
National Recommendation

National Policy Recommendations on Fighting Antigypsyism in Germany



Sozialfabrik

2025

The JEKHIPE Project

Reclaiming Our Past, Rebuilding Our Future: New Approaches to Fighting Antigypsyism (JEKHIPE) is a CERV-funded project aimed at improving the lives of Roma by addressing systemic and institutional antigypsyism, promoting transitional justice, fostering knowledge-building and awareness, and strengthening Roma identity and participation.

It is a follow-up to an earlier CERV project called 'CHACHIPEN', officially titled 'Paving the way for a Truth and Reconciliation Process to address antigypsyism in Europe. Remembrance, Recognition, Justice and Trust-Building'. Concluded in 2023, CHACHIPEN introduced an innovative transitional justice-based approach to raising awareness of systemic injustice and ongoing antigypsyism in policymaking, while advocating for a comprehensive truth and reconciliation strategy.

JEKHIPE focuses on multiple levels of policy-making, including research, monitoring, advocacy, networking, alliances building, awareness raising, capacity building, and empowerment. It aims to engage with national and European institutions, academia, politicians, justice mechanisms, state authorities, civil society, and Roma communities themselves to challenge the status quo on approaching Roma issues, particularly antigypsyism, and propose mechanisms for increased accountability by national governments.



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Executive Summary

Sinti and Roma continue to experience pervasive patterns of antigypsyism and discrimination across all aspects of life, including education, employment, housing, and interactions with police and public authorities. The rise of right-wing extremism, including within political party systems, is reflected in the increasing antigypsyism faced by these communities. Members of the minority regularly express fear about a changing political environment and discourse, stereotypical media coverage and general societal views about Sinti and Roma.

The Reporting and Information Office on Antigypsyism (MIA) documented 1,678 incidents in 2024, which is an increase of almost 40% from 2023 (MIA 2025a, 10 f.). Yet, these numbers are only the tip of the iceberg as many members of the communities do not report their experiences, often out of resignation or fear of retribution. Independent research by Leipzig University confirms that more than 40% of the German society holds antigypsyist prejudices. (Decker et al. 2024, 67 f.)

This policy paper and the recommendations draw their insights from several key sources, combining quantitative and qualitative approaches. The Roma Civil Monitor on the National Roma Strategic Framework “Fighting Antigypsyism, Ensuring Participation! Towards the Implementation of the EU-Roma Strategy 2030” provides important information about the state of implementation and the strength and weaknesses of the framework more broadly. Similarly, the forthcoming Jekhipe country briefing and research briefing on Germany (on file with the author) and MIA’s reports provide a detailed, cross-sectoral overview about the state of antigypsyism and strategies to combat it. Moreover, the Jekhipe project’s survey allows to incorporate the perceptions and needs analysis of key figures in public administration and Sinti and Roma as well as pro-Roma CSOs. These sources are complemented by a stakeholder map, that identifies and analyses key institutions and individuals influencing and developing policies regarding the situation of the minority.

To improve the situation of Sinti and Roma in Germany, we suggest concrete steps on a policy level and with regard to the public portrayal of Sinti and Roma by both politicians and civil society in general. These steps can be described as low-effort, high impact. It is of the utmost importance to use the measures and institutions available to develop policies and programs that specifically target the situation of Sinti and Roma. The NRSF simply lists existing measures that the minority *could* benefit from but does not have preferred access to. Sozialfabrik considers this situation inadequate especially in the light of Germany’s historical responsibility towards Sinti and Roma. (Roma Civil Monitor Germany (RCM) 2025, 8) The newly established Standing Federal-State-Commission has the potential to streamline and coordinate policy efforts between the federal state and the 16 regional governments, thereby harmonizing approaches and strengthening best practices. The recommendations

of the Independent Commission on Antigypsyism (hereafter: UKA) and the 27 demands the Bundestag articulated towards the government on the situation of Sinti and Roma in December 2023 (BT Drs. 20/9779) provide a detailed analysis of key issues in the upcoming years. More generally, it is important to ensure substantial and long-term funding for existing structures like the Federal Commissioner against Antigypsyism and MIA to enable them to continue existing programmes and projects, e. g. the Legal Aid Network against Antigypsyism.

Trough targeted policies and concrete steps, a positive impact is expected on the national policy level, as long-term challenges such as school segregation, exclusion from social services and meaningful job opportunities need to be overcome. Moreover, a more respectful narrative that highlights the achievements and contributions of Sinti and Roma in the German society is necessary to reduce prejudices. To achieve this, school curricula must be critically assessed and updated, including, but certainly not limited to the concerning lack of adequate representation of the Sinti and Roma Holocaust. Not only would a different approach increase the knowledge about the persecution of Sinti and Roma and their status as an integral part of society. A narrative shift is also critical to impact prejudice and discrimination of Roma, especially by social service agencies, schools and bureaucratic institutions, that have repeatedly proven more problematic than a lack of adequate policies.

In the context of this paper, an overview of the historical context and present consequences of antigypsyism in Germany will be given. A special focus will be on the persecution and police special registration before, during and after National Socialism, also taking note of the consequences, this has today. The “Second Persecution” of Sinti and Roma will briefly be described as it is key to understanding the situation in Germany today and the most important goal of Jekhipe is to aid the establishment of an independent academic commission on this matter as a tool of transitional justice. Furthermore, policy recommendations will be given based on a policy analysis and a survey among key stakeholders in Roma and pro-Roma CSOs. Both show that education about the history of Sinti and Roma is seen as a key factor in improving the overall situation, however, challenges are also identified, including the shortcomings of the National Roma Strategic Framework. Therefore, recommendations target overarching issues as well as key policy questions in specific sectors such as housing, police and education.

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1. National Context and the Role of Jekhipe

Antigypsyism has been deeply rooted in German society for centuries, finding its murderous peak in the Nazi Era. Sinti and Roma were targeted by government and police during the German Empire, where specific police divisions were set up that solely focused on members of the minority. (Hehemann 1987, 285) Moreover, Sinti and Roma were labelled as different than “regular” Germans or a “foreign race”, leading to exclusion from society, denial of formal education and segregated housing. In the 19th and early 20th century, many families were artisans and merchants, having especially important roles in rural areas due to their mobility. After World War I and Germany’s first democratization, policies of inequality and exclusion, police structures and special divisions were further strengthened, e. g. through the so-called *Zigeuner- und Arbeitsscheuengesetz* in Bavaria in 1926 (GVBL 1926, 359).

