these practical requirements, the adoption of curricula risks remaining a declarative measure rather than an effective education policy.

The availability of qualified teaching staff is particularly important. The introduction of Romani as an optional subject requires teachers with appropriate linguistic and pedagogical competencies, as well as clear arrangements for their certification, employment and professional development. Establishing a sustainable pool of qualified Romani language teachers should therefore be treated as a prerequisite for the implementation and expansion of Romani language education.

The development of teaching materials is another positive aspect of the Tuzla Canton initiative. Materials have been developed specifically for teaching the Romani language and culture, including “Angluno romano lil – Roma Beginner”, as well as materials addressing Roma traditions, history, culture and customs. However, the existence of teaching materials has not, by itself, resulted in the introduction of Romani language classes. Further institutional support, teacher training and age-appropriate educational resources will be necessary to ensure effective implementation once classes are introduced.

The issue should also be addressed beyond the teaching of the Romani language itself. The systematic inclusion of Roma history, culture and contributions to society in mainstream curricula is important for combating anti-Gypsyism and creating a more inclusive educational environment. The limited representation of Roma history and culture in mainstream education means that non-Roma pupils have few structured opportunities to learn about Roma heritage and their contribution to the history and society of Bosnia and Herzegovina.

Area	Main findings
Access to education	Available figures indicate 69.3% primary enrolment among Roma children, compared with 98% nationally . Secondary enrolment is approximately 23% , falling to 18% among Roma girls .
Preschool education	Roma participation remains below 2% . General preschool infrastructure investments have not demonstrated a comparable increase in Roma participation.
Attendance and dropout	Dropout remains a concern despite reported increases in compulsory-school enrolment. Poverty, transport barriers, migration, discrimination and early marriage disrupt educational continuity.
Quality of education	Roma language, history and culture remain insufficiently represented. Teacher development and monitoring of learning outcomes remain weak.
Discrimination and segregation	Bullying, prejudice and unequal treatment persist. Recent evidence is insufficient to establish systematic placement of Roma pupils in separate classes.
Educational support	Transportation, mediators and individual assistance remain inconsistently available. Euro Rom projects provided 690 secondary-level and 130 higher-education monthly scholarship payments in 2025/2026, alongside academic and career support.
Romani language	Tuzla Canton adopted a curriculum in October 2023 , but classroom implementation remained pending. Systematic Romani-language education remains unavailable nationwide.

13. HEALTH

During the 2025/2026 reporting period, the Government of Bosnia and Herzegovina continued to allocate targeted funding for improving healthcare access for Roma communities. The originally planned allocation of BAM 490,000 for healthcare grants for Roma was increased to BAM 539,710 in the final 2025 allocation. The funds were distributed through nine projects implemented by public health institutions in the Federation of Bosnia and Herzegovina and Republika Srpska.

The 2025 allocation financed the following projects:

Institution	Project purpose	Allocation (BAM)
Public Health Centre Gračanica	Procurement of a mammography machine for the prevention of malignant diseases among Roma women	70,000
Public Health Centre Čelić	Improvement of healthcare provision in the municipality	70,000
Public Health Centre Kladanj	Improvement of oral health among the Roma population	58,000
Public Health Centre Stari Grad Mostar	Improvement of sexual and reproductive health of Roma women	70,000
Public Health Centre Kalesija	Reduction of health risk factors among the Roma population	70,000
Public Health Centre Konjic	Improvement of oral healthcare among Roma in Konjic	48,144
Public Health Centre Doboј	Improved access to healthcare through mobile preventive medical examinations for Roma	70,000
Public Health Centre Gradiška	Preventive health activities through “Prevention for a Healthy Life”	65,200
Public Health Institute of Republika Srpska	Strengthening Roma organisations to improve Roma health and access to healthcare in Republika Srpska	18,366
Total		539,710

The 2025 allocation therefore represents a positive development in terms of the availability of dedicated public funding for Roma healthcare. Several of the supported projects directly address preventive healthcare, women's sexual and reproductive health, oral health and mobile services. The project implemented by the Public Health Centre in Doboј, for example,

specifically provides mobile preventive examinations for Roma communities, while the project in Mostar focuses on the sexual and reproductive health of Roma women.

However, an important concern remains regarding the use of Roma-targeted inclusion funds for the procurement of medical equipment for public health institutions. The 2025 allocation includes several examples of equipment purchases, including a mammography machine in Gračanica and medical equipment procured through projects in other municipalities. In July 2025, the Ministry for Human Rights and Refugees publicly presented the delivery of a biochemical analyser to the Public Health Centre in Sapna through a Roma healthcare project. In April 2025, the Ministry also presented medical equipment acquired by the Public Health Centre in Konjic through a Roma healthcare project.

Civil society organisations have raised concerns that Roma-targeted inclusion grants should primarily finance direct interventions addressing barriers faced by Roma communities, rather than equipment that becomes part of the general infrastructure of public health institutions. From this perspective, equipment procurement should be accompanied by clear evidence that it will generate measurable and additional benefits for Roma communities, including information on the number of Roma beneficiaries, services delivered, geographic coverage and improvements in access to healthcare.

