A BLUEPRINT FOR MULTI-LEVEL GOVERNANCE OF INCLUSIVE INTEGRATION AND GOOD RELATIONS IN FINLAND









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MAP FINLAND ry (Panu Artemjeff, Miriam Attias) & OPHELIA FIELD The "Blueprint for Multi-Level Governance of Inclusive Integration and Good Relations In Finland" was prepared and published in the framework of the European Union / Council of Europe joint project "Building an Inclusive Integration Approach in Finland".

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All other correspondence concerning this document should be addressed to the Intercultural Inclusion (II) Unit of the Council of Europe's Inclusion and Anti-Discrimination Programmes Division.

> Inclusion and Anti-Discrimination Programmes Division Council of Europe F-67075 Strasbourg Cedex France

Email: intercultural.cities@coe.int

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Executive Summary

his document, written within the framework of the European Union – Council of Europe joint project Building an Inclusive Integration Approach in Finland,¹ aims to compare internationally recommended arrangements for multi-level governance of inclusive integration and good relations with current structures and practices in Finland, and to thereby provide a guiding Blueprint for future implementation. It is written at a time of transition and potential in Finland, when a new Integration Act (681/2023) has not yet come into force and when a new layer of regional governance, in the form of 'well-being service counties', has recently been introduced.

After defining key terms and setting out the report's structure, six elements are selected for particular attention from among the many normative recommendations of the Council of Europe and European Union in this policy area. These are: the benefits of having an independent and expert body, with a crossadministrative and holistic overview, operating at national level; the importance of cross-sector coordination at regional and municipal levels to ensure coherence of both policy and implementation; the value of dynamic and inclusive consultations with those directly involved in integration and community relations at ground level; the need for organisations and authorities to feel secure in long-term funding that fairly reflects their responsibilities and their contributions; the need for political commitment at all levels to effectively communicate a vision of

1. The European Union / Council of Europe Joint Project "Building an Inclusive Integration Approach in Finland" is co-funded by the European Union via the Technical Support Instrument and the Council of Europe and implemented by the Council of Europe in co-operation with the European Commission.

inclusion and good relations, as well as accurate information about the system and its beneficiaries; and, finally, the importance of monitoring and evaluating outcomes at all levels in ways which hold authorities and organisations to account and create a virtuous cycle of continuous improvement. These elements are illustrated by a few recent international examples, and current arrangements in Finland are reviewed through their lens. The wider background context of the Finnish integration and good relations policy framework is also summarised, including the monitoring approach known as 'VOTA' and the '3T model' of identification, recognition and action. It is acknowledged that many structures and duties already exist in Finnish legislation and only need to be better activated and connected.

A diagram representing the 'whole picture' of the Blueprint, with stakeholders at national, regional and local level, the communication channels and the participatory mechanisms and the idea of identifying, recognising and designing actions is presented. As an example, the Blueprint is filled with and by the Oulu city perspective, to illustrate how multi-level governance is perceived at the local level and how it could work in future in a wide variety of other municipalities and regions. The diagram is also enriched by the 'Begiri model', a facilitation mechanism which has proved successful in creating 'meaningful participation' in the National Pilot Project on Good Relations (2021-25). The model is recommended for wider and more permanent replication throughout the country as a way to enhance and enliven existing structures.

Finally, the document concludes with a set of recommendations addressed to each of the three main levels of Finnish governance, for their consideration.

Introduction

his document's aim is to provide guidance on how to incorporate key elements of the multilevel governance model developed by the Council of Europe into the practical implementation of the Finnish government's policies on good relations' ('väestösuhdepolitiikka'2), with the long-term goal of increasing inclusive integration in Finland.

Inclusive integration – of migrant and refugee newcomers, but also of others who may feel excluded from mainstream Finnish society – is an approach to integration which does not seek to absorb individuals into an unchanging culture and/or society, but which creates a society that values and respects all people equally.

Multi-level governance ('monitasoinen hallinto'), meanwhile, is the recognition that 'the success of integration policies depends on their ability to achieve effective inclusion by promoting ownership and active engagement of state institutions, regional and local authorities, and civil society' (Model Framework, CDADI, Council of Europe, 2021). It has both horizontal and vertical dimensions, and it recognises that most of the work of inclusive integration takes place at the local level. The question then is: how to enhance communication and coordination between the levels of government and between all types of stakeholders? Structures make it possible for information to circulate, but without an active approach, nothing much happens.

This report initially outlines six elements required for active, effective multi-level governance of inclusive

2. Note on Finnish terms: 'väestöryhmä' translates as population group in English, and refers also to a community or a group of people; 'väestösuhteet' means community relations or inter-group relations; 'väestösuhdepolitiikka' means policy for community or inter-group relations or, as it is most commonly translated, 'good relations'; and 'väestösuhteiden viitekehys' means the framework for good relations, which serves as basis for governmental work to promote good relations. The term 'governance', in 'Multi-level Governance' in English does not have a direct equivalent in Finnish. The Finnish word 'hallinto' equates more directly to the English word 'administration', but in English 'governance' means both administration and leadership, and refers to processes, structures, laws, rules and norms of administration, and management - and also takes into account the systems, i.e. the interaction and power relations, as well as the people who are involved and in different positions in relation to the administrative body or structure.

integration, in some cases with selected international examples of each element's implementation. These are elements drawn from among those recommended by Ministers of the Council of Europe and European Union,³ which the authors' research indicates are most pertinent to improving policy and practice in Finland.

The next section then summarises the current Finnish integration and good relations policy framework. It explains the levels of governance, the responsibilities for implementing relevant policy programmes, and the current coordination mechanisms, as set out, in large part, in the new Integration Act (681/2023) due to come into force on 1 January 2025. Structures and practices are analysed in relation to the elements set out in the preceding section.

Section IV then describes horizontal and vertical methodologies and mechanisms that could improve the implementation of good relations policies (and synergies with other related policy areas). A diagram is provided to give an overview of stakeholders, communication channels and participation structures in the Finnish system. The diagram is enriched by 'The Begiri Model', which has operated as a facilitation mechanism during the National Pilot Project on Good Relations (2021-25). It bridged the national policy programme and the regional and local stakeholders' needs and facilitated a communication process in which regional action plans were designed. The model has proven successful at facilitating a bottomup approach to building inter-community relations in Finland. To make the model more concrete, an extended good practice example from the City of Oulu is then presented in Section V. Other municipalities are invited to think about how the same diagram of multi-level governance and a similar model of facilitation could apply to their own contexts.

^{3.} Model Framework (CDADI, Council of Europe, 2021). Recent policy frameworks of other intergovernmental bodies and organisations touch on several similar elements – for example, the EU Action Plan on Integration and Inclusion (2021-2027) emphasises, among other priorities, migrant participation, multi-stakeholder partnerships, and the need to design funding mechanisms for long-term integration outcomes, as well as effective monitoring and evaluation that again involves all stakeholders.

Finally, drawing together the strands of the preceding analyses, this report offers a series of recommendations and considerations addressed to each level of governance in Finland – municipalities, regional authorities (including the new 'well-being service counties'), and national ministries.

The present Blueprint is based on the report *Review of current practices in Multi-level Governance in Finland* (Artemjeff, Attias & Wilson, 2023), a comparative analysis of international strategies on intercultural integration, and stakeholder interviews carried out in the spring of 2024. It is also in line with the guide *The Intercultural City, Step by Step, adapted to Finland* (2024). It was refined by consultations with representatives from municipal and regional levels, the Ministry of Justice, and civil society, at a meeting in Helsinki on 31 October 2024, and then by further consultation

with the Ministry of Economic Affairs and Employment (TEM) the following month.

Writing of this report was carried out in the framework of the joint project *Building Inclusive Integration in Finland* funded by the European Union, the Council of Europe and the Finnish Ministry of Justice through the European Union Technical Assistance Instrument. The Council of Europe is implementing the project. This report was commissioned as part of the project and has been prepared by Panu Artemjeff, Miriam Attias and Ophelia Field. Panu Artemjeff is a researcher and senior expert on non-discrimination issues from Finland, and Miriam Attias is an independent expert from the think tank MAP Finland, specialising in intergroup relations and conflicts. Ophelia Field is an expert adviser to the Council of Europe on intercultural integration, based in London.

Key elements for multilevel governance

he Intercultural City, Step by Step (Revised edition adapted to the Finnish context, ICC Council of Europe, 2024: 21-22) emphasises the following goals:

- 'deep interaction and co-creation between people from different backgrounds';
- 'a model of governance that enables all members of the community, regardless of their origin or status...to contribute to local well-being';
- 'power-sharing' and 'the participation of people of different origins in decision-making';
- 'promoting intercultural competence';
- 'acceptance of cultural pluralism and the complexity of identities through leaders' language and symbolic actions'; and
- supporting the development of 'inclusive stories' in governmental communications with the general public.

Set against these goals, on the other hand, typical challenges of multi-level governance across the globe tend to include:

- inadequate transparency and information sharing between different levels of government;
- deficits of knowledge, skills and/or infrastructure, including lack of intercultural competence;
- gaps between local revenues and responsibilities;
- misaligned administrative borders for different sectors or uncoordinated policy across different sectors:
- ineffective or misaligned spending and/or powers at different levels;
- failures to fully involve non-governmental stakeholders of all kinds (including businesses, social partners and individual advocates) in models of meaningful participation.

