

# EDUCATIONAL TOOLS FOR ADDRESSING RACIALLY MOTIVATED CRIMES AGAINST ROMA AND TRAVELLERS

Resources for police academies and police schools



2025

**VOLUME 1**  
CROSS-CUTTING FACT SHEET



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The term "Roma and Travellers" is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of the terms Roma and/or Travellers.

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# ABOUT THE EDUCATIONAL FACT SHEETS

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The European Court of Human Rights (the European Court) has issued several judgments concerning the lack of effective investigations, including the failure to investigate possible racist motives in relation to allegations of ill-treatment, police operations or racial profiling of Roma and Travellers. A number of these judgments are currently under review by the Committee of Ministers, which is overseeing the implementation of measures at the national level to prevent the recurrence of similar issues.

In the supervision process of the implementation of European Court of Human Rights Roma and Traveller-related judgments, the Committee of Ministers took note of relevant measures taken by police agencies, including changes in legislation and practice, but further invited national authorities to continue and intensify their actions and to provide targeted training, enhanced capacity-building measures and awareness-raising activities for police and prosecutors in relation to the classification, investigation and prosecution of hate crimes including racially motivated crimes.

Recommendation CM/Rec(2024)4 of the Committee of Ministers to member States on combating hate

crime suggests that compulsory modules on hate crime should be included in the curricula of police training academies.

The [Roma and Travellers Division](#) supports member states' governments in the design and implementation of laws, policies, programmes and measures so as to ensure that Council of Europe human rights standards are effectively implemented by the police and truly benefit Roma and Travellers.

A critical aspect of training police officials to address racially motivated crimes against Roma and Travellers is to ensure a systematic approach to professional development. A viable solution would be to integrate the relevant Council of Europe standards and case law of the European Court into the curricula of initial or in-service police training institutions.

These educational fact sheets are designed to assist police educators and trainers to incorporate the Council of Europe's standards on racially motivated crimes against Roma into existing training programmes offered by police and educational institutions (police academies; police schools).



# RACIST VIOLENCE AGAINST ROMA AND TRAVELLERS

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## INTRODUCTION AND BACKGROUND

This fact sheet draws on key judgments of the European Court of Human Rights and other Council of Europe standards to set out:

- ▶ the nature and impact of racist violence against Roma and Travellers;
- ▶ the core elements of an effective investigation, including the concept of bias indicators and how they can be used to unmask hate crimes against Roma and Travellers;
- ▶ the importance of recording hate crimes and gathering disaggregated data;
- ▶ the importance of building the confidence of Roma and Travellers in policing.

The European Court of Human Rights (the European Court) consistently finds that discrimination on account of one's actual or perceived ethnicity is a form of racial discrimination under Article 14 of the European Convention on Human Rights (the Convention). "Racial discrimination is a particularly invidious kind of discrimination and, in view of its perilous consequences, requires from the authority's special vigilance and a vigorous reaction. It is for this reason that the authorities must use all available means to combat racism, thereby reinforcing democracy's vision of a society in which diversity is not perceived as a threat but as a source of enrichment" (*Paketova and Others v. Bulgaria*, 2022, paragraph 152).

The *Declaration* of the Committee of Ministers on the rise of antigypsyism and racist violence against Roma in Europe underscores growing concerns about increasing racist violence targeting Roma communities across Europe. Reports by the European Commission against Racism and Intolerance (ECRI) and other Council of Europe bodies have found that Roma and Travellers face daily risks of racist violence in the context of widespread *antigypsyism* and *discrimination*. In its *General Policy Recommendation No. 13* on combating antigypsyism and discrimination against Roma, ECRI states that it is "deeply concerned by the increasing acts of violence inflicted on a large number of Roma, and by the too-frequent impunity that the culprits enjoy". Such violence can also take place along with the risk of or forced

displacement and destruction of property belonging to Roma communities (*Moldovan (No. 2) and Others v. Romania*, 2005; *Burlya and Others v. Ukraine*, 2018; *Paketova and Others v. Bulgaria*, 2022).

The Council of Europe recognises hate speech as both a contributing factor to hate crime and a point of intervention for preventing such crimes.

Recommendation *CM/Rec(2024)4* of the Committee of Ministers to member States on combating hate crime explains: "Member States should take appropriate steps to improve awareness raising, education, training and the use of counter-speech or alternative discourse measures, in line with Recommendation *CM/Rec(2022)16* on combating hate speech, in order to improve the ability of relevant actors and institutions, including public officials, to proactively identify factors and conduct which could lead to hate crime. Particular attention should be given to the proliferation of hate speech in online platforms" (paragraph 56).

The European Court has repeatedly found that national authorities have failed to conduct an effective investigation into the potential racial motivation of violence against Roma and Travellers (see the *European Court's Factsheet on Roma and Travellers*). As such, the requirement for police to actively seek out and prove ethnic hatred or prejudice is highlighted in multiple cases heard by the European Court, highlighted in this fact sheet.

The European Court has emphasised that, where evidence indicates patterns of violence and intolerance against an ethnic minority, states have heightened positive obligations to respond effectively to alleged bias-motivated incidents (*Balkasi and Others v. Albania*, 2022; *Nachova and Others v. Bulgaria*, 2005; *Panayotopoulos and Others v. Greece*, 2025; *R.B. v. Hungary*, 2016; *Memedov v. North Macedonia*, 2021; *Lingurar v. Romania*, 2019; *M.B. and Others v. Slovakia (No. 2)*, 2023; *Pastrama v. Ukraine*, 2021).

Reports by ECRI emphasise the low rate of prosecution and poor quality of investigations into hate crimes, which may also be classified as less severe offences. Evidence of institutional racism further compounds these challenges. For example, Roma communities have been found to be the target of ethnic profiling, of police raids and of police brutality

(Parliamentary Assembly, “[Institutional racism of law-enforcement authorities against Roma and Travellers](#)”, 2023).

ECRI and other standard-setting bodies emphasise the critical role of police training in identifying, recording and responding to hate crime and racist violence, with a particular focus on improving the recognition and documentation of bias indicators (joint statement of the United Nations Committee on the Elimination of Racial Discrimination and the European Commission against Racism and Intolerance, 2025).

Recommendation [CM/Rec\(2024\)4](#) of the Committee of Ministers to member States on combating hate crime recommends the inclusion of compulsory training on combating hate crime in police academies. Regular awareness training, especially for officers specialising in hate crime investigations, should cover key areas such as identifying bias indicators, uncovering hate elements, securing evidence, conducting victim needs and risk assessments, and ensuring referrals to appropriate support services.