Under National Socialism, the exclusion and persecution increased dramatically and systematically. Sinti and Roma were sterilized under the *Gesetz zur Verhütung erbkranken Nachwuchses* (RGBl. 1933 I, 529), they were prohibited from marrying German citizens (*Nürnberger Rassegesetze*; RGBl. 1935 I, 1334 f.), more systematically segregated in schools and often even prevented from using busses, cinemas, public pools, etc. In 1936, the Racial Hygiene Research Institute began to systematically register Sinti and Roma, create genealogies and photo databases. More than 20,000 data sets were created and later used to facilitate the deportations of Sinti and Roma to concentration and extermination camps (Hohmann 1991, 15). The *Reichsführer SS und Chef der deutschen Polizei*, Heinrich Himmler, already demanded “the final solution of the Gypsy question according to the nature of that race” in 1938 and the first systematic deportations took place in May 1940 (Rose 2024, 4). It is estimated that more than 500,000 Sinti and Roma were murdered across Europe during the Holocaust.

The liberation of Europe and the democratisation of Western Germany did not mark a turning point for Sinti and Roma or an end of their exclusion. Debates about the German constitution (hereafter: Basic Law) in 1948/49 already saw attempts to specifically exclude Sinti and Roma from the equality guarantee in Article 3, Basic Law (Rauschenbeger 2022). Special police units to persecute the minority were re-established as early as 1950 and a special registration in police databases continued until 2001 in some regional states, often using the data sets of the Racial Hygiene Research Institute (Central Council of German Sinti and Roma 2001). Reports show that special registration is an ongoing phenomenon in some states under new terminology such as “clan criminality” (RCM 2025, 15 f.). This is denied across political parties and government ministers refuse to allow independent studies on racial profiling by the police.

Continued exclusion was not limited to police work, however, but encompassed all areas of state bureaucracy, most notably the “compensation” for the Nazi persecution, which was

deemed to be legitimate due to the prevention of criminality until 1943 by the Federal Court of Justice in 1956 (BGH IV ZR 273/55). This exclusion only decreased in the 1980s, after the Federal government formally acknowledged the Nazi genocide. Education remained an especially problematic area, as the recommendations to send Sinti and Roma youth to schools for children with special needs denied members of the minority access to quality education, which had a negative effect on general socioeconomic opportunities and on future generations (RomnoKher 2021, 52 f.). To this day, Sinti and Roma are referred to such schools on a regular basis despite showing no signs of special needs, as a MIA report on antigypsyism in the education sector shows (MIA 2025a, 35 f.).

Another problematic issue is the antigypsyism that Roma refugees from Ukraine and the Western Balkans and migrants from the EU face. Especially Bulgarian and Romanian immigrants are suspected of social services fraud by right-wing politicians and media, whereas Roma from Ukraine are facing worse housing than their compatriots as well as accusations that they are not really fleeing from the Russian war of aggression. Roma from the Western Balkans have received only short-term residence permits, sometimes for decades, and face expulsion despite a lack of ties to any state in the region regularly. There are growing reports of stateless people being deported to their parents' countries of origin despite spending their entire life in Germany (RCM 2025, 24, 35 f.).

These aspects can be summarised under the label “Second Persecution”, a term also used by German president Frank-Walter Steinmeier in 2022, when he asked the communities for forgiveness for the state's role in the continued exclusion after 1945. However, these events remain largely unacknowledged by political figures and the broader society, which makes tools of transitional justice that the Jekhipe project aims to introduce, difficult, yet very important to apply.

The lack of recognition perpetuates problems, such as a mistrust by Sinti and Roma towards state institutions and especially the police. Continued patterns of exclusion e. g. in the education sector stem from a lack of awareness about the historical roots of the problem and lead to ongoing negative consequences for the minority communities. The lack of a coherent National Action Plan for Sinti and Roma inclusion and the complete lack of measurable goals and objectives in the National Roma Strategic Framework prove to be especially problematic, as these tools would be most feasible in enforcing cross-sectoral or intersectional approaches to improve the living conditions of Sinti and Roma.

The Jekhipe Project specifically aims to aid the establishment of an *Independent Historical Commission on the Second Persecution of Sinti and Roma after 1945* through high-level advocacy. Dialogue with community representatives has repeatedly shown that Sinti and Roma demand the truth about their decades-long exclusion from German democratic society and an acknowledgement of discriminatory policies. Moreover, the project cooperates with other stakeholders to identify key areas of research and needs of the communities. The participation of researchers and representatives of the minority is also

demanded to ensure every approach that respects the communities' needs and effectively fosters truth and recognition of historical injustices. The Jekhipe project activities include addressing local-level events such as the pogroms in Rostock-Lichtenhagen against Roma refugees from Romania in August 1992, supporting the efforts of those most affected to gain recognition and have their voices heard in Germany and Romania. By promoting the long history and diverse culture of Sinti and Roma in Germany, the Jekhipe project helps to establish counter-narratives that portray Sinti and Roma as active figures within a public discourse instead of reducing them to stereotypes as media coverage often does to this day.

2. Policy Analysis

Cross-sectorial approaches to combat antigypsyism and Action Plans with similar goals are explained in detail in the National Roma Strategic Framework. Likewise, existing measures and policies in areas such as reduction of poverty and exclusion or equal access to education, quality employment, health care and housing are discussed, giving a comprehensive overview of programs that Roma *could* benefit from and have access to. As the Roma Civil Monitor has criticized in the past and again in 2025, none of these measures are focused *only* on the needs of Sinti and Roma and intended for their benefit (RCM 2025, 8). Most policies listed are available to the general populace, whereas others, like the previous government's announcement to invest heavily in affordable housing (300,000 new flats to be built annually), never went beyond the status of a declaration of intent. Furthermore, the NRSF completely lacks measurable targets and objectives whose progress can be monitored. It is of the utmost importance for the fight against antigypsyism that policies and laws are developed which address the specific needs of the communities and challenges that this centuries-old form of racism poses.