Taking the above goals and challenges into consideration and reading them in conjunction with reviews of current practice in Finland – including Good Practices in Multi-level Governance in Finland (Artemjeff, Attias & Wilson, 2023) - this section identifies six crucial elements of multi-level governance to which Finnish authorities may wish to pay particular attention going forward. In some cases, the chosen elements are merely about refining or deepening implementation of arrangements already framed in the Finnish legislation. Particular attention has been given to Element 3, for example, which relates to reinvigorating public consultations to make them into truly inclusive 'co-creation' or 'co-design' processes, involving people as equals in the governance of all decisions, funds and bodies that affect them. This is because such horizontal multi-level governance often proves to be more complex to implement than its vertical aspects. For example, an ongoing project on 'Measuring and evaluating migrant integration governance at the regional level' (REGIN / MIPEX-R) in 25 regions within seven European countries, conducted by the Barcelona Centre for International Affairs (CIDOB) and the Migration Policy Group (MPG), stated in a 2022 interim report: 'Particularly worrying is the scarce participation of migrant associations, which tells us that governance of integration tends to be conceived without the inclusion or consultation of the population that it targets.' (Pasetti et al, 2022: 28).

Structured dialogue and sustained partnership in policy making, implementation, monitoring and evaluation with civil society organisations – particularly those which are migrant- or refugee-led – is critical to the success of multi-level governance at every level. Not only specialised advisory bodies (see the ETNOs described below) but also the Finnish Government's National Strategy on Civil Society, and its Advisory Board on Civil Society Policy (KANE), should therefore be seen as closely related to the successful implementation of good relations policy.

Element 1: An independent and expert body at national level

In several national contexts, such as Portugal, a single 'hub' or centre, with dedicated budget and staffing, that can work across every aspect of inclusive integration and intergroup relations at the national level, has been found to improve coherence of policy and implementation. It has proven valuable for such an expert centre to possess some formal independence from the vested interests or natural biases of any single ministry, and from the vagaries and short-termism of electoral politics, because integration is inherently a cross-administrative and long-term, multi-generational endeavour. This is highlighted in Section IV of the *Model Framework*, under 'The structures/mechanisms needed to provide a coherent framework'.

The risk of under-emphasising the good relations and inclusion aspects of integration, such as meaningful social interaction and political participation at neighbourhood level, or the aspirations of residents who are not in the labour market, might be prevented by creating a centre to focus on these aspects in a holistic way and on multi-sectoral coordination at national level. Studies of migrants in Austria, Germany and Sweden, for example, emphasised that knowing a member of the majority community was 'perceived as being of exceptional value' (Yilmaz and Conte, 2024 - citing Cetrez et al.,2020; Chemin & Nagel, 2020; Josipovic & Reeger, 2020). No doubt such friendship is of value in terms of finding employment, but also more broadly in terms of creating a sense of connection and belonging.

Such a central body should be established with a degree of permanence that would help protect it from short-term financial or political pressures. It should not be structured nor staffed in a way that isolates it from other universal public policy issues, and its mandate should derive from the framework of good relations, so that it does not just focus on, for example, migrants' rates of employment and language learning but rather on the larger societal goals that give that data importance. It should be in continual conversation with the non-governmental and third sector, so as to create a shared picture of realities as well as policy intentions.

Element 2: Cross-sector coordination at regional and municipal levels

This element is again derived from Section IV of the *Model Framework* ('The structures/ mechanisms needed to provide a coherent framework') and from the second part of *The Intercultural City, Step by Step Guide* (titled 'Building an Intercultural City'). It is simply the recognition that – particularly at the regional level – horizontal cross-administrative consultation

and coordination within the government can be easily neglected, with work often taking place in administrative siloes and vertical funding streams, without due consideration given to how policy or practice in one area – e.g. health or social care – can hinder an individual's inclusive integration in another – e.g. education.

The REGIN / MIPEX-R research found that in most of its 25 studied regions, regional integration governance left 'a great deal of room for improvement', with insufficient involvement of non-governmental organisations at that level and a lack of inter-regional collaboration (Pasetti et al, 2022: 27).

Element 3: Dynamic and inclusive consultations at ground level

The Model Framework and Step by Step Guide, as well as other intergovernmental documents – such as Effective Inclusion of Refugees: Participatory approaches for practitioners at the local level (UNHCR & MPG, December 2021) or Building meaningful public participation in Intercultural cities – A guide to the appreciative inquiry approach (ICC Policy Brief, 2023) – provide guidance on how to ensure that public consultations constitute meaningful interactions with real impact on decision making. Widespread participation in these processes can itself help promote intercultural integration of newcomers and good relations between residents.

In a recent EU monitoring report, only 0.5% of respondent civil society organisations found the quality of national consultations (across all topics) 'very high' and 40.5% found them 'poor' or 'very poor' (FRA, 2024). Key challenges were identified as timing of consultations, lack of outcomes and feedback, poor processes, and lack of capacity on the civil society organisations' own side (time, skills, knowledge). It is not enough, in other words, simply to invite participation; it must be supported practically and financially. Grassroots organisations typically lack core funding and therefore capacity to sustain their role as interlocutors. For migrant and refugee-led organisations, such meetings rarely have sufficient interpretation available, and conveners often fail to think about other access issues so that a diverse cross-section of each community feels able to attend. Nonetheless, a few promising examples can be cited.

The 2022-24 UNITES (UrBan inTEgration Strategies through co-design) project coordinated by Eurocities in partnership with MigrationWork CIC and two migrant-led organisations (New Women Connectors and UNITEE) has been conducting research and running pilot projects in eight European cities (Athens, Bologna, Dusseldorf, Grenoble Alpes, Prague, Zagreb, Zaragoza, and in Finland in the city of Oulu) on how to truly involve migrants and refugees in the co-design of integration policy. MigrationWork CIC has produced a summary of some inspiring examples discovered

by the UNITES project in other locations (Nantes, Liverpool, and Mörsil in northern Sweden, for example), while Razan Ismail of New Women Connectors reports that she has found, through involvement in both UNITES and the MILE (Migrant Integration through Locally-designed Experiences) project, that there are currently six broad types of co-design in use:

- the consultation of a Migrant Integration Council as they do very effectively in Sao Paulo and in Nuremberg;
- Citizens Boards, as used in Grenoble, Bologna and Almeira;
- Working groups and/or online platforms for engagement, as used in Zaragoza, Liverpool and, perhaps most effectively, in Barcelona;
- Citizens Dialogue Forums, as in Mörsil or Fuenlabrada;
- Participatory Research projects led by migrants and refugees, as in Coventry or Brussels;
- and Knowledge Production (mapping service users' experiences) as in Nantes and Yorkshire.

Ismail emphasises what she calls her'Five C Framework' of criteria for effective co-design: Communication, Connections, [elimination of] Competition, Cooperation and Community Building. Within this, she notes that it is often crucial to look at whose participation time and energy is being compensated and whose is not, emphasising that there can be creative ways to compensate migrants for their input such as Dusseldorf's practice of awarding extra points towards citizenship to committed participants. Often the key is finding ways to lower the bar for the participation of newcomers, such as providing free childcare to those attending, in order to keep mechanisms dynamic and diverse (i.e. intersectional).

The case study of actions taken by Swansea Council in Wales, highlighted in the *Step by Step Guide as adapted to Finland* (ICC, 2024: 44-45) includes a number of parallel methodologies that they undertake to really obtain a true picture of residents' opinions, including both dedicated consultation (a Black and Minority Ethnic Forum) and a database on mainstream issues (Swansea Voices Online Panel). Barcelona similarly has a 'padron' register for those using the city's services which is firewalled from police and immigration authorities, so that people of all statuses feel safe to register themselves. This produces more reliable data on the needs of the city's inhabitants and can be used for consultative outreach.

One of the key components that makes consultation into true co-creation, with those who are most directly or acutely affected by policy and implementation, is local decision-making and local planning being recognised as vital by national legislation. To do this, national 'Strategies' or 'Action Plans' are mirrored by matching, but more detailed, strategies or action plans

developed at regional and local level to cover the same period, with the views and experiences of those directly affected thereby able to shape and review such strategic planning. This was – on paper at least – the set up in Finland under the previous Integration Act (see below, Section III). Less formal multi-level governance planning may give local authorities more room for manoeuvre, but it also removes a strong statutory mechanism by which grassroot opinion can be fed upwards to national level, making consultations feel consequential.

Element 4: Secure funding that fairly reflect responsibilities

Integration funding is generally most effective when it is secure, structural and sustained rather than purely project-based, and this is equally true in relation to the wider societal goals of promoting inclusion and good relations. This is emphasised in Section IV of the Model Framework ('The scale and source of resources required for implementation') and in the EU Action Plan on Integration and Inclusion (2021-2027). It is also important that the allocation of funding aligns logically and fairly with competences and responsibilities for implementation at each level, and that NGOs who have been delivering a service for many years are given the certainty of secure funding as a basis from which to improve their offer over the longer-term.

