

Montenegro

1. INSTITUTIONAL ISSUES

1.1 Decade Action Plan Drafting

Montenegro's Decade Action Plan (hereinafter, DAP) for the Decade of Roma Inclusion was drafted by a country Working Group, formed in February 2004 at the initiative of the government. The Working Group consisted of 15 people, most of them representatives of ministries and international organizations with offices in Montenegro. However, no representatives of organizations working with internally displaced persons and refugees, such as the UNHCR, participated in the drafting of the DAP. As a result, the DAP does not reflect the needs of internally displaced and refugee Roma, Egyptians, and Ashkalia (hereinafter, RAE), who have lived in Montenegro since the outbreak of the Kosovo conflict and who are by far the most disenfranchised categories in the country.

The Working Group included only one Roma representative, Veselj Beganaj, the director of the "Pocetak" ("Beginning") nongovernmental organization and the coordinator of a network of NGOs called "Roma Circle." The severe imbalance in the representation of RAE in the drafting process was partly remedied by the actions of the NGO members of the Roma Circle, who met every month during the DAP drafting to present comments and corrections on the margin of the draft documents produced by the official Working Group.

Another problematic aspect of the DAP drafting process is the fact that none of the officials actively involved in drawing up the plan actually had any power or influence over the government structures that are supposed to enact it. Among the government representatives participating in the Working Group, only one ranked at the level of assistant minister—Sabahudin Delic from the Ministry for National Minorities and Ethnic Groups, which is not directly involved in Decade implementation. This set-up in effect ensured that the DAP would carry very little weight with government structures and agencies.

A first draft of the DAP was presented at the Decade's second International Steering Committee meeting, held in April 2004. As the first draft needed more detailed work, the Working Group divided into four sub-groups, each of which was dedicated to a particular focus area and was led by representatives of the relevant ministries or state agencies. Education was led by the Ministry of Education and Science (hereinafter, the Ministry of Education); employment was led by the Montenegrin Employment Agency; health was led by the Ministry of Health and the Montenegrin Health Institute; and housing was led by the Ministry of Urban Planning and Environmental Protection (hereinafter, the Ministry of Urban Planning), together with the Ministry of Labor and Social Welfare (hereinafter, the Ministry of Labor). The final version of the DAP is the result of the work conducted in these sub-groups over the second half of 2004.

1.2 Decade Action Plan Content

Montenegro's DAP is based on a number of domestic policy documents—including the Poverty Reduction Strategy Paper adopted in 2003, the National Action Plan for Children adopted in 2004, and the Economic Reforms Agenda adopted in 2003. The drafters of the DAP also referred to some international obligations undertaken by the government, such as various international human rights law instruments to which Montenegro acceded, as well as the Millennium Development Goals. Furthermore, the DAP drafters tried to incorporate the findings of a 2003 household survey of RAE, refugees and internally displaced persons. The survey was conducted by the Institute for Strategic Studies and Prognoses (ISSP) with the support of the United Nations Development Program (UNDP) and several Roma NGOs that are now part of the Roma Circle and that assisted with data collection and analysis (ISSP/UNDP, *Household Survey*).

Unfortunately, this last one-off study is the only document directly relating to the specific situation of Roma that could be used as a basis for developing the DAP. No government strategy on RAE had been adopted in Montenegro prior to the country's joining the Decade. NGOs in the Roma Circle tried to pressure the government to adopt a national strategy on Roma, but the government showed no interest in developing such a policy before joining the Decade. As of this writing, government officials interviewed for this report have said that the text of the strategy is close to finalization. Once adopted, the strategy is expected to flesh out the implementation of various measures included in the DAP focus areas, and it is also expected to cover issues such as legal subjectivity, political representation and gender equality, which are currently not adequately covered in the DAP.

The DAP appears to be designed as a pro forma bureaucratic document, rather than a comprehensive, detailed policy that the government is actually committed to implement. The DAP contains a narrative section, which explains the overall issues and goals covered by the action plan, followed by a table listing measures, indicators and other details relating to implementation. Even a cursory glance, however, reveals that not all focus areas receive an adequately detailed treatment. The education section is clearly the most developed,

while the employment, health and housing sections are not as thoroughly articulated. Roma NGOs have pointed out, for instance, that the employment section lists objectives that do not concern RAE specifically, but are instead general objectives that the Employment Agency has set for its activities on a national level. This shortcoming makes it difficult to monitor the specific manner in which the government undertakes its commitments to assisting RAE under the Decade. Similarly, the housing section fails to specify the criteria that will determine which RAE households will be targeted, making it impossible to measure outcomes objectively. Issues such as these are covered by a separate policy document, the National Action Plan on Housing Policy, which includes a small, separate chapter listing some measures to remedy the housing situation of RAE. However, although this plan has existed since 2005, most Roma NGOs and civil servants/officials do not seem to be aware of it, and it is most often not taken into account in discussions of Roma issues.