In terms of general demands and overarching issues, the NRSF reiterated the six key recommendations by UKA that were first presented in 2021 (UKA 2021, 14-17). Two key recommendations have been adopted, namely the establishment of a Standing Federal-State-Commission and the appointment of a Federal Commissioner against Antigypsyism. Both steps were seen as important forms of recognition by the minority and have shown their potential in the fight against antigypsyism. Other measures that are critical in the context of transitional justice have not yet been implemented, namely the comprehensive recognition of the Holocaust and the establishment of a commission on the Second Persecution. "Comprehensive recognition of the Nazi genocide" is defined not only as an effort to enhance and broaden remembrance formats, but rather to acknowledge the structural discrimination of Sinti and Roma in the process of "compensation" for the Nazi persecution, e. g. compared to Jewish victims of National Socialism. The Independent Commission emphasizes that this recognition must not only come in the form of truth-seeking but also in a form of permanent pensions that benefits those who survived the Holocaust and who subsequently suffered further exclusion from social and economic reparations as well as compensation for their mental and physical damage. Likewise, lump-sum payments to children of Holocaust survivors and easily accessible one-off payments for all Sinti and Roma that lived in Nazi-occupied territories or were deported from there were demanded (ibid. 16). None of these policies have even been attempted to implement yet, which demonstrates a continued lack of political will to acknowledge the suffering of Sinti and Roma during National Socialism beyond verbal tributes. In contrast to that, plans for the establishment of a Commission on the Second Persecution were already well advanced in November 2024, when the collapse of the German coalition government brought these

attempts to a halt. A civil society coalition, supported by the Jekhipe project, has committed to push for the fulfilment of this UKA recommendation by 2026 and hopes to garner political support.

The fifth measure suggested by the UKA was the institutionalised implementation and consolidation of participation structures of Sinti and Roma in various areas of public life, like media control bodies. Such measures are indispensable in the context of transitional justice as they would allow Sinti and Roma to take a more active role in the shaping of narratives and especially the portrayal of the minority. However, a comprehensive strategy for this has not yet been developed and only two regional control bodies have members from Sinti communities. Jekhipe's Survey results also show that media coverage is a key concern for many experts in the field.

No progress is expected when it comes to the special protection of Roma refugees as a particularly vulnerable group in asylum cases due to the anti-immigration backlash in Germany, spearheaded by far-right political parties and reiterated by the current government.

The key recommendations of the UKA were revisited and expanded in December 2023 by a joint parliamentary resolution supported by all democratic factions that addressed 27 key issues and demanded decisive measures by the government to combat antigypsyism and ensure the participation of Sinti and Roma in all areas of society (BT-Drs. 20/9779). While this resolution marked the first formal acknowledgment of the Holocaust and the Second Persecution by the German parliament and was praised as a historical milestone in the recognition of Sinti and Roma by most major CSOs, the majority of the suggested measures, many of which could positively influence transitional justice, have yet to be addressed. The commitment of the new Federal Commissioner to assess the possibilities to implement the measures suggested by parliament is a positive indication of political will.

In specific areas that need policy initiatives to improve participation, access to basic rights and recognition of Sinti and Roma, little to no progress can be expected. It has to be added that designing policies which are accessible only to Sinti and Roma is complicated for various reasons. Firstly, the prohibition of discrimination that also generally includes positive discrimination. Secondly, the prohibition to collect data on ethnicity is strongly supported by all relevant Sinti and Roma and pro-Roma CSOs, which makes targeting the communities' needs more difficult. Other very specific difficulties exist, e. g. when it comes to desegregated housing. After 1945, "Sinti quarters" were established in various German towns, often labelled a compensation for Nazi persecution. Their value is ambivalent. While communities sometimes portray them as safe havens from antigypsyism to this day, their construction on the outskirts of towns with defective materials, insulation and sometimes hygienic conditions poses present-day problems. Desegregation and resettlement are often expressly rejected by the communities. However, renovations are emphatically demanded and could be addressed through targeted city-development policies (MIA expert hearing, June 24, 2025).

Improved access to health care and quality employment could be better achieved through general reforms and better sensibilisation of social services employees that must go hand in hand with a firm stance against antigypsyism.

One area where policy change is possible, extremely relevant, and repeatedly demanded by CSOs is the education sector. Various challenges intersect in this area, e. g. school segregation, individual discriminations by other students and staff and lack of representation of Sinti and Roma history and culture. As the 2021 RomnoKher study “Unequal Participation. On the situation of Sinti and Roma in Germany” and MIA’s report “Antigypsyism in the Education System” prove, the referral of children from the minority to schools for children with special needs is still vastly larger than in the general populace. The recommendations have to be reiterated here as they have a potentially significant impact on educational opportunities that greatly influence chances of social and economic participation later in life. The key recommendation suggested a critical review of the criteria for special school criteria with parents being guaranteed the right to make the final decision (MIA 2025a, 38 f.). Moreover, effective instruments to combat discrimination in schools were demanded, which is seconded in the “Joint Recommendation by the Central Council of German Sinti and Roma and the Standing Conference of Education Ministers on Antigypsyism in schools”. These issues fall into the jurisdiction of the regional states and can be accomplished with the support of CSOs and relevant stakeholders at low political and budgetary costs.

A key concern for CSOs and in the context of the Jekhipe project, as well as transitional justice concepts more generally, is the adequate representation of Sinti and Roma history in school curricula as well as universities and research. It is expected that a well-balanced dissemination of knowledge, that explains the history of antigypsyist prejudices, the persecution and genocide of Sinti and Roma would be significantly benefit the recognition of the minority and its place in European history. To further emphasize this point, the teaching of Sinti and Roma history mustn’t be reduced to the history of the persecution but provide ample examples for the positive contributions the communities made to German and European history. Demands have also been made to intensify research on Sinti and Roma issues through strengthening existing structures like the Research Centre on Antigypsyism, the Documentation and Cultural Centre of German Sinti and Roma or the Society for Antigypsyism Research, as well as assuring sufficient funding for innovative new projects (BT Drs. 20/9779). Whereas the development of school curricula is a key competence of the regional states, the strengthening of research requires a joint effort by the Federal State and the regional governments.

3. Stakeholder Mapping

The following stakeholder map identifies key actors who hold decisive roles in the fight against antigypsyism and for the inclusion of Sinti and Roma. The focus lies on figures with high influence and authority in policymaking. The extent to which their decisions have relevance for combatting antigypsyism is a primary consideration in the mapping process, leading to the exclusion of federal government ministries that are responsible for key issues but with limited direct connection to antigypsyism or potential of overarching impact, e. g. the Health Ministry (ensure access to quality healthcare), the Housing Ministry (ensure access to affordable, desegregated housing) or the Federal Ministry for Research, Technology and Space (provide sufficient funding for research on antigypsyism).

