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| logo_ec_17_colors_300dpi | EUROPEAN COMMISSIONDIRECTORATE-GENERAL JUSTICEDirectorate D: Equality**Unit D.4: Non discrimination policies and Roma coordination** |

***Information from Member States***

***on progress in implementing their national strategies or sets of policy measures supporting Roma integration***[[1]](#footnote-1)

**(1) Dialogue with relevant stakeholders**

*Could you please share information on progress made in the dialogue with and involvement of relevant stakeholders on the implementation of your respective national Roma integration strategy (NRIS) or set of policy measures?*

Latvia has developed a set of national Roma integration policy measures.[[2]](#footnote-2) The measures have been included in the development planning document – National Identity, Civil Society and Integration Policy Guidelines 2012 – 2018 (approved by the Cabinet of Ministers in 20.10.2011.). The Ministry of Culture is responsible for the implementation, coordination and evaluation of the Guidelines as well as set of Roma integration policy measures, and other sectoral ministries like the Ministry of Education and Science, the Ministry of Welfare, the Ministry of Economic are responsible for Roma integration in the frame of their competences.

Implementation of the Guidelines is due to take place in cooperation with state bodies, local authorities and NGOs, including Roma NGOs that are involved in the area of national identity, society integration and civil society policies.

In August 2012 the Council supervising the implementation of Roma integration policy measures (thereafter - Council) has been established by the Ministry of Culture. The Council include representatives from state bodies (the Ministry of Education and Science, the Ministry of Welfare, the Ministry of Economic, the Ministry of Health, the Ministry of Environmental Protection and Regional Development), the Office of Ombudsman, local authorities, educational establishments, NGOs that work in the area of protecting the interests of the Roma, Roma NGOs and the community, as well as experts in Roma integration issues. The main aim of the Council is to assess and foster the policy for Roma integration, as well as to promote civil participation of the Roma community and to strengthen cooperation between the Roma community and national authorities, in accordance with the National identity, civil society and integration policy guidelines for 2012 -2018. The main tasks of the Council are ensuring an effective implementation and evaluation of results of the policy for Roma integration and particular the set of national Roma integration policy measures; providing recommendation to the authorities to improve the implementation of the policy for Roma integration especially in field of education, employment, health care and housing; fostering the cooperation between Roma community, authorities, stakeholders, social partners, NGO and experts; evaluating the possibility of effective use of EU structural funds to implementation of the set of national Roma integration policy measures.

The first meeting of the Council was taken place in the premises of the Ministry of Culture on 19th September. The participants of the Council were informed about actualities of Roma integration at national and European level, including:

* the Communication of European Commission “National Roma Integration Strategies: a first step in the implementation of the EU Framework”;
* the process of elaboration of the National Developing Plan 2014-2020;
* a participation of Latvian expert in the thematic group on Roma education issues of Ad hoc Committee of Experts on Roma Issues of the Council of Europe;
* an information about situation of Roma in education area;
* the opportunities for Roma and non-Roma NGO to receive and allocate financial support for Roma integration.

At the meeting members of the Council are discussed about Roma integration issues and proposed recommendations to improve national policy for Roma inclusion. The main recommendations are:

* to foster the process of life learning education (for example granting the Roma students in high schools);
* to support employers who are promoted employment of Roma;
* to provide better and suitable social assistance and access to housing for Roma where it is appropriate;
* to foster and support activities of a preservation and developing of the unique culture of Latvian Roma;
* the approach of the implementation and support teacher’s assistants with Roma background into the education institutions should be continued by local governments;
* to improve cooperation between the Roma community and institutions of local governments and provide a financial support for coordination of this process.

All these recommendations have to be practically implemented as positive actions in accordance of the principle of non**-**discrimination focusing on Roma needs and involving representatives of Roma community at all stages.

The recommendations and proposals of the participants of the meeting of Council for improving Roma integration will be examined and assessed by government institutions.

* *Local and regional authorities*

The representatives of local government are involved in the Council supervising the implementation of Roma integration policy measures.

According to data of the Ministry of Education in 2012 the implementation of the institute of Roma teacher assistants is being carried on in collaboration and with adequate support from local municipalities with high percentage of ethnic Roma population (Talsi, Limbaži, Jēkabpils, Jelgava, Jūrmala, Valmiera, Rūjiena). Besides, in 2011-2012 the training for teachers and school social workers has been carried out in Sabile high school, in one of the most Roma inhabited region of Latvia, with the support of Soros Foundation – Latvia and local municipality.

