

EVALUATION OF THE GOVERNMENT'S EQUAL FINLAND ACTION PLAN FOR COMBATING RACISM AND PROMOTING GOOD RELATIONS BETWEEN POPULATION GROUPS



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EVALUATION OF THE GOVERNMENT'S EQUAL FINLAND ACTION PLAN FOR COMBATING RACISM AND PROMOTING GOOD RELATIONS BETWEEN POPULATION GROUPS

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Abstract

The report assesses the Equal Finland Action Plan for Combating Racism and Promoting Good Relations between Population Groups using the European Commission's criteria for national action plans against racism and the recommendations made by the European Commission Against Racism and Intolerance (ECRI), from the Council of Europe, in its monitoring report on Finland (2019, Fifth Cycle). The evaluation was carried out as part of the European Union and Council of Europe joint project "Building an Inclusive Integration Approach in Finland", which was co-funded by the European Union via the Technical Support Instrument, and implemented by the Council of Europe, in co-operation with the European Commission and the Ministry of Justice of Finland. The purpose of the evaluation was to identify areas for improvement to be taken into account in future national efforts to combat racism. The evaluation has drawn on the preparatory and implementation documents of the Action Plan, evaluation questionnaires and interviews with key persons.

The evaluation shows that the Action Plan meets the EU criteria very well and takes into account some key recommendations made by ECRI. Its preparation and implementation were coordinated by a broad-based working group, the measures were designed and assessed in consultation with a wide range of population groups, funding was earmarked for their implementation, the measures selected covered a wide range of areas of life and forms of anti-racism work, and the Action Plan was monitored and evaluated using various methods. The implementation of the Action Plan at regional and local level was strengthened by the HVS pilot project on good community relations.

Despite the positive overall picture, the evaluation highlights areas for improvement. Suggestions for improvement concern, for example, data collection in the preparation of the programme, measures and their resourcing, and monitoring and evaluation methods.

Introduction

The purpose of this report is to evaluate the Equal Finland Action Plan to combat racism and promote good population relations¹. The Action Plan was implemented in different branches of government between 2021 and 2023. The evaluation work has been carried out in a joint project between the European Union, the Council of Europe and the Ministry of Justice entitled “Building an Inclusive Integration Approach in Finland”, funded via the European Union’s Technical Support Instrument. The Council of Europe is responsible for the implementation of the project. This report was commissioned as part of the project activities and was prepared by Panu Artemjeff, Miriam Attias and Adan Mohamed, independent experts at MAP Finland, a think tank specialising in good relations policy.

The evaluation will examine the process of preparation, implementation and monitoring of the Action Plan and its content in the light of the evaluation criteria for anti-racism action plans developed by the European Commission and the OECD, taking due account of the recommendations made by the Council of Europe and in particular the European Commission against Racism and Intolerance (ECRI) in its fifth monitoring report (2019). The evaluation also makes suggestions for improvements for future action plans. The Action Plan will be compared with a number of other European examples and good practices.

The material used in this report includes the Equal Finland Action Plan and its monitoring reports and surveys, the European Commission’s Anti-racism Action Plan and the Commission’s guidelines for the preparation of national action plans, as well as guides from the Office of the High Commissioner for Human Rights and the European Network Against Racism ENAR, which present guidelines and good practices on anti-racism plans and criteria for their preparation in different countries. The report also takes into account the recommendations made by the European Commission against Racism and Intolerance (ECRI) in its fifth monitoring report (2019). In addition to documentary analysis, the evaluation has drawn on discussions with key persons involved in the preparation and implementation of the Action Plan² and the results of an evaluation survey carried out by the Ministry of Justice.

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1. Ministry of Justice (2021). An Equal Finland – Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups. Publications of the Ministry of Justice, Memorandums and statements 2021:34. <http://urn.fi/URN:ISBN:978-952-259-808-0>.
 2. Interviews: Anna Brun (Ministry of Economic Affairs and Employment, 21 June, 2023) and Katriina Nousiainen (Ministry of Justice, 3 July, 2023).

Background to the Equal Finland Action Plan

The Government's Equal Finland Action Plan for Combating Racism and Promoting Good Relations between Population Groups was implemented in different branches of government between 2021 and 2023. It was prepared by a broad-based preparatory working group with representatives from all ministries and the Prime Minister's Office, the Association of Finnish Municipalities, the Sámi Parliament, the Advisory Board for Ethnic Relations, the Advisory Board on Romani Affairs, the Swedish Assembly of Finland, the Human Rights Centre and the Non-Discrimination Ombudsman. The same working group was also responsible for monitoring and evaluating the implementation of the Action Plan.³

The last time the Government adopted a separate action plan against ethnic discrimination and racism was in 2001, under the government of Paavo Lipponen.⁴ Since then, governmental action on racism and discrimination has been part of human rights agendas and action plans on immigration and integration.

The internal security plans have also included actions on inter-group relations. In 2016, the Ministry of Education and Culture developed an action plan to prevent hate speech and racism and to promote social inclusion.⁵ As part of the Government Programme, the Ministry of Economic Affairs and Employment prepared a working life diversity programme, which in many respects links to the Government's action plan on anti-racism and good relations.⁶

Measures against racism and discrimination in Finland have often received funding from EU funding programmes. The funding programmes have been linked to the implementation of EU legislation and EU policies in EU countries. Key funding programmes have included the European Union's anti-discrimination programme, the Progress programme, the REC programme and the CERV programme, which have supported many projects in Finland. The main policy programmes and funding channels are summarised in Table 1.

Table 1. Policy document materials		
Policy programmes (Finland)	EU policy programmes	EU funding programmes
An Equal Finland: Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups	EU Anti-racism Action Plan 2020–2025	Citizens, Equality, Rights and Values Programme (CERV)
Working Life Diversity Programme	EU Commission Recommendation (EU 2018/951) on standards for equality bodies	Rights, Equality and Citizenship (REC) funding programme
"Merkityksellinen Suomessa" programme to prevent hate speech and racism and to promote social inclusion	Council Framework Decision (2008/913/JHA) on combating certain forms and expressions of racism and xenophobia by means of criminal law	Progress programme
National Action Plan on Fundamental and Human Rights 2017–2019	Framework strategy for non-discrimination and equal opportunities for all	European Union's anti-discrimination programme
National Action Plan on Fundamental and Human Rights 2012–2013	THE GREEN PAPER Equality and non-discrimination in an enlarged European Union	

3. Ministry of Justice (2021), p 11–13.

4. *ibid.*, p. 9.

5. Ministry of Education and Culture (2016).

6. Ministry of Economic Affairs and Employment (2021).

Finland has received numerous recommendations from international human rights treaty monitoring bodies on combating racism, discrimination, hate speech and hate crime, and on the protection of human rights and fundamental rights. For example, the European Commission Against Racism and Intolerance (ECRI) published its fifth report on Finland in September 2019, which included 20 recommendations to combat racism and intolerance.⁷

The EU Anti-racism Action Plan (2020–2025) required EU Member States to draw up national action plans to combat racism.⁸ The national action plans were expected to be completed by the end of 2022. The Equal Finland Action Plan was prepared according to the criteria set out in the EU Anti-racism Action Plan and met Finland's obligation to prepare a national plan (see the section "European Commission criteria for the preparation and content of national anti-racism action plans").

Overview of other EU countries' action plans

Action plans against racism have been drawn up in several EU countries.