Stakeholder	Role and Relevance	Power/ Influence/ Support	Tools they hold	What Influences them	Advocacy Message	Engagement Strategy
Federal Commissioner Against Antigypsyism and for the Life of Sinti and Roma in Germany	Government contact person for all matters related to the minority and antigypsyism. Capable of mainstreaming the issue within government and promoting/ shaping policy initiatives	Medium agenda and policy setting power, high influence on minister of education, medium influence on cabinet, high support by civil society and key government figures and of Sinti and Roma demands	Specific budget that can be used to support CSO projects, public communication and standing, suggestion of legislative projects, coordination of Standing State-Federal-Commission	Political will of the government and especially minister of education, demands by CSOs, public opinion and discourse	“Support demands of Sinti and Roma CSOs within the government and take a leading role in combatting antigypsyism and promoting inclusion and equal rights.”	Strategic partnership, provision of data and expertise, regular advocacy meetings and roundtables, agenda setting and plea for support
Standing Federal-State-Commission on Antigypsyism	Institution coordinating efforts between federal and regional governments to combat antigypsyism,	Little actual power and influence, relies on the good-will and support of federal and state institutions	Informal and confidential room for discussions among experts within the bureaucracy that can influence	General political climate, willingness by leading figures like the Commissioner against	“Coordinate efforts between the federal governments and the 16 states to combat antigypsyism and develop concrete agreements in	Offer expertise and suggest concrete policies, briefing and sensibilization of participants for key issues

	meeting bi-annually. Could identify overarching challenges and best practices and informally suggest policy changes		decision-makers	Antigypsyism to set an ambitious agenda	key areas such as education, housing, labour market access and health care.”	
Federal Cabinet of Ministers	Most important political body within the Federal government	Agenda setting on all matters of national relevance & positioning Germany on matters it decides to do so	Policy proposals, development of regulations, authority to issue instructions to subordinate bodies, draft budget allocation	Overall political situation, public opinion, templates from responsible ministries and specialist departments	“Ensure sufficient funding for key CSOs, commit to measure of transitional justice and support establishment of 2 nd independent commission.”	Influence ministries most relevant for Sinti and Roma issues to ensure they garner cabinet support for policies and concrete support measures.
Federal Ministry for Education, Families, Elderly People, Women and Youth	Funding of key CSOs from its budget, Federal Commissioner against Antigypsyism and NRCP are located there	Agenda setting in areas of its competence, power to suggest draft budgets that influence CSO work	Policy initiatives, public agenda setting, draft budget allocation	Overall political climate, experts’ opinions, key areas of concern identified within the cabinet	“Promote education about the Sinti and Roma Holocaust, ensure sufficient funding for key actors in the field and play a leading role in government efforts vs. antigypsyism.”	Advocacy for mainstreaming Sinti and Roma issues in remembrance politics and assurance of adequate and long-term funding.
National Roma Contact Point within the Federal Ministry for Education	Coordinating point and experts department within the ministry on Sinti and Roma issues, responsible for progress reports on NRSF	Little top-level influence, but trusted by figures most responsible for shaping ministry policy	Reporting duties, responsibility for Sinti-and-Roma related questions	Position by heads of department, experts’ opinion, EU and federal government agenda setting	“Further develop the NRSF and ensure it is an actual strategy with Roma-centred policies and measurable success indicators.”	Strategic partnership, present data and expertise, support efforts to improve the NRSF

Federal Ministry of the Interior	Responsible for measures of internal security, budgetary of key CSOs, Federal Commissioner for National Minorities is located there	High-influence on policy and agenda-setting, strong role within government, at best mediocre interest in Sinti and Roma issues	Policy initiatives, public agenda setting, draft budget allocation	Overall political climate, experts' opinions, key areas of concern identified within the cabinet	"Allow an independent study on racial profiling, police violence and special registration of Sinti and Roma in past and present times and sign a state contract with key CSOs, acknowledging and sufficiently funding their work."	Pressure to fulfil advocacy message concerning police, top-level and specialist-department level advocacy for a state contract, provide data on hate crimes against Sinti and Roma
Regional State Education Ministries and Standing Conference of Education Ministries	Regional ministries shape school curricula and policies in education, Standing Conference coordinates dialogue between states and streamlining in overarching questions	Major influence in shaping educational policies and key areas of school curricula	School curricula development and policies about teacher training, coordination between states, shape general developments in primary and secondary education	Experts' opinions, overall policies of regional governments, general public discourse	"Integrate a stronger focus on education about the history of Sinti and Roma in school curricula and ensure the implementation of the joint recommendations by the Central Council and the Standing Conference."	Offer expertise on situation for Sinti and Roma in the education system and problems of school segregation, provide suggestions for best ways to implement joint recommendations
Lower Saxony Ministry of the Interior and Ministry of Justice	Responsible for measures of internal security & functioning/ shape of judicial system as well as annual report on clan criminality	Capability to terminate labelling of individuals as clan members and evaluate harm done by the practice	Development of legislative and policy agenda, authority over subordinate bodies	overall policies of regional government, general public discourse, reports by subordinate bodies	"End police special registration of Sinti and Roma under the pretence of combating clan criminality."	Apply pressure, appeal to duty of equal treatment under Basic Law and Human Rights Conventions, highlight unanimous findings on discriminatory nature of clan criminality concept

Federal Parliament (and Bundesrat)	Indispensable for all legislatives measures, policy-shaping capacity, right to demand information by government on all matters MPs consider relevant	Medium power (high on budget allocation, but lower especially in implementation of policies), high influence (in shaping public discourse and towards cabinet ministers), medium support/ interest in Sinti and Roma issues among most MPs	Legislative and budgetary competence (Bundestag), obligation to vote on changes of the constitution (Bundesrat), with 2/3 approval necessary to change constitution	Public opinion, party interests, advocacy, experts' opinion	"Reform the Antidiscrimination law to allow litigation against state actors and enshrine the protection of minority rights in the constitution. Develop, support and promote initiatives about the situation of Sinti and Roma"	Advocacy meetings, strategic partnerships, provide expertise and data on Sinti and Roma related issues
State governments	Central coordination and agenda setting, policy development, capability to mainstream political questions	High power (executive responsibility to conclude contract), high influence (by proposing the state budget), different levels of support (for CSOs and the minority's general concerns)	Right to conclude contracts, draft budget, shape policies	Public opinion, key political challenges, experts' opinions	"Conclude contracts with Sinti and Roma CSOs that acknowledge their key role in the fight against antigypsyism and ensure their sufficient long-term funding."	Strategic partnerships, offer expertise on tools to foster inclusion and participation of Sinti and Roma
Federal Commissioner	Government contact person	Low power (to shape	Specific budget that can be	Ministry guidelines	"Mainstream the protection of Sinti	Strategic partnership,