The municipality of Jelgava City has played active role in designing and implementation of the policy of Roma integration at local and national level. The municipality provides financial and informative support annually to the local Roma NGO. In cooperation with the Association of National Cultural Organisations of Jelgava and NGO “Center for Education Initiatives”, the municipality are implemented several projects to improve the level of education and employment of the Roma community. For example, in 2012 three well educated Roma specialists (Romani women) have been employed in local schools – in Jelgava Preschool “Pasaciņa” and in Jelgava Primary School no.4. These experts worked in inclusive classes (Roma children educated with children with different ethnic background), provided moral support to Roma pupils and facilitated them in the process of education and the adaptation into social environment, as well as fostered cooperation between local Roma community and schools.

The authority of local Roma community and the leader of Roma NGO is member of the Committee of Administrative issues of the Municipality of Jelgava city.

The specialist of the Department of Preschool education of the Municipality of Jelgava city as the member of the thematic group on school drop out/absenteeism of Roma girl visited Finland in October 2012 to share experience and good practise in the field of Roma education. This thematic group has been initiated by the Ad hoc Committee of Experts for Roma Issues (CAHROM) of the Council of Europe. The report of the visit will be presented at the CAHROM meeting in 2013.

Many local government institutions were involved and active participated in the Latvian and Switzerland programme project “**School and Community for inclusion of Roma children**” in period of 2011 -2012, for example the Municipality of Jelgava City, the Municipality of Valmiera, the Municipality of Jūrmala and others.

The representatives of municipalities of Jūrmala City, Ventspils City and Jelgava City are participated in the European Social Fund projects for social rehabilitation of Roma community.[[3]](#footnote-3)

* *Roma communities and civil society.*

Representatives of Roma NGO are involved in the process of designing, implementation and evaluation of Roma integration policy measures. The authorities of Roma community from different regions are included in the Council supervising the implementation of Roma integration policy measures – totally 8 Roma representatives are involved in the Council: 6 representatives of Roma NGOs, one representative from the Office of Ombudsman and one expert.

Almost all Roma representatives participated on the 1st meeting on 19th September. They had active participation and made many proposals and suggestions to improve Roma integration policy at national level.

Roma representatives are members also of such governmental consultative bodies as The Minorities’ Consulting Council of the President of the Republic of Latvia, the Consulting Councilin Ethnic Minority Education Affairs of the Ministry of Education and Science and the Consultative Council of National minorities of the Ministry of Culture (dealing with implementation of the Framework Convention for the Protection of National Minorities of the Council of Europe).

As well representatives of Roma community are the members of several committees of municipalities at local level (Jelgava, Tukums).

**(2) Allocation of proportionate financial resources**

*Could you please share information on progress made in the allocation of financial resources to secure the implementation of planned measures for Roma integration?*

In 2012 October the call for project proposal „Support for fostering the participation of Roma community” financed by state budget was opened only for Roma NGO. The aim of the call of proposal is fostering the participation of Roma community, ensuring the cooperation between Roma and public administration (local governments and other stakeholders), as well as promoting Roma employment.

There are two activities will plan to support:

* five practical seminars with participation of the representatives of the Roma community, local authorities and the representatives of the social partners and non-governmental organisation in all Latvian regions to develop cooperation projects, to identify good practices and forms to better collaboration;
* establishing and developing the cooperation platform between employers and Roma to improve social inclusion of Roma in the field of employment.

These activities will be implemented in 2013. Total financial support provided in this call for project proposal is 3500 LVL.

In order to promote teacher’s intercultural competences the guide “To Integrate Roma pupils” was published in 2012 by NGO “Center for Education Initiatives” and granted by Ministry of Culture (total amount of the project – 2650 LVL).[[4]](#footnote-4) The many informative and practical materials are included in the guide, for example, description of Roma culture features and sensitive tradition practice, pedagogical programmes for work with Roma pupils in the inclusive groups. The material has distributed to schools and other educational structures.