Element 5: Commitment to communicating a vision of inclusion and good relations

Integration strategies at national, regional and municipal levels need to include plans for frequent, adequately resourced and well-targeted communication with the general public concerning good relations, the principles of inclusion, and the advantages of social and cultural diversity. This involves more than simply opposing racial or xenophobic hatred at times of crisis; it involves political leaders proudly showcasing examples of interfaith, interethnic and other crossdifference community projects and participatory consultation processes, as well as presenting a vision of a future that is both pluralistic and peaceful. This is emphasised in the Model Framework ('The vehicles of communication of the policy and to whom') and repeatedly in The Intercultural City Step by Step (Point 1(b) of 'Develop an intercultural vision for the city' and also under 'Media and Communication').

In November 2023, for example, the London Mayor launched the 'London for Everyone' campaign involving vibrant images of individual newcomers with lines such as 'From Lublin to Ladbroke Grove [a London suburb] - We All Make London' on billboards in the underground and on the streets. The Mayor's press release read: 'London's greatest strength is our diversity, and we simply wouldn't be the city we are today without the input, energy and experiences of everyone who lives

here. We have seen a concerning rise in hate crime across our city and nationwide. In times marred by division and fear, I am committed to seeing Londoners respond with unity and in hope. That is why I've increased funding to tackle hate crime in our capital and why I've launched our new "London for Everyone" campaign. As we strive to build a better, safer and more equal London for everyone it is vital that we stand together and remember that we have far more in common than that which divides us.' Such communication initiatives set the tone for others to follow, appeal across party lines to a wider 'us', and counterbalance the more common images of newcomers only as dependents in need of rescue and support.

A recent study has confirmed that 'favourable integrational policies go hand in hand with favourable opinions of refugees' (Whole-COMM, 2024: III) – for example, the belief that newcomers are filling labour gaps is positively associated with perceiving them as well integrated. There is also a correlation between places where integration policy is objectively rated as more successful (by MIPEX) and places where public perceptions of integration are more favourable. The causality behind this correlation is harder to unpick, but a reasonable assumption would be that it is a dialectic, with favourable opinion both reflecting and creating reality.

The use of traditional news media to showcase success is just one approach, with the use of arts and pop culture, sports and leisure, or community media, being other important ways to reach those who consume less news and official public messaging. Government

administrations giving behind-the-scenes space and support to non-governmental, migrant or refugee led communications initiatives in these areas is vital. See the Council of Europe's ICC Guide to designing a communication strategy in intercultural cities (2023) and other 2021 policy briefs on inclusive narratives, such as Migration and Integration: Which alternative narratives work and why (April 2021).

Element 6: Monitoring and evaluation of outcomes at all levels to ensure accountability

Monitoring and evaluation of real outcomes is required to ensure that integration policy is having impact and to improve future implementation. The Model Framework deals with this under 'Arrangements for monitoring and evaluation of its [the Strategy's] effectiveness' and The Intercultural City Step by Step devotes an entire section to 'Monitoring Implementation and Measuring Progress', with particular focus on a participatory methodology known as Community-Based Results Accountability (CBRA). The local or 'grassroots' level is clearly where the weight of qualitative monitoring and evaluation should take place, involving those directly affected, while efficient, unbiased channels are then required to convey such information upwards to regional or national level. A suggested way forward might be to develop the model of shared evaluation - stakeholders' views in tandem with independent evaluators who use more quantitative measures – that can be found in the French city of Lyon (OECD, 2022: 67).

The Finnish integration and good relations policy framework

In this section we briefly outline:

- ▶ How Finnish policy and practice has evolved;
- The relevant levels of governance at the current time;
- ► The existing legislative basis in the field of integration and good relations;
- ➤ The coordination mechanisms already in place, largely with statutory basis; and therefore,
- How the above six elements each relate to the existing Finnish context.

A. Good relations as the cornerstone of integration

The first Finnish Integration Act came into effect in 1999. The Act has since been revised in 2010 and by the 2023 Integration Act, which will come into force at the beginning of 2025.

The development of a specific policy on intergroup relations in Finland started with the 2012 Good Relations Project led by the Ministry of the Interior (Ministry of the Interior, 2014). In this context,

authorities from different sectors familiarised themselves with the framework for good relations developed in the United Kingdom and developed a version suitable for the Finnish context. The approach has since been promoted via different projects in relation to policies for equality and integration. It is preferred by many Finns to the concepts of 'two-way integration' or 'intercultural integration', though the 'good relations' framework mirrors many principles of the intercultural approach such as promoting inclusivity, interaction and political participation. In the latest governmental report on integration, the main theme through which integration was evaluated continued to be the theme of good relations (Renvik, Tuuli Anna & Säävälä, Minna, 2024).

VOTA

According to the framework, the quality of intergroup relations can be monitored and developed in four

areas (interaction, inclusion, security and attitudes - from which the acronym 'VOTA' is derived, referring to the Finnish terms). The framework has since been developed through the Ministry of Justice good relations policy development projects (e.g. TRUST projects, At home in Finland-project). The monitoring of intergroup relations is part of the discrimination monitoring system maintained by the Ministry of Justice. Projects coordinated by the Ministry of Justice to combat hate speech and hate crime have also included aspects of good relations policy, and they have experimented with the use of mediation when implementing this policy field. Thus, in the Finnish context, the approach of good relations is extremely broad.

In late 2022, the Drivers of Equality project published a guide for municipalities on promoting intergroup relations, which contains a concise bank of guiding material published by the projects about the development of good relations policies at different levels of society (Ministry of Justice, 2022).

A holistic approach to good relations policy can best be described by a three-part model, which was presented in the <u>Inception Report</u> mapping the existing integration and good relations policies in Finland:

- Assessing the impact of mainstream policies on different groups (for example, urban planning, housing, education - do they enable mixing and interaction?)
- Utilising non-discrimination and minority rights policies (which can be group-specific and aim at equal rights and opportunities to participate, thereby enabling grounds for symmetrical interaction)
- ➤ Focusing on **good relations policies** that specifically aim at building meaningful and symmetrical interaction and communication between different groups of society and at handling tensions and mediating conflicts.

The 3T model

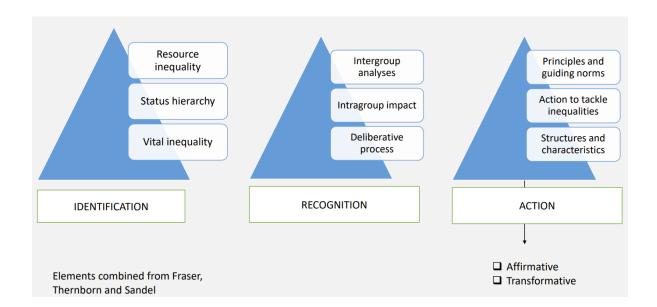
Another conceptual tool developed within Finnish good relations policy is the '3T model'. It refers to three concepts ('tunnistaa', 'tunnustaa' and 'toimia') which can be translated as 'identify, recognise and act'. These concepts are derived from sociological recognition theory (see for example: Honneth, 1996; Fraser, 2003) and they capture the elements to which policymakers responsible for minority policies should pay attention.

Identify refers to answering the question of whose needs or experiences of injustices are recognised within policy development, and how. Target groups are the main sources of information when it comes to identifying the areas of the policy. This notion makes it evident that the policy designed should be based on a bottom-up approach rather than top-down.

The concept of **recognition** captures a participatory element of policy making. The question to be addressed here is whether the members of the target group genuinely feel heard and have had their needs

and concerns recognised. Taking these questions seriously requires critical reflection on participatory procedures (procedural justice) and on the ways in which the shared understandings of key targets are to be negotiated together with those of different stakeholders. The elements of dialogue and deliberation are keys to success. The element of recognition must be guaranteed at all levels of governance but the grassroot, local level is the priority area.

After the key targets and problems are identified and discussed with the stakeholders, the focus shifts into **action** that has transformative potential. In this phase the main questions are what should be done to tackle identified issues, by whom, and what kinds of remedies are available to compensate for injustices. Activities can be either changes in rules, new activities or structural changes. Most effective and impactful measures can be discussed within and between different layers of the multi-level governance structure, together with the target groups. The 3T model is inspired by Nancy Fraser's theory on recognition (Fraser, 2003).



B. Levels of governance

The Finnish model of governance is of a locally decentralised state. Vertically, there are three main levels of governance: the state, the region and the municipality. The region, however, currently refers to three different administrative entities: the state's regional administration; 15 business, transport and environmental centres ('ELY-keskus' or ELY Centres) – which will be replaced in the beginning of 2026 by 'Vitality Centres'; 6 regional administrative agencies ('AVI' or AVI Centres); and the 21 well-being service counties ('hyvinvointialue'), which were created at the beginning of 2023. The role of the regional level is in many ways currently in transition.