Sweden's national action plan against racism, xenophobia and related offences and hate crime⁹ is a comprehensive plan that takes into account the views of the various authorities, regional and local actors and civil society organisations. The plan covers five specific lines of action to combat Afrophobia, anti-Semitism, anti-Gypsyism, Islamophobia and racism against Sámi people between 2022 and 2024.

The Norwegian government has developed an action plan to combat racism and discrimination based on ethnicity and religion for the period 2020–2023.¹⁰ The plan consists of 50 measures, divided into nine components, and its implementation is reviewed annually.

France has a national plan to combat racism, anti-Semitism and ethnic discrimination for the period 2023–2026.¹¹ Overall, the plan contains 80 action points across five categories: measuring the reality of racism, antisemitism and discrimination; accurately describing the reality of hate; improving education and training; sanctioning perpetrators and supporting victims. The implementation of the plan is monitored annually.

Germany's national action plan¹² against racism includes policies and measures to address ideologies based on inequality and the resulting discrimination. In 2008, Germany presented its first national action plan against racism, xenophobia, anti-Semitism and related intolerance to the UN High Commissioner for Human Rights in Geneva and has continued its work since then.

7. Ministry of Justice (2021), p. 17.

8. European Commission (2020), p. 23.

9. Regeringskansliet (2023).

10. Kulturdepartementet (2019).

11. Délégation Interministérielle à la lutte Contre le Racisme, l'Antisémitisme et la Haine anti-IGBT (DIICRAH) (2023).

12. Die Bundesregierung (2018).

European Commission criteria for the preparation and content of national anti-racism action plans

According to the EU Anti-racism Action Plan published in 2020, the Commission encouraged all Member States to draw up and adopt national action plans against racism and racial discrimination. The action plans should guide the fight against racism at national level and could be used to share good practices between Member States. The Commission also proposed to work with Member States to identify common guiding principles for national action plans. The recommendations were to be made in close cooperation with civil society and bodies responsible for the promotion of equality.

In 2020, the Commission set out the key principles and elements needed to develop effective national action plans. All Member States were expected to prepare and adopt national action plans by the end of 2022. On the following page you will find the Commission's proposals for common principles..

Common guiding principles for national action plans

A Union of equality: EU Anti-racism Action Plan 2020–2025 (page 19)

1. Policy areas identified at EU level in this Action Plan, such as legislation to combat racism,
2. combating discrimination or ensuring non-discrimination by law enforcement authorities in education, employment, health and housing; a comprehensive assessment at national level of the action needed in all areas identified in this Action Plan;
3. Tailoring actions to social, historical and cultural contexts and country specificities in order to respond to the most urgent needs; Involving regional and local authorities, civil society and equality bodies in the planning, implementation and evaluation of actions;
4. Collecting data and defining indicators to measure progress;
5. Making use of the practical guidance provided by the Office of the United Nations High Commissioner for Human Rights and the key elements and principles identified.

In 2022, the European Commission finalised the more detailed recommendations on the development of national action plans. The recommendations were published in two documents, one dealing with the general principles for the preparation of action plans, and the other with the content areas of preparation and reporting.¹³ When the revised recommendations were finalised, the Equal Finland Action Plan was already completed and in the implementation phase. The revised recommendations were drawn up by a working group of Member States and experts set up by the Commission, which also included experts from Finland.

The revised evaluation framework was partly based on a previous OECD guidance document and includes a general list of recommendations and a separate reporting tool, both of which are intended to guide Member States in preparing and monitoring the implementation of anti-racism action plans. The recommendations should be interpreted in the light of country differences and, when applied, attention should be paid to intersectional inequalities, i.e. the intersection of different forms of discrimination, such as racism and gender. The key principle is that a national action plan is both a process and an outcome – and that both aspects are equally important.¹⁴

According to the recommendations, there are four stages in the process of drawing up an action plan: preparation, development, implementation and monitoring, and evaluation. In addition to the four stages, the processes should include three cross-cutting activities: collecting and using equality and equity data, applying a participatory approach, and ensuring structured cooperation and coordination.¹⁵

The guiding principles are summarised below.

EU's common guiding principles for the development of national action plans against racism¹⁶

1. Recognise and encourage diversity, equity and equality.
2. Ensure that EU legal and policy frameworks and other commitments derived from international obligations are fully embedded and implemented at national level.
3. Identify and tackle potential manifestations of structural racism and their impact.
4. Set specific and achievable objectives in national action plans.

5. Establish measures tackling racism in a holistic approach by ensuring coordination and mainstreaming of anti-racism actions in policies at national, regional and local levels.
6. Ensure that engagement, active participation, and transparency are guiding principles and inform the design and implementation of national action plans.
7. Collect and use equality and hate crime data to ensure evidence-based policymaking.
8. Duly consider proper monitoring and/or evaluation of national action plans.

The general part of the revised recommendations is largely in line with the principles guiding the action plans set out in the EU Anti-racism Action Plan, with only some additional requirements.¹⁷ In addition to the above requirements, the action plans should:

- ▶ include participatory activities to ensure the groups experiencing racism are heard in the preparation and implementation of action plans,
- ▶ include effective monitoring and evaluation mechanisms, and
- ▶ be publicly available in an accessible format.

The recommendations include a checklist and a reporting tool for three steps: the preparation and development of the action plan, the implementation of the plan, and the monitoring and evaluation of the plan.¹⁸ Each step contains a set of criteria (Table 2) that an effective national anti-racism action plan should meet. The checklist is used to assess whether the criteria are met or not. The reporting tool, on the other hand, contains more detailed questions that help carry out a more in-depth evaluation of the plan.

Next, we will present the checklist and apply the Commission's evaluation model to assess the preparation, implementation and monitoring of the Equal Finland Action Plan.

13. See European Commission (2022/a) and European Commission (2022/b).

14. European Commission (2020), p. 19.

15. European Commission (2022/b), p. 6.

16. *ibid.*, p. 5.

17. European Commission (2022/b), p. 5.

18. European Commission (2022/a), p. 6.

Table 2. Checklists: Steps in the development of a national action plan against racism (NAPAR¹⁹)	
Preparation and development phase	yes / no
Designation/establishment of a specific NAPAR management body/function/contact point	
Designation/establishment of a NAPAR cooperation and coordination mechanism	
Designation/establishment of a NAPAR advisory mechanism	
Mapping of existing legislation and policies, relevant agreements and recommendations from expert bodies	
Mapping of relevant institutions	
Survey of interested parties, civil society organisations and representatives of affected communities	
Mapping information needs on equality: data disaggregated by ethnic origin	
Making use of information on the implementation of equality in relation to the communication of the scope of the NAPAR	
Public consultations	
Securing funding	
Participation of interested parties and affected communities	
Comprehensive scope of NAPAR	
Addressing structural racism and intersecting inequalities	
Public launch of the programme / communication / awareness raising	
Implementation phase	yes / no
Ongoing coordination through a cooperation mechanism	
Ongoing coordination through a cooperation mechanism	
Involving several actors in the implementation of the NAPAR	
NAPAR implementation at regional and local level	
Monitoring NAPAR implementation / reporting on progress	
Monitoring and evaluation	yes / no
Mid-term evaluation of NAPAR implementation	
Final evaluation of the NAPAR and its impact/effectiveness	
Designation/establishment of an independent mechanism for NAPAR monitoring and evaluation	
Data and indicators for NAPAR evaluation and monitoring	
Reporting on the results of NAPAR evaluation and monitoring	

¹⁹ NAPAR stands for National Action Plan Against Racism.