The guide book for Roma teacher assistants was published in 2012 by NGO “Center for Education Initiatives” supported by The Soros Foundation **–** Latvia.[[5]](#footnote-5)

According to the information provided by the Ministry of Education in 2012/2013 the allocation of financial resources in sphere of education is – 36, 800 LVL in fees for 20 Roma teacher assistants in above mentioned municipalities, 4180 LVL for Roma teacher assistant four day trainings, 91,784 LVL for subsidized learning aids/ manuals for Roma pupils.

In the frame of Latvian and Switzerland programme project “**School and Community for inclusion of Roma children**” (total amount 78 794, 98 LVL) many activities has been organised in period 2011-2012 regarding to improving Roma situation in education field, including foster the cooperation between school staff and Roma parents. The Support centrs for parents have establishing in schools (Vlademārpils, Jelgava, Jūrmala, Jēkabpils and Valmiera), to improve involvement of Roma parents into their children’s education process.

As well during the project teachers and staff of structures of municipalities have been trained for work with Roma children and families: 120-150 pre-school and school teachers as a whole have been trained. Teachers and educational leaders will also receive advisory support to promote provision of inclusive education for Roma children).[[6]](#footnote-6) Pedagogues specialized in work with Roma children have been trained to work in multiethnic groups (inc. to foster collaboration with Roma teacher’s assistants) whithin the project “School and Society for Roma children inclusion”. Within the project the exibition „School un Society to inclusion of Roma children” was organised aiming to foster inclusion of Roma children and their Family into Society and to developintercultural dialogue between community and rest population.

According to the information provided by The Society Integration foundation, there are two projects where Roma is one of target groups have implemented in 2012 within the frame of the Programme of Latvian NGO fund for cohesion of society „Programme of Extracurricular activities”:

* the Project „To become friends working together” was implemented by NGO „Tradicionālās kultūras biedrība „Mantojums”” in cooperation with Elementary school of Ladezers City, Venspils Evening School, (17.08.2012. – 20.11.2012.) (total amount of the project - 7393,33 LVL). The project aimed at the promotion of the cohesion and integration of society, focusing on rise awareness of ethnic and cultural traditions between Latvian and Roma pupils. In the project were involved 110 pupils (65 Latvians and 45 Roma children) and 13 teachers. In the result of the project the pupils been working together and had developed mutual understanding of diversity of culture and positive outcome of the interaction. The Project was implemented in Kurzeme and Riga planning region;
* the project “The Impulse for the future” was implemented by NGO „ Center for Education Initiatives” in cooperation with Jēkabpils State High school and Jēkabpils Secondary school no.2. (15.08.2012. – 20.11.2012.) (total amount of the project - LVL 6978,19 LVL). The project aimed at the promotion of cooperation between children and young people with different ethnic background, as well as fostering their civil participation and intercultural dialogue. In the frame of the project 18 activities were organized and totally 100 pupils, including Roma children, from different regions are participated in these activities.

Regional Roma NGO „Šatra” (Jēkabpils) and „Romanu čačipen” (Jelgava) are involved in the project „The Coalition of Ethnic minorities for civil participation in the public policy”. The project is implemented by NGO „Center for Education Initiatives” in cooperation with “Ziemeļkurzemes NGO support centre” and “the Association of National Cultural Organisations of Jelgava” within the frame of the European Social Fund programme “The strengthening of administrative capacity of NGOs”(total amount of the project - 21 526,77 LVL). The project aimed at strengthening the capacity of NGO for the active participation to protect their interest and rights at regional, local and national level. The main activities of the project are:

- the organization of training seminars;

- the elaboration of methodical material on issues of cooperation and active representation;

- the formation of the Coalition.

The project „Children’s and Youth’s Jury” is implemented by the Latvian National Library in 2012 aimed at improving reading, language and discussion skills of pupils aged from 6 -14, including Roma children (total amount of the project - 50 000 LVL).

The activities of the project are:

* sessions of the reading books (including books with tolerance and nondiscrimination themes);
* creative workshops in four regional libraries;
* discussions on the basis of what was achieved at the workshops;
* interactive classes on tolerance.

The libraries and schools of such cities of Kurzeme’s region as Ventspils, Sabile and Talsi are focused an attention on Roma pupils to improve their inclusion in the social environment of education and to foster intercultural dialogue between Roma and non-Roma children. For example, 62 Romu children aged from 7 -14 from the Ventspils Evening School are participating in the activities of the project organized by The Library of Ventspils. In the frame of the project Roma pupils have to read books in Latvian and in Romani language, then discuss with other children their opinion about books and present the achievement. The reading sessions are organized in interactive way, for example, as games.