Moreover, the DAP fails to list any measures for RAE returnees from Western Europe who need help to reintegrate into the community. This is a particularly problematic issue in the area of education, where children who have been educated in languages other than Serbian are supposed to be integrated into mainstream schools with no additional support. Similarly, except for some cursory treatment in the employment section, the DAP does not adequately provide for solving the problem of personal documents, a dilemma that prevents many RAE in Montenegro from accessing even the most basic rights.

While poverty reduction and, to a lesser extent, anti-discrimination have been incorporated in the DAP, gender is not adequately addressed as a cross-cutting priority in the relevant sections. This is especially problematic because unofficial surveys estimate illiteracy among RAE women to be over 90 percent, which in effect makes their political and economic participation unthinkable.

Indicators also appear to be badly understood: At best, they are set in absolute terms—i.e., not in relation to the situation of the non-Roma population. Even when expressed in percentages, the indicators cannot be used as an accurate measuring instrument, because it is not clear what baseline they are measured against. Many RAE did not identify themselves as such

in the most recent census, for fear of discrimination and stigma, and unofficial surveys, which may be more accurate, have not been updated in recent years. In the worst cases, the listed activity itself is used as an indicator in the DAP, rendering the entire notion of indicators meaningless.

Funding is another area that is not adequately covered by the DAP. For most of the listed activities, the government did not assign any additional funds other than those already assigned for the implementation of the Poverty Reduction Strategy. Thus, the current budget estimates for DAP implementation stand at EUR 11,385,000, out of which EUR 5,110,000 is supposed to come from sources other than the state budget, most probably donations from international agencies and funds—but the specific sources, funding mechanisms and amounts are not clarified in the DAP. NGOs say they believe that the only funds clearly earmarked for activities under the Decade as of this writing are the ones coming from the Roma Education Fund. When interviewed for the purposes of this report, Deputy Minister of Education and Science Cazim Fetahovic confirmed that less funding from state sources is available than planned, and that the government expects 80 percent of the financing for Decade activities to come from foreign donors, like the World Bank and the European Commission. This funding situation only adds to the confusion about the actual enactment mechanisms for the DAP.

It is also confusing that many of the deadlines are set by default to the entire duration of the Decade. Many of the deadlines appear to be set arbitrarily, without a clear understanding of how objectives will be phased in relation to each other. Some of the early deadlines have already passed without being met, which appears to indicate that they were not devised realistically. Others are set unnecessarily late in the Decade, with no explanation.

One other problem with the DAP is that it often fails to set clear responsibilities for specific line items, making it possible for various state agencies and ministries to claim the DAP itself exempts them from many implementation activities.

There have been no attempts to improve the DAP since its adoption. No efforts to develop more detailed priority action plans are known as of this writing.

1.3 Decade Coordination and Implementation

Despite calls from NGOs and independent observers for the establishment of a fully-supported, independently budgeted national office or council for Roma inclusion, the Decade was delegated fairly far down the chain of command in the Montenegrin government. The appointed Decade coordinator is a senior adviser with the Ministry of Labor, Remzija Ademovic. It is not clear when and how the Decade coordinator was appointed. Until the launch of the Decade in Montenegro, the person in charge of coordinating the Decade preparation process was a representative of the Ministry of Foreign Affairs, Dubravka Lalovic. Soon after the launch of the Decade, in April 2005, this official was appointed to another position, and, for almost one year after that, NGO calls for an official appointment of a new Decade coordinator went unanswered by the prime minister's office. NGOs have not been able to obtain any official document relating to the appointment of a new Decade coordinator. In fact, they only found out that the position had been filled by Senior Adviser Ademovic in February 2006, at a roundtable organized by the Project on Ethnic Relations. It is not clear when the new coordinator was actually appointed, and who was in charge of the Decade between the departure of the first coordinator in April 2005 and the appearance of the new coordinator in February 2006.