Evaluation of the Action Plan

Next, we will assess the Equal Finland Action Plan against the general criteria set by the European Commission and the steps set out in the Commission's checklist.

Preparation of the Action Plan

The Equal Finland Action Plan was prepared and implemented in four phases: the evaluation phase, the planning phase, the implementation phase and the ongoing evaluation phase. The process was coordinated by a working group set up by the Ministry of Justice, with representatives from all ministries and the Prime Minister's Office, the Association of Finnish Municipalities, the Sámi Parliament, the Advisory Board for Ethnic Relations (Etno), the Advisory Board on Romani Affairs, the Swedish Assembly of Finland, the Human Rights Centre and the Non-Discrimination Ombudsman. The preparation was guided by the Ministerial Working Group on Internal Security and Strengthening the Rule of Law.

In addition to the Coordination Group, the Discrimination Monitoring Group set up by the Ministry of Justice was responsible for analysing the knowledge base of the Action Plan. The group discussed studies carried out under the Action Plan, such as a preliminary study to identify structural discrimination in different parts of the society.²⁰ Representatives of the Discrimination Monitoring Group include the Advisory Board for Ethnic Relations (Etno), the University of Helsinki (CEREN), the Human Rights Centre, the Advisory Board on Romani Affairs, the Sámi Parliament, the Migration Institute of Finland, the Finnish National Youth Council Allianssi, the Finnish Red Cross, the Ombudsman for Equality, the Finnish Institute for Health and Welfare, Statistics Finland, Ministry of Economic Affairs and Employment / Centre of Expertise in Immigrant Integration, Advisory Board for the Rights of Persons with Disabilities (VANE) and the Non-Discrimination Ombudsman.

The purpose of the evaluation phase was to review the current state of racism and population relations according to the UN Human Rights Indicator Model, particularly with regard to the following:

- a. Structures (legislation and legal protection structures)
- b. Policy (anti-racism policy in different sectors and in different branches of government)
- c. The experiences of different groups

The evaluation was mainly based on the results of studies and surveys published at national and international level and on official statistics.²¹ This information was used to produce the report "Discrimination in Finland 2017–2019", which was published in October 2020.²² In addition, two research reports were produced on promoting inter-group relations: one on ways to promote positive inter-group relations²³ and the other providing an overview of the current state of inter-group relations in Finland.²⁴ The sectoral assessment was carried out through an internal survey by the preparatory working group. The different ministries were asked to identify key legislation and policies in their area of responsibility that are relevant to the fight against racism and the promotion of good relations between population groups. In building up the legal picture, the evaluation also made use of the VN-Teas study commissioned by the Ministry of Justice, which mapped the effectiveness and development needs of equality legislation.²⁵

Participation of different population groups in the preparation of the plan was sought through participatory methods. An open virtual consultation was held on 19 October 2020. Virtual workshops were organised for the regional advisory boards for ethnic relations (7), the regional advisory boards on Romani affairs (4) and the Sámi Parliament to discuss the manifestation of racism and the structures of anti-racism work in different areas. In addition, five digital workshops were organised for young people in different parts of Finland. Civil society actors were also involved in planning the Action Plan measures. The Ministry of Justice launched a call for ideas to propose measures for the Action Plan.²⁶ The Action Plan was launched at a national seminar on 13 December 2021 and was made available on the Ministry of Justice website.²⁷

20. Ministry of Justice (2021), p. 11.

21. Ministry of Justice (2021), p. 12.

22. Mannila, S. (2020).

23. Ministry of Justice (2020).

24. Mannila, S. Tilannekuva väestöryhmien välisten suhteiden tilasta Suomessa. An unpublished working paper.

25. Nieminen, K., Jauhola, I., Lepola, O., Rantala, K., Karinen, R., Luukkonen, T. (2020).

26. Ministry of Justice (2021), p. 13.

27. See <https://oikeusministerio.fi/hanke?tunnus=OM065:00/2020>.

The preparation and evaluation phase of the Action Plan largely meets the EU's criteria for the preparation of national action plans (Table 2). A specific body, cooperation and coordination mechanisms and an advisory mechanism were designated to prepare the Action Plan. Existing legislation, policies and international human rights treaties were assessed and mapped extensively. A separate mapping of the relevant institutions and interested parties, civil society organisations and the representatives of affected communities was not carried out, but a participatory approach was used to ensure that as wide a range of actors as possible were involved.

The accessibility of participatory processes from the perspective of different minority groups is difficult to assess on the basis of the available data. However, it can be assumed that **language skills problems may be an obstacle to the equal participation of different linguistic and ethnic groups in the preparation of the Action Plan. The strengthening of participatory preparation in local languages could increase the equality of different groups in future action plan preparation processes. (recommendation 1)**

The introduction of information collection in local languages during the implementation phase of the Action Plan can be very important in the future.

In line with the general criteria set out in the EU Anti-Racism Action Plan, the preparation of the Equal Finland Action Plan has sought to take into account country specificities, the views of different branches of government and civil society and equality bodies, as well as the results of recent research on racism. The preparation of the plan has also benefited from the practical guidance provided by the Office of the United Nations High Commissioner for Human Rights.²⁸ The preparation and evaluation phase also included identifying and defining the objectives and measures of the Action Plan. The funding allocated for the evaluation made it possible to commission additional studies and launch an idea competition to increase participation. The cross-cutting themes set by the Commission, i.e. the collection and use of equality and equity data, the application of a participatory approach and structured cooperation, were well implemented during the preparation phase.

According to the EU guidelines, the guiding principles for national action plans should be commitment, active participation and transparency. In the light of the preparatory documents for the Equal Finland Action Plan, participation and transparency have been considered particularly important, and various forms of consultation were tested for different target groups (digital panels, workshops, consultation procedures). It is difficult to assess the level of commitment on the basis of the documents, but the responses to

the questionnaires from the preparatory and implementation working groups suggest that the various stakeholders were committed to the preparation of the Action Plan.

Political commitment can be assessed in terms of the status of the policy programme and the resources allocated to its activities. The preparation of the Action Plan for Combating Racism and Promoting Good Relations between Population Groups was part of the Government Programme and was monitored as part of the monitoring of the Government Programme projects.²⁹ The budget allocated to the preparation of the Action Plan was EUR 50,000 and the total budget for implementation was approximately EUR 2.13 million. Much of the funding came from EU project funding outside the state budget. In the end, the resources allocated to the Action Plan at government programme level were quite low compared to the funding of other policy projects during the government period. **For future action plans, governments' commitment to resourcing anti-racism policy is a key factor in measuring political commitment. (recommendation 2)**

The evaluation also focused on identifying structural racism in different areas of life. The different ministries were required to assess the situation in their areas of responsibility from the point of view of structural recognition of discrimination, and information on existing equality plans was included in the Action Plan. According to the Commission's criteria, action plans should address legislation to combat racism, combat discrimination by law enforcement authorities or ensure non-discrimination in education, employment, health and housing. In the Equal Finland Action Plan, the evaluation was carried out with a much broader focus.