There is also a proven lack of trust between Roma and police, highlighting the need for better relations and confidence building ([ECRI, Preventing and combating antigypsyism and discrimination against Roma and Travellers](#), 2023).

## WHAT ARE ANTI-ROMA AND ANTI-TRAVELLER HATE CRIMES AND VIOLENCE?

“Hate crime” is understood as a criminal offence committed with a hate element based on one or more actual or perceived personal characteristics or statuses ([CM/Rec\(2024\)4](#)). “Hate” includes bias, prejudice or contempt. Anti-Roma and anti-Traveller hate crimes are crimes with a hate element based on actual or perceived Roma or Traveller identity. The crimes may also target an individual who is neither Roma nor a Traveller but has some sort of association with these groups, like a partner or a lawyer. People or property mistakenly targeted as Roma or Traveller are also considered victims of anti-Roma violence and should be treated accordingly. Recommendation [CM/Rec\(2024\)4](#) explains that “hate can be manifested with different degree of severity, ranging from everyday stigmatisation and discrimination, micro-aggressions and verbal abuse, to violence, terrorism, war crimes and genocide”.

## THE EFFECTIVE INVESTIGATION AND PROSECUTION OF RACIST CRIMES: KEY ELEMENTS

The explanatory memorandum of Recommendation [CM/Rec\(2024\)4](#) specifies that member states “should

ensure that the criminal justice system as a whole, including the institutions and individuals operating within it, makes certain that the hate element of hate crime is detected, unmasked, acknowledged and addressed throughout the criminal justice process in order to ensure that relevant positive obligations are met” (paragraph 21). The European Court and ECRI have identified several elements that constitute the effective investigation of racist violence against Roma and Travellers.

Article 14 of the Convention (prohibition of discrimination) imposes a duty on the police to adequately investigate possible racist motives in violent offences. As the European Court has explained, “when investigating violent incidents, such as ill-treatment, State authorities have the duty to take all reasonable steps to unmask possible discriminatory motives,” including race and ethnic origin, gender, religion, political opinion and sexual orientation ([Turan Cakir v. Belgium](#), 2009; [Abdu v. Bulgaria](#), 2014; [Angelova and Iliev v. Bulgaria](#), 2007; [Škorjanec v. Croatia](#), 2017; [Eremia v. the Republic of Moldova](#), 2013; [Virabyan v. Armenia](#), 2012; [Georgian Muslim Relations and Others v. Georgia](#), 2023; [M.C. and A.C. v. Romania](#), 2016).

## Public authorities

With regard to Article 2 (right to life), in the case of [Nachova and Others v. Bulgaria](#) the European Court concluded that in the context of the witness account and evidence of widespread prejudice and hostility against Roma in the country, the failure to adequately investigate a possible causal link between alleged racist attitudes and the use of lethal force by police officers constituted a violation of the procedural dimension of Article 14, in conjunction with Article 2. With regard to Article 3 (prohibition of torture and inhuman and degrading treatment), in the case of [Balázs v. Hungary](#), the European Court found that racist comments on social media boasting about an assault to be “powerful hate crime indicators” and that the failure to investigate them “impaired the adequacy of the investigation to an extent that it is irreconcilable with the State’s obligation in this field to conduct vigorous investigations” under Article 14 read in conjunction with Article 3 of the Convention.

## Private individuals

The additional duty to investigate possible racist overtones to a violent act applies also in cases in which private persons are involved, not only state authorities. In the case of [Šečić v. Croatia](#) the European Court found a violation of Articles 3 and 14 resulting from the failure of the authorities to take all reasonable steps to unmask any racist motive and to establish whether ethnic hatred or prejudice played a role in a violent attack committed by private individuals.

The European Court explained that to treat racially induced violence and brutality on an equal footing with cases that have no racist overtones would be to “turn a blind eye to the specific nature of acts that are particularly destructive of fundamental rights.”

## RELEVANT ASPECTS FOR CONSIDERATION BY NATIONAL INVESTIGATIVE AUTHORITIES

**Mixed motives:** while noting that not only acts based solely on a victim’s characteristic can be classified as racially motivated crimes, the European Court also acknowledged that perpetrators may have mixed motives, being influenced by situational factors equally or more strongly than by their biased attitude towards the group to which the victim belongs (*Balázs v. Hungary*, 2015).

**By association:** the European Court clarified that “the obligation on the authorities to seek a possible link between racist attitudes and a given act of violence, concerns not only acts of violence based on a victim’s actual or perceived personal status or characteristics but also acts of violence based on a victim’s actual or presumed association or affiliation with another person who actually or presumably possesses a particular status or protected characteristic” (*Škorjanec v. Croatia*, 2017).

**Best endeavours:** the respondent state’s obligation to investigate possible discriminatory overtones to a violent act is an obligation to use best endeavours and not absolute (*Bekos and Koutropoulos v. Greece*, 2005; *Stoica v. Romania*, 2008).

**Secure evidence:** the authorities must do what is reasonable in the circumstances to collect and secure the evidence, explore all practical means of discovering the truth and deliver fully reasoned, impartial and objective decisions, without omitting suspicious facts that may be indicative of discrimination through violence (*M.B. and Others v. Slovakia (No. 2)*, 2023; *Balkasi and Others v. Albania*, 2022).

**Uncover possible racist motives:** where any evidence of racist verbal abuse comes to light in an investigation, it must be checked and, if confirmed, a thorough examination of all the facts should be undertaken in order to uncover any possible racist motives (*Panayotopoulos and Others v. Greece*, 2025). Moreover, the general context of the attack has to be considered (*Škorjanec v. Croatia*, 2017).

## DEFINING AND RECORDING RACIST INCIDENTS

ECRI’s [General Policy Recommendation No. 11](#) on combating racism and racial discrimination in policing defines a racist incident as “any incident which

is perceived to be racist by the victim or any other person”. This means that if a person perceived that they were the target of anti-Roma or anti-Traveller violence, the police should record the incident as a racist incident. This broad definition aims to ensure that any instance perceived as racially motivated is recorded and potentially investigated, reinforcing inclusivity and sensitivity in overseeing such cases.

The same [recommendation](#) also stresses that police forces should establish a system for recording and monitoring racist incidents, regardless of whether these incidents are subsequently classified as criminal racist offences. This process serves as a basis for accountability and monitoring. In the same respect, the Committee of Ministers [Recommendation CM/Rec\(2024\)4](#) on combating hate crime encourages member states to ensure the “collection, analysis and publication of disaggregated data across the criminal justice system, including victim support, for the purposes of evaluating the effectiveness of implementation of this legislation, policies and other measures and their impact on preventing and combating hate crime”.