Roma pupils and their parents are also involved in the activities of the project by the Library of Talsi Primary School. Specialists of the library have found that many of Roma children have positive results in the reading of books, improving their language skills and formulating their opinions and thoughts.

The project will continue until end of 2012.

In order to foster the social inclusion of the Roma community four projects are implemented at the regional level by institutions of local governments which are working in the field of social rehabilitation. These projects are implemented within the framework of the European Social Fund sub-activity „Development of social rehabilitation and community-based social care services in regions”. Roma as main target group was defined in two of these projects:

- the project “Development of social rehabilitation programs and implementation in the Day care center for Roma people in Jurmala city” began in 2011 and will continue until 2013 (total amount of the project - 100 000,00 LVL). In the result of the project 400 Roma will receive services of the social rehabilitation, which have been improved. The evaluation of the outcomes of the project will be plan in 2013.

- the project “Social rehabilitation program for Roma families with preschool or school-age children living in Jelgava” began in 2012 and will continue until 2013 (total amount of the project - 78 729.91 LVL). Main target group of the project are the Roma families with pre-school and primary school aged children who live in Jelgava. In the result of the project are planned that 50 Roma will receive the services of the social rehabilitation. The evaluation of the outcomes of the project will be plan in 2014.

In other two projects Roma are defined as one of target groups:

- the project “Set of Alternative social rehabilitation services and support services for children and young people, including Roma in Ventspils secondary evening school” is implemented in 2012 (total amount of the project - 100 000,00 LVL). In the result of the project 60 persons including Roma received services of the social rehabilitation, which have been improved. The project is finished.

- the project “Set of social rehabilitation services of Latvian Red Cross in the Center of hygiene in Jūrmala” began in 2012 and will continue until 2013 (total amount of the project - 100 000,00 LVL). In the results of the project 400 persons including 40 Roma will receive services of social rehabilitation, which have been improved. The evaluation of the outcomes of the project will be plan in 2014.

There is many activities for promotion tolerance in society were planned to implement in 2012 in the framework of the national project “Latvia-Equal in Diversity VI”, which was submitted for call of project proposals under European Union Programme for Employment and Social Solidarity PROGRESS 2007 – 2013 (thereafter – PROGRESS programme). For example, information campaign in the mass media „Tolerance and equal opportunities”, public opinion survey on the knowledge, skills and attitudes of Latvian residents in the areas tolerance and the prevention of discrimination. Taking into account that European Commission is not supported the project “Latvia-Equal in Diversity VI”, aforementioned activities are not implemented as been planned in the set of Roma integration policy measures.

In 2012 The Society Integration foundation in cooperation with the Ministry of Culture has drafted the project “Different people, various experiences, one Latvia” for 2013 and submitted it for the call of project proposals under the PROGRESS programme. In the framework of the project several activities aimed at raising awareness of Roma and supporting their integrationwill plan to implement. For example, sharing of good practice of Latvia on Roma integration in field of education on international level; the round table discussions to strengthen Roma integration in field of education as well as the organization information campaign on equality issues for general public. The results of the call of project proposals are not published yet.

Roma as one of socially disadvantages groups regularly receive support from local governments in spheres of social assistance, education, unemployment reducing, e.c.

**(3) Monitoring transformation and enabling policy adjustment**

*Could you please share information on progress made to secure an effective monitoring of the progress in implementing your respective strategy or set of policy measures, as well as in securing the review of the strategy or set of policy measures according to the results on the ground?*

According to results of the Census of population, which was held in 2011, the population of Roma in Latvia has decrease from 8205 of Roma in 2000 until 6489 of Roma in 2011.[[7]](#footnote-7) The reason of this decrease can be explain with the intense level of Roma emigration to other Member States in last years.

To monitor the progress the Ministry of Education and Science is using annual statistical reports, data from local municipality Education Boards, and data from the studies by Centre for Education Initiatives.