<p>for Displaced Persons, ethnic German repatriates and National Minorities</p>	<p>for Sinti and Roma, coordinator of the Advisory Committee on Issues of Sinti and Roma</p>	<p>policies), medium influence (on Minister of the interior), low support for Sinti and Roma (more focused on German minorities abroad and DPs)</p>	<p>used to support CSO projects, public communication and standing, suggestion of legislative projects</p>	<p>and positions, personal beliefs and affiliations, experts' opinions</p>	<p>and Roma according to the 1995 CoE Framework agreement and commit to combating anti-gypsyism as well as fostering the culture."</p>	<p>provide data and policy initiatives</p>
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4. Key Survey Findings and Analysis

Approximately 25 key stakeholders from civil society and public administration were contacted and asked to participate in the Jekhipe survey that aimed to identify major policy concerns, areas where antigypsyism is most problematic and chances and limitations of the NRSF.

The responses underscore key findings of past research and reports like the Roma Civil Monitor and the Central Council's statements. Media coverage of Sinti and Roma and treatment by the police and in the justice system were identified as the most concerning factors by all but one respondent. Likewise, access to quality education and housing was repeatedly mentioned as an area of concern, whereas access to the labour market and healthcare were rarely mentioned. However, the survey asked to name the three most concerning areas, which does not mean that those not or only rarely mentioned don't give reason for concern. The suggestions for concrete policy measures participants were asked to formulate reflect the analysis of antigypsyism of an overarching issue that has been repeatedly stressed in reports, research and political statements by Sinti and Roma CSOs. This is shown by the fact that no area specific measures like labour-market training, were suggested, but rather ideas that focused on the funding of CSOs and measures of political education. While regional offices in every state that focus on issues minority members are facing everyday are an important demand, most responses focused on education. On the one hand, a focus lay on schools (see below), on the other hand, sensibilisation programs for public institutions were a reoccurring issue. Teachers, police, public administration and media were specifically mentioned as important target groups for seminars on the structural nature of antigypsyism and current manifestations that might well affect their work on a day-to-day basis. Generally speaking, the responses show that there might indeed be glory in prevention when it comes to antigypsyism in Germany.

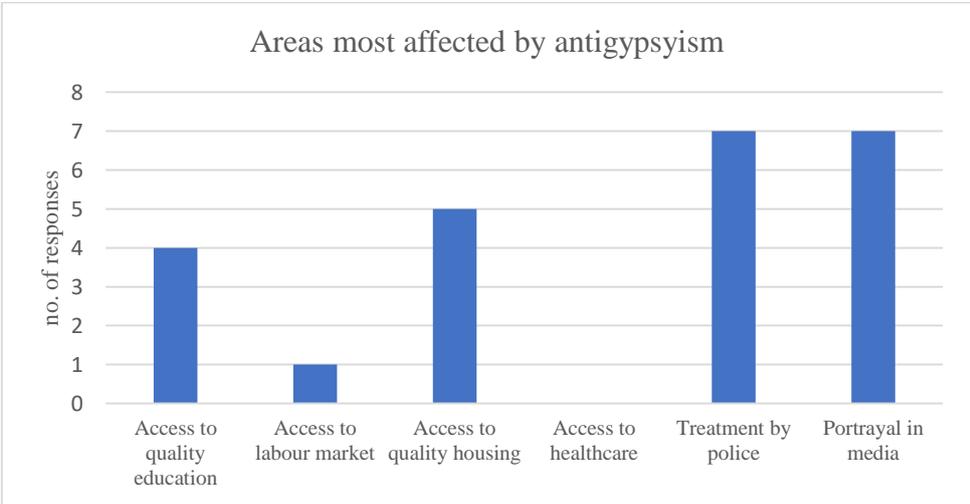
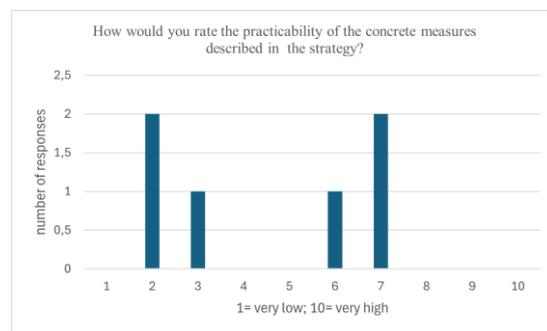
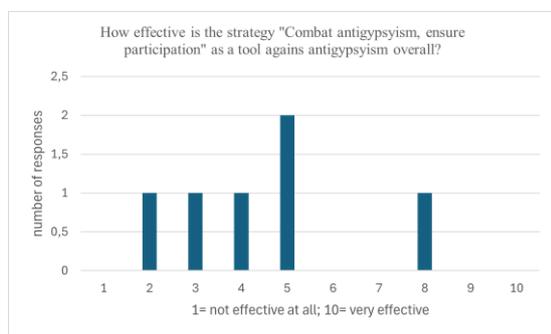


Figure 1: Which THREE sectors are most affected by antigypsyism for Sinti and Roma?

The assessment of the National Roma Strategic Framework “Fighting Antigypsyism, Ensuring Participation! Towards the Implementation of the EU-Roma Strategy 2030” varies significantly sometimes. The average score the effectiveness of the strategy in combating antigypsyism received was 4.5/10, however, as one respondent deemed it quite effective (8/10), this number blurs the general scepticism. Similarly, the question about the practical utility of the NRSF to prove measurable impacts has an average score of 4.5/10. However, the scope of the responses is smaller and more polarised, with half the answers being between two and three, while the other half suggests a higher practical utility with scores of six and seven.