These concerns should be presented as civil society concerns rather than established evidence of misuse. Available official information confirms what was purchased and which institutions received funding, but it does not provide sufficient information on the number of Roma beneficiaries or demonstrate the measurable impact of each investment on reducing inequalities in access to healthcare. Greater transparency regarding project outputs and outcomes would therefore be important.

There are also significant gaps in the availability of up-to-date data on the general health status of Roma. No comprehensive new national data for 2025/2026 were identified that would allow for reliable comparison of life expectancy, mortality, major health conditions or overall health outcomes between Roma and the general population. UNICEF continues to identify Roma children as a particularly vulnerable group and notes significant disparities in poverty, nutrition and access to healthcare. Roma children are estimated to be three times more likely to live in poverty and five times more likely to experience malnutrition than non-Roma children.

Access to health insurance remains an important structural issue. There are still administrative and financial barriers affecting Roma who are not insured or who have difficulty establishing their entitlement to healthcare. The 2025 programme of the Federation of Bosnia and Herzegovina specifically allocated BAM 35,000 for healthcare for Roma without permanent residence or registered residence in the Federation, recognising the need to provide healthcare under equal conditions to other population groups exposed to increased health risks.

The lack of personal documentation and residence registration continues to be relevant to access to health services. In addition, Roma families may face financial barriers, geographical distance from health facilities and difficulties navigating a fragmented health system. The lack of reliable and regularly updated data on the percentage of Roma covered by health insurance makes it difficult to assess the scale of these barriers during the 2025/2026 reporting period.

Maternal and child health and immunisation remain areas of particular concern. Available UNICEF evidence has previously estimated mandatory vaccination coverage among children

in Roma communities at only 5–6%, with barriers including difficult access to health facilities, parents' concerns regarding vaccination, and lack of health insurance among some children and parents. No newer comprehensive national vaccination figure specific to Roma children for 2025/2026 was identified. The persistence of targeted immunisation and preventive-health interventions during the reporting period nevertheless indicates that significant gaps remain.

Preventive health activities continued during 2025/2026. In September 2025, UNICEF documented a Health Day in the Roma community in Kakanj, where children and families received information on healthy nutrition, hygiene and dental health and participated in preventive health examinations. Such community-based activities demonstrate the value of bringing preventive services directly into Roma communities and combining health education with accessible health checks.

Roma health mediators remain an important mechanism for overcoming barriers between Roma communities and healthcare institutions. The previous Roma Action Plan included a target to involve at least 20 mediators in strengthening Roma organisations' capacity to promote healthy lifestyles and inform Roma communities about their rights to health insurance and healthcare. However, no comprehensive and up-to-date national information was identified for 2025/2026 on the number of Roma health mediators currently engaged, their employment status, geographic coverage, responsibilities or the number of Roma beneficiaries assisted. The continued lack of such information makes it difficult to assess whether this mechanism has been adequately institutionalised and sustained.

The 2021–2025 Action Plan for the Social Inclusion of Roma included specific measures on healthcare, including strengthening Roma representatives and mediators, analysing the number of uninsured Roma, developing guidance on access to healthcare, improving cooperation between health institutions and Roma organisations, and implementing preventive measures related to infectious and non-communicable diseases, sexual and reproductive health and oral health. The 2025 grant framework continued to finance activities linked to these measures. However, the Action Plan expired at the end of 2025, and no comprehensive new national Roma healthcare action plan for the subsequent period was identified that would allow progress and continuity to be assessed.

A further concern is the relationship between health and living conditions. Roma communities living in settlements without adequate access to safe water, sanitation, sewage and nearby health facilities remain exposed to increased health risks. The European Union noted in December 2025 that many Roma families in Bosnia and Herzegovina continue to face difficulties accessing basic services, including healthcare, electricity and water.

14. HOUSING

Area	Main findings
Identified housing needs	Data from 26 local government units identified 890 housing structures requiring legalisation, 285 Roma families needing new housing and 609 families requiring reconstruction or rehabilitation.

2025 expenditure	The Ministry for Human Rights and Refugees executed BAM 849,175 for Roma housing, supporting reconstruction, individual housing construction and infrastructure improvements.
Local implementation	In October 2025, a Kiseljak housing agreement provided BAM 100,000 from the Ministry , supplemented by BAM 10,000 from the municipality . Selection procedures for an individual housing unit in Modriča continued in February 2026.
Legalisation barriers	The 2024 implementation report recorded no implemented legalisation project in informal Roma settlements. Obstacles included unresolved property relations, missing planning documents and complex procedures.
Antigypsyism policy	The March 2025 Instruction calls for non-discriminatory housing, legalisation, free legal assistance and urban planning that prevents segregation.
New EU funding	A EUR 12 million EU-funded programme was announced in 2026. Detailed allocations, beneficiary selection, geographic coverage and implementation results were not yet available.

During the 2025/2026 reporting period, housing support for Roma in Bosnia and Herzegovina continued to rely primarily on targeted grants for housing reconstruction, construction of individual housing units and improvements to local infrastructure. While these interventions have provided tangible support to individual Roma families and communities, available evidence indicates that the scale of assistance remains insufficient in relation to the identified housing needs, particularly in the areas of legalisation, construction of new housing, infrastructure and the regularisation of informal settlements.