The ELY Centres have been the most crucial regional institutions for integration and good relations policies: they are in charge of coordinating the implementation of the national integration programme's priorities on the local level, and also of promoting 'ethnic equality' and non-discrimination. For the latter, they coordinate the activities of the regional advisory boards for ethnic relations (ETNOs). The regional administrative agencies (AVI Centres) implement activities in the field of social and health services and education. Roma issues are framed under these policies and therefore the AVI Centres coordinate the activities of regional advisory boards for Roma affairs (RONKs).

Finland has a strong tradition of municipal self-government, with councils holding a lot of decision-making power on issues affecting citizens' everyday life. Alongside representative decision-making, however, a wide range of new forms of participation have emerged.

The new well-being service counties, and the municipalities, have their own elected councils and parliaments, so to a certain extent there is regional and local autonomy in service provision. Both are crucial actors for integration and good relations, as the well-being service counties manage the social and health services, whereas the municipalities have primary responsibility for the delivery of integration and other relevant policy areas such as education.

Originally, the new Integration Act required municipalities to set objectives concerning: the employment, education, well-being, housing and health of immigrants; the promotion of inclusion, non-discrimination and equality; opportunities for maintaining one's own language and culture; promotion of good relations between population groups in their area. The municipalities were also designated as responsible for implementing and monitoring these objectives at local level, while recording these issues in a local integration action plan or another municipal planning document, accompanied by objectives. However, as of November 2024, the Government has proposed an amendment to the above Act (HE 192/2024) which would remove most of the aforementioned municipal obligations. Instead, there is to be only a 'general and coordination responsibility for planning and

developing'the integration of immigrants and others, and for good relations between population groups (§ 45, HE 192/2024). This is supposed to be done in coordination with the well-being service counties and other relevant multi-sectoral bodies and taking account of central/national governmental objectives. This proposal therefore leaves municipalities without specific strategy-setting, objective-producing or monitoring obligations in relation to integration, good relations and related matters.

Municipal responsibilities are therefore, at the time of writing, somewhat uncertain. Historically, prior to 2025, they included:

- Overall development, planning, coordination and monitoring of integration at local level;
- ▶ Planning for the promotion of good relations;
- ► Education and training of both children and adult newcomers, including teaching of literacy in Finland's official languages;
- Provision of multilingual and accessible information for newcomers about services available;
- Providing access to appropriate educational and career paths for those whose existing overseas qualifications are recognised in Finland;
- Providing equal access to education, employment and housing, with financial responsibility for the long-term unemployed shared between national and local levels; and
- Coordination with third sector organisations and enterprises involved in supporting integration and good relations.

TABLE: Key players at different levels, key policy programmes & participatory structures				
LEVELS	Authorities	Legislation / Policy programmes	Participatory structures	
National	Ministry of Economic Af- fairs and Employment	National Programme for integration	Inter-ministerial Cooperation Group for Integration (KYHRY) Prime Minister's roundtable on	
	Prime Minister's Office*	Report to parliament on equality and non-discrimination	equality and non-discrimination	
	Ministry of Justice	Equality and non-discrimination legislation (follow-up of the report to parliament)	Advisory Board for Ethnic Relations (ETNO)	
		Ethnic relations	Advisory Board for Civil Society (KANE)	
		NGO strategy	Advisory Board for Roma Affairs	
	Ministry of Social Affairs and Health	Roma policy programme (2023-2030)	(RONK)	
	Ministry of Interior	Internal Security Strategy	Inter-ministerial Steering Commit- tee, TUOVI-portal and network of	
	KEHA-center	Supporting ELY-centers services	internal security professionals	
	*NB: An initiative under the current government, not necessarily permanent.	and capacity building in integration		

TABLE: Key	TABLE: Key players at different levels, key policy programmes & participatory structures				
Regional	Business, transport and environmental centres (ELY) (15)	Coordination and follow-up of the municipal integration services and activities	Regional committees on integra- tion		
		Regional Action plans for good re- lations (coordinating, preparing, funding the implementation)	Regional ETNO		
	Regional administrative agencies (AVI) (6)	Coordination and follow-up of the Roma policy programme	Regional RONK		
	Well-being service counties (21)	Provide social and health services			
Local	Municipalities	Provide integration services, in line with national planning and in coordination with the regional well-be-	Municipal working group in integration*		
		ing service counties and other multi-sectoral bodies	Immigration Councils		
		Municipal programme for integration (locally relevant, respecting the frame of the national programme)**			
		Municipal Participation & interaction plan	Local security networks & NGOs		
		National guidelines for local security planning			

^{*} According to changes proposed by the government (HE 192/2024) no longer mandatory

C. Finnish legislation on multi level governance in the field of integration and good relations

The legislative basis for multi-level governance that promotes participation is strong in Finland. According to the constitution, Finnish democracy entails the right of the individual to participate in and influence the development of society and their living conditions. The constitution also states that 'the public authorities shall promote opportunities for the individual to participate in societal activity and to influence the decisions that concern him or her'. In the Municipality Act, it is stated that to ensure participation of underrepresented groups, the municipalities, for example, must set up councils for young, elderly and disabled people.

In the field of integration and good relations the new Integration Act requires multi-disciplinary cooperation at different levels. At the national level, since the 2010 Promotion of Immigrant Integration Act, and also by the Act coming into force in 2025, it is required that the Ministry of Economic Affairs and Employment (TEM) should elaborate a national programme, with objectives over four years, and relevant departments should set their own objectives and measures within that. A new **Development and Administration Centre (KEHA Centre)**, operating under this Ministry, has the task to support regional ELY-centres and offer counselling and advice in the development of employment and integration services, skills and capacities as necessary.

The Cooperation Group for Integration (KYHRY)

The above development of a national programme must be done within and with the support of a cooperative platform of all relevant ministries. This body is called KYHRY (the horizontal inter-ministerial cooperation group for integration) and is coordinated by the Ministry of Economic Affairs and Employment. It brings together eight ministries (Ministry of Economic Affairs and Employment, Education, Environment, Justice, Foreign Affairs, Interior, Social and Health,

^{**}According to changes proposed by the government (HE 192/2024) to the new Integration Act the municipal planning obligation will be lightened. According to the proposal the municipalities will have general and coordination responsibility for planning and developing integration at the local level. Municipalities must develop integration through multidisciplinary cooperation. Municipalities must coordinate the planning and development of integration with the well-being services county.

and Treasury) for the purposes of information sharing, but has no decision-making power. The aim is to improve cooperation, coordination and communication related to the theme of integration. Specific tasks are designated to expert groups coordinated by different ministries, and KYHRY has consultations with research institutes and the **Knowledge Centre for Integration** inside the Ministry of Economic Affairs and Employment. As it is a forum for inter-ministerial exchanges, however, KYHRY is not an independent body, and the same is true of the **National Board of Ethnic Relations (ETNO)**, or the **National Board of Roma Affairs**.

Duties on each ministry to promote good relations

On equality and good relations policy at national level, the responsible ministry is the Ministry of Justice, which also coordinates the national advisory board for ethnic relations (the national ETNO) and the advisory board for NGOs. This work is carried out in close cooperation with the Ministry of Economic Affairs and Employment. Roma policies, meanwhile, are coordinated through the Ministry of Social Affairs and Health.

All ministries have a duty to promote good relations, but some are further advanced in this work than others. In the field of internal security, the Ministry of Interior has a statement about promoting good relations in response to harmful polarisation, and in the national guidelines for regional and local security planning, there is a chapter on the promotion of good relations, with a special angle on conflicts and the preparedness to deal with them. The implementation of the Inter-ministerial Internal Security Strategy is done in multi-level and multi-disciplinary cooperation, but the document is only a non-binding guideline without monitoring mechanisms.

Regional coordination

At the regional level, the ELY Centres have coordinated and followed up the implementation of the National Integration Plan. To support the task, they can set regional committees for immigration and integration to support the integration measures. They can invite municipalities of the region, well-being service counties, police, reception centres for asylum seekers, other authorities, representatives of business life and organisations, non-governmental organisations, associations and communities, as well as service providers of integration services. They also have a duty to promote ethnic equality and they coordinate the activities of the regional advisory boards for ethnic relations (the regional ETNOs). When it comes to Roma policies, however, these are coordinated through the regional AVI Centres.

At the level of the ELY Centres, one of them (the Centre for Uusimaa) is also currently coordinating the

facilitation mechanism – 'The Beqiri model' – that we describe in greater detail below (see section IV) as a good model for a multi-level coordination mechanism. This pilot project reaches out to different communities, NGOs and local networks to collect information on local needs. It facilitates local encounters with decision-makers and different communities, and then facilitates the making of regional action plans for good relations.

There is a reform under preparation, which will turn the current ELY-centres into 'Vitality centres' from the beginning of 2026. The new centres will be charged with developing and financing regional development and economic vitality, within which they will take up the roles of ELY-centres with regard to immigration and integration.

Local coordination

At the local level (Integration Act, 45 §), it is stated that the municipality has general and coordination responsibility for the planning, development and monitoring of the promotion of the integration.