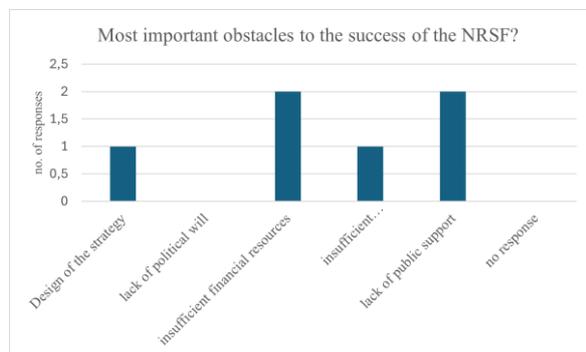


These findings are in line with the results of RCM research as they seem to prove differences that stem from varying point of view. This can be exemplified by the question of desegregated, affordable housing. If one asks what Roma-specific measures are undertaken, the strategy remains vague, and its practical use is questionable. If one expects that Roma profit from general policies to increase affordable housing that target the general population, higher results can be expected.

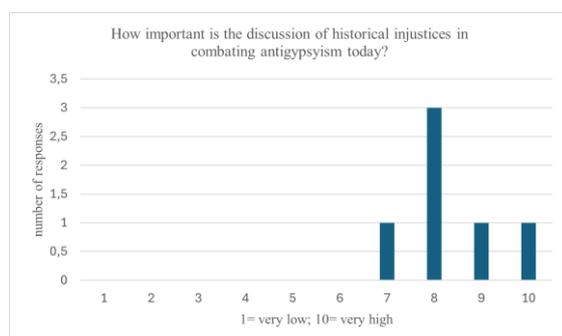
The third question on the actual impact the NRSF has on reducing forms of antigypsyism shows more pessimistic respondents as the average score is only a 3.5/10, with half of those responding estimating the impact at 2/10. While it is rather understandable that scepticism prevails whether a five to ten-year strategy can effectively reduce centuries-old prejudices in the broader society in a changing political climate, the answer to the question on the biggest obstacles shed light on other pressing problems.

From a transitional justice perspective and the aims of a project that targets decision-makers, it is very positive to see that lack of political will was the only one of five possible obstacles that no-one deemed most problematic. However, 40% of the respondents criticized a lack of adequate funding, which is in and on itself a political decision that apparently hinders progress. Another 40% mentioned a general lack of public support for the inclusion of Sinti and Roma and continuous prejudices as a main obstacle. This factor is much harder to come by, yet an increased transitional justice effort offers opportunities for

positive long-term effects. Therefore, two thirds of the respondents see political advocacy by CSOs as a key tool to improve not only the strategy but also the overall situation of Sinti and Roma in Germany.



From the Jekhipe project's point of view, the questions on Holocaust education might well be the most interesting, as education and acknowledgement of the past remain key factors in changing the perception of Sinti and Roma. It is not at all surprising that the importance of Holocaust education had a score of 8,33/10 among all respondents, with the lowest response being a 7/10.



Unsurprisingly, when asked what potential they identify in the Jekhipe project, respondents repeatedly touched the issue, asking for the creation of tools that strengthen support measures for those affected by antigypsyism and deconstruction of stereotypes and excluding narratives. One respondent specifically stated that the Jekhipe project ought to contribute to the sensibilisation and resilience building within the non-Roma society. Some of the suggestions for concrete policy measures also touch this field, as the establishment of an Independent Commission on the Second Persecution was specifically mentioned, while another respondent focused on the necessity to increase funding for research on historical and current issues concerning Sinti and Roma. Likewise, a stronger focus on Sinti and Roma in history classes and in the context of memorial sites was demanded.

Others focused on the importance of coalition building, bringing Sinti and Roma activists and supporting CSOs together in order to counter the idea of antigypsyism as a problem that only Sinti and Roma should speak about. Another answer highlighted the necessity to

broaden the concept of antigypsyism as it does predominantly but not exclusively affect Sinti and Roma.

5. Policy Recommendations

The Jekhipe project survey and existing analyses show a need for reforms and improvement in various areas. We therefore present a set of policy recommendations that do not focus on isolated issues but demand systematic reforms that contribute to sustainable change and an improvement of the situation of Sinti and Roma in Germany, thereby also strengthening social cohesion and access to equal rights and opportunities for the minority.

1. Establishing an Independent Commission on the Second Persecution of Sinti and Roma

The government must set up a second independent expert's commission following the example of the UKA that focuses on the Second Persecution of Sinti and Roma after 1945 in both the Federal Republic of Germany and the former German Democratic Republic. Key areas of concern include, but are not limited to police special registration, school segregation, denied access to equal job opportunities, access to quality housing and health care, exclusion from social services, denial of Holocaust acknowledgement and "compensations" and anti-refugee policies. Communities first and foremost demand truth and recognition which is why the commission is a key factor in strengthening integration and equality of Sinti and Roma. The Federal Commissioner against Antigypsyism is the key stakeholder in this context as he should champion this issue within the Federal Cabinet. Messaging will focus on the aspects of restorative justice and historical truth, which will be addressed at a conference in November and in regular discussions with MPs.

2. Implementing the protection of national minorities in the constitution and strengthen the standing and funding of key CSOs through state treaties

Integrate the protection and promotion of national minorities and their rights and culture in the constitution in accordance with the CoE's Framework Agreement on National Minorities. Moreover, the Federal government and state governments should conclude state contracts with key Sinti and Roma CSOs that acknowledge their achievements in combating antigypsyism and improving equal participation of the minority and ensure sufficient and long-term funding. At the very least, add the explicit prohibition of discrimination because of the belonging to a national minority in Article 3 of the constitution. An initiative that would lead to such an extension of the constitution is currently developed by several state governments and will be supported through Jekhipe's general social media and advocacy efforts.

3. Extending the scope of the antidiscrimination law

The Federal Antidiscrimination Law (AGG) should be extended to the Länder level, or federal states should adopt their antidiscrimination laws aligned with the EU anti-discrimination law. A reformed AGG has to include the possibility to bring discrimination by state actors to court.

Key stakeholders that will be addressed include MPs and government representatives, especially within the Federal Ministry of Justice.

4. Strengthening the Office of the Commissioner against Antigypsyism

Consolidate and secure long-term funding for the Office of the Commissioner against Antigypsyism. The office should be insulated from political shifts and adequately staffed with personnel to ensure its effective functioning. Federal States should appoint commissioners as well as they are responsible for key policy areas affecting Sinti and Roma, especially education. When looking at the position of the Federal Commissioner, the situation seems to be consolidated for the next couple of years, and the focus will shift to ensuring that the budget is adequately and fully used to support projects of Roma and pro-Roma CSOs. On state level, advocacy will focus on government ministers and officials to ensure the establishment of a Commissioner's office in state treaties or at the very least in the form of a cabinet decision, highlighting the importance of such a position to mainstream and coordinate the fight against antigypsyism.