ECRI’s [General Policy Recommendation No. 13](#) on combating antigypsyism and discrimination against Roma encourages member states to take steps to encourage Roma victims of racist violence and crimes to lodge complaints and ensure that they receive the necessary assistance. [Recommendation CM/Rec\(2024\)4](#) emphasises the importance of “ensuring that no adverse repercussions will be suffered as a result of reporting hate crime, particularly in relation to those working in criminalised industries, irregularly present migrants and persons seeking international protection, by ensuring, for example, that there is a separation between the reporting of hate crime on the one hand and the enforcement of immigration laws on the other”.

## IDENTIFYING POTENTIAL HATE CRIMES: USING BIAS INDICATORS

[CM/Rec\(2024\)4](#) on hate crime emphasises the importance of “bias indicators” to help unmask the hate element of crimes and explains: “These indicators should be carefully developed in co-operation with relevant civil society organisations and should guide police in recording and investigating hate crimes appropriately”. Bias indicators are “objective facts, circumstances, or patterns attending a criminal act(s), which, standing alone or in conjunction with other facts or circumstances, suggest that the offender’s actions were motivated, in whole or in part, by any form of bias” (Organization for Security and Co-operation in Europe (OSCE), [Hate crime laws: a practical guide](#), Revised edition, 2022).

Bias indicators can serve as circumstantial evidence and help identify patterns of targeted offending. While they offer objective criteria for assessing the probable motive behind an incident, they do not necessarily prove that an offender's actions were driven by bias (OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR), *Understanding anti-Roma hate crimes and addressing the security needs of Roma and Sinti communities: a practical guide*, 2023). It is essential for police agencies to document and consider these indicators when interviewing victims and investigating cases of violence against Roma and Travellers (ECRI, *General Policy Recommendation No. 13*).

The European Court has found that, where there are no bias indicators or facts suggesting a connection between racist or discriminatory attitudes and the crime committed, the authorities are not obliged under Article 14 to investigate a "hate element" (*Ognyanova and Choban v. Bulgaria*, 2006). The authorities must do what is reasonable in the circumstances to collect and secure the evidence and explore all practical means of discovering the truth, without omitting suspicious facts that may be indicative of racially induced violence (*B.S. v. Spain*, 2012). Overall, it is crucially important that bias indicators are actively followed up and not ignored.

## KEY QUESTIONS TO OUTLINE RELEVANT INFORMATION

The following questions may assist identify potential anti-Roma hate crimes. Alternatively, they could be considered as plausible information that is sufficient to alert the authorities to the necessity of conducting investigations into possible racist motives (OSCE/ODIHR, *Understanding anti-Roma hate crimes and addressing the security needs of Roma and Sinti communities: a practical guide*, 2023; *Anti-Roma hate crime, Reporting*, 2021).

### Do the victims or witnesses perceive the incident to have been motivated by anti-Roma racism?

Victim perception is at the core of the definition of a racist incident, defined by ECRI's *General Policy Recommendation No. 11* as "any incident which is perceived to be racist by the victim or any other person". For example, individuals may assert that they had been forced to leave their homes against the backdrop of racist demonstrations because they were Roma. They may refer to circumstances of threats, verbal assaults and racist slurs of public officials and private individuals alike (*Paketova and Others v. Bulgaria*, 2022, paragraph 136; *Burlya and Others v. Ukraine*, 2018, paragraphs 92, 136).

### Were there comments, written statements, gestures, or graffiti that indicate bias?

This can include the use of anti-Roma racist insults, tropes, stereotypes and prejudices. Factual evidence relating to police officers asking someone if they are "Gypsy or Romanian" before resorting to physical force, following a deputy mayor's request to "teach the Roma a lesson", as well as police remarks about behaviour of Roma individuals as "pure Gypsy", or "common tactic employed by the Gypsies", may be considered as indicating racial bias (*Stoica v. Romania*, 2008, paragraphs 128-131; *Petropoulou-Tsakiris v. Greece*, 2007, paragraphs 29, 65; *Lingurar v. Romania*, 2019, paragraphs 74-78).

When victims or witnesses state that they heard police agents uttering anti-Gypsy slurs while performing their duties, when using firearms, resorting to force or other similar instances as well as in the aftermath of such instances, such as using racist language on social media, it may be vital to thoroughly investigate potential racial motives. (*Nachova and Others v. Bulgaria*, 2005, paragraphs 163-168; *Memedov v. North Macedonia*, 2021, paragraphs 47-49; *M.B. and Others v. Slovakia (No. 2)*, 2023, paragraph 95; *Balázs v. Hungary*, 2015, paragraphs 66-76; *Bekos and Koutropoulos v. Greece*, 2005, paragraphs 72-75).

### Was the victim visibly identifiable as belonging to Roma or Traveller communities?

Concerning an assault on a Roma man and a non-Roma woman, and racist insults directed at them based on their perceived ethnicity and relationship, the European Court held that the failure to consider and establish the link between the racist motive for the attack and the association with the Roma partner led to a deficient assessment of a racially motivated act (*Škorjanec v. Croatia*, 2017, paragraphs 70-71).

### Was the targeted property a place of professional, legal or cultural significance, such as a Roma settlement, a cultural club and/or other places that may be frequented by individuals from Roma and Traveller communities?

Some cases concern incidents where large numbers of non-Roma residents have protested, destroyed or set on fire houses in a Roma settlement (*Gergely v. Romania*, 2007, paragraph 10; *Kalanyos and Others v. Romania*, 2007, paragraphs 10-11; *Tănase and Others v. Romania*, 2009, paragraphs 9-10), while others involve non-Roma individuals randomly picking and shooting Roma people in the neighbourhood

"where Roma live" (*Lakatošová and Lakatoš v. Slovakia*, 2018, paragraphs 11-13).

The case of *R.B. v. Hungary* concerns incidents that took place in a Roma neighbourhood, involving anti-Roma marches and direct threats against Roma families. The European Court found: "In the light of the evidence before it, in particular the report of the Parliamentary Commissioner for National and Ethnic Minorities, ... that the behaviour of those participating in the marches was premeditated and motivated by ethnic bias" (*R.B. v. Hungary*, 2016, paragraph 47).

### **Did the property damage involve racist epithets against Roma or Travellers?**

In some cases, there may be instances where individuals resort to threats or uttering insulting remarks, which can be accompanied by physical violence, directed towards members of the Roma community or the community as a whole. For example, large crowds of non-Roma people ransack houses or set fire to and destroy Roma houses and their contents, forcing members of the Roma community to flee or subsequently deny return (*Tănase and Others v. Romania*, 2009, paragraphs 9-11, *Gergely v. Romania*, 2005, paragraph 1, *Burlya and Others v. Ukraine*, paragraphs 8-12).