The most recent official monitoring data provide a more detailed picture of the remaining housing needs. According to data collected by the Ministry for Human Rights and Refugees from 26 local government units, 890 housing structures were identified as requiring legalisation. In addition, 285 Roma families were identified as needing newly constructed housing units, while 609 families required reconstruction or rehabilitation of existing housing. These figures demonstrate that housing exclusion remains a structural problem and cannot be addressed through reconstruction grants alone.

For 2025, the Ministry for Human Rights and Refugees executed BAM 849,175 for Roma housing, following an adjustment of the originally planned allocation. The funds supported projects implemented by local authorities, including housing reconstruction and rehabilitation, construction of individual housing, and infrastructure improvements in Roma communities. The 2024 grant cycle, for which contracts were signed at the end of 2024 and funds transferred at the beginning of 2025, included projects in Brčko District, Prijedor, Doboj, Modriča, Novi Grad, Teslić, Vlasenica, Kiseljak, Sapna, Jajce, Breza, Visoko and Kalesija. Projects included both housing interventions and infrastructure works, such as improvements to roads, pedestrian infrastructure and drainage in Roma settlements.

Concrete implementation continued during the reporting period. For example, in October 2025 the Ministry signed an agreement with the Municipality of Kiseljak for BAM 100,000, supplemented by BAM 10,000 from the municipality, for the rehabilitation and reconstruction of housing owned by Roma. In February 2026, the Ministry was also involved in the selection process for the construction of an individual housing unit for a Roma family in Modriča.

At the same time, the available monitoring data show that legalisation remains one of the least developed areas of Roma housing policy. The official 2024 implementation report states that no project for the legalisation of housing in informal Roma settlements had yet been implemented. It identifies unresolved property relations, the absence of spatial and urban planning documents, and complicated administrative procedures as major obstacles. This is particularly significant given that hundreds of Roma housing structures remain in need of legalisation.

The data also indicate persistent limitations in infrastructure and settlement planning. The Ministry's monitoring identified numerous Roma settlements and neighbourhoods across Bosnia and Herzegovina, including settlements in Brčko District, Bijeljina, Modriča, Novi Grad, Zenica, Kiseljak, Sapna, Živinice, Mostar and other municipalities. However, the available data do not provide a comprehensive, up-to-date national assessment of which settlements have received full access to water, electricity, sewage, roads and waste-management services. This limits the ability to measure progress against previous findings concerning Roma settlements with inadequate utility connections.

There is therefore a need to move beyond a predominantly project-based approach towards a comprehensive housing policy addressing legal security of tenure, legalisation, adequate infrastructure, social housing, urban planning and the prevention of segregation. In March 2025, Bosnia and Herzegovina also adopted an Instruction on the prevention and combating of antigypsyism, which specifically calls for affordable and adequate housing without discrimination, legalisation of Roma housing, free legal assistance in legalisation procedures, and urban planning that does not perpetuate segregation.

A significant new development occurred in 2026, when the Ministry for Human Rights and Refugees announced a new EUR 12 million EU-funded programme aimed at improving housing conditions and housing support for Roma in Bosnia and Herzegovina. This represents an important increase in the potential scale of housing assistance. However, as of the end of the reporting period, detailed information on the final allocation of these funds, beneficiary selection, geographic coverage, targets and implementation results was not yet available.

The previous Action Plan for Social Inclusion of Roma and Roma Women 2021–2025 expired on 31 December 2025. During 2025, consultations were conducted for the preparation of a new Action Plan for 2026–2030, including housing as one of its priority areas. By July 2026, the Ministry and Republika Srpska authorities were still working to harmonise positions and finalise the new plan. Consequently, during the reporting period there was a transition between the expired Action Plan and the development of its successor, which created a need for continuity in funding, monitoring and implementation.

15. EMPLOYMENT

Employment remains one of the areas in which Roma in Bosnia and Herzegovina face some of the most significant structural inequalities. During the 2025/2026 reporting period, employment support continued to be implemented primarily through public employment services and targeted grants. However, the available data indicate that the scale of targeted measures remains very limited compared with the number of Roma registered as unemployed.

The latest official monitoring data collected by the Ministry for Human Rights and Refugees provide updated figures from the entity and Brčko District employment services. In the Federation of Bosnia and Herzegovina, 3,314 Roma were registered with the Federal Employment Institute, including 1,695 Roma women. Of these, 2,957 were classified as unqualified workers. In Republika Srpska, 121 Roma were registered as unemployed, including 64 Roma women, with 96 classified as unqualified workers. In Brčko District, 341 Roma were registered as unemployed, including 183 Roma women, while 325 were classified as unqualified workers.

These figures should be interpreted with caution, as they refer to persons registered with public employment services and therefore do not capture Roma working informally, persons outside the employment registration system, or Roma who are economically inactive. Nevertheless, they demonstrate the continued scale of unemployment and the particularly high proportion of Roma with no formal qualifications.

The same official monitoring exercise collected data from 36 local communities and identified 198 employed Roma, including 143 men and 55 women. Of these, 80 were employed in the public sector at the local level and 102 in the private sector. The same local-government data reported 2,705 unemployed Roma, consisting of 1,360 men and 1,345 women. However, the Ministry's data collection was incomplete and should not be interpreted as a comprehensive national employment rate for the Roma population.