In the Action Plan, anti-racism measures were assessed from the perspectives of foreign and security policy, international human rights policy, development policy and consular services, human rights treaty enforcement, equality, linguistic rights and fundamental and human rights policy, labour, migration, security, housing, education, culture, sport and youth, social and health, gender equality and digital services, indigenous Sámi rights and Roma policy, as well as municipal and third sector policies.³⁰

The starting point for the evaluation was quite ambitious and the work done in the Action Plan can be seen as a baseline against which future policy programmes can be assessed. However, the evaluation of the Action Plan shows that the **measures are not as pervasive as one might hope. Identification of concrete objectives and measures may require delving into a more limited number of areas of life,**

28. Ministry of Justice (2021), p. 10.

29. Ministry of Justice (2021), p. 11.

30. *ibid.*, p. 21-35.

where channels and measures can be designed as a whole, cutting across all levels of government and civil society. (recommendation 3)

The evaluation also identified studies and surveys published in different sectors, such as hate crime studies, which could help target sector-specific measures. Intersecting inequality themes were identified during the evaluation phase. Special attention was paid to racism experienced by young people and women in particular. The evaluation also made use of the discrimination monitoring system maintained by the Ministry of Justice and the indicators developed within it. The second element in the indicator work was the UN's Human Rights Indicators Framework, which served as a basis for the evaluation work.³¹

Thus, in line with the Commission's guidelines, information orientation played a key role in the preparation of the Action Plan. To assess the quality of the information policy, it would be necessary to carry out a more in-depth analysis of the survey and indicator data used. The overall assessment suggests that in some areas of life, such as employment and

security, there is more research evidence on discrimination suitable for policy-making than in others. **The preparation of action plans against racism would be strengthened if as many sectors as possible increased their collection of data on racism and its manifestation in their respective areas of life. (recommendation 4) In the future, due account should therefore be taken of the recommendation made by ECRI in paragraph 68 of its fifth monitoring report on Finland (2019), in which ECRI calls for a consistent and comprehensive system for collecting disaggregated data on different groups. The identification of group-specific issues should also be improved. (recommendation 5)**

Measures in the Action Plan

The Equal Finland Action Plan set eight key objectives and 52 measures to achieve them. The actions selected were based on the research evidence gathered during the evaluation phase, key stakeholder insights from consultations, and recommendations for action from international human rights treaty monitoring bodies.³²

Objectives of the Equal Finland Action Plan

1. Identifying and dismantling structures of inequality in society
2. Promoting diversity and non-discrimination in Finnish working life
3. Strengthening the equality expertise of public authorities at different levels
4. Raising awareness of racism and its different forms
5. Further developing good relations policies and ensuring a safe everyday life for all
6. Encouraging municipalities to actively promote equality and anti-racism
7. Addressing hate speech through systematic action and cooperation
8. Developing research and data collection on racism

According to the Commission's guidelines, action plans should adopt measures to combat racism in a comprehensive way, ensuring coordination and mainstreaming of anti-racism measures at national, regional and local level. The objectives and measures of the Equal Finland Action Plan cover a wide range of different areas of life and activities, and the cross-governmental structure created under the plan strengthens the coordination of anti-racism policy. One of the objectives of the Action Plan was to improve internal coordination within the government in order to combat racism and discrimination more effectively. This was also done by strengthening the role of anti-discrimination and anti-racism work as part of results-based management processes in all ministries. The activities of the Action Plan required

the involvement of many different actors and levels of government.

The Action Plan considered and defined as key concepts a wide range of manifestations of racism and related phenomena, including racism, anti-racism, racialisation, discrimination, harassment, multiple discrimination, structural racism and discrimination, inter-sectionalism, good inter-group relations and their promotion, diversity, hate speech, hate crime and ethnic profiling.³³ In relation to specific groups, the Action Plan mentioned anti-Semitism, Islamophobia, Afrophobia, and racism against Sámi and Roma. However, there are few concrete measures to reduce anti-Semitism, Islamophobia or Afrophobia.

31. Ministry of Justice (2021), p. 37-52

32. Ministry of Justice (2021), p. 54-59.

33. Ministry of Justice (2021), p 68.

Action was also targeted at several areas of life, in particular in the fields of equality, fundamental and human rights, language rights, security, employment, migration, integration, housing, culture, sport, education and youth, as well as in specific policies for specific population groups such as the Roma and Sámi.

The Commission's guidelines on national action plans identify **anti-racism legislation, combating discrimination by law enforcement authorities and ensuring non-discrimination in education, employment, health and housing** as separate content areas. In addition to the substantive criteria set by the Commission, we will also examine the measures in the light of the model of good relations policy. The model is presented in detail in the Council of Europe's report on Finland's integration and good relations policies.³⁴ In reviewing the content of the Action Plan, we focus in particular on the good relations policy aspect. The framework is based on the three-level model of good relations policy analysis presented in the report "An overview of good relations policies in Finland" (Figure 1).

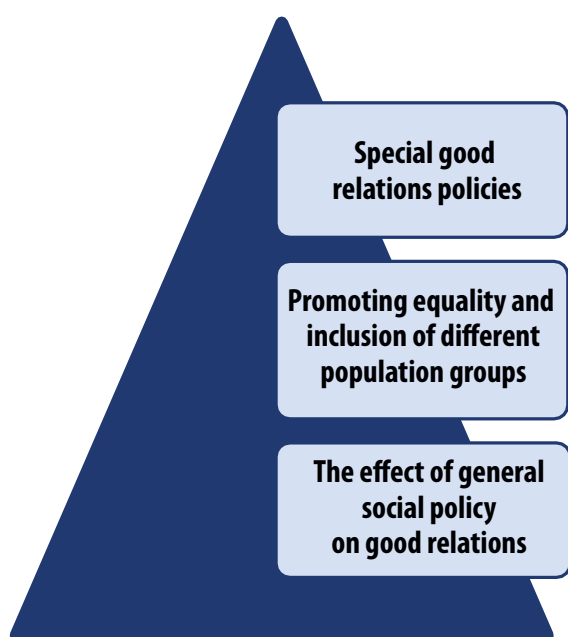


Figure 1. Levels of good relations policy analysis

We use the model to examine:

1. How the measures in the Action Plan affect the equal opportunities for groups at risk of racial discrimination to operate within social institutions and mainstream services (**general social policy**);
2. How the measures in the Action Plan strengthen the rights of people experiencing racism and take into account group-specific issues in strengthening equality and inclusion (**group-specific equality and inclusion policy**); and
3. How the measures in the Action Plan strengthen the interaction between different population groups and their capacity to resolve conflicts affecting their relations (**special good relations policy**).

Legislation

The partial reform of the **Non-Discrimination Act** was one of the measures of the Equal Finland Action Plan. The reform also strengthened the legal protection of victims of discrimination by extending the powers of the Non-Discrimination Ombudsman to cover employment issues.³⁵ Equality planning and the promotion of equality was extended to early childhood education and care providers on an establishment-by-establishment basis. Moreover, the definition of harassment changes so that harassment can be considered to target not only an individual but also a group of people.

The Action Plan sets the objective of clarifying and strengthening the regulation on the promotion of good inter-group relations as part of the reform of the Integration Act.³⁶ The Act on the Promotion of Immigrant Integration,³⁷ which will enter into force in 2025, includes the promotion of good inter-group relations and the receptiveness of society as one of its objectives. Good inter-group relations are defined in Chapter 1, Section 5 of the Act as "relations between population groups based on positive attitudes, effective interaction, a sense of security and participation in society."

The law imposes an obligation on municipalities to promote inter-group relations at local level. In planning the promotion of integration, the municipality must at least set objectives concerning the employment, education, wellbeing and health, housing, inclusion, equality and equity of immigrants, opportunities to maintain one's own language and culture, and the promotion of good relations, as well as measures, responsibilities, cooperation and monitoring to support them. The municipality must record the above in

34. Artemjeff, Attias & Kettunen (2023).

35. Footnote: Council of Europe, ECRI (2019).

36. Ministry of Justice (2021), p 20.

37. Act on the Promotion of Immigrant Integration 681/2023.

a separate programme of measures or include them in another municipal planning document with indicators. At least every two years, the municipality must report to the Regional Centre for Economic Development, Transport and the Environment on the achievement of the integration promotion objectives and the implementation of the measures (Chapter 5, Section 45).