Moreover, the current Decade coordinator has no independent decision-making power, no public profile to speak of, no assigned funding, and no support staff for activities under the Decade. This arrangement seriously calls into question the Montenegrin government's commitment to effectively implement the goals set under the Decade.

The Working Group that drafted the DAP appears to have dissolved for all intents and purposes, and it has not met even once since the launch of the Decade. As it was the Working Group's mandate to monitor the implementation of the DAP, no official monitoring of the first two years was in fact conducted, and, therefore, no official report exists against which to measure the findings of this one.

Since the adoption of the DAP, there appears to be no coordination among the members of the Working Group—or among the ministries that are supposed to

implement the DAP. None of the ministries seem to have designated units or officials in charge of Roma inclusion, and there are no Roma or members of related ethnic groups employed in senior positions within government structures or agencies. This document's authors have no knowledge of Roma working in local authority structures, either—with the exception of two Roma experts temporarily employed by the Herceg Novi and Podgorica municipalities.

No implementation units appear to have been set up on a local level, either. Local authorities interviewed for the purposes of this assessment reported that they had not received any instructions relating to Decade implementation. They also said that most of their actions affecting RAE are taken on an ad hoc basis or as a result of ongoing projects developed in partnership with local NGOs, not based on the understanding of a wider national strategy. Representatives of the Roma Circle attempted to remedy this communication gap by organizing presentations of the DAP for most local authorities in municipalities with significant numbers of Roma. According to Roma Circle leader Veselj Beganaj, all local authorities with whom the Roma NGO met showed themselves willing to participate in the implementation of the DAP, but the officials indicated that they expected funding to come from sources other than their own local budgets. Recent local elections also disrupted these early communication efforts, as many of the local officials have been replaced by new ones, who are most probably entirely unfamiliar with the Decade.

The municipality of Herceg Novi is the happy exception to this general state of affairs: In autumn 2006, the municipality, together with the local NGO “Young Roma,” opened a Roma office that employs an ethnic Roma from the municipal budget. This arrangement, however, is only valid for six months to one year, and the fate of the Roma office beyond this term is uncertain.

Government officials, including the Decade coordinator, have said that the implementation of the Decade goals has been disturbed by external factors, including Montenegro's recent independence. Roma NGOs, however, argue that Montenegro has had institutions that were de facto independent for years before the referendum, and that the relevant governmental structures for the process of Roma inclusion

have remained largely unchanged by the declaration of independence—with the exception of the ministries of health and labor, which were merged to form the Ministry of Labor, Health, and Social Welfare.

More specific implementation-related issues are discussed in the sections dedicated to each focus area below. On the general level, it is worth mentioning that no annual priority plans for the Decade have been adopted, and it is not clear how many of the issues listed in the DAP were actually mainstreamed into other national policies. Some of the more recent laws adopted by Parliament have incorporated concepts such as affirmative action—but it is not clear whether this is a result of direct pressure from NGOs or the ripple effect of the Decade.

2. FOCUS AREAS

2.1. Education

There is no regularly collected data that would allow the authorities to track progress in promoting access to education for RAE children. However, some survey data is available, and it gives a snapshot of the challenges: The education gap between RAE and other ethnic groups in Montenegro is wide, and current enrolment among RAE children is low. Data from a 2003 survey (ISSP/UNDP) shows that an alarming 63.1 percent of the RAE population have no education, 21.3 percent have incomplete primary schooling and only 9.2 percent have completed primary schooling. The picture shows little sign of changing, with only 38 percent of RAE children enrolled in primary schools, as opposed to 86 percent of children belonging to other ethnic groups, according to UNDP estimates (UNDP, *At Risk*). This gap widens in secondary education, where the respective ratios are 13 percent and 83 percent. Only a very small percentage of Roma have graduated secondary schools, and very few follow through with higher education. For instance, six Roma students were enrolled in university during the 2004-2005 academic year; by 2006, their number had dropped to two. The drop-out rate among RAE is much higher than in the general population, and literacy among RAE is at 55 percent,

although in the general population it is estimated at 99 percent (Roma Education Fund, *Advancing Education*).