A further issue concerns the distinction between funding allocated in 2024 and its implementation in 2025. The BAM 50,000 Roma employment grant was allocated for 2024, with BAM 31,330 assigned to the Federation, BAM 15,670 to Republika Srpska and BAM 3,000 to Brčko District. The funds were transferred to the employment services in January 2025 for implementation over 12 months. Since the Brčko Employment Service did not submit an application, the BAM 3,000 initially intended for Brčko was proposed for reallocation to Roma housing.

For 2025, the final executed grant for Roma employment amounted to BAM 47,000. Official budget execution data confirm that this amount was actually spent, while BAM 849,175 was executed for Roma housing and BAM 539,710 for Roma healthcare. The reduction of the employment allocation from the originally planned BAM 50,000 to BAM 47,000 further illustrates the limited scale of direct state-supported employment measures.

The available official data also show that Roma employment measures continue to depend heavily on short-term subsidised employment and self-employment schemes. Public employment services regularly issue calls for Roma employment and self-employment, with selection commissions involving representatives of the Ministry for Human Rights and Refugees and Roma civil society. However, available monitoring does not yet provide

sufficient evidence regarding how many beneficiaries remain employed after subsidies expire, how many businesses remain operational, or the long-term income and social-protection outcomes of beneficiaries.

The implementation of employment measures has also been affected by unused or returned funds. The official monitoring report identifies several reasons for unspent funds, including beneficiaries withdrawing from programmes, employers not fulfilling the requirements of public calls, fewer persons being employed than originally requested, and the initiation of procedures for the return of funds in cases where obligations were not fulfilled. These findings suggest that improving the effectiveness of employment programmes requires not only additional funding but also stronger monitoring, employer support and mechanisms to ensure that beneficiaries remain employed after the subsidy period.

There is also evidence of a significant qualification gap. In the Federation of BiH, almost 89% of Roma registered with the Federal Employment Institute were classified as unqualified workers, while 325 of the 341 Roma registered in Brčko District were similarly classified as unqualified. This highlights the need for employment policy to be linked more closely with vocational training, adult education, retraining and acquisition of formal qualifications.

The broader policy environment remains fragmented. The Action Plan for Social Inclusion of Roma and Roma Women 2021–2025 expired on 31 December 2025. A new Action Plan for 2026–2030 was being developed through consultations during 2025, with employment identified as one of its central thematic areas. In July 2026, the Ministry for Human Rights and Refugees and Republika Srpska authorities were still working to harmonise positions and finalise the new Action Plan.

The European Commission has continued to identify employment discrimination as a major concern. Its assessment of Roma inclusion in Bosnia and Herzegovina has noted that discrimination in employment remains widespread and that Roma unemployment is very high. In March 2025, Bosnia and Herzegovina also adopted an Instruction on the prevention and combating of antigypsyism that includes measures to address discrimination in recruitment and employment, facilitate the transition from informal to formal employment, support Roma entrepreneurship and ensure that discrimination in employment is recognised and sanctioned.

Informal employment remains an important concern, particularly in traditional Roma occupations and other low-paid forms of work. The new anti-antigypsyism framework specifically recognises the need to facilitate the transition from informal to formal employment in occupations such as music, arts, crafts and collection of secondary raw materials, while ensuring dignified working conditions and access to social protection. However, there are no comprehensive 2025/2026 national data quantifying the proportion of Roma working informally or measuring their access to labour rights and social protection.

16. CIVIL REGISTRATION AND PREVENTION OF STATELESSNESS

During the 2025/2026 reporting period, Bosnia and Herzegovina continued to maintain the legal and institutional framework necessary for birth registration, acquisition of citizenship and issuance of personal documents. However, Roma who lack birth registration or identity

documents remain particularly vulnerable to administrative exclusion and, in some cases, to the risk of statelessness.

A significant limitation remains the lack of comprehensive and regularly updated data disaggregated by ethnicity. Publicly available administrative statistics do not provide a complete picture of the number of Roma children whose births remain unregistered, the number of Roma without identity documents or the number of Roma whose citizenship or nationality remains undetermined. Consequently, it is not possible to establish from official 2025/2026 data whether the number of Roma facing these problems has decreased compared with the previous reporting period.

The latest UNHCR data indicate that, at the end of 2025, there were 17 known persons in Bosnia and Herzegovina who were stateless or at risk of statelessness. UNHCR also cautions that statelessness figures can be affected by under-identification, particularly where persons lack documentation or are not registered in official systems.

The Roma population has historically been disproportionately represented among persons at risk of statelessness in Bosnia and Herzegovina. UNHCR has identified lack of birth registration and the absence of legal identity documents as key factors placing Roma at risk. Since 2014, UNHCR and its partners, including Vaša prava BiH, have supported Roma communities through legal assistance, awareness-raising and assistance with birth and citizenship registration. Earlier UNHCR reporting documented that more than 640 individuals had obtained legal identity through these interventions since 2014. However, no comparable comprehensive figure for Roma beneficiaries specifically during 2025/2026 was identified in publicly available sources.

The principal risks remain concentrated among persons living in poverty, persons who were never registered at birth, persons lacking documents establishing their parents' identity or citizenship, and persons whose family circumstances involve birth abroad or migration. The absence of documentation can create a chain of administrative barriers, affecting access to education, healthcare, employment, social protection and other public services.