As explained above (under Section III (b)), new proposals (before the Finnish Parliament as of November 2024 – HE 192/2024) would lighten the statutory obligation of a municipality to do its own planning - in line with national priorities - on issues relating to integration, inclusion, non-discrimination, equality and good relations. Instead of reporting on local objectives and delivery (including equal access to services, the adequacy of services' funding and the impact of services) to the regional business, transport and environment centres every few years, the municipalities will merely have to take account of whatever objectives are set out by the national Government and coordinate with counterparts at regional level, including their respective well-being service counties. The requirement to have a multi-disciplinary local coodination group on immigration and integration in each municipality, bringing together authorities and decision-makers from multiple levels, as originally required by the new Integration Act, is also to be dropped.

Thus, the November 2024 amendments, if passed, would remove a great deal of policy-shaping influence from the local level and would give municipalities a great deal more latitude in deciding how to coordinate their work with others. While the municipalities with the most diverse populations and the longest experience working on integration and intercultural issues are therefore likely to continue voluntarily organising coordination and planning meetings – including local Roma working groups – it may be that more remote, less diverse municipalities de-prioritise these matters, and the status of any such local bodies, plans, or monitoring frameworks is likely to be reduced by becoming non-statutory.

D. Finnish structures and practice in relation to the six key elements

Element 1: An independent and expert body at national level

Finnish immigration, integration and good relations policies – as well as internal security policy – are under the competence of several different ministries, and the roles of the different actors are defined by separate pieces of legislation. There is no single, permanent body that has a cross-sectoral overview of the numerous themes related to inclusive integration.

Until 2025, there has been a national Knowledge Centre for Integration operating under the Ministry of Economic Affairs and Employment. It has produced and disseminated information to decision-makers, authorities and experts involved in integration. Its information has been based on research and monitoring as well as on practical experiences of policy implementation at local level. As its name implies, however, it was never a truly independent body established to critically review or boldly help shape policy, but rather an implementing body which prepared policy briefs for the government based on the most recent research and data. The Knowledge Centre has probably been the closest thing in Finland to an independent expert body in this field, however it was neither formally nor attitudinally (politically) independent of its host Ministry and governmental policy, so there has always been a limit to what it might say or propose. In addition, its remit never included the broader aspects of inclusion and good relations that can play such a determining factor in whether people actually feel like they belong to their communities and to Finnish society as a whole. When the new Integration Act comes into force in 2025, the roles of this Knowledge Centre will be taken over by the new **Development and Administration Centre** (KEHA Centre), which will provide support to governmental professionals working on integration and refugee reception. According to the new Act (§ 56), the KEHA Centre will be responsible for:

- Monitoring, assessing and publishing data on the effectiveness and functionality of integration promotion measures;
- Supporting the development of competence and of services relating to integration at national level;
- ► Legal advice on the implementation of the new Integration Act;
- ► Providing centralised support to municipalities and other actors in the field of integration.

This implies the need to run national data systems, including monitoring systems, and the need to build networks and vertical relationships with non-governmental organisations and other bodies working

on non-discrimination issues at ground level. It is clear, however, that the KEHA Centre will be no more independent than the previous Knowledge Centre. Nor will it necessarily be any more responsive to grassroots opinions (of individuals, NGOs and third sector entities) about policy or implementation than the previous Knowledge Centre, and its coordinating and training roles will not be reinforced by any statutory obligations for municipalities and regional authorities to participate.

Further, it is currently unclear whether the KEHA Centre's mandate will lead to better mainstreaming of integration issues or better coordination with the work of other Ministries. There is therefore no structure that guarantees coordination across all relevant national level actors, and very little sharing of knowledge across sectors/Ministries other than a handful of six-month staff placements. Such a permanent, independent and expert body might be compared to the current office of the Finnish **Ombudsman for Equality**, except that it would need a more proactive rather than purely monitoring role, particularly in terms of coordinating multi-level policy making.

Another interesting recent Finnish model for such a cross-sector expert body might be the Expert Panel for Sustainable Development, which is a scientific panel tasked with promoting and achieving the UN's sustainable development goals in Finland, coordinated under the Prime Minister's Office. This Sustainability Panel provides a research-based understanding to support decision-making and public debate affecting sustainable development in Finland, working across many sectors. Some, nonetheless, have pointed out that a body focused on integration and good relations needs to have contributors who are not only scientific experts but also diverse (in terms of ethnicity, geography, political and professional profile etc). At the same time, it cannot replace but only supplement normal democratic channels of policy development and decision, so relevant technical expertise and experience would remain central qualifications of any such body's staff/members.

Element 2: Cross-sector coordination at regional and municipal levels

As described earlier, the Finnish legislation on regional and local governance has many elements of participatory democracy and it obliges both regional and local authorities to set up consultative structures such as councils for youth and for elderly citizens. Many municipalities have also chosen to appoint optional **councils for immigration or multicultural issues**, and they are used as a consultation mechanism in local decision-making processes. Some who commented on this Blueprint felt that it ought to be compulsory for city officials working across all sectors to consult

specialised advisory bodies, containing people with lived experience of migration and integration.

The national Advisory Board of Ethnic Relations (ETNO) has counterparts in **seven regional ETNOs** around the country, as expressed in the ETNO Government Decree 771/2015. Regional boards are required to serve, for example, as platforms for preparation of regional action plans against racism and for promotion of good relations.

However, at the time of writing, the operational environment is changing rapidly at the regional level. Complexity has recently been added to the coordination of integration at regional and municipal level in Finland by the creation of the 21 well-being service counties, which bring cost efficiencies and other benefits of scale to local service provision. These do not map identically onto existing regional authority geographies and require some duplication of participatory structures. It has been reported to the authors of this paper that this complicates accountability when dealing, for example, with an issue that may involve both health and social care but also good relations or other aspects of inclusive integration such as policing of racism, or fair and equal access to housing. Certainly, in terms of promoting good relations and planning for inclusive integration, this structural innovation means that an extra layer of coordination between different officials is urgently required.

Proposed amendments to the new Integration Law, as discussed above, mean that municipalities will no longer be obliged to generate their own local integration plans and share those with the regions. Representatives of regional authorities who were consulted on this Blueprint suggested that their middle level was perhaps the best locus from which to conduct vertical coordination, as their work naturally faces both 'up' and 'down'. The new well-being service counties have the advantage of covering areas that are each somewhat demographically homogenous and not overly large, and they have already been given an equalising role at national level, so they could be useful as leading entities for planning. Meanwhile, the ELY Centres have the historical expertise in the integration field that could be utilised to facilitate such planning. Utilising these various regional entities in some such combination could not only ensure a vertical flow of knowledge back and forth between the capital and municipalities but could also encourage the multiple regional entities to operate without inconsistencies or duplications.

If any national strategy or action plan or multi-year objectives on integration will not be formally elaborated at regional and local level, as under the previous Integration Act, then at least it may be helpful for regions to get together and pre-define a list of topics on which they are going to coordinate and consult,

both horizontally and vertically. Set topics act as a way of safeguarding certain issues from temporary spikes in political neglect or hostility and ensure that cross-cutting and sensitive issues related to good relations do not get neglected in favour of purely economic policies.

Element 3: Dynamic and inclusive consultations at ground level

The elements of horizontal consultation are linked with participatory structures such as **local and regional councils**. Some Finnish cities have also introduced other participatory channels such as **citizens' panels**, **participatory budgeting**, **and specific service design processes**. According to the *Finnish Guidebook on Participatory Policies*, the many points of participation include: **knowledge production**, **cocreation**, **decision making** and **implementation**. A comprehensive multi-level governance model should take into account all these forms of participation and also pay attention to the involvement of all sectors of society (public, private, third and fourth sectors) as well as all communities and citizens' groups.

Currently, issues linked to integration or good relations tend to be handled separately from so-called mainstream participation structures relating to universal services and neighbourhoods. As Finnish society becomes more diverse, this should be reconsidered. The narrative of 'integration' is becoming almost outdated, so there is a need to operate parallel strands of public voice: specialised forms of consultation but also more general ways of consulting residents regardless of their status or migration background. The ETNOs were conceived at a time when Finland received far fewer and less globally diverse immigrants, and while the national ETNO remains a useful consultative body for the Ministry of Economic Affairs and Employment and for the Ministry of Education (it was a particularly significant voice during the dialogues of youth on racism in 2023), the ETNO system is not so fully nor pro-actively deployed at every level of government and by every Ministry. And having a local ETNO in place should never make a municipality 'lazy' about how it consults with diverse residents.

Good relations consultations require the widest possible definition of participation, rather than limiting themselves only to people with permanent residency or citizenship (as ETNOs do), and controversial subjects that can seriously impact community relations and prejudices (such as overseas conflicts) need to be discussed as readily as issues such as access to employment or health services. Having one settlement and integration system for people under international protection and another for those who migrate under international talent visas or through other labour channels is another structural inequality that should

not be exacerbated by having separate consultation processes for these two categories.