### **Is the suspect a member of a different ethnic or racial group to that of the victim?**

In some cases, victims may provide relevant information about the attackers, such as being engaged in similar violent acts and using racist verbal abuse against other Roma individuals or allegedly being sympathisers of extremist or racist ideologies (*Šećić v. Croatia*, 2007, paragraphs 24, 68-70; *Yotova v. Bulgaria*, 2012, paragraphs 106, 110; *Škorjanec v. Croatia*, 2017, paragraphs 6-12, 68). Racist overtones may be identified in the course of investigations, based on statements by victims, witnesses or perpetrators (*Angelova and Iliev v. Bulgaria*, 2007, paragraphs 13, 116-117).

It is important to note that some hate crime victims are chosen not because they possess a particular characteristic (being Roma) but because of their association with another person who actually or presumably possesses the relevant characteristic. This connection may take the form of the victim's membership of, or association with a particular group, or the victim's actual or perceived affiliation with a member of a particular group through, for instance, a personal relationship, friendship or marriage (*Škorjanec v. Croatia*, 2017, paragraph 66).

### **Does the suspect belong to a hate group?**

These could include different far-right groups or groups advocating anti-Roma racist intolerance. Domestic authorities should pay particular attention to the specific context in which racist statements are uttered. It is important to consider the timing of events, particularly those involving large groups, far-right groups and paramilitary groups known for their militant behaviour. Questions regarding the targeting of the Roma community and the co-ordinated nature of intimidation are of critical importance. Racist statements taken together with the context in which they are expressed could constitute a clear and imminent risk of violence against members of the targeted group (*Király and Dömötör v. Hungary*, 2017, paragraphs 76-80; *R.B. v. Hungary*, 2016, paragraphs 36, 39-40, 88; *Vona v. Hungary*, paragraphs 59-61, 67-69).

### **Were drawings or graffiti of symbols, such as a Nazi symbol, a Ku Klux Klan sign or a Celtic cross, among others, found at the scene of the crime or incident?**

For example, the victim complained about his neighbours using racist remarks such as "dirty gypsy", "trash", "Muslim", and that during a religious holiday celebrated by him, a large cross was drawn on his apartment door, and a large message was written on the wall next to it saying "move out or you'll bitterly regret it" (*Alković v. Montenegro*, 2017, paragraphs 8-18).

### **Did the incident occur following or amid political campaigns that scapegoated Roma and Travellers and blamed them for various societal ills, such as crime or unemployment, or being beneficiaries of social welfare schemes?**

The European Court stated that "organising a series of rallies allegedly in order to keep 'Gypsy criminality' at bay by means of paramilitary parading can be regarded as implementing a policy of racial segregation. In fact, the intimidating marches can be seen as constituting the first steps in the realisation of a certain vision of 'law and order' which is racist in essence". Furthermore, the European Court held that "large-scale, coordinated intimidation – related to the advocacy of racially motivated policies which are incompatible with the fundamental values of democracy – may justify State interference with freedom of association" (*Vona v. Hungary*, 2013, paragraphs 69-71, 59-61; *R.B. v. Hungary*, 2016, paragraphs 36, 39-40, 88; *Király and Dömötör v. Hungary*, 2017, paragraph 76-80).

## **Is there evidence of national patterns of violence and prejudice against Roma and Traveller communities, for example based on ECRI reports or research conducted by local civil society organisations or equality bodies?**

In circumstances related to incidents that may be perceived as having racist overtones, it is important to consider the broader context of general prejudice and hostility against Roma. This is particularly relevant in light of the prevalence of discrimination and violence against Roma and ongoing incidents of police abuse. In such cases, it is essential to verify the situation within the framework of the obligation to investigate a possible causal link between the alleged racist attitudes and the abuse suffered by the victims (*Ciorcan and Others v. Romania*, 2015, paragraph 164; *Lingurar v. Romania*, 2019, paragraphs 76, 80; *Fedorchenko and Lozenko v. Ukraine*, 2012, paragraph 68).

## **PROMPT AND THOROUGH INVESTIGATIONS**

The European Court held that “where there is suspicion that discriminatory attitudes induced a violent act, it is particularly important that the official investigation is pursued with vigour and impartiality, having regard to the need to reassert continuously society’s condemnation of discriminatory hatred” (*Nachova and Others v. Bulgaria*, 2005, paragraph 160).

In *Balkasi and Others v. Albania*, the European Court explains that the authorities must always make a serious attempt to find out what happened and be capable of leading to the identification and – if appropriate – punishment of those responsible. Importantly, “the authorities must do what is reasonable in the circumstances to collect and secure the evidence, explore all practical means of discovering the truth and deliver fully reasoned, impartial and objective decisions, without omitting suspicious facts that may be indicative of racially induced violence” (*Balkasi and Others v. Albania*, 2022, paragraphs 50, 68).

## **SUPPORTING AND PROTECTING VICTIMS**

The police play a central role in identifying and addressing the needs of hate crime victims, and their ability to effectively support victims can strengthen their legitimacy with Roma and Traveller communities. The Council of Europe Committee of Ministers Recommendation [CM/Rec\(2023\)2](#) on rights, services and support for victims of crime sets out key rights for all victims, including victims of hate crime. At European Union level, the minimum standards on

the rights, support and protection of victims of crime are set by [Directive 2012/29/EU](#).

Victims’ rights include an individualised assessment of their protection needs upon first contact with criminal justice authorities to identify necessary protections based on personal characteristics, the nature and circumstances of the crime, and specific vulnerabilities, including for victims of hate crime. Police are recognised as being part of the “competent authority” responsible for ensuring victims’ rights, especially with regard to individual needs assessment and victim protection.

Victims also have the right to clear, accessible communication and to understand proceedings, with measures to support their understanding and participation, including the option for interpretation and translation. Depending on national law, victims can receive procedural information, make formal complaints and be informed of case developments, including decisions related to protection, compensation and procedural participation.

The rights to protection and support are key to Recommendation [CM/Rec\(2023\)2](#), including measures to prevent secondary victimisation, the right to minimal and sensitive interviews, and privacy protections. Victims should be offered appropriate victim support from relevant public authorities or specialist civil society organisations, facilitated by referrals from justice authorities.