The situation of children born abroad remains particularly relevant for Roma families with a history of migration. Registration of children born outside Bosnia and Herzegovina may require foreign birth certificates and other documentation, proof of the parents' identity or citizenship, and completion of procedures before competent authorities in Bosnia and Herzegovina. However, there are no publicly available 2025/2026 data indicating the number of Roma children born abroad whose registration remains unresolved. This should therefore be treated as an important area requiring targeted monitoring rather than as a problem for which a reliable current numerical estimate is available.

Bosnia and Herzegovina remains a party to both the 1954 Convention relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness. UNHCR continues to work with the authorities and civil-society partners on prevention and resolution of statelessness and on ensuring access to nationality and legal identity.

Civil society and legal-aid organisations remain important in resolving individual cases. In particular, legal assistance and community outreach can help families obtain birth certificates, citizenship certificates and identity documents, address unresolved administrative procedures

and establish the documentation required for registration. Such support is especially important for Roma living in poverty or in settlements where access to administrative services is limited.

At the policy level, the Government continued the process of developing a new Action Plan for Social Inclusion of Roma and Roma Women for 2026–2030. Consultations for the new Action Plan began in April 2025 and involved state institutions, local authorities, civil society and Roma organisations. The previous Action Plan for 2021–2025 expired at the end of 2025. As of April 2026, the Ministry for Human Rights and Refugees and Republika Srpska authorities were still working to harmonise positions and finalise the new Action Plan.

The development of the new Action Plan provides an opportunity to strengthen measures aimed at preventing statelessness and ensuring universal access to civil registration. In particular, future measures should include systematic identification of persons without birth registration or identity documents, targeted legal assistance, simplified administrative procedures, outreach to vulnerable Roma communities and systematic monitoring of cases involving children born abroad.

Overall, no major deterioration in the legal framework for civil registration or citizenship was identified during the reporting period, and Bosnia and Herzegovina continue to cooperate with UNHCR and civil-society organisations on prevention of statelessness. However, the absence of updated Roma-specific administrative data remains a significant monitoring gap. Without systematic ethnic and gender-disaggregated data, it is difficult to determine the actual scale of unresolved registration and documentation cases among Roma or to assess whether existing measures are reaching the most vulnerable families.

17. DISCRIMINATION AND ANTIGYPSYISM

During the 2025/2026 reporting period, discrimination and antigypsyism continued to represent major barriers to the social inclusion and equal participation of Roma in Bosnia and Herzegovina. The European Commission's 2025 Report continues to identify Roma as the country's most vulnerable and disadvantaged minority and notes that stereotypes, prejudice, discrimination and antigypsyism continue to contribute to their social exclusion. The Commission also assessed the legal and institutional framework on Roma as requiring further improvement and found that funding for implementation of the Roma inclusion Action Plan remained insufficient.

At the same time, the reporting period saw several positive institutional developments in recognising and addressing antigypsyism. In March 2025, the Ministry for Human Rights and Refugees introduced an Instruction on the prevention and combating of antigypsyism in Bosnia and Herzegovina. The Instruction recognises antigypsyism as a specific form of discrimination and provides for the possibility for members of the Roma minority to submit complaints to the Ministry concerning conduct or actions that may constitute antigypsyism. The national Roma contact point presented this framework to the Council of Europe's ADI-ROM Committee in April 2025.

Further capacity-building measures were implemented in 2025 and 2026. In March 2026, the Ministry for Human Rights and Refugees, the Institution of the Human Rights Ombudsman and civil society partners, with support from the Council of Europe and the European Union, organised training for 28 public servants from 17 institutions on recognising and addressing

discrimination and antigypsyism. This represents a concrete step towards strengthening the institutional capacity to identify and respond to anti-Roma discrimination.

In April 2026, the Council of Europe and the European Union published a dedicated Report on the Position of Roma in Bosnia and Herzegovina, with a focus on discrimination and antigypsyism. The report was based on consultations with 132 respondents, including representatives of 59 institutions and 14 civil society organisations, as well as focus groups with 35 Roma community members in five local communities. Its recommendations include stronger awareness-raising and training on antigypsyism, improved information for Roma—particularly young people—about their rights and protection mechanisms, greater media space for national minorities, responsible reporting and stronger enforcement of penalties for hate speech and discrimination.

Despite these developments, the institutional response remains insufficient in relation to the scale and persistence of discrimination. The European Commission's 2025 assessment found that the 2009 Law on the Prohibition of Discrimination is still not applied effectively. Discrimination is under-reported, judicial practice remains inconsistent, proceedings are lengthy and enforcement is weak. The Ombudsman registered 196 discrimination cases in 2024, mostly concerning workplace and ethnic discrimination. The Commission also noted that hate speech remains present in official discourse and that monitoring and enforcement of online offences are insufficient.

The same structural weaknesses affect Roma specifically. The Commission found that anti-Roma stereotypes, prejudice, discrimination and antigypsyism continue to hinder Roma inclusion. Roma women face multiple and intersecting forms of discrimination, including additional obstacles in accessing services, escaping violence and participating in leadership and public life.