All those consulted on this Blueprint agreed that the most important relationships in the entire piece are the relationships between local community organisations and local authorities. Often, however, Finnish consultations at this level have taken place within the context of a short-term project, with experience and knowledge not carried ahead to inform the next round of consultation. This can create a weary sense of reinventing the wheel in each process. Tied to this is the need for conclusions of consultations to be tied to specific agenda-setting, decision-making or budgeting processes so that people can see that their participation does in fact have influence. Part of this involves leaving room in the drafting of law and policy for stakeholders to have meaningful input, at an early stage, rather than presenting them with such detailed and finalised proposals that it feels little or nothing can be altered. Creating this link between participatory processes and decision-makers will, in turn, naturally attract wider intersectional interest in participating.

Alongside the Beqiri model (see section IV), another positive Finnish model reported was **The Tampere Welcome City Model**, which is coordinated across a range of sectors and services under the City Council. The mayor is responsible for ensuring all services delivered balance the needs of those with migrant and non-migrant backgrounds, and its processes are attached to decision-making. It particularly involves the fourth sector and provides a structure by which to support (e.g. with free venues and ad spaces) entrepreneurial individuals who want to help the city with integration and good relations but who might not wish to join a council like an ETNO.

Another good example of consultation has taken place via the data gathering on equality and non-discrimination in the city of Hämmenlinna. Migrant and refugee NGOs have participated in knowledge generation by collecting it in different languages, since most surveys on universal policy issues are a common instance of structural discrimination when they are circulated only in Finnish. This data informed a Plan which every administration in Hämmenlina then had to implement, so the process proved itself to be consequential.

Finnish NGOs also see a need for capacity building (leadership programmes) to develop the voices of newcomers in political fora at all levels. Such programmes might be delivered at national or regional level for efficiency, and, in Turku and the surrounding region, they should include representation of the rising number of migrants from Sweden.

The wide variety of consultative options open to municipalities, regions and Ministries show that no

single model needs to be imposed on every area or every topic. Thus, while this Blueprint recommends one recent model that has proven successful in different parts of Finland, it does not do so to undermine the autonomy of local authorities within Finland's decentralised constitution. One size does not have to fit all, and every model can be adapted to local needs.

Element 4: Secure funding that fairly reflect responsibilities

In Finland, due to the cross-administrative nature of integration, funding for the promotion of integration is distributed to several actors through different channels. The municipality is paid compensation from state funds (and subsidies from the European Union's resettlement allocation) for the reception of those receiving international protection and for the promotion of their integration, based on both projected and actual costs. Meanwhile, the services for job-seeking immigrants are financed as part of public workforce and business services, and contracts for the organisations providing language and orientation courses to newcomers have been awarded on a rather short-term basis.

Migrant integration services are often developed with project funding. For example, the development of municipal immigrant competence centre activities and low-threshold guidance and counselling services have both been supported by project grants in recent years. In addition to ESF+ and AMIF funding, the aim is to utilise funding from the EU's Recovery and Resilience Facility (RRF) to strengthen the skills and employment of immigrants.

Project funding is a good tool for developing innovative measures, but permanent funding is needed for permanent operations. For example, forty mentors were trained to support newcomers in Turku but then the project funding ended so that these skills were not efficiently passed on to others and the desired mentorships were not fully implemented.

The same over-dependence on project funding is also found in the wider areas of good relations, non-discrimination and anti-racism work. Designated funding to support work on good relations - now a statutory duty of every municipality and regional body, as well as Ministry – is therefore urgently needed. Giving core funding to NGOs for at least five years reduces competition between organisations and allows different organisations, representing different communities, to thereby cooperate more easily with one another. This creates good relations between population groups. Instead, at the time of writing, the non-governmental sector working on both integration and good relations issues were reporting polarising tensions caused by funding cuts. These cuts tended to unite local authorities, regional authorities and NGOs against the national level in a way that is counter-productive for multi-level governance. Inversely, the Ministry of Economic Affairs and Employment has found that, without state funding for municipalities earmarked for particular integration or good relations objectives, they are unable to do more than support and advise municipalities in these areas. The reduction of available funds effectively reduces this centralised role even further.

At the same time, Finnish non-governmental organisations recognise the need to become less dependent on state funding (with more focus, for example, on corporate responsibility partnerships) and governmental administrators recognise that not everything is about money. **Existing resources** also need to be better activated – for example, utilising the large number of municipal staff working on education or at youth centres or on young people's mental health in order to reach more migrant and refugee families and gather their views on services.

Element 5: Commitment to communicating a vision of inclusion and good relations

In Summer 2023, a public debate about racism in Finland led to a **Government Statement to Parliament on equality and non-discrimination**, which consisted of new initiatives on public communication and a reaffirmation of commitment to inclusive values. As a part of the Statement's implementation, a new annual Prime Minister's Roundtable on equality and non-discrimination was launched in March 2024, to be followed by a national campaign against racism.

If Finland is to welcome the levels of additional skilled labour and educational migration that it hopes to welcome by 2030, political leaders will need to remain extremely vocal in support of good relations policies and similar inclusive integration approaches. This will need to be supplemented by support for the arts and entertainment industries, as well as culture, sport and community media, to embrace diverse representation and inclusive narratives about Finnish identity. Currently, only national-level projects – such as films or sporting events - tend to receive funds with conditionality applied that relates to representation, non-discrimination and other aspects of good relations. More such conditionality also needs to be applied as part of funding or permission processes at regional and local level.

In November 2021, only 4% of Finns thought that they were 'very well informed' about immigration and integration related matters, while 59% said they were 'not very well informed' (*Special Eurobarometer 519, Integration of Immigrants in the EU: Finland*, 2022). Therefore, there is plenty of scope for improvement, even at a basic level of **civic education**. More creative ways need to be found to reach those who are most

in need of, or most resistant to, such education, and these efforts should not be limited to urban areas or to reactive crisis situations. Currently, only a few of the more diverse Finnish municipalities have the resources to really think about this type of pro-active communication work.

Finally, Finland needs mandatory intercultural competence training for, at a minimum, all public sector employees who interact with the general public (as in Austria, where all public administrators must pass such a competence test) and, ideally, such training should also be made widely available to individuals in third sector organisations.

Element 6: Monitoring and evaluation of outcomes at all levels to ensure accountability

There are currently several monitoring structures in the field of integration policy in Finland. As explained earlier, a Knowledge Centre for Integration monitors the progress of immigrant and refugee integration and the state of these populations through its databases and employment reports. Every four years, the Knowledge Centre produces an overall review of integration. The Centre has also established the Integration Indicators Database in cooperation with the Finnish Institute for Health and Welfare. Its indicators are divided into five themes: employment, education, well-being, participation and two-way integration (the latter two being particularly relevant to good relations). Under the new Integration Act, this Indicators Database will likely be administered by the KEHA Centre (see Section d, Element 1, above).

Another body in the field is the **Discrimination Monitoring Group**. This Group has worked since 2008 and consists of research institutes, NGOs and public officials who have expertise on non-discrimination data collection and analysis. The Monitoring Group had an evaluative role in the previous Government's Action Programme against Racism during its various phases. Although the Discrimination Monitoring Group already plays an important role in collecting data at national level, the subjects of good relations and inclusion require more bottom-up and more qualitative forms of monitoring and evaluation, based on the dynamic consultation processes mentioned in Element 3.

Some cities have also developed monitoring mechanisms on integration policies at the local level. The City of Helsinki has **The Urban Research and Statistics Unit** at the Executive Office which conducts extensive urban research, maintains official statistical and registered data, and produces statistical publications and information services.

What is missing is a **holistic overview**, whereby the data produced under inclusive integration and

non-discrimination indicators might be considered alongside comparable (quantitative and qualitative) data collected under indicators relating to good relations. Whether the KEHA Centre will have a broad enough mandate to take this holistic view remains to be seen, given that the Integration Act focus is overly narrow; if not, then a first step might be setting up a shared database into which responsible organisations are either encouraged or obliged to input data sets of relevance. Experts, such as those working in a centralised body as described in Element 1, are then needed to translate data into analysis and future projections; Al alone cannot do this reliably, and there needs to be clarity about the various purposes of collecting any such data. It may be, however, that the central body envisaged in Element 1 cannot play both a coordination and policy review role and, simultaneously, a monitoring and evaluation role. It would need to be carefully designed if it did so, to ensure objectivity and accountability.

In terms of monitoring and evaluating good relations, to see how 'good' they truly are, one analogy may be found in the way that gender impact is currently monitored and evaluated in Finland. The data

produced needs to be able to identify, address and measure structural inequalities, and should not only be a study of one segment of population (newcomers and those with migrant family backgrounds) but of all residents. Regional authorities have expertise to contribute in relation to the quality assurance of data gathered from vulnerable or hard-to-reach individuals, and social work training institutions also have expertise on how to do this effectively and yet ethically (by applying user-oriented or dialogically-oriented methodologies).

Again, some good models already exist in the Finnish context. In Hämmenlina, for example, any new local measure or policy in that municipality has to be put through an equality and non-discrimination assessment tool before it is adopted. Finnish government decision-makers at all levels need an equivalent for seeing how measures and polices may impact community relations. The Council of Europe's Intercultural Cities Index, which is a popular self-monitoring tool for cities across Europe to assess how intercultural they are at any point in time, might be useful for this purpose, or as a basis for Finnish authorities to develop their own key indicators.