The Ministry of Education has requested City and regional local municipalities to gather information on the number of Roma pupils in schools by their levels of educational achievement, as well as to identify in which subjects the Roma children have a low assessment, as well as the actions of the school plans to undertake to encourage the quality education of Roma children. According to this information Roma children have the difficulties in such subjects as Latvian language, mathematics, natural science, English etc. In year 2012 224 Roma students have extended school year, which means that the school gives them education in addition measures. Data shows also the problem of school attendance of Roma children. 16,7% of Roma children who have the real problems – vision and hearing disorders etc., are educated by special education programmes. At the moment data of pre-school attendance of Roma children is not collected.

According to the information provided by the Public Employment Service, 819 unemployed Roma[[8]](#footnote-8) have received the state support and benefits in 2012.

The statistical information of the Public Employment Service shows that many unemployed Roma are participated in several training activities to support integration of unemployed and job-seekers into the labour market:

1. non-formal training (including in official language) – 51 Roma (0,5% from all participants);
2. vocational training, vocational retraining, up-skilling – 6 Roma (0,2% from all participants);
3. measures to increase competitiveness - 248 Roma (0,5% from all participants);
4. measures for certain groups of persons (subsidised employment measures for the most vulnerable groups of unemployed) – 1 Roma (0,1% from all participants);
5. supporting voluntary work of young people – 2 Roma (0,3% from all participants);
6. paid temporary public works – 249 Roma (1,1 % from all participants).

There is the statistical collection of data, on health care and public health in Latvia – out**-**patient and in**-**patient medical care, emergency medical aid, oncology, mental health, maternal and child health, population mortality and other topics. The statistics of public health and health care ethnicity**-**related is not separately collated.

According to the Latvian set of Roma integration policy measures, the system to collect and collate statistical data developed on the situation of Roma in socio-economic areas of life (employment, education, healthcare and access to housing) and the study „The Roma community and human rights in Latvia” (access to education, housing, healthcare, various services, employment, etc.) will be worked out in 2013. Partially these activities are planned to implement in the frame of the project “Different people, various experiences, one Latvia” under the PROGRESS programme.

**(4) Fighting discrimination effectively**

*Could you please share information on progress made to fight discrimination affecting persons of Roma origin and to ensure that anti-discrimination legislation is effectively enforced?*

In the field of education the most effective since not completely sustainable is financial support for Roma pupils covering the expenses of learning aids (above mentioned subsidies for learning aids/ manuals for Roma pupils, because discrimination of Roma pupils is poverty caused).

Educational NGOs in cooperation with the Ministry of Education and Science, the State Education Centre and State Service of Education Quality create projects for monitoring the culture in schools aimed at investigating teachers and school administrators` tolerance, fight against prejudices and discrimination in the schools.

Informative materials to support teachers, teacher assistants with Roma background and other pedagogical staff:

In order to promote teacher’s intercultural competences the guide “To Integrate Roma pupils” was published in 2012 by NGO “Center for Education Initiatives” and granted by Ministry of Culture.[[9]](#footnote-9) The many informative and practical materials are included in the guide, for example, description of Roma culture features and sensitive tradition practice, pedagogical programmes for work with Roma pupils in the inclusive groups. The material has distributed to schools and other educational structures.

The guide book for Roma teacher assistants was published in 2012 by NGO “Center for Education Initiatives” supported by The Soros Foundation **–** Latvia.[[10]](#footnote-10)

 Number of investigated cases of the prohibition of discrimination based on Roma origin are initiated by the Office of the Ombudsman of the Republic of Latvia in a period of 01/01/2012 – 14/11/2012:

* Three cases on hate speech in the Internet. All cases are under investigation.
* Two cases on the prohibition of discrimination providing social assistance to Roma in the field of housing. All cases are under investigation.
* The analysis of activities on prevention of Roma discrimination and promotion of Roma social inclusion implemented in a period 2007-2012. The case is under investigation.
* One case on the termination of guardianship (parental) rights and the placement of the child for adoption, based on Roma origin. Opinion of the Ombudsman: decision to permit the child to be adopted abroad was taken in accordance with the norms of substantive and procedural law.

**(5) Additional information**

*You are invited to share any additional information or concern (regarding for instance measures taken in response to the assessment by the Commission in its report of May 2012).*

Education is the national Roma integration policy priority, including the support for the Roma NGOs and other non-governmental organizations to promote educational activities, providing material support to Roma students for learning aids acquisition, motivational activities for Roma youth, who want to continue their education (Study “Roma right to education: state of implementation in Latvia”, 2011).