## **ACKNOWLEDGING AND RESPONDING TO INTERSECTIONALITY**

Recommendation [CM/Rec\(2024\)4](#) on combating hate crime explains that the experiences of those targeted by hate crime are not necessarily limited to a single aspect of their identity, but can be understood as also operating on multiple, intersecting grounds. Police should be aware that hate victimisation can be more harmful when cumulatively experienced due to intersections of identity. For example, in *B.S. v. Spain* and *Alković v. Montenegro* the European Court stressed the importance of effectively investigating multiple aspects of the applicant’s complaint regarding perceived discrimination on grounds of both racial origin and gender or ethnic origin and religion.

## **ADDRESSING RACIAL PROFILING**

ECRI’s [General Policy Recommendation No. 11](#) on combating racism and racial discrimination in policing highlights racial profiling as a specific form of police discrimination, defined as “the use by the police, with no objective and reasonable justification, of grounds such as race, colour, language, religion, nationality or national or ethnic origin in control,

surveillance, or investigation activities". Crucially, experiences of racial profiling lead to humiliation, alienation and the stigmatisation of minority communities, including Roma and Travellers.

ECRI's recommendation emphasises that these effects degrade trust between communities and police, which is essential for effective policing. Member states need to take steps to monitor, address and prevent racial profiling through training, guidelines, data collection, oversight and, where necessary, disciplinary action (Parliamentary Assembly, "Institutional racism of law-enforcement authorities against Roma and Travellers", 2023).

In cases where Roma people have been targeted by police operations and the authorities have perceived the Roma community in terms of ethnicity and criminal behaviour, the European Court of Human Rights has found that such treatment amounts to ethnic profiling (*Lingurar v. Romania*, 2019, paragraphs 76, 79).

The issue of ethnic profiling has also been raised in the context of border controls, particularly in relation to Roma persons (*Memedova and Others v. North Macedonia*, 2023, paragraphs 90 and 91).

Other cases before the European Court have considered the issue of racial profiling through identity checks by the police on the basis of physical characteristics and skin colour (*Muhammad v. Spain*, 2023; *Basu v. Germany*, 2023; *Wa Baile v. Switzerland*, 2024, *Seydi and Others v. France*, 2025).

## ENCOURAGING ROMA AND TRAVELLER COMMUNITIES TO REPORT RACIST VIOLENCE

The Recommendation CM/Rec(2017)10 of the Committee of Ministers on improving access to justice for Roma and Travellers in Europe urges states to encourage Roma to report hate crimes and

discrimination while also allowing for third-party reporting to support Roma victims.

The police should aim to improve their relationship with Roma and Traveller communities through community policing and crime prevention, which, in turn, will help enhance trust and improve reporting.

Dedicated hate crime plans should also be considered as a key strategy, ensuring that the police take a structured and proactive approach to addressing hate crime.

The Recommendation CM/Rec(2024)4 on combating hate crime emphasises the need to encourage the reporting of hate crimes by providing multiple reporting pathways, including both online and anonymous options. This approach aims to make reporting more accessible, especially for individuals who may distrust the police or face other barriers.

Additionally, the recommendation calls for practical support to civil society organisations, enabling them to serve as third-party reporting centres. These centres provide alternative mechanisms, such as hotlines and online systems, allowing victims to report incidents anonymously and access support services.

To address underreporting, member states are encouraged to collaborate with civil society to raise awareness about reporting options and ensure these options are widely accessible in various languages and formats.

Encouraging the reporting of racist violence is strongly connected to the need to develop broader confidence-building measures, such as consultation meetings between police officers and representatives of Roma and Traveller communities and the establishment of dedicated hate crime units.

Furthermore, the role of Roma police officers in building public confidence should be recognised, as well as the capacity of Roma police unions, where they exist, to inform best practices.

# CROSS-CUTTING FACT SHEET SLIDE TEMPLATE

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## INSTRUCTIONS FOR TRAINERS

This presentation provides learners with essential knowledge for identifying, investigating and responding to racist violence against Roma and Travellers. It is based on the cross-cutting fact sheet, which sets out European Court of Human Rights rulings, Council of Europe recommendations and ECRI reports to ensure the police uphold their legal obligations in addressing hate crime.

Throughout this session, trainers should remind participants to refer to their fact sheet for additional case examples, legal references and key definitions. Emphasise and integrate national laws, police training guidelines and any specific policies on hate crime and anti-Roma and anti-Traveller hate crime.

There are two ways to do this, as indicated below.

1. Integrate national laws and guidelines into relevant sections of this presentation as you present each topic.
2. Use the final resource slides to provide (if available):
  - ▶ the national legal framework on hate crime (legislation, definitions, criminal code provisions);
  - ▶ national police policies and training guidelines on hate crime investigations;
  - ▶ specific measures addressing anti-Roma and anti-Traveller hate crime;
  - ▶ national hate crime data, including recorded cases and trends related to Roma and Travellers.

## ADDRESSING RACIST VIOLENCE AGAINST ROMA AND TRAVELLERS

### Slide 1 – Introduction and background

#### Key points

- ▶ The European Court of Human Rights has ruled that racial discrimination is particularly harmful and requires a vigorous state response.
- ▶ Authorities must use all available means to combat racism and uphold democratic values.
- ▶ Anti-Roma and anti-Traveller racist violence is a serious concern across Europe.

- ▶ The police have a heightened obligation to investigate and respond effectively.

#### Speaker notes

- ▶ This section highlights the police's legal duty to address hate crimes targeting Roma and Travellers.
- ▶ The European Court has emphasised that states must take special measures to prevent and respond to racist violence.
- ▶ Failure to do so violates human rights obligations.

### Slide 2 – What are anti-Roma and anti-Traveller hate crimes?

#### Key points

- ▶ Hate crime is a criminal offence committed with a hate element – meaning it is motivated, in whole or in part, by bias, prejudice or contempt.
- ▶ A hate element can be based on the victim's actual or perceived Roma or Traveller identity.
- ▶ Victims can also include non-Roma individuals associated with Roma (partners, lawyers, activists).
- ▶ Hate crimes range from everyday discrimination and microaggressions to violence, terrorism and genocide.

#### Speaker notes

- ▶ The hate element is central to defining hate crime.
- ▶ Officers must recognise that even if a crime appears random, it may have been motivated by bias against Roma or Travellers.
- ▶ Inadequate investigations lead to underreporting and impunity.

### Slide 3 – Key elements of effective investigations

#### Key points

- ▶ Authorities must actively investigate racial motives in violent crimes involving both public officials and private individuals.
- ▶ Failure to explore bias motivation can violate human rights obligations.

- ▶ Case examples: *Nachova and Others v. Bulgaria* (2005) – Excessive police force against Roma men, failure to investigate racial bias. *Balázs v. Hungary* (2015) – Hate speech ignored in investigation, undermining justice. *Šećić v. Croatia* (2007) – The duty to investigate racial bias also applies to crimes by private individuals.