The Blueprint enriched by the 'Beqiri model'

Here we first outline:

- the general structure of a coordination mechanism spanning the different levels of governance;
- ▶ the main stakeholders within each level;
- the main channels where policy developments and goals are discussed; and
- essential policy tools available for change at each level.

In the following section, to make the mechanism clearer in practice, we will show how it has been applied in the City of Oulu. We intend for this diagram to assist any local, regional or national-level actor to see their position in relation to others and to fill it in with their own details – to see what is accomplished, what is missing and what is needed.

The Blueprint is divided into the three vertical levels: **local, regional and national.** The three key areas identified within each level are: stakeholders; channels and structures for decision making and participation; and relevant policies. The linkages between the different administrative levels and synergies between different policy strands and strategies are also identified.

The horizontal aspect of each level should take into account the public, private and civil society **stake-holders.** Needs identification should derive from the experiences of stakeholders in their day-to-day life – in workplaces, neighbourhoods, communities, leisure activities and public services. This bottom-up approach places the emphasis on the local level especially when it comes to evaluating the impact of any national policy initiative. The actual impact of good relations policy in combination with integration policy has to be measured at the local level, and instruments like the Council of Europe's Intercultural City Index can be incorporated into the evaluation process.

Decision-making and its participatory structures are at the heart of multi-level governance at every level. Relevant structures are either mainstream political institutions or specific participatory structures such as advisory boards or consultative channels. The key questions that should be addressed in setting up multi-level governance are whether the structures have decision-making powers and whether they are giving equal access and opportunities for stakeholders to influence planned policies. The concepts of co-design or participatory design both capture the ideal situation.

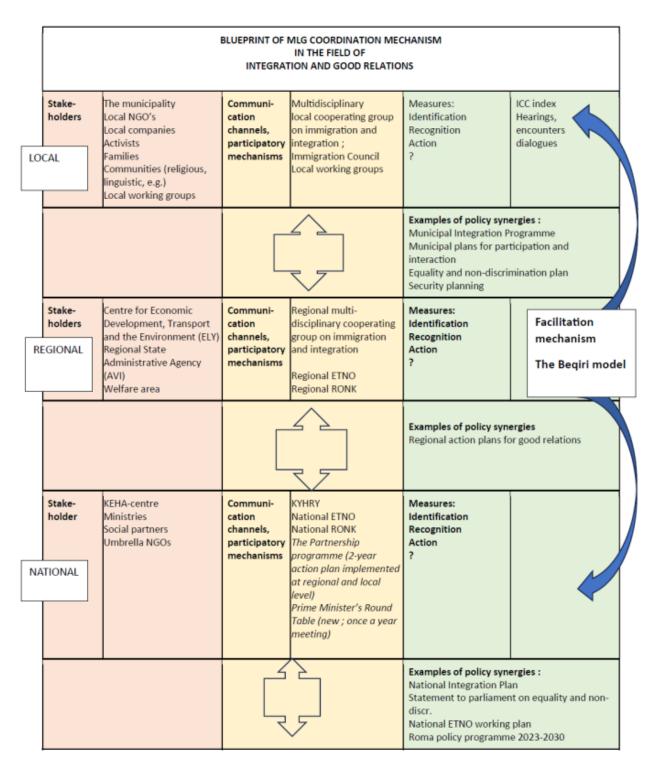
Linking of the decision-making and other participatory structures of different levels of administration is a major challenge in building vertically functioning multi-level governance models. There is a high degree of autonomy in different levels of Finnish governance, but national legislation and government policies are to be implemented at every level. Tight sectoral boundaries are also challenging when it comes to building cross-sectoral policies around inclusive integration and good relations.

Identifying overlap between key policy areas or frames is crucial for understanding the synergies of multi-level governance in both vertical and horizontal directions. For example, the policy areas that have dealt with good relations issues have been numerous. According to a report by Council of Europe, the specific target to promote good relations between ethnic, religious and language groups were found in policy areas of integration, equality and non-discrimination, internal security, crime prevention, Roma, Sami and linguistic minority policies (Artemjeff, Attias & Kettunen 2023). It is vital to identify the specific policy challenges within shared policy frameworks and which level of governance has the most effective tools for influencing the situation, or what is the optimal division of labour, vertically and horizontally, to tackle each specific issue.

Another way to overcome the challenges of multilevel governance is to include activities to facilitate interaction and co-creation between different levels. The stakeholders have brought up the need for a forum or structure to communicate and build relations between the local and the regional level, so it would not depend on personal relationships and connections only. The facilitation or cooperation mechanism should be able to operate at all levels and aim at fostering shared understanding on policy goals and targets. It can be arranged many ways: for example, by development projects that lead to more sustainable activities at national, regional and local level; network programmes like the Partnership Programme; or restructuring the division of labour in a way that emphasises the links and synergies between different levels of multi-level governance. In this Blueprint, we illustrate how the Finnish Pilot Project on Good Relations (employing the 'Begiri model' described below) has served the purpose of acting as a facilitation mechanism since 2022 and how it has been able to effectively transfer national policy goals and targets down to regional and local strategies and actions.

The last theme of the Blueprint relates to the **measures or policy tools** each level has available in their toolkit for moving towards the shared goals within the multi-level governance setup. It is critical to reflect on who sets the agenda and whether the people and target groups of policies at the local level get their voices heard in the system. The measures can be related to identification (making inequalities or other challenges visible), recognition (promoting participation and influence) or actions for promoting, for example, non-discrimination or equal opportunities of different minority groups. Each level and stakeholder

involved has its specific competences and capabilities and it is important to recognise which tools are most effective for solving which problems and challenges. For example, national or state level toolkits might consist of legal remedies, public funding instruments and national media campaigns. Regional and local authorities and NGOs have better understanding on the specificities of regional context and can utilise the policy tools and networks set up for regional and local needs. The overall architecture of multi-level governance should be designed in the way that benefits from the strongest capabilities of all stakeholders.



As described above, there is information on integration and good relations on four different levels (local, two regional levels, and national level). There are horizontal and vertical information channels, but in order to effectively transfer information from the grassroots level to higher decision-makers and vice versa, structures and channels are not sufficient. What is also needed is an active facilitation mechanism and resources to respond to local needs.

A good practice of this kind of facilitation is the 'Beqiri model', named after Nexhat Beqiri, who has coordinated the National Pilot Project on Good Relations. The project was first financed by the Ministry of Justice (2021-23), and now (2023-2025) by the Ministry of Labour, and it is run by the ELY Centre of Uusimaa. It implements the regional and local levels of the National Action Plan Against Racism nationwide.

The approach of the model is bottom-up. The starting point is to diagnose the needs and interests of different communities in different places. During 2022-2023, the National Pilot Project enabled and facilitated 52 workshops in 23 different towns and in 15 different languages. In these workshops, experiences of different communities concerning integration and related issues of intergroup relations (such as interaction, participation, safety and attitudes) were collected. The workshops were organised by commissioned service providers. The service providers were mainly NGOs working within different communities themselves.

After the round of workshops, in which needs were identified, the information was raised to the attention of local and regional decision-makers. In 21 towns, they were invited to a dialogue, in which the information gathered in the local workshop was provided to them. In addition to expressing needs and recognising them, the goal was to strengthen the local and regional cooperation structures and to draft local action plans derived from the information. The local action plans follow the priorities of the national policy programme, taking into account the local needs. At the time of writing, the local action plans are being prepared.

The success of the local dialogues with decision-makers has been evaluated. They have influenced the attitudes and the intentions positively and they have also promoted inter-group understanding and social cohesion (Valtioneuvosto 2024). Additional funds and

comparable, quantitative indicators are needed in order to evaluate the initiatives in at least another ten municipalities. There are a few elements that explain the success of the facilitation mechanism. The first one is the co-design with local communities. Anyone can participate as a stakeholder, not only registered associations or well-organised groups or professionals in the field – in other words, there are no gatekeepers. Key actors and individuals are recognised and invited to work for a common goal, and the structure is flexible. This approach requires good knowledge of the formal and informal local networks. Indeed, the decisive factor of individuals' 'soft skills', in terms of listening openly and making human connections across sectors and between levels of government, cannot be underestimated. Another factor that contributes to the model's success is the facilitation resource, which enables meaningful participation. The channels and the stakeholders exist, but in addition interaction and communication need to be supported so that the right amount of energy makes things happen.

The Beqiri model has elements of a methodology known as meaningful participation. In meaningful participation, the facilitator invests equally in:

Topics, i.e. mapping what information and views the participants present in relation to essential questions;

Structures, i.e. preparing and guiding the dialogue or the deliberation so that its purpose, operating principles and the importance of participating are clear to everyone and so that people have an opportunity to prepare in advance;

Social Capital, i.e. building conversational connections, relationships and trust, as well as the scope for cooperation and interaction between the parties involved.

TOPICS

What do we talk about? What are the issues at stake and the common goals?

FACILITATION

Planning, deciding, communicating

STRUCTURES

The procedures for planning, co-creating and decision-making, the practices of participation

SOCIAL CAPITAL

The relationships between the parties, the mutual trust, interaction and communication, the capacity to cooperate

(Attias, Jääskeläinen & Stenroos, 2021)

Application of the model in the city of Oulu: an example of good practice

o give a practical example, we can look at the stakeholders and the communication channels and participatory structures of the City of Oulu.