In order to improve the health of the Latvian population, the Ministry of Health develops and implements a national policy in public health and health care. According to the law, health promotion activities and health care services are provided to all residents, irrespective of ethnic origin, social status, legal status and other factors. Roma as one of target groups are mainstreamed in the process of national policy in public health and health care.

1. The Public Health Strategy 2011 – 2017 is a medium term policy planning document which has been developed and adopted in order to continue the implementation of the public health policy. The aim of a public health policy is to prolong the healthy life years of the Latvian population and to prevent premature deaths, maintaining, improving and restoring health. To reach the main aim of the public health policy, the objective “to eliminate inequality in the field of health, by implementing measures to ensure equal health possibilities to all inhabitants of Latvia” has been set. The Public Health Strategy 2011 – 2017 highlights one of the basic principles of public health policy “equal rights and opportunities for all – justice and solidarity”, indicating that all have equal rights to receive the necessary health promotion and health care services within the limits of the human, technical and financial resources available within the state, within the scope and in accordance with the procedure defined by legal acts, irrespectively of gender, age, race, skin colour, language, religious beliefs, sexual orientation, political and other views, social background, ethnicity, education, social and material status, type of occupation and other conditions.
2. The Cabinet of Ministers Regulation No.1046 of 19 December 2006 „The Procedure of Organising and Funding Health Care”provides health care organization and financing order. According to the Cabinet of Ministers Regulation No.1046, the health care services are provided equally to all residents of Latvia irrespective of ethnic group. A survey on the situation of Roma in Latvia concludes that the Roma have lower incomes because of their low level of education and employment, as well as the level of intolerance within society towards this ethnic group and this may limit their access to medical services and increase the risk of suffering from chronic diseases[[11]](#footnote-11).

In order to protect the Roma on low incomes and support them to receive health care services, Subparagraph 10.17. of the Cabinet of Ministers Regulation No.1046 of 19 December 2006 „The Procedure of Organising and Funding Health Care” provides that people on low incomes, who have been recognized as such in accordance with legislation on procedures for recognizing a family or an individual as being on a low income, are exempt from patient contributions. This means that any person on a low income is entitled to receive state financed healthcare services without having to pay patient contributions (free of charge). Nevertheless, the low level of education, lack of information and, possibly, other factors inherent to the Roma community may hinder them from receiving health care services.

1. In view of the 2013 report from the Commission on the implementation of the EU Framework for national Roma integration strategies. See also Communication from the Commission on *National Roma Integration Strategies: a first step in the implementation of the EU Framework*, COM(2012) 226 final (21 May 2012). [↑](#footnote-ref-1)
2. <http://ec.europa.eu/justice/discrimination/files/roma_latvia_strategy_en.pdf> [↑](#footnote-ref-2)
3. See detailed information in this questionnaire part “Allocation of proportionate financial resources”. [↑](#footnote-ref-3)
4. Available at <http://issuu.com/iic_daiga/docs/celvedis_izgl_iest?mode=window&backgroundColor=%23222222> [↑](#footnote-ref-4)
5. Available at <http://www.iic.lv/en/projects/support_system.html>. [↑](#footnote-ref-5)
6. Available at <http://www.iic.lv/en/projects/training_pedagogues.html> [↑](#footnote-ref-6)
7. Information provided by The Central Statistical Bureau of Latvia. Information available at <http://www.csb.gov.lv/statistikas-temas/tautas-skaitisana-28290.html>. [↑](#footnote-ref-7)
8. 57 % of these Roma are unemployed more than one year (the Public Employment Service, 2012). [↑](#footnote-ref-8)
9. Available at <http://issuu.com/iic_daiga/docs/celvedis_izgl_iest?mode=window&backgroundColor=%23222222> [↑](#footnote-ref-9)
10. Available <http://www.iic.lv/en/projects/support_system.html>. [↑](#footnote-ref-10)
11. The situation of Roma in Latvia. Riga: Latvian Human Rights and Ethnic Studies Centre, 2003, p. 46. According to data from the State register for HIV and AIDS, 1-2% of the entire Roma population in Latvia were infected with HIV in 2002, which is 7.5% of all people infected with HIV. This is the greatest number of people infected with HIV amongst all other ethnic groups in Latvia. As before, p. 44. [↑](#footnote-ref-11)