In addition, the municipality must set up a multidisciplinary cooperation group at the local level for the development of its planning and implementation of the promotion of immigration and integration, as well as for the promotion of good population relations, if the service needs of immigrants in the municipality so require. In addition to the municipality, the cooperation group may include the wellbeing services county, the Centre for Economic Development, Transport and the Environment (ELY Centre), another municipality in the region, the police, a reception or identification centre, other authorities, organisations, associations and communities, business community representatives and integration service providers. One of the tasks of this cooperation group is to promote equality and good inter-group relations at local level. (Chapter 5, Section 48).

The new Non-Discrimination Act, which entered into force on 1 June 2023, also contains a new reference directly related to inter-group relations. The duties of public authorities to promote equality (Section 5) state that “A public authority shall assess the impact of its activities on different population groups and the way in which equality is otherwise achieved in its activities, and shall take appropriate measures to promote equality”.

During the Action Plan period, Finland received reminders from the European Commission that the EU rules on combating racism and xenophobia through criminal law have not been fully implemented in Finnish national legislation. The Council of Europe, through ECRI, has also drawn attention to the need to improve criminal justice in its 2019 country report on Finland.³⁸ Future governments should therefore bring criminal law in line with Council of Europe and EU standards and recommendations, including the EU Framework Decision on combating racism and xenophobia through criminal law (2008/913/JHA) and ECRI’s relevant recommendations. (recommendation 6).

Law enforcement authorities

The Action Plan included several discrimination-related measures taken by law enforcement authorities. A related aim was to promote non-discrimination in law enforcement and strengthen the capacity of law enforcement authorities to identify and tackle hate crime. Equality and anti-racism training was to be provided to key target groups in different administrative

sectors, such as regional public transport authorities, police officers, municipal housing officers, employment advisers, prosecutors and members of the armed forces. The project to promote diversity in the police organisation continued, and training was provided to all police forces on non-discriminatory policing, in particular on the control of foreigners.

The Ministry of the Interior committed itself to finding ways to strengthen equality in the activities of the security services (training/curriculum development). Materials (e.g. brochures, posters) on hate crime indicators (e.g. anti-Semitic and Islamophobic indicators) and hate crime statistics were also produced for police forces.³⁹

Education

The Action Plan also included a number of **training measures**. The objective concerning training was to increase the knowledge of teachers and other school staff about anti-racist education. To promote this, an equality planning guide for primary education will be developed and training events will be organised to deploy the guide. In addition, information on good practices to promote equality was collected online for teachers and seminars on good practices were organised as part of the Educa2023 exhibition, the Kuntamarkkinat municipal fair and the municipal welfare seminar of 2022. In 2022, the Ministry of Education and Culture set anti-racism and equality planning as part of the criteria for continuing education.⁴⁰

Working life

The Equal Finland Action Plan also aimed to increase **diversity in working life** in a systematic way and to strengthen the fight against recruitment discrimination. For this objective, the Action Plan was strongly linked to the Working Life Diversity Programme prepared by the Ministry of Economic Affairs and Employment. Anti-recruitment discrimination and measures to promote anonymous recruitment were mainstreamed into the diversity training, guides, campaigns and solution clinics, and a media campaign for employers (Working Life Diversity Programme) was run to market the training and other tools available to employers.

The Working Life Diversity Programme also developed tools for employers on diversity management and non-discriminatory working life, and developed management quality indicators, workshop materials, a website and a virtual guide. The Finnish Government also planned to launch a TET traineeship campaign to promote equal traineeship opportunities for Roma and other ethnic minority young people.⁴¹

38. Footnote: Council of Europe, ECRI (2019) and (2022).

39. Ministry of Justice (2021), p 65.

40. Oikeusministeriö (2021), s.65.

41. *ibid.*, p. 62.

Housing and social and health services

The Action Plan included one **housing-related** measure. It aimed to strengthen equality and anti-racism skills in urban planning by disseminating the results of the City of Helsinki pilot project at national level as part of the Suburban Development Programme. The Action Plan also included the design, production and dissemination of a comprehensive online training package on anti-racism and anti-discrimination for **health and social services staff**.⁴²

Other areas of life and the regional and local dimension

In addition to the areas of life recommended by the Commission, the Action Plan included measures to strengthen the cultural and artistic life, youth work and the media's work against racism, as well as an awareness-raising campaign aimed at the whole population and measures to strengthen the capacity of the organisational sector. The Action Plan aimed to raise awareness of racism and how to tackle it among the general population, and to strengthen adults' media literacy and ability to recognise fake news and hate speech.

The measures for regional and local anti-racism work formed a separate whole. The measures at local level emphasised the aspect of good relations policy and aimed to develop tools to promote good population relations, in particular for municipalities and other local actors, and to promote local dialogue. The Action Plan also aimed to promote systematic data collection

on structural racism and discrimination and its impact on society and minority groups.⁴³

The Equal Finland Action Plan thus covered the content criteria set by the European Commission for national anti-racism action plans quite well. The only EU-recommended areas where no measures were found are the risks posed by new technologies and artificial intelligence and the impact of slavery and colonialism.

Good relations policy analysis

The Action Plan talks about combating racism and discrimination in parallel with inter-group relations. The fight against racism promotes the rights, equality and inclusion of minority groups. However, combating racism does not in itself automatically build good inter-group relations, or prevent or resolve problems and conflicts. The Action Plan focuses in particular on group-specific equality and inclusion policies, but specific good relations policies are less prominent: there are only a few isolated forms and they are particularly present in security policy.

It is not easy to assess the quality of these measures, but some observations can be made by looking at the different forms of good relations policy (Figure 1). The Action Plan has looked at general social policy and the different branches of government in terms of what is being done in each, as well as group-specific policies for Sami and Roma. Figure 2 shows the administrative sectors presented in the Action Plan, mirroring them at the different levels of good relations policy.

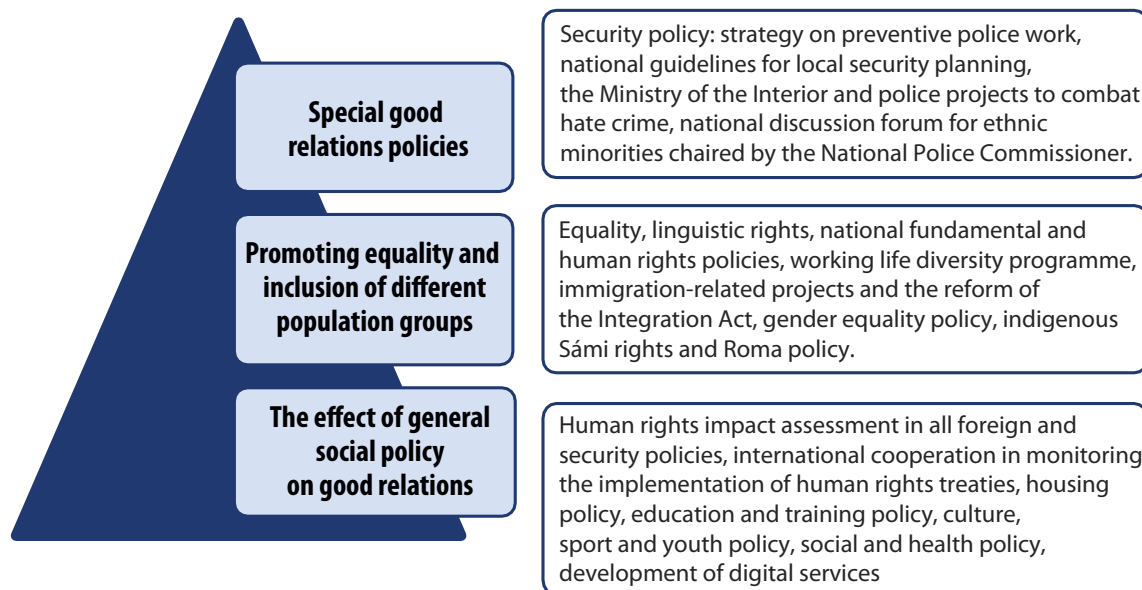


Figure 2. The policy areas mentioned in the Action Plan, mirrored by examples of different levels of good relations policy

42. Ministry of Justice (2021), p. 61.

43. *ibid.*, p. 64-66.