The lack of reliable data remains one of the key obstacles to effective anti-discrimination policy. Bosnia and Herzegovina does not have a comprehensive system for systematically recording discrimination, hate speech and hate crimes against Roma across all levels of government. Under-reporting remains a particular concern, meaning that official complaint and court statistics cannot be treated as a reliable measure of the actual prevalence of discrimination against Roma. This is especially important for cases involving hate speech, discriminatory treatment by public authorities, employment discrimination, access to services and hate-motivated incidents.

Roma participation in decision-making also remains insufficient. The European Commission found that participation of minority groups in political and public life remains low and that there was no progress towards adopting a countrywide strategy on persons belonging to national minorities. At the same time, the Council of Europe has identified strengthening Roma participation in public and political life as one of the core priorities of its new Roma and Traveller inclusion framework.

The participation of Roma representatives in the development of Roma policies has nevertheless improved in some areas. Consultations for the new Action Plan for Social Inclusion of Roma and Roma Women 2026–2030 involved Roma representatives, civil society and public institutions. In November 2025, the Board for Roma also discussed priorities for 2026, including operational planning and responsive budgeting. These processes represent

progress compared with a purely institutional approach, but meaningful participation requires that Roma recommendations are reflected in final decisions, budgets and implementation mechanisms, rather than participation being limited to consultation.

The broader constitutional and political framework continues to create structural inequalities. The European Commission's 2025 Report notes that members of national minorities and non-affiliated citizens still cannot stand for election to the Presidency and the House of Peoples, contrary to the European Court of Human Rights' Sejdić and Finci case law. Constitutional reform to ensure political equality and non-discrimination has therefore still not been achieved. While this issue concerns all citizens excluded by the constitutional system and should not be presented as a Roma-specific discrimination mechanism, it remains relevant to the broader structural context of equality and political participation of national minorities.

Public awareness: Number and reach of public campaigns, educational programmes and media initiatives addressing antigypsyism and anti-Roma stereotypes.

Media representation: Monitoring of discriminatory or stereotypical reporting about Roma and measures taken to promote responsible and inclusive reporting.

Structural discrimination: Continued monitoring of Roma access to employment, education, healthcare, housing and public services, with data disaggregated by ethnicity and gender.

18. BUDGET

State-level funding for Roma inclusion in Bosnia and Herzegovina remained insufficient and inconsistent during the reporting period. A total of BAM 1,380,000 was allocated in 2025 for measures in employment, housing, healthcare, and education. Although the overall amount corresponds to the total reported in the previous shadow report, the distribution of funds among the four priority areas changed considerably.

Table X. Allocation of funds for Roma inclusion by sector, 2025

<i>Sector</i>	Allocation reported in the previous shadow report	Allocation reported for the current period	Difference
<i>Employment</i>	BAM 200,000	BAM 50,000	–BAM 150,000
<i>Housing</i>	BAM 840,000	BAM 800,000	–BAM 40,000
<i>Healthcare</i>	BAM 300,000	BAM 490,000	+BAM 190,000
<i>Education</i>	BAM 40,000	BAM 40,000	No change
Total	BAM 1,380,000	BAM 1,380,000	—

The most substantial change was the reduction of funding for employment measures from BAM 200,000 to BAM 50,000, accompanied by an increase in healthcare funding from BAM 300,000 to BAM 490,000. Housing funding decreased from BAM 840,000 to BAM 800,000, while the allocation for education remained unchanged at BAM 40,000.

The funds were distributed according to the established allocation framework: 62.66% to the Federation of Bosnia and Herzegovina, 31.34% to Republika Srpska, and 6% to Brčko District.

Table X. Distribution of Roma inclusion funding, 2025

<i>Administrative level</i>	Employment	Housing	Healthcare	Education	Total
<i>Federation of BiH</i>	BAM 31,330	BAM 501,280	BAM 307,034	BAM 25,100	BAM 864,744
<i>Republika Srpska</i>	BAM 15,670	BAM 250,720	BAM 153,566	BAM 12,500	BAM 432,456
<i>Brčko District</i>	BAM 3,000	BAM 48,000	BAM 29,400	BAM 2,400	BAM 82,800
Total	BAM 50,000	BAM 800,000	BAM 490,000	BAM 40,000	BAM 1,380,000

Delays in budget adoption

The implementation of Roma inclusion measures was further affected by significant delays in the adoption of the state budget. The 2024 state budget was adopted only in July 2024, while the 2025 budget was adopted in November 2025.

The Ministry for Human Rights and Refugees launched public calls for grants in the areas of employment, housing, healthcare, and education in November 2025, covering the 2024–2026 budget period. The late adoption of the budget and delayed publication of the calls reduced the time available for project selection, implementation, monitoring, and reporting.

Employment grants

Only **BAM 50,000** was allocated for Roma employment measures in 2025. Of this amount, BAM 31,330 was allocated to the Federation of BiH, BAM 15,670 to Republika Srpska, and BAM 3,000 to Brčko District.

The expected outcomes were extremely limited, providing for the employment of only three Roma individuals in the Federation of BiH and Republika Srpska for a period of 12 months. Brčko District authorities reportedly did not apply for the available funds.

Civil society organizations criticized the limited scope of the measure, emphasizing that an allocation of BAM 50,000 and the temporary employment of a very small number of beneficiaries cannot meaningfully address structural unemployment among Roma.