5. Ensuring the continued funding and expansion of MIA

The Reporting and Information Office on Antigypsyism (MIA) should be provided with sufficient funding to continue monitoring antigypsyism after 2025. The regional states must finance MIA with sufficient resources in the regions where it already exists; they should establish MIA offices where they do not yet exist. Advocacy will highlight the successful work and impact of MIA's reports as well as the interest to replicate the structure in other countries. The messaging will be directed towards the Federal Minister for Education, Families, Elderly People, Women and Youth and the Federal Commissioner against Antigypsyism as well as MPs from all democratic factions in parliament.

5.1. Establishing counselling centres for discrimination and on antigypsyism

The regional states should set up regionally accessible counselling centres on discrimination with a focus on antigypsyism. Organisations of Sinti and Roma should run these counselling centres to ensure that they are trusted and accessible for affected communities. The centres should offer support in cases of discrimination, provide information on legal rights, and assist in resolving conflicts.

6. Full implementation of UKA recommendations

Ensure that the recommendations of the Independent Commission on Antigypsyism (UKA), particularly those in the Bundestag's December 2023 resolution, are implemented within defined timelines. This includes regular reporting on progress and providing necessary resources for implementation. The federal and state governments should align their efforts to guarantee comprehensive action. The Jekhipe project team will demand the implementation as a sign of Germany's historical responsibility towards Sinti and Roma and will address especially the Federal Commissioner and lawmakers.

6.1. End statelessness and acknowledge antigypsyism as a form of persecution in asylum cases

The government must enable descendants of Holocaust survivors, who are stateless because the Nazis stripped their parents and grandparents of their citizenship, to get facilitated access to full German citizenship. The acknowledgement of the fact that this phenomenon exists is crucial to Sinti and Roma communities. Similarly, structural antigypsyism is not accepted as a form of persecution and discrimination in asylum cases especially of Roma from the Western Balkans and Moldova. Ultimately, the designation of these countries as safe countries of origin must be reassessed and revised in accordance with the recent ECJ ruling on prerequisites for declaring safe countries of origin. This issue lies within the jurisdiction of the Federal Ministry of the Interior and should be supported by the Federal Commissioners against Antigypsyism and for National Minorities, especially when it comes to descendants of Holocaust survivors.

7. Developing and implementing a National Action Plan against Antigypsyism

The Federal Government should develop and implement a comprehensive National Plan against Antigypsyism. This plan should be developed by the NRCP with Sinti and Roma CSOs according to their needs and demands and encompass all policy fields at both the national and state levels. The Plan should be based on the NRSF, however, it has to include measurable goals and actionable measures which would be an improvement. Advocacy will be directed towards government representatives, especially the Federal Commissioner against Antigypsyism.

8. Fighting antigypsyism in the police

The regional states should undertake comprehensive measures to counter antigypsyism and discrimination in the police. These measures should address discrimination, disproportionate use of force, racial profiling, the stigmatisation of Sinti and Roma in external communications and the continued 'special registration' of members of the minority by the police. The removal of the discriminatory and useless category 'clan-criminality' should be central in measures fighting antigypsyism against the police. Past transgressions have to be subject of independent research. Messaging will focus on more than a century of police mistreatment of Sinti and Roma and address the Federal and State Ministries of the Interior.

9. Addressing segregation in education and strengthen Holocaust education

Implement policies that directly address the school segregation of Sinti and Roma children, including the unjustified placement in special schools. This should involve creating transparent, anti-discriminatory criteria for school placements, offering training on antigypsyism for teachers, and involving organisations of Sinti and Roma, as well as anti-discrimination offices, in the placement process for special schools. Programmes of school counsellors should be extended to support Sinti and Roma families to encounter

antigypsyism at school and advocate for their children's inclusion in regular schools. Monitoring mechanisms for racism in schools should be implemented; studies on racism and antigypsyism in schools should be developed; and counselling centres on discrimination in schools should be established in all states. School curricula must be developed further to document the persecution and Holocaust of Sinti and Roma adequately. These recommendations are a responsibility of State Ministries of Education and messaging will focus on historical mistreatment as well as current exclusion procedures and highlight the right to equal education and participation.

10. Tackle the various housing issues

Rolling out a Federal Programme to renovate traditional Sinti settlements in accordance with the communities' needs, including access to communal infrastructure; abolish the various 'problem house task-forces' that cause the eviction of Roma families from their homes, predominantly in high-density population areas; end segregation of Roma refugees from Ukraine and migrants from the Western Balkans and EU member states.

11. Improve access to sustainable and high-quality employment

Develop tailor-made programs to address the specific issues Sinti and Roma face in accessing the labour markets. This includes awareness-raising measures and anti-bias training for employees of social security agencies, as well as the strengthening of Customs Officers tasked with combating mandatory minimum wage fraud and exploitative work contracts. Moreover, FEAD-Plus measures should be more accessible to Sinti and Roma CSOs, and specific issues of the communities must be acknowledged. The 'Working aid to combat gang-related benefit abuse in the specific context of EU freedom of movement' must immediately be abolished as it inherently contains a high risk for antigypsyist discrimination. A multi-level approach is necessary, stakeholders include the Federal Ministry of Social Affairs, the Federal Labour Agency and municipal agencies.

12. Ensure access to health insurance and treatment

At the very least, the concept of *Anonymer Krankenschein* (anonymous healthcare access note) should be implemented nationwide to make sure that treatment is accessible in emergencies. For EU-migrants and refugees, many of them Roma, an approach should be implemented that prevents exclusion from basic social services, among them a guaranteed healthcare, at all costs.

13. "Compensations" for Holocaust victims

The federal government should increase and promote the humanitarian aid programs for Sinti and Roma Holocaust survivors that have long been successfully implemented by the Foundation "Remembrance, Responsibility, Future". The key recommendation of UKA on financial acknowledgement because of long-term effects of the Holocaust must be implemented.