#### Speaker notes

- ▶ Investigators must ask key questions: was the victim targeted because of their ethnicity? Were there racial slurs or extremist links? Investigating hate motivation is not optional—it is a legal duty.

### Slide 4 – State obligations: substantive limb

#### Key points

- ▶ Substantive limb: whether or not discriminatory attitudes were a causal factor in the impugned conduct.
- ▶ Relevant cases: *Stoica v. Romania* (2008), paragraph 118; *Antayev and Others v. Russia* (2014), paragraph 123; *Aghdgomelashvili and Japaridze v. Georgia* (2020), paragraph 46.
- ▶ In principle, the burden of proof lies on the applicant.
- ▶ However, where events lie wholly or largely within the exclusive knowledge of the authorities, the burden shifts to the authorities to provide a satisfactory and convincing explanation.

#### Speaker notes

- ▶ Courts assess whether discrimination played a role in the violation of rights.
- ▶ Authorities must rebut allegations of bias with clear evidence or risk violating Article 14 of the European Convention on Human Rights.
- ▶ Failure to acknowledge bias contributes to institutional impunity.

### Slide 5 – State obligations: procedural limb

#### Key points

- ▶ Procedural limb: the state has an obligation to investigate possible racist motives for acts of violence.
- ▶ Where racial attitudes induced a violent act, the authorities must pursue an official investigation with vigour and impartiality (*Nachova and Others v. Bulgaria*, 2005, paragraph 160).
- ▶ Failing to unmask discriminatory motives and treating bias-motivated crimes as ordinary offences ignores their destructive impact on fundamental rights.

- ▶ The obligation to prove discriminatory motives is an obligation to use best endeavours – authorities must do what is reasonable under the circumstances.

#### Speaker notes

- ▶ The police must actively investigate hate motives, not dismiss them as ordinary crimes.
- ▶ Authorities must seek out bias indicators, interview witnesses and analyse patterns of targeted violence.

### Slide 6 – Identifying and recording racist incidents

#### Key points

- ▶ ECRI's General Policy Recommendation No. 11 defines a racist incident as any incident perceived as racist by the victim or any other person.
- ▶ Police must document hate incidents, even if they do not meet the criminal threshold.
- ▶ Proper recording helps track trends and ensure accountability.

#### Speaker notes

- ▶ Perception matters: if a victim believes a crime was racist, police must record and investigate it accordingly.
- ▶ Failure to record hate crimes masks the real scale of the problem.

### Slide 7 – Using bias indicators to identify hate crimes

#### Key points

- ▶ Bias indicators are objective facts, circumstances or patterns that suggest a hate motivation.
- ▶ The Council of Europe emphasises that bias indicators should be developed in co-operation with civil society.
- ▶ Bias indicators serve as circumstantial evidence but do not necessarily prove hate motivation.
- ▶ The police must document and consider bias indicators when interviewing victims and investigating cases of violence against Roma and Travellers.

### Slide 8 – Bias indicators: victim and witness perception

#### Key points

- ▶ Victim perception is central to defining a racist incident.

- ▶ ECRI's General Policy Recommendation No. 11 states that a racist incident is "any incident which is perceived to be racist by the victim or any other person".
- ▶ Examples: *Paketova and Others v. Bulgaria* (2022) – Roma families forced to leave their homes because of racist demonstrations.
- ▶ *Burlya and Others v. Ukraine* (2018) – Roma individuals reported fleeing their homes because of racist threats and mob violence.

#### **Speaker notes**

- ▶ The police must always consider victim perception when assessing bias motivation.
- ▶ Even if no direct evidence of bias is found, the context of the crime must be examined.

### **Slide 9 – Bias indicators: racist comments or graffiti**

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#### **Key points**

- ▶ Were there comments, written statements, gestures or graffiti that indicate bias?
- ▶ This includes anti-Roma racial slurs, tropes, stereotypes and prejudices.
- ▶ Examples: *Stoica v. Romania* (2008) – Police officers used racial slurs while assaulting a Roma man.
- ▶ *Petropoulou-Tsakiris v. Greece* (2007) – Authorities ignored anti-Roma racial slurs during police brutality cases.
- ▶ *Lingurar v. Romania* (2019) – Officers used racial insults while conducting raids in Roma settlements.

#### **Speaker notes**

- ▶ Racial slurs are a strong bias indicator and should always be recorded in hate crime investigations.

### **Slide 10 – Bias indicators: targeted location**

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#### **Key points**

- ▶ Was the crime committed in a Roma neighbourhood, settlement, cultural site or other significant place?
- ▶ Examples: *R.B. v. Hungary* (2016) – A Roma neighbourhood was subjected to anti-Roma marches and direct threats.
- ▶ The headquarters of the Roma non-governmental organisation Amalipe in Bulgaria was vandalised, with racist and anti-Roma slogans spray-painted on the building.

#### **Speaker notes**

- ▶ Hate crimes often target symbolic locations to intimidate an entire community.

### **Slide 11 – Bias indicators: suspect's background**

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#### **Key points**

- ▶ Is the suspect a member of a different ethnic or racial group than the victim?
- ▶ Does the suspect belong to a hate group or extremist movement?
- ▶ Examples: *Šečić v. Croatia* (2007) – Attackers of a Roma man were part of a far-right group known for hate crimes.
- ▶ *Király and Dömötör v. Hungary* (2017) – Large-scale anti-Roma rallies organised by far-right groups led to co-ordinated intimidation of Roma communities.
- ▶ *Vona v. Hungary* (2013) – The European Court ruled that paramilitary-style marches against Roma communities were acts of large-scale racist intimidation.

#### **Speaker notes**

- ▶ If a suspect has extremist affiliations, this must be flagged as a potential bias indicator.

### **Slide 12 – Bias indicators: hate symbols and political context**

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#### **Key points**

- ▶ Were hate symbols (Nazi symbols, Ku Klux Klan signs, Celtic crosses) found at the crime scene?
- ▶ Did the incident occur amid anti-Roma political rhetoric?
- ▶ Examples: *Alković v. Montenegro* (2017) – Racist messages were written on a Roma family's home, urging them to leave the neighbourhood.
- ▶ *Vona v. Hungary* (2013) – Hate speech and far-right rhetoric during election periods contributed to increased violence against Roma.

#### **Speaker notes**

- ▶ Hate crimes often escalate in politically charged environments where Roma are scapegoated.

### **Slide 13 – Bias indicators: other**

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#### **Key points**

- ▶ Was the victim visibly identifiable as Roma or Traveller?  
Clothing, language, traditional appearance.