The causes for this situation are primarily poverty and discrimination. Many RAE families do not have the means to support children in school, and often the children themselves need to contribute to the financial support of the family by helping other family members with their work, recycling household waste in town or simply begging. Meanwhile, the education system has yet to become an inclusive, flexible environment that can address the individual needs of each child and easily accommodate children belonging to the RAE minorities. Another problem is that large numbers of internally displaced persons and returning unsuccessful asylum seekers, many of whom are Roma, face obstacles in accessing the Montenegrin education system, either because they do not have personal documents or because they began their studies in other educational systems and in languages other than Serbian. Furthermore, the largely traditional make-up of the RAE population in Montenegro may be a factor behind a significant gap between the school outcomes of girls and boys.

Preschool education is not mandatory in Montenegro. Some incentives aimed at increasing the number of RAE children in preschools are currently in place, primarily in the guise of tuition subsidies, free hot meals, and free transportation to and from preschool.

Unfortunately, economic barriers persist, as enrolment is conditioned on the payment of a one-time EUR 10 fee, in addition to the monthly EUR 30 tuition and miscellaneous expenses fee. Fifty percent of this latter fee can be subsidized by the state for families who receive welfare assistance benefits through the Centers for Social Care. As many RAE do not have the necessary personal documents to register for these benefits, in practice, preschool fees, however low they may appear, are often beyond the reach of impoverished RAE families. Moreover, enrolment is conditioned on the presence of vaccinations and other medical certificates, which are not in practice available to many Roma children.

Segregation is another problem that RAE children face in the Montenegrin educational system. Classes entirely made up of Roma and Egyptian students have been reported, particularly in areas with large numbers of internally displaced persons from Kosovo. Such

classes appear as a consequence of the school administrators' assumption that these students speak mostly Albanian—though many of them speak Serbian as well. To make matters worse, non-Roma students tend to leave schools where large numbers of Roma are enrolled, because the quality of education these schools offer is poor. The exodus of non-Roma students has the effect of lowering educational standards even further, in addition to increasing the isolation and ethnic distance experienced by RAE students. The Ministry of Education has indicated that it intends to develop desegregation plans for such situations, but, as of this writing, no progress appears to have been made on the issue.

Some progress has been made, however, in terms of setting up incentives for increasing school attendance. Failure to enrol children in school can be punished by a severe fine—though this provision appears to be rarely, if ever, applied where RAE are concerned. Free schoolbooks began to be distributed as part of a government initiative in the 2005-2006 school year. Some basic information on Roma culture has been included in mainstream curricula, particularly in civic education classes, with the idea of developing more inclusive educational environments. But other incentives to school attendance—such as free school lunches or transportation, the systematic provision of free after-school support, scholarships below higher education level, etc.—are not firmly in place in Montenegro. Still, enrolment of RAE is growing steadily: According to the Ministry of Education, in the 2001-2002 school year, there were only 536 pupils who declared themselves to be Roma or Egyptians in primary schools in the country. Over the last few years, their numbers grew steadily, reaching 1,236 for the 2006-2007 school year. These numbers are not entirely reliable, as students are registered on a quarterly basis, and the figures provided by the ministry do not account for variations and drop-outs from one quarter to another.

Indeed, in October 2006, in Podgorica, Deputy Minister of Education Fetahovic announced that school enrolment among Roma students grew 100 percent over the past four years. Much of this increase can be credited to a series of nongovernmental programs piloted by UNICEF, the Open Society Institute–Montenegro, and other international organizations in Montenegro. Also, beginning with 2006, a larger-scale two-year

project, the Roma Education Initiative, which built on prior experiences developed by the Open Society Institute in this area, was introduced by the Ministry of Education. The Roma Education Initiative was developed together with the Pedagogical Center of Montenegro, which has the status of an NGO. The initiative was financed by the Roma Education Fund and aims to facilitate the development of models for comprehensive integrated education programs in schools and preschools in five locations in the country. The Roma Education Initiative seeks to provide RAE students with support and incentives to succeed in school, while supporting schools themselves and helping teaching staffs to develop the tools for successful integration. External evaluations conducted to-date indicate that the Roma Education Initiative has contributed significantly to the school success of children included in the program (Roma Education Initiative, *Final Report*).

As part of this program, Roma teaching assistants were introduced in Montenegrin schools to bridge existing communication gaps between the education system and RAE families. Twenty such assistants were trained to date, but only 10 are actually working, primarily because salaries were significantly cut in 2006, when the payroll was transferred from external donors to the Ministry of Education. Independent observers and teaching assistants themselves have expressed concerns that this transfer of responsibilities to the ministry may lead to the elimination of those assistants who are perceived by school administrators as disloyal. Still, there is hope that official structures are slowly realizing the benefits of having Roma teaching assistants, and that training programs for such assistants will be extended.