Anti-discrimination policies can focus on different perspectives such as strengthening legislation, developing equality planning and specific positive actions, policy and financial guidance, tendering, increasing civil society resources, improving support for victims of discrimination, strengthening the skills of public authorities and other actors, influencing media culture, crime prevention and conflict mediation, influencing public attitudes, increasing research knowledge, population relations policy and group empowerment.

Almost all of the above forms of anti-discrimination work can be identified in the measures of the Action Plan. Training for the different actors, i.e. the reinforcement of skills and knowledge, are clearly over-represented in the measures. There is only one measure to support victims of racism. Measures **relating to victim support and low-threshold services should be strengthened in the future. (recommendation 7)** In this context, it should also be noted that **ECRI, in its fifth report on Finland, called on the authorities to provide victims of racist violence with detailed information on reporting procedures and on all available assistance (such as medical, psychosocial or legal counselling).**

From the perspective of anti-racism and anti-discrimination, the action is broadly focused on promoting the rights of different population groups, such as different linguistic and religious groups, Sámi, Roma and migrant groups. The Action Plan draws attention to structural racism and equality planning in ministries, which is seen as an important tool for combating racism.⁴⁴ In several areas, efforts have been made to increase staff diversity, to promote equality and non-discrimination skills among staff and to communicate

in a way that takes into account the needs of different language groups.

Studies on racism show that people with a visibly different skin colour and religion are particularly affected by racism in Finland. The Action Plan addresses these groups and several measures aim to combat racism against these groups. **However, future action plans should develop and strengthen measures to combat Afro- and Islamophobia and to promote the participation of affected groups in the preparation of anti-racism policies. (recommendation 8)** **Measures to dismantle anti-Semitism should also be included in future anti-racism action plans. (recommendation 9)** The Russian invasion of Ukraine at the time of the implementation of the Action Plan has also increased the **need to identify and address racism against people from both Russian and Ukrainian backgrounds. In addition, the construction of relations between these groups can become a major social issue in the field of good relations policy, which should be addressed. (recommendation 10)**

There are a number of objectives in the Action Plan relating to special good relations policies, including trainings aiming at strengthening the skills in the field of good relations policy.⁴⁵ The main ideas of good relations policy are to increase interaction between people belonging to different groups and to prevent, reconcile and fight against conflicts related to inter-group relations. ECRI has also drawn attention to the need for greater interaction and has, for example, recommended in its fifth report on Finland that the authorities should continue their efforts to actively involve the relevant local authorities in research and dialogue aimed at improving the participation of

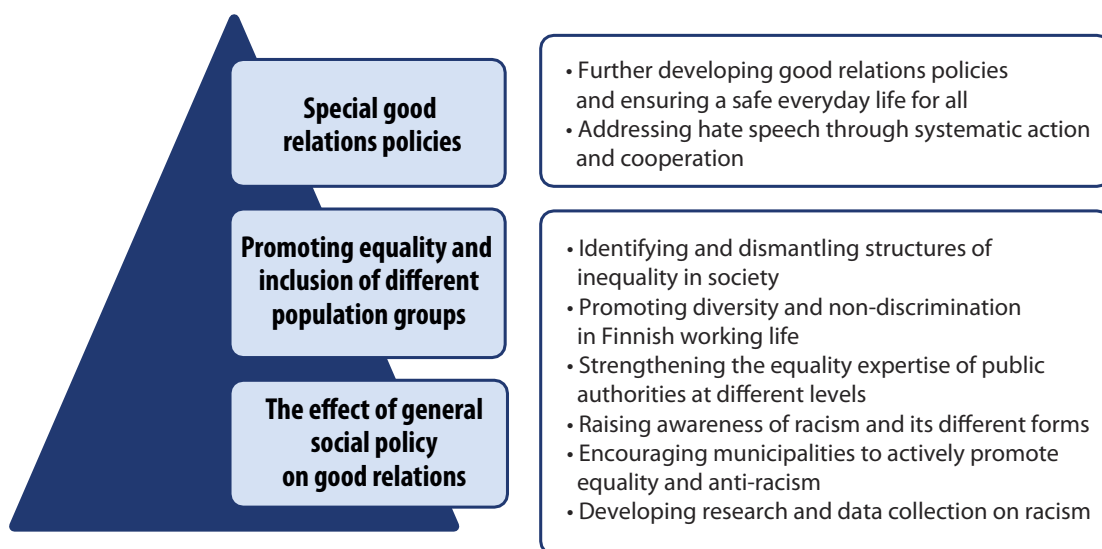


Figure 3. The objectives of the Action Plan in relation to the different levels of good relations policy

44. Ministry of Justice (2021), p. 21–22.

45. Ministry of Justice (2021), p. 60, 64–65.

members of the Sámi community. We have broken down the objectives of the Action Plan to those that directly promote interaction between population groups (so-called special good relations policies) and to those that combat racism and discrimination and promote the inclusion and equality of minorities and the realisation of these rights.

Two of the objectives in the Action Plan are directly related to the development and implementation of a special good relations policy in Finland, while six are directly related to actions against racism and discrimination. The Action Plan's approach to special good relations policy focuses in particular on promoting integration policies, equality planning, the skills of local authorities, minority employment, the fight against hate crime, channels for inclusion and empowerment, and the fight against segregation. For example, one of the Action Plan measures included adding the supporting of interaction between children and young people of different backgrounds in the grant criteria for children's culture. Another objective was to create a compass tool to support intercultural dialogue and diversity efforts at art and culture institutions and organisations.⁴⁶ However, apart from these examples, there are hardly any activities aimed at increasing interaction or mediating inter-group conflicts. **In future action plans, there should be more activities that directly promote interaction. (recommendation 11)**

The communication measures of the Action Plan concerned the communication of the plan and various communication measures such as media campaigns. The most visible campaign was the national "I am anti-racist" campaign. Communication measures, especially in the field of the Action Plan itself, **should in future consider the accessibility of communication in relation to the different target groups for anti-racism work. This could be reinforced by a more detailed analysis of the use of different communication channels by target groups and by expanding the range of languages used in communication. (recommendation 12)**

Implementation

According to the Commission's evaluation criteria, the evaluation of the implementation of national action plans should pay particular attention to the functioning of the coordination and cooperation mechanism, the consultative process, the implementation from the perspective of the different actors, regional and local measures, the monitoring of implementation, communication and visibility of the plan (see Table 3).