- ▶ Is there any other clear motive?  
The absence of another motive strengthens the case for bias.

#### **Speaker notes**

- ▶ If a victim is clearly identifiable as Roma or Traveller, this could be considered as part of the investigation.

### **Slide 14 – Supporting and protecting victims**

#### **Key points**

- ▶ Hate crime victims require individualised risk assessments and protection.
- ▶ Hate crime causes severe trauma and secondary victimisation.
- ▶ Roma women, disabled Roma and lesbian, gay, bisexual, transgender, queer and more (LGBTQ+), Roma face compounded discrimination.
- ▶ Police must ensure victims have access to support services.

#### **Speaker notes**

- ▶ Intersectionality matters – some victims face multiple vulnerabilities.
- ▶ Police must ensure victim protection and prevent retaliation.

### **Slide 15 – Addressing racial profiling**

#### **Key points**

- ▶ ECRI defines racial profiling as unjustified use of ethnicity in policing.
- ▶ Roma are disproportionately stopped, searched and raided by police.
- ▶ Profiling damages trust and discourages Roma from seeking police protection.

#### **Speaker notes**

- ▶ Racial profiling undermines trust between police and communities.
- ▶ Officers must receive training to avoid discriminatory practices.

### **Slide 16 – Encouraging reporting of hate crimes**

#### **Key points**

- ▶ Many Roma and Travellers do not report hate crimes because they distrust or fear the police.
- ▶ Solutions include:
  - anonymous reporting options (hotlines, online forms);
  - third-party reporting through non-governmental organisations;
  - community engagement initiatives.

#### **Speaker notes**

- ▶ Encouraging victims to report requires building trust through fair treatment and accessible reporting mechanisms.

### **Slide 17 – National legal and policy context (trainers to add)**

#### **Key points**

- ▶ National hate crime laws and legal definitions.
- ▶ National police policies and training guidelines on hate crime.
- ▶ National data on anti-Roma and anti-Traveller hate crimes.

### **Slide 18 – Conclusion and key takeaways**

#### **Key points**

- ▶ Police must thoroughly investigate racial motives in violent crimes.
- ▶ Failure to consider bias motivation violates human rights obligations.
- ▶ Bias indicators must be actively followed up.
- ▶ Building trust with Roma communities requires fair policing and proactive engagement.

#### **Speaker notes**

- ▶ Effective policing requires accountability, fairness and trust.
- ▶ Ensuring a proper response to hate crimes benefits police and strengthens public safety.

# ROOTS OF ANTIGYPSYISM

## SLIDE TEMPLATE

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### INSTRUCTIONS FOR TRAINERS

This presentation can be used and adapted alongside the main training presentation to introduce the overall subject. The slides should be used before discussing modern hate crime investigations and bias indicators. Trainers should encourage participants to connect historical discrimination with present-day police challenges. Encourage officers to reflect on local examples of institutional racism and hate crime trends.

The content of the presentation is based on the report titled ["Antigypsyism: causes, prevalence, consequences, possible responses"](#) undertaken under guidance of the Council of Europe Committee of Experts on Roma and Traveller Issues and the Parliamentary Assembly [Resolution 2523 \(2023\)](#) and its corresponding [report](#) on institutional racism of law-enforcement authorities against Roma and Travellers.

### Slide 1 – The roots of antigypsyism

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#### Key points

- ▶ Historical exclusion, perceptions of stateless outsiders, legal and social exclusion.
- ▶ Religious and cultural stigmatisation. Christian myths framed Roma as sinners or cursed, reinforcing deep-seated prejudices. Roma were enslaved in Eastern Europe.
- ▶ Racial classification and “scientific” racism. During the 18th and 19th centuries “race science” falsely depicted Roma as criminal and inferior. Eugenics policies led to forced sterilisation, segregation and genocide.
- ▶ Colonial stereotypes and the “Gypsy” myth: Roma were romanticised as exotic yet dangerous, justifying legal discrimination.

### Slide 2 – The scale and forms of anti-roma violence

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#### Key points

- ▶ Manifestations of antigypsyism: hate crimes, discrimination, school segregation, police violence, forced evictions and mob attacks.

- ▶ Structural discrimination: Roma face exclusion in housing, education and employment.
- ▶ Roma Holocaust denial and distortion: failure to acknowledge historical injustices reinforces contemporary exclusion.
- ▶ State complicity and impunity: police failures embolden perpetrators of anti-Roma violence.

### Slide 3 – Police brutality and excessive use of force

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#### Key points

- ▶ Documented cases: European Court rulings against Bulgaria, Greece, Hungary, North Macedonia, Romania and Slovakia.
- ▶ Violence resulting in death: multiple cases where police brutality led to fatalities.
- ▶ Failure of investigations: systemic impunity in handling police violence against Roma.

#### Speaker notes

- ▶ Discuss European Court findings on excessive use of force, including cases where Roma individuals died due to police actions.
- ▶ Highlight *Nachova and Others v. Bulgaria*, where the European Court ruled that authorities failed to investigate racial motives in police killings.
- ▶ Explain that impunity fosters a culture of violence, as perpetrators expect no consequences.

### Slide 4 – Raids on Roma settlements

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#### Key points

- ▶ Violent police raids: Roma communities frequently targeted under false pretexts.
- ▶ Impact: trauma, property destruction, forced displacement.
- ▶ European Court findings: raids justified through racial stereotypes and political scapegoating.
- ▶ Failure of state protection: the police fail to prevent mob attacks against Roma.

#### Speaker notes

- ▶ Describe cases like *Lingurar v. Romania*, where the European Court ruled that a police raid was racially motivated.

- ▶ Explain that raids are often justified by racist narratives, branding Roma as criminals.
- ▶ Highlight cases where the police failed to intervene against violent mobs attacking Roma settlements.

## Slide 5 – Ethnic profiling and police stops

### Key points

- ▶ Frequent targeting of Roma and Travellers in routine checks.
- ▶ Racial profiling: the police disproportionately stop, search and question Roma.
- ▶ Criminalisation of poverty: begging and informal housing treated as crimes.
- ▶ Impact: humiliation, mistrust and fear of police.

### Speaker notes

- ▶ Define ethnic profiling: use of ethnicity in control, surveillance or investigation without objective justification.
- ▶ Cite ECRI's General Policy Recommendation No. 11 against racial profiling.
- ▶ Use Parliamentary Assembly Resolution 2523: systematic checks on Roma increase distrust in police.