For now, there is little support for Roma education beyond the limits of mandatory schooling in Montenegro. Vocational training is available only through the general activities of the national Employment Agency, and it is usually not tailored to the specific needs of Roma. Adult literacy classes are organized mostly by NGOs. And higher education scholarships are paid for by outside donors, as is the case with the six Roma students in the university-level preparatory education program, whose scholarships are paid for by the OSCE.

2.2 Employment

There is no nationally representative data on Roma employment as of this writing, though the Employment Agency initiated a survey of the employment situation of Roma as a first step in the implementation of the employment goals of the DAP. The survey was first piloted in the municipality of Niksic in 2005, in cooperation with the Roma NGO “Pocetak.” Then it was extended to the whole of Montenegro, with OSCE financing and support from the Foundation for Scholarship of Roma, in 2006. The results of the survey had not been published as of this writing.

Unofficial surveys indicate that the unemployment rate among Roma is as high as 82 percent (ISSP/UNDP). This estimate is even higher when taking into consideration refugees and internally displaced persons, who have a particularly difficult situation in accessing employment. Similarly, unemployment among RAE women is even higher than among men, primarily because of traditional gender roles, which leave women even less educated, less familiar with the official language, and less informed about employment options and job requirements.

Though discrimination plays an important role in perpetuating this state of affairs, Montenegro has yet to adopt comprehensive anti-discrimination legislation in line with current international standards in the field. Some declaratory bans on discrimination can be found in the Constitution, the Law on Minorities, the Law on Employment and the Law on Labor, but these statements are not associated with any specific enforcement mechanisms or penalties, so they are entirely ineffective.

In a positive development, the Employment Agency of Montenegro has taken the initiative to conduct regular anti-bias training for its personnel and to develop special application forms tailored to the specific situation and needs of Roma job seekers. Moreover, the Employment Agency set up a working group that aims to develop services for people with special difficulties in accessing employment, including Roma.

Unfortunately, these actions at the level of the Employment Agency are not matched by more concrete initiatives to facilitate or stimulate the actual employment of RAE in the public or private sector. A national employment strategy is expected to be adopted

for the 2007–2010 period, and it is to be followed by a more narrow strategy on stimulating employment of hard-to-employ categories. But, as of this writing, state institutions have no affirmative action programs for Roma employment, and there are no incentives for hiring minority candidates in the private sector. Sporadic training sessions for trades such as chimney-sweeping or household waste recycling are made available to Roma through the Employment Agency, but they are not tied to any programs to stimulate employment of those who complete the training.

There are no programs promoting self-employment that are specifically designed for RAE, and no state support for traditional handicrafts, which are simply relegated to the black market. Regular self-employment programs are available only to those who can fulfill standard requirements, and many RAE applicants cannot access them. Indeed, most RAE who are in business are involved in the so-called “gray market” economy, which is not recognized by financial institutions. They also often lack the type of guarantees, such as real estate or other assets, that are required to access credit. Microfinancing is available only through very few small NGO programs, which make credit available to particular vulnerable groups. As a consequence, most self-employed Roma and Egyptians use consumer credit to finance their businesses.

The problems in securing employment faced by internally displaced and refugee Roma have been compounded by the adoption of a new Law on Employment in 2002 and the Law on the Employment of Foreigners in 2004. In addition to erecting extra layers of bureaucracy for job-seekers, these new regulations mean that those who hire refugees and internally displaced persons must pay additional taxes, which naturally act as a disincentive for any employer.

2.3 Health

There is no data disaggregated by ethnicity on the health situation of Roma in Montenegro, but independent research, such as a report published in November 2006 by the UNDP, reveals severe gaps between RAE and other ethnic groups—both in terms of health determinants and in terms of outcomes. The UNDP estimated that more than 7 percent of Roma in Montenegro have

been denied medical services because they lacked personal identity documents, while 62 percent reported that, over the course of the previous year, they had not been able to afford prescription medication at least once (the corresponding figure among other ethnic groups is only 8 percent). Only 17 percent of Roma children have confirmed vaccinations against poliomyelitis, diphtheria, tetanus and whooping cough; the status of another 72 percent is impossible to confirm. Poor living conditions, low levels of education, and traditions such as the virginity cult contribute to perpetuating this situation (UNDP).