The Oulu City Migrant Council is the central structure for multi-level governance in integration and good relations policies. Being a permanent structure, it is considered as a stakeholder. It has gained goodwill and brand recognition amongst other stakeholders in the city. It is known to be a very impactful channel because it has direct contact and a structural link with decision makers (political stakeholders), which allows its members' voices to be heard at key moments.

The Council is chosen every fourth year, following the cycle of municipal elections. An open call is launched, and the goal is to attract people who represent the diversity of communities (heterogeneity of backgrounds, languages, religion, nationality, gender, profession, etc) but who also have some expertise on the issues. They write a motivation letter to apply. There are 5 permanent experts and 11 Council members, of which one chair is elected. The chair must hold expertise in equality, equity and minority issues and also have good communication and interaction skills. The members are selected in a process based on co-design. The applicants are invited to a workshop, in which the criteria are designed – by themselves.

A constant capacity-building takes place, with the members provided with trainings, information and study tours. The resources of the Council are 35,000

€ per year, from which the members are paid for attending meetings.

There is a real chance for meaningful participation because the Migrant Council is linked to the political stakeholders, the city council and the local members of the national parliament. These structures and communication channels facilitate real opportunities to have impact and to influence outcomes.

In Oulu, many of the working groups and committees are fluid, being theme and issue specific. Once a need is identified and recognised, the Migrant Council takes an initiative to tackle the issue. Key actors are identified and invited according to the needs and goals. Usually, the mandate is temporary, and the goal of the work is clear and measurable.

The below picture of Oulu's multi-level governance reveals the way in which the local stakeholders and horizontal channels are currently most meaningful at local level. In contrast, effective communication channels or participatory structures are much less well developed at the regional and the national levels. The most active stakeholders appear to be the local members of the national parliament, and then the international partners found in the Eurocities network.

One weakness is that the Migrant Councils are not recognised at the national level. This might be due to their lack of statutory status (unlike the Councils for elderly, youth and disabled persons). Oulu City Migrant Council, led by its chair, has now made an initiative to build a national network (Sood, 2024).

BLUEPRINT, OULU CITY'S EXAMPLE				April 2024		
Stake-holders	Represe bodies Migrate Equalication Councies Roma, & disacouncies Publication Langua commit Migrate Religio commit Neighbassocia School	ouncil committees sentative /structures: nt council ty & equity l elderly, youth bled persons ls officials age based unity groups nt associations ous unities courhood	Channels	Round tables twice a year of city board, mayor, and migrant council Migrant council's 4 working groups: welfare, equality & equity, integration & communication (members + theme specific stakeholders); City's steering committees: cultural, equality & equity, welfare etc Ukraine working group (Migr. council members, NGO's, church, volonteers) Temporary committees*	Identification Recognition Action	Resource mapping: Identifying migrant council members own networks and relationships Designing strategic goals & areas of impact, linking the networks and the strategies and creating channels of impact Defining measurable indicators for impact (e.g. number of initiatives to the city council) Co-design practices for integration strategy with the (ukrainian) community (supported by EU-project)
LOCAL		communication channels participation structures				
Stake- holders	ELY		Channels	Regional ETNO (1 migrant council member nominated)	Identification Recognition Action	
		communication channels participation structures				
Stake- holders	holders		Channels	PM's round table (Oulu city representative invited)	Identification Recognition Action	
INTER- NATIONA				l cooperation & projects IES-NETWORK)		

Recommendations and considerations

he following sets of recommendations and considerations pick up on points flagged in the preceding sections and focus on the most important improvements needed in Finland to ensure that governance of good relations and inclusive integration is prepared for higher numbers of newcomers, including skilled migrants and students, in future.

As of 1 January 2025, with the coming into force of the new Integration Act, all levels of governance and all regions and municipalities will need to be prepared to operationalise the principles and processes described in this Blueprint. The following are therefore suggested as recommendations.

For municipalities

- 1. Implement the Begiri model (complemented by collection of quantitative data to reach an objective 'diagnosis') when developing policy and reviewing implementation. As a first step, review existing channels of communication between the municipality and each regional authority (including the well-being service counties) on issues relating to good relations and inclusive integration. For the sake of administrative efficiency and effectiveness, build the Begiri model into existing, ongoing processes – including planning cycles – and see whether existing consultative bodies can be made more inclusive and diverse before creating new dedicated bodies. Make sure that consultative bodies or participatory structures (whether ETNOs or new) are involved in setting agendas for meetings and that those meetings feed into channels of real decision-making at an early stage, rather than simply meeting according to a set calendar.
- 2. Review the current participatory processes (involving newcomers and other groups) in light of recent guidance on best practice, especially the Beqiri model's dynamic methodologies. Involve residents, including newcomers, in the decision about which approach to deploy and in planning of events and processes. Consider also the usefulness of **digital platforms** where members of the public can register for remote consultation, but ensure that these are 'firewalled' so that individuals without secure residency

- status participate with confidence, and ensure that a human-centred, client/service-user perspective dominates their design. Finally, make sure to **publicise successful consultations or co-design processes in the media** as examples of good relations in action.
- 3. Ensure that NGOs, civil society organisations and other interlocutors (e.g. private residents; interpreters) who participate in the above processes are **compensated fairly** for their time, skills and contributions. Establish budget lines for funding of civil society organisations, particularly migrant or refugee led organisations, in order to support their full and equal participation in any local consultations or co-design processes. **Leadership programmes** to develop the voices of newcomers in participatory processes and political fora at all levels should also be developed.

For regional authorities

- 1. Establish strong mechanisms to ensure that the several different regional authorities (the state's regional administration; ELY and AVI centres; the new well-being service counties) are working on improving integration and good relations consistently and collaboratively, without gaps of accountability. At a minimum, this should take the form of an annual calendar of frequent meetings attended by directly relevant senior staff; it may also require a national coordinating network, with dedicated resources to highlight problems and to signpost where responsibility for resolving them should lie. Developing clear signposting for service users could also be part of this team's remit. Those who provide specialised integration services need to be brought together at regional level to talk to those who provide more mainstream public services, such as those working with youth, community mental health, or disability inclusion.
- 2. Considering the centrality of public perceptions to good relations, establish an **inter-regional working group and a generous budget to invest in communications with the general public** that can (a) showcase local examples of successful inter-group cooperation and reciprocity; (b) amplify accurate information about issues of public concern; (c) make

information about public services accessible to all residents, not only in terms of language but also in terms of culture and representation; (d) be informed by periodic research studies on public attitudes which also look at residents' values and media consumption; (e) be based on narratives which dismantle stereotypes and prejudice, and which are tested with those they concern as well as those they address; (f) utilise pop culture, arts, sports and community media as well as official statements and news media; (g) include supportive language from senior regional leaders. **Mandatory training in intercultural competence** for at least those officials with public-facing roles, if not also third sector organisations, is also part of this communications emphasis.

3. Clarify – initially, perhaps, through an inter-regional working group – where and how qualitative **monitoring and evaluation** at municipal level is to be collected and channelled towards decision making at regional level and upwards to national level, and inversely how national monitoring, using **indicators developed around good relations**, will be applied to hold regional and local authorities to account. Regional authorities who work with vulnerable groups and social work training institutions should be invited to contribute relevant expertise regarding how to collect and utilise sensitive data.

For national ministries

1. Institute **secure**, **structural and sustained funding** for good relations policy development and programme implementation, rather than leaving this area of work reliant on project funding. Include funding of the Beqiri model at each local level, or at least in all areas where there are relatively high levels of diversity. Also consider guarantees of **long-term core funding to organisations that provide key services** such as language and orientation courses to newcomers.

Ensure that, in such ways, the implementation of good relations policy is not undermined by funding cuts to grassroots and other service-providing NGOs. KYHRY may be the best body to take the lead on activating existing funding working groups, or, if necessary, establishing a new working group on resourcing of inclusive integration and good relations.

- 2. Establish a permanent national **Centre of Excellence on Good Relations [between population groups]** at the Ministry of Justice (alongside or within a Centre of Excellence for non-discrimination to combat acts of hate) and task it with, among other functions, coordinating multi-level governance of good relations and inclusive integration policy, while policy development and implementation remain the responsibility of individual Ministries. Ensure the Centre has sufficient budget and staffing to fulfil its mandate, and clear agreements with other Centres such as the KEHA Centre. It could, perhaps, be a joint operation adjacent to the office of the Finnish Equality Ombudsman, though with a more pro-active role than the Ombudsman.
- 3. Establish an independent expert panel to advise the above Centre, with the capacity and freedom to publish its own reports and which is not dependent on any single Ministry for either its continued funding or mandate. This panel should include members with lived experience, especially of racism and discrimination, but should be primarily a scientific panel providing research-based understanding to support decision makers. It could take the Expert Panel for Sustainable Development as a model, though it may be wise to locate it outside of governmental structures (for example, within an independent research institution or a professional education institution that has experience of partnership with the third and fourth sectors).

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