## Slide 6 – Hate crime and political hate speech against Roma

### Key points

- ▶ Hate crimes against Roma are widespread but underreported. Roma fear retaliation and police inaction, leading to low reporting rates.
- ▶ Violent attacks by citizens on Roma and Traveller communities. Insufficient police intervention to prevent or stop attacks.
- ▶ Far-right political discourse fuels hate crime. Politicians and media spread anti-Roma narratives, framing Roma as criminals or parasites.
- ▶ Hate speech on social media escalates real-world violence. "Far-right" groups and extremists attack Roma communities.

## Slide 7 – Forced evictions and housing discrimination

### Key points

- ▶ Forced evictions as a form of systemic discrimination. Roma are evicted without alternative housing, leading to homelessness and social exclusion.
- ▶ Municipal regulations justify segregation and displacement. Roma are isolated in poor,

- marginalised areas, often in ghettos or informal settlements. Discriminatory urban planning keeps Roma in poverty and vulnerable to attacks.
- ▶ The police's role in forced evictions. The police often carry out evictions, further eroding Roma trust in authorities.

## Slide 8 – Access to justice

### Key points

- ▶ Underreporting of hate crimes: Roma fear reprisals and police inaction.
- ▶ European Court rulings: states must investigate bias motives in hate crimes.
- ▶ Legal barriers: Roma face discrimination within judicial systems.
- ▶ Recommendations: improve legal aid, victim support and training for prosecutors.

### Speaker notes

- ▶ Explain that European Court case law requires police to unmask racial motives in hate crimes.
- ▶ Reference *Šećić v. Croatia*, where the European Court found a failure to investigate racist motives in an attack against a Roma victim.
- ▶ Emphasise the importance of bias indicators in identifying hate crimes.

## Slide 9 – Good practices and solutions

### Key points

- ▶ Data collection: essential for tracking police abuse and hate crime trends.
- ▶ Independent complaint mechanisms: ensure accountability for police misconduct.
- ▶ Training: the police must be trained in bias indicators and hate crime recognition.
- ▶ Dialogue and confidence building: engage Roma communities in policing strategies.

### Speaker notes

- ▶ Highlight, where applicable, [projects](#) or activities, which have trained police on discrimination in Roma communities.
- ▶ Discuss how cultural-awareness training helps combat antigypsyism.

## Slide 10 – Conclusion and key takeaways

### Key points

- ▶ Institutional racism must be acknowledged and addressed. Independent investigations are necessary for police accountability.

- ▶ Hate crime investigations must unmask bias motives. Building trust with Roma communities is essential for better policing.
- ▶ Reinforce the need for proper hate crime investigations.
- ▶ Highlight the importance of continued police training and confidence-building measures.

#### **Speaker notes**

- ▶ Summarise the importance of recognising and addressing systemic discrimination.

# TRAINER NOTES AND TIPS

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## TRAUMA-INFORMED TRAINING

When dealing with sensitive issues such as violence against Roma communities, it is essential to foster a respectful and effective learning environment. A trauma-informed approach to police training is appropriate. This approach not only recognises the potential trauma experienced by participants but also ensures that training methods do not inadvertently cause harm. Below are some practical tips for trainers.

**Create a safe learning environment:** establish clear guidelines that promote respect, confidentiality and empathy during training sessions. Ensure that all participants feel secure and supported, recognising that some may have personal experiences related to the training topics.

**Use culturally sensitive materials:** develop training content that is respectful and inclusive of Roma culture. Avoid stereotypes and ensure that scenarios, such as role-plays, are realistic and free from bias. This sensitivity helps prevent re-traumatisation and fosters a more inclusive environment.

**Offer opt-out options for sensitive activities:** recognise that role-playing scenarios involving violence or discrimination may trigger traumatic responses. Provide participants with the option to observe rather than participate in these activities, ensuring that opting out does not lead to judgment or negative consequences.

**Debrief thoroughly after role-playing exercises:** after conducting role-playing scenarios, facilitate debriefing sessions where participants can express their feelings, discuss their experiences and process any emotions that have arisen. This practice helps mitigate potential trauma and reinforces learning.

**Provide access to support resources:** ensure that participants are aware of available support services, if available, such as counselling or peer-support groups, should they need assistance in processing emotions triggered during training. Having support readily available underscores the importance of mental health and well-being.

By integrating these trauma-informed practices, trainers can create a learning environment that is respectful, supportive and effective. This approach should have the added benefit of enhancing the capacity of police officers to engage empathetically and professionally with all communities.

## THE EUROPEAN CONVENTION AND THE EUROPEAN COURT OF HUMAN RIGHTS

The [Toolkit for police officers](#) regarding Council of Europe standards on racially motivated crimes and non-discrimination with a focus on Roma and Travellers points to a number of important aspects when discussing relevant standards for police.

Anyone, including police officers, who think that they are personally and directly the victims of a violation of one or more of their European Convention rights can file a complaint with the European Court of Human Rights.

In the context of the European Convention on Human Rights, police officers have the right to be protected in dangerous situations and have the necessary equipment, training and adequate resources.

If a police officer must stand trial in criminal proceedings for acts performed as an official, all fair-trial standards apply.

A reasonable expectation of privacy in the workplace for police officers should be ensured, as well as protection against discrimination in relation to recruitment, working conditions, promotions, equal pay, dismissal or harassment.

Reasonable working hours and rest periods, and adequate remuneration and health regulations should be put in place; sick-leave and invalidity insurance with respect to on-duty accidents, and other social-security measures should be ensured (parental leave, childcare responsibilities, etc.).

Many police officers have won cases before the European Court of Human Rights (mostly related to salary issues and other labour disputes).

The European Court of Human Rights is fully aware of the difficulties (and dangers) the police face every day and takes them into account when reviewing allegations of improper police conduct.

For details on cases referred to the European Court of Human Rights by police officers, see the [Toolkit for police officers](#), pages 43-45. Another relevant resource for trainers is the "[Manual for police education on equality and non-discrimination](#)", which is available in various languages.

The Roma and Travellers Division of the Council of Europe supports member states' governments in the design and implementation of laws, policies, programmes and measures so as to ensure that Council of Europe human rights standards are effectively implemented and truly benefit Roma and Travellers including in relation with the police.

A critical aspect of training police officials to address racially motivated crimes against Roma is to ensure a systematic approach to professional development. A viable solution would be to integrate the relevant Council of Europe standards and case law of the European Court into the curricula of initial or in-service police training institutions.

These educational fact sheets are designed to assist police educators and trainers to incorporate Council of Europe standards on racially motivated crimes against Roma into existing training programmes offered by the police and educational institutions (police academies, police schools).

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The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union.

All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law.

The European Court of Human Rights oversees the implementation of the Convention in the member states.

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