Still, according to NGOs and other independent observers, these numbers may be more reflective of failures in record keeping than of actual discrimination in the Montenegrin healthcare system. Even though there are no government healthcare policies targeting RAE, and even though no health-mediator program was initiated by the government, healthcare professionals in Montenegro regularly conduct vaccination drives and awareness-raising activities in Roma neighborhoods. No additional funds are available for most of these activities, and healthcare professionals often participate in them on a voluntary basis. As a consequence, Roma activists estimate that more than 90 percent of RAE children have actually been vaccinated in the past five years. Moreover, for those who do not have identity cards or healthcare records, the Red Cross and some welfare institutions can facilitate access to subsidized medical care.

There are no government-funded reproductive health programs specifically targeting Roma. NGOs and international agencies have filled this gap through short-term projects, which revealed the pressing need for such programs. For instance, according to the Niksic-based Center for Roma Initiatives, half of the Roma women examined as part of such a reproductive health project had at least one home birth, and more than 70 percent do not use any family planning means. NGO projects have helped improve this situation to a certain extent: The project conducted by the Center for Roma Initiatives in Niksic (Centre for Roma Initiatives, *Research on the Position of Roma Women in Niksic*) reported that the percentage of women under the age of 30 having home births has decreased to just more than 5 percent in the past five years, while the proportion of couples planning their families increased to 48 percent.

2.4 Housing

The vast majority of RAE in Montenegro live within segregated informal suburban settlements or inner-city ghettos—in overcrowded, substandard living spaces without basic utilities, such as sewage, or public services, such as garbage removal. Many informal settlements grew and became more compact with the addition of refugees and internally displaced persons, especially during the Kosovo conflict.

Survey results from 2003 (ISSP/UNDP; UNDP) show that 48 percent of Roma live in makeshift shacks, and 61 percent live in houses smaller than 30 square meters. Some 81 percent of Roma have less than 10 square meters per family member. While most Roma have access to electricity and some running water, sanitation is often unavailable in unregistered settlements, as local authorities are obliged to provide sanitation only in areas with a clear legal status. Unemployed Roma do not contribute to local taxation and frequently fall behind on their utility bills, and local authorities often cite the lack of payments as a reason to refuse any improvements in infrastructure for Roma communities. To make the situation worse, some settlements are located in the vicinity of landfills or other polluted or hazardous areas. According to the survey, 48 percent of Roma households are located close to garbage dumps, while 22 percent are placed in areas that regularly flooded by sewage, and 17 percent are in locations with highly polluted air.

Some of these issues are addressed by the Action Plan on Housing Policy adopted by the Montenegrin government in April 2005. The plan predicts investments in the housing sector of more than EUR 126,000,000—two-thirds of which is supposed to come from foreign donors—by the end of 2008, and it sets ambitious goals, such as building more than 1,000 social housing flats by the end of 2007. But, as fewer than 100 flats had been built by the end of 2006, it appears that some, if not all, of the targets set by this action plan will not be met as scheduled. Still, some

of the general directions set by the Action Plan on Housing Policy indicate the government's willingness to adequately address the housing situation of RAE. For instance, the action plan envisages that existing illegal settlements be granted legal status and be provided with the necessary infrastructure. In and of itself, this does not represent a major shift in housing policy: The 2000 Law on Building Constructions also required that illegal homes be registered, but local authorities failed to do so on deadline for lack of funding. Still, though it covers old ground, the action plan represents a renewed commitment to solving the legal status of informal settlements.

Such policy documents, even if only declarative for the most part, have registered some effects with local authorities, who have halted evacuation plans for residents of illegal settlements over the past two years. Moreover, in some cases, local authorities have even taken steps to provide alternate accommodation for Roma residents who found themselves homeless. In one instance, the municipality of Niksic provided 13 Roma families whose makeshift homes had burned to the ground with new housing with running water, canalization and other utilities.

Social housing, on the other hand, has yet to become available to Roma on a straightforward as-needed basis. For instance, according to a representative of the municipality of Podgorica present at a roundtable organized in October 2006, approximately one-third of the social housing recently built in the city had been given to Roma families. But some of this housing came with very tight strings attached: Twenty-two internally displaced Roma and two locally resident Roma were provided with housing through a project that gave the municipality the right to transfer the housing to new tenants if the current tenants found full-time employment. More generally speaking, the criteria and procedures for allocating social housing in Montenegro are not clear, and, therefore, it is difficult to evaluate how many such housing units are in practice available to Roma.