During the implementation phase of the Equal Finland Action Plan, the preparatory working group continued to act as an implementation monitoring group and compiled monitoring data on the Action Plan in line with the monitoring of the Government Programme. The project was set to run from 18 March 2020 to 31 December 2023. The implementation of the Action Plan was reported to the Government's Ministerial Working Group on Internal Security and Strengthening the Rule of Law. An interim report on the Action Plan was submitted to the Ministerial Working Group in the context of the mid-term review of the Government Programme.⁴⁷

To support the monitoring of the implementation of the measures, the monitoring working group drew up an **implementation plan** specifying the timetable, target groups, cost and impact of the measures and the monitoring of the cross-cutting themes (equality and intersectionality). The plan also specified the rationale behind each measure (e.g. recommendations of international treaty monitoring bodies). An evaluation matrix was also developed for the implementation plan to address group and theme-specific issues (such as anti-Semitism, Islamophobia, Afrophobia, racism and hate speech against Sámi and Roma).

The monitoring working group involved NGOs representing different population groups, regional advisory boards for ethnic relations and a group of experts on monitoring discrimination in the impact assessment. Coordination of the implementation of the Action Plan has been effective and inclusive. The coordination model developed under the Equal Finland Action Plan could serve as a model for future anti-racism action plans.

The measures of the Action Plan were implemented by the responsible ministries in cooperation with other ministries, regional authorities, government ministries, the Advisory Board for Ethnic Relations, the Advisory Board on Romani Affairs, the Sámi Parliament and non-governmental organisations. The regional and local level was also taken into account. According to a follow-up survey carried out by the Ministry of Justice, most of the measures were implemented in accordance with the Action Plan. The Ministry of Justice also commissioned a survey in connection with a seminar in December 2022, which asked actors in the anti-racism field for their views on the implementation of the Action Plan.

46. Ministry of Justice (2021), p. 67.

47. *ibid.*, p. 65.

Regional and local implementation

The Action Plan set the objective of strengthening local and regional structures for anti-racism and good inter-group relations work and recognised NGOs as strong local actors. The Action Plan included several efforts to increase the local dimension, including strengthening the role of regional NGOs, providing training, raising awareness of racism among the authorities, and organising regional communication activities and debates.⁴⁸

In order to translate the objectives of the Action Plan into regional and local level, a pilot project on good community relations (the HVS project) was launched, coordinated by the ELY Centre for Uusimaa. The project ran from 18 October 2021 to 30 June 2023 and was funded by the Ministry of Justice. The aim of the HVS pilot project was to strengthen the capacity of regional advisory boards for ethnic relations (in particular organisations) to engage in local and regional work to promote good inter-group relations, equality and anti-racism, to support the strengthening of cooperation structures between local authorities and civil society, and to support the development, implementation and testing of tools and models to promote good inter-group relations at local level.

The pilot project developed regional action plans for the implementation of an anti-racism and good relations agenda in all areas of operation of the regional advisory boards. The action plans bring together specific regional and local issues for all the objectives of the National Action Plan, as well as measures taken by different actors to achieve the objectives. The HVS project has also included organising data collection events on the state of inter-group relations in different parts of Finland, and decision-makers' meetings to present the data collected and find solutions to the problems identified.

The project has also funded projects by organisations to promote good relations. The projects included events to promote working life diversity and non-discrimination (27.9. in Seinäjoki, 3.10. in Vaasa and 7.10.2022 in Kokkola), a radio programme on the state of population relations in Turku, Salo and Pori, a live newsletter broadcast (2.11.2022), videos and podcasts on good relations between population groups and Etno's member networks in Lapland, a youth video project to promote youth wellbeing and equality in Tampere, and a project on anti-racism action plans in secondary schools in Turku.

The HVS project also included conducting a survey of local and regional actors on strengthening anti-racism work in different parts of Finland. The survey was used to plan the activities of the regional action

plans. In addition, the HVS project organised a national seminar on the implementation of the action plan and the sharing of good practices in Kuopio in May 2023.

Regional action plans have been developed jointly by officials and organisations, and the NGO sector has played a central role in organising interactive activities. **The activities of the pilot project were very important for the implementation of the Action Plan at regional and local level, and such activities should also be included in future anti-racism action plans to ensure their impact at regional and local level. (recommendation 13)**

Monitoring and evaluation

The implementation of the Equal Finland Action Plan was monitored by the Action Plan working group set up by the Ministry of Justice and reported to the Government's Ministerial Working Group on Internal Security and Strengthening the Rule of Law.⁴⁹ The monitoring consisted of several elements: oral reporting by the different ministries at the meetings of the group, reporting to the monitoring mechanism of the government programme projects, maintenance of the action-specific monitoring table prepared by the Ministry of Justice, a monitoring questionnaire sent to the ministries in spring 2023, and action-specific data collection. In addition, the Ministry of Justice collected feedback and views from participants in the Action Plan events. The HVS project, which was responsible for the regional implementation of the Action Plan, also gathered the views of different actors to strengthen anti-racism work. In addition to the materials described above (minutes, implementation plan, evaluation questionnaires), this evaluation has made use of interviews with key persons involved in the preparation and implementation of the Action Plan, which took place in June 2023.

Evaluation questionnaire for the Action Plan working group

As mentioned in the chapter on the implementation of the Action Plan, the monitoring data show that most of the measures in the Action Plan were implemented as planned. A few outstanding measures, such as the project on the achievement of language proficiency requirements during the period of employment and the guidelines on equality planning in primary education, are delayed and still awaiting implementation.

The data collected through the follow-up questionnaire included questions on the implementation of the measures, as well as evaluations of the effectiveness of the Action Plan. The questionnaire was answered by all the participating ministries, the ELY

48. Ministry of Justice (2021), p. 60.

49. Ministry of Justice (2021), p.

Centre for Uusimaa, the Advisory Board for Ethnic Relations, and the Finnish Red Cross. The respondents'

assessment of the success of the Action Plan was positive (see Figure 4).

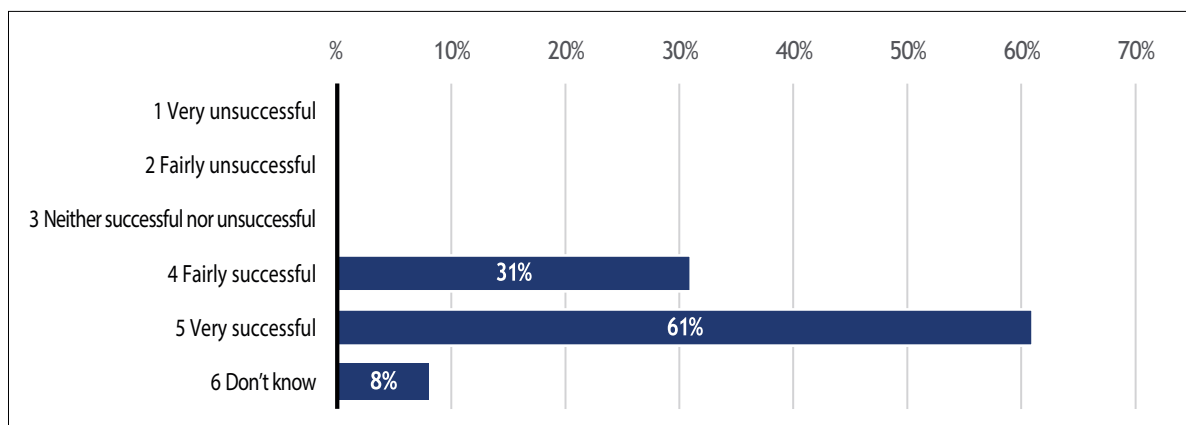


Figure 4. Overall assessment of the success of the Action Plan

92% of respondents considered the Action Plan to be either very successful or fairly successful. The evaluation questionnaire also asked for views on the most effective measures, which have been collected below.