Housing grants

A total of BAM 800,000 was allocated for Roma housing programmes: BAM 501,280 for the Federation of BiH, BAM 250,720 for Republika Srpska, and BAM 48,000 for Brčko District.

Housing projects included reconstruction and rehabilitation activities in:

- Vlasenica;
- Kladanj;

- Gornji Vakuf-Uskoplje;
- Kiseljak;
- Ilidža;
- Bugojno;
- Gračanica;
- Vukosavlje;
- Kalesija;
- Modriča;
- Doboj;
- Brčko District.

While these projects addressed urgent housing needs for certain families, civil society representatives assessed the interventions as fragmented. The projects were not accompanied by a comprehensive long-term approach to the legalization of Roma settlements, urban integration, infrastructure development, or sustainable housing policy.

Healthcare grants

A total of **BAM 490,000** was allocated for Roma healthcare projects. The Federation of BiH received BAM 307,034, Republika Srpska BAM 153,566, and Brčko District BAM 29,400.

Funded activities included preventive examinations, oral healthcare services, mammography programmes, vaccination campaigns, and public health awareness activities implemented through local health centres and public health institutions.

Although these projects may contribute to improved access to preventive healthcare, civil society organizations raised serious concerns about the use of Roma inclusion grants to procure medical equipment for local health institutions. They argued that medical equipment should be financed through regular public healthcare budgets, while Roma-targeted grants should prioritize direct community-based interventions.

Civil society organizations further stated that the Ministry had not demonstrated how the procurement of medical equipment through these grants would structurally reduce discrimination or address the specific barriers Roma face in accessing healthcare. Allegations were also raised that certain allocations may have been politically motivated and used for political promotion or patronage. These allegations should be treated as concerns reported by civil society unless confirmed through an independent investigation or audit.

Education grants

Only BAM 40,000 was allocated for Roma education programmes: BAM 25,100 for the Federation of BiH, BAM 12,500 for Republika Srpska, and BAM 2,400 for Brčko District.

Within the Federation of BiH, the average amount available per canton was approximately BAM 4,180. Civil society representatives considered this allocation symbolic and insufficient to address the educational exclusion experienced by Roma children.

At the time of drafting the report, implementation reports concerning the education grants were not publicly available. It was therefore not possible to assess the number of beneficiaries, activities implemented, funds spent, or results achieved.

Transparency and concerns regarding possible misuse

Civil society organizations raised serious concerns regarding the transparency, accountability, and possible misuse of grants intended for Roma inclusion. Particular criticism concerned housing-grant allocations in the municipality of Vlasenica.

According to testimonies from local Roma representatives, some families receiving housing grants allegedly did not belong to the Roma community. They also reported that certain beneficiaries had surnames not historically associated with Roma families in Vlasenica.

Roma communities in Vlasenica were primarily concentrated in the Barice settlement until 1992, when their settlement and homes were destroyed during the war. Civil society representatives reported that Roma property was looted and destroyed, that no Roma families permanently returned after the war, and that reconstruction requests submitted by Roma families remained unresolved for decades. At the same time, grants were reportedly allocated to persons not recognized by the local community as Roma.

These testimonies raise concerns regarding the procedures used to verify beneficiary eligibility, possible political influence over grant allocations, and the potential misuse of public funds intended for Roma inclusion. As these claims have not been independently verified, they should be presented as allegations reported by Roma representatives and civil society organizations. Nevertheless, their seriousness requires transparent institutional review and public disclosure of the selection criteria, beneficiary-verification procedures, approved beneficiaries, allocated amounts, and implementation results.

Overall assessment

The 2025 allocation of BAM 1.38 million demonstrates the continuation of state-level financing for Roma inclusion. However, the amount remained inadequate in relation to the scale of exclusion affecting Roma communities. Funding for employment and education was particularly limited, while delays in budget adoption and the late publication of grant calls undermined timely implementation.

The available information also raises concerns regarding the targeting and transparency of allocations. The absence of publicly available implementation reports, limited information on direct Roma beneficiaries, concerns about the use of healthcare grants for equipment, and allegations regarding housing beneficiaries prevent a complete assessment of whether the funds reached the intended communities and produced measurable results.

Greater transparency is required throughout the entire grant cycle, including publication of selection criteria, evaluation procedures, beneficiary lists, project budgets, implementation reports, direct beneficiary data, and measurable outcomes. Independent monitoring and meaningful participation of Roma representatives are also necessary to ensure that public funds intended for Roma inclusion respond to actual community needs and are protected from political influence or misuse.

19. CONCLUSION

The findings of this shadow report indicate that Roma inclusion in Bosnia and Herzegovina during the 2025/2026 reporting period remained marked by a substantial gap between formal commitments and implementation. Public funding, targeted projects and policy developments provided important support, but fragmented institutional responsibilities, limited resources and uneven implementation continued to restrict access to rights and services.

The expiry of the previous Action Plan at the end of 2025, without the timely adoption of the 2026–2030 framework, disrupted strategic continuity. The January 2026 decision establishing a Roma Advisory Board with equal institutional and Roma representation created a formal basis for participation. However, concerns about consultation and selection procedures raised questions about transparency and the extent to which Roma representatives can influence decisions, budgets and implementation.