6. Future Outlook and Sustainability

Jekhipe activities in the upcoming months will focus on three key areas, namely the establishment of an Independent Commission on the Second Persecution of Sinti and Roma as a pivotal tool for transitional justice, the support for the implementation of the Joint Declarations/ Recommendations by the Central Council and the Standing Conference of Education Ministers on teaching the history of Sinti and Roma as well as combating antigypsyism and the analysis of police behaviour towards Sinti and Roma that is also intended to influence public debate.

Jekhipe is part of a broader coalition that advocates for the establishment of the Commission, and the project team will focus its efforts on the promotion of the local case of Rostock-Lichtenhagen and its transnational dimensions, while also participating in several conferences and high-level advocacy meetings to garner political support. We are confident that a concise effort can lead to satisfying results by the end of the project and maybe even an announcement on the establishment of the Commission in Roma week. Jekhipe also supports the Central Council's efforts to promote the implementation of the declarations with the Standing Conference of Education Ministers (with a regional focus on Berlin) as a better education about Roma history and the Holocaust is one of the project's key concerns. In December, two studies will be published, by MIA and the Central Council, on the history and present forms of police persecution towards Sinti and Roma, which will be followed by awareness-raising campaigns through Jekhipe and suggestions on trainings and measures to sensitize about antigypsyism in the police force. Similarly, Jekhipe partners with the Cooperative Network against Antigypsyism to develop trainings that help police recognize antigypsyism as a motivation in hate crimes as those are specifically documented in government statistics and current numbers are just the tip of the iceberg.

Sozialfabrik, as Jekhipe's German project coordinator partners closely with MIA and the Cooperative Network and will do so as long as their funding is secure (which is the case for the Network long-term). It would be desirable if major Sinti-and-Roma NGOs decided to cooperate more closely and coordinate their advocacy efforts, however, a coalition of willing partners is more promising in the short- and medium-term.

The fact that Jekhipe enables trans-border cooperation and debates between Roma and pro-Roma CSOs is extremely valuable and should be institutionalized on a regular basis. Moreover, it is useful to coordinate national and EU-level advocacy and expertise, as especially the National Roma Strategic Frameworks have the potential to be an important change agent but often lack funding and/ or political support, as the survey for this paper clearly demonstrates.

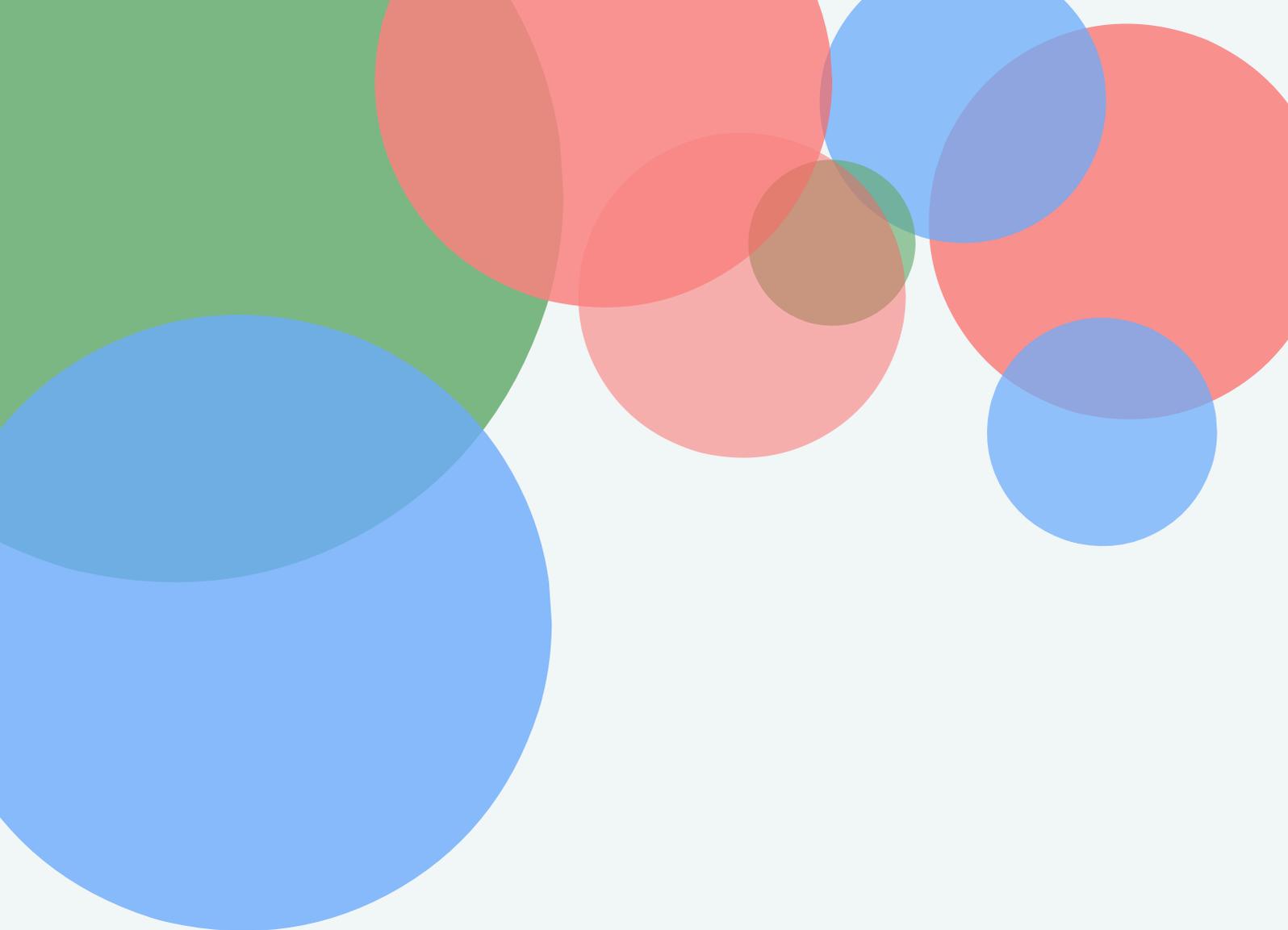
In the future, a general increase and long-term sustainability in funding of CSOs through EU and national grants is necessary as right-wing politics is on the rise in Germany and across

Europe and civil society needs to be able to plan ahead instead of spending time every year to allocate funding and face insecurity even about the future of most successful projects like MIA. Moreover, smaller CSOs with grassroots approaches deserve better funding instead of just supporting a small number of umbrella organizations.

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