Answers: which measures do you find most effective?

- ▶ Raising public awareness and the skills of the various professional groups are key measures, as racism grows in particular out of ignorance. In turn, concrete impact measures (intervention, resource management, etc.) quickly alert communities and individuals to notice negative practices and change them.
- ▶ Objective 3: Strengthening the equality expertise of public authorities at different levels
- ▶ Objective 4: Raising awareness of racism and its different forms
- ▶ More visible action.
- ▶ The main result is an increased awareness of the good relations framework and policy. The HVS model is becoming better known nationwide.
- ▶ By their nature, (effective) measures targeted at public authorities have a higher impact than measures aimed at the general public or society at large.

- ▶ I am not very familiar with most of the measures or their impact, and I think that the vast majority of the measures were such that their effects can only be seen in the longer term. However, projects such as the “Y-Festival” diversity event and the good relations project already seem promising.
- ▶ The HVS pilot project, because it was able to concretise regional and local visions and the recognition of the actors.
- ▶ The “I am anti-racist” campaign and the “Y Festival” diversity event, which highlighted the commitment of the public authorities (Ministry of Justice) to anti-racist work.

As can be seen from the responses, measures such as equality training for public authorities, the activities of the HVS pilot project and awareness-raising campaigns and events for the general public were considered to be effective.

It is difficult to judge from the open-ended responses what the respondents’ assessments are ultimately based on, and this could be an area for improvement in the preparation of future action plans. **The analysis of the effectiveness of the activities should also be extended from the internal analysis of the implementing bodies to the evaluations of the target groups (surveys or evaluation workshops). (recommendation 14)**

In the follow-up survey, respondents were also asked to assess the next steps to be taken in the national anti-racism and good relations policy to make equal opportunities a reality in Finnish society. The responses are shown below.

Answers: what are the next steps for a national anti-racism and good relations policy?

- ▶ Promoting equality in political culture and working life.
- ▶ For example, training must be integrated into structures, the work cannot be done by projects.
- ▶ Will become a reality if and when diversity becomes part of society and its activities. If diversity is not tolerated or understood, things will not improve substantially.
- ▶ Ensuring the continuity of the Action Plan in general. There is probably not much to change in the objectives of the Action Plan.
- ▶ Projects must not remain isolated. Debate must be actively maintained, for example by regularly monitoring the achievement of project objectives, and making corrections where necessary.
- ▶ It is important for all actors and levels to 1) recognise racism in everyday life and structures,
- ▶ 2) be aware of prejudices and discriminatory practices, and 3) be active in dismantling discriminatory structures and practices. Work must continue in all sectors and on a broad front. Public opinion is increasingly being influenced in many ways, so the visible dissemination of correct information (facts, statistics, experiences, etc.) is very important. Information should also be formulated and distributed in such a way that it targets the majority of the population and does not to create or deepen divisions on equality issues. This requires effort from all actors – organisations and other civil society actors also have an important role to play.
- ▶ Creating stronger coordination networks at national and regional government levels to better develop the work of promoting good relations in society. Also, additional resources should be allocated to development work.
- ▶ A long-term, ambitious programme of measures spanning more than one term of government. A sustainable programme for a government term is a good start, but all coalition governments need to commit to long-term promotional measures, so that

they are better integrated into “structures” than campaigns.

- ▶ Continuing the work of the Action Plan. It would also be important to develop a cross-governmental cooperation structure and strengthen equality and population relations expertise across the administration.
- ▶ The Action Plan must be continued and all ministries and their branches of government must be more closely involved in implementing the measures. Equal opportunities will be realised if anti-racist work is actively pursued in all areas of society.
- ▶ A strategic follow-up to the Action Plan is needed. There is also a need for dissemination and awareness-raising about the existence of the Action Plan, so that people facing discrimination are aware of it.

As can be seen from the responses, the continuation of the work launched in the Action Plan was considered particularly important. At the same time, the respondents hoped that anti-racism work would be integrated into structures so that it was part of the basic work of the authorities and not just a project. The responses also highlighted clear areas for improvement, such as strengthening coordination networks between central and regional government, increasing resources, developing a longer-term anti-racism strategy that will last beyond governmental terms, and engaging an even wider range of actors to bring about change.

Feedback survey on the Action Plan seminar

At a seminar organised under the Action Plan in December 2022,⁵⁰ an online survey was conducted to gather participants’ views on the event and on anti-racism policy. The question “*What you would like to see happen next on this topic?*” was answered by a total of 60 respondents, including authorities, NGOs and researchers. The responses to this question do not directly reflect the views of the respondents on the Equal Finland

Action Plan but give an idea of the importance that different actors attach to anti-racism work in different areas of life. The following examples of responses illustrate the different actors’ views on what should be invested in:

- ▶ A broader debate on racism and discrimination and stronger anti-racist policies and practices by government.

50. Structural discrimination and racism – what do they mean and how can they be tackled? – seminar at the House of the Estates on 19 December 2022

- ▶ Research funding for quantitative research on the experiences of racism.
- ▶ Compulsory training on structural discrimination for teachers, police, doctors, etc.
- ▶ Addressing racism in early childhood education and primary school. How to talk about power structures and problems and not just that everybody is equal, because even if they are in school, they are not in society.
- ▶ Some kind of network or other community where e.g. work communities could share tips and experiences on anti-racist activities. This could help to spread good practices more widely.
- ▶ I wish you would also go to the Parliament and talk to the decision-makers about this issue.
- ▶ That the next government will continue its long-term work to combat racism and dismantle structural racism.
- ▶ Perhaps some analysis of how/if anti-racism training has affected the policies of the organisations that have received it.
- ▶ It would be nice to hear young people's views. There was a lot of talk about the world of school and entering the world of work, but not much about what young people think about structural discrimination (e.g. what tools they want for the future).

As the responses show, there is a desire for anti-racism policies to continue in future governments. The responses indicate that the work carried out under the Action Plan was considered very important and that anti-racism work in all areas of life should be strengthened in the future. There were also calls

for the debate to be extended beyond specialist circles, for political decision-makers to be involved, for research into the impact of anti-racism training, for a wide range of professional groups to be trained on the subject and for funding to be provided for research on racism.

The objectives and measures of the Equal Finland Action Plan address, at some level, most of the development issues raised by the respondents. Based on the responses to the feedback questionnaire, it can be said that the Action Plan's objectives and content choices were quite successful and provide a good basis for defining the content areas for future action plans.

Activity-specific evaluation data

The Equal Finland Action Plan also included activity-specific evaluations. For example, in the anti-racism campaign "I am anti-racist", participants were asked about their views on the effectiveness of the campaign. A total of 171 organisations from different sectors and fields, such as government, cities, educational institutions, student organisations and unions, NGOs, cultural and sports organisations and federations, participated in the campaign. During autumn 2021 and spring 2022, Webropol stakeholder surveys were conducted to assess the effectiveness of the campaign. 94 organisations responded to the surveys in autumn and 67 in spring.

The surveys were used to explore, among other things, the visibility of the campaign publications in different media and the views of the actors on the success of the campaign. The campaign publications achieved the most visibility on Facebook in autumn 2021 and on Instagram in spring 2022 (see Figure 5).