In education, exclusion begins at preschool level and continues through secondary education and the transition to employment, with additional barriers affecting Roma girls. Reported improvements in compulsory-school enrolment coexist with persistent concerns about attendance, dropout and discrimination. Scholarships, mentoring and tutoring provided concrete assistance, but transportation, teaching assistants and individualised support remain inconsistently available. Limited teacher preparation and insufficient representation of Roma history and culture further affect inclusion. The Romani-language curriculum adopted in Tuzla Canton in 2023 also demonstrates the gap between formal recognition and classroom implementation, which the report identifies as still pending.

Healthcare funding supported preventive examinations, reproductive and oral health, and mobile services. Nevertheless, documentation and insurance difficulties, financial barriers and geographical distance continued to affect access. Available reporting does not sufficiently demonstrate how funded activities, including equipment purchases, improved access or health outcomes for Roma. Inadequate housing, water and sanitation further compound these disadvantages.

Housing programmes supported reconstruction, construction and infrastructure improvements, but assistance remained limited compared with identified needs. Data from 26 local government units recorded 890 structures requiring legalisation, 285 families needing new housing and 609 families requiring rehabilitation. Unresolved property relations and planning and administrative barriers continued to obstruct progress. The announced EUR 12 million EU-funded programme offers potential for expanded assistance, but its results were not yet available.

Employment measures also remained small in relation to identified needs. Employment-service records show substantial numbers of Roma without recognised formal qualifications, while executed state-level Roma employment grant funding amounted to BAM 47,000 in 2025. Discrimination, informal work and dependence on temporary subsidies continued to limit economic inclusion. Insufficient monitoring of employment retention and business survival prevents a reliable assessment of lasting outcomes.

Civil registration and legal assistance helped resolve individual cases, but missing documentation continued to create barriers to education, healthcare, employment and social

protection. Incomplete Roma-specific data prevent a comprehensive assessment of unresolved cases, particularly among families affected by poverty and migration.

The March 2025 Instruction on preventing and combating antigypsyism, together with institutional training, represented progress in recognising anti-Roma discrimination. However, under-reporting, weak enforcement and limited evidence on complaint outcomes continued to undermine effective protection. Roma women faced intersecting disadvantages, while barriers to political participation and concerns about representative mechanisms remained unresolved.

Across these areas, delayed budgets and grant calls, limited allocations and incomplete public reporting weakened implementation and accountability. Civil society concerns about grant targeting remain unverified, but highlight the importance of transparent allocation and oversight. Older statistics and gaps in ethnicity- and gender-disaggregated data also limit conclusions about changes during 2025/2026; they do not establish that no progress occurred.

Overall, the report identifies partial progress and valuable assistance to individual families, but limited evidence of sustained reductions in inequality. Roma civil society continues to provide essential support and monitoring, while access to services remains uneven and dependent on local capacity and individual projects. The central finding is that institutional commitments have yet to translate into consistent implementation and demonstrable improvements in the lives of Roma across Bosnia and Herzegovina.

20. RECOMMENDATIONS

- Establish an independent and transparent monitoring mechanism for the allocation, implementation and impact of Roma-targeted grants, including regular public reporting on beneficiaries, activities, results and expenditure.
- Finalise and adopt the Roma Action Plan 2026–2030 through a transparent and participatory process, ensuring the full, effective and meaningful participation of Roma representatives and Roma-led civil society organisations throughout its finalisation, implementation and monitoring.
- Ensure transparency, accountability and independent auditing of all Roma-targeted grant programmes, including the publication of funding decisions, selection criteria, beneficiaries, allocated amounts and implementation results.
- Strengthen verification and accountability mechanisms to ensure that Roma-targeted funding reaches genuine beneficiaries and responds to identified needs, while preventing conflicts of interest, irregularities and the diversion or ineffective use of funds.
- Increase and sustain public investment in Roma inclusion, particularly in housing, healthcare, education and employment, based on identified needs and measurable targets, with adequate resources at state, entity and local levels.
- Move from predominantly short-term, project-based interventions towards long-term and systemic inclusion policies, with multi-year funding, measurable indicators, clear institutional responsibilities and mechanisms for monitoring outcomes and sustainability.
- Fully implement the judgments of the European Court of Human Rights concerning discrimination in political participation, including *Sejdić-Finci v. Bosnia and Herzegovina*, and ensure equal political and institutional participation of Roma and

other citizens who are currently disadvantaged by the constitutional and electoral framework.

- Strengthen institutional mechanisms for preventing, monitoring and responding to discrimination, hate speech, hate crimes and antigypsyism, including effective complaint mechanisms, investigation, prosecution and sanctions, as well as access to remedies and support for victims.
- Establish a systematic mechanism for the collection and publication of reliable, regularly updated and appropriately disaggregated data on Roma inclusion, including data on education, employment, housing, healthcare, discrimination and access to social protection, while fully respecting privacy, human rights and data-protection standards.
- Ensure the meaningful and independent representation of Roma in consultative and advisory bodies dealing with Roma inclusion, including transparent procedures through which Roma communities and Roma-led organisations can select or elect their representatives without undue institutional or political interference.
- Introduce regular public reporting on progress in implementing Roma inclusion commitments, including the Roma Action Plan 2026–2030, with clear indicators, responsible institutions, timelines and opportunities for Roma civil society to independently monitor and provide feedback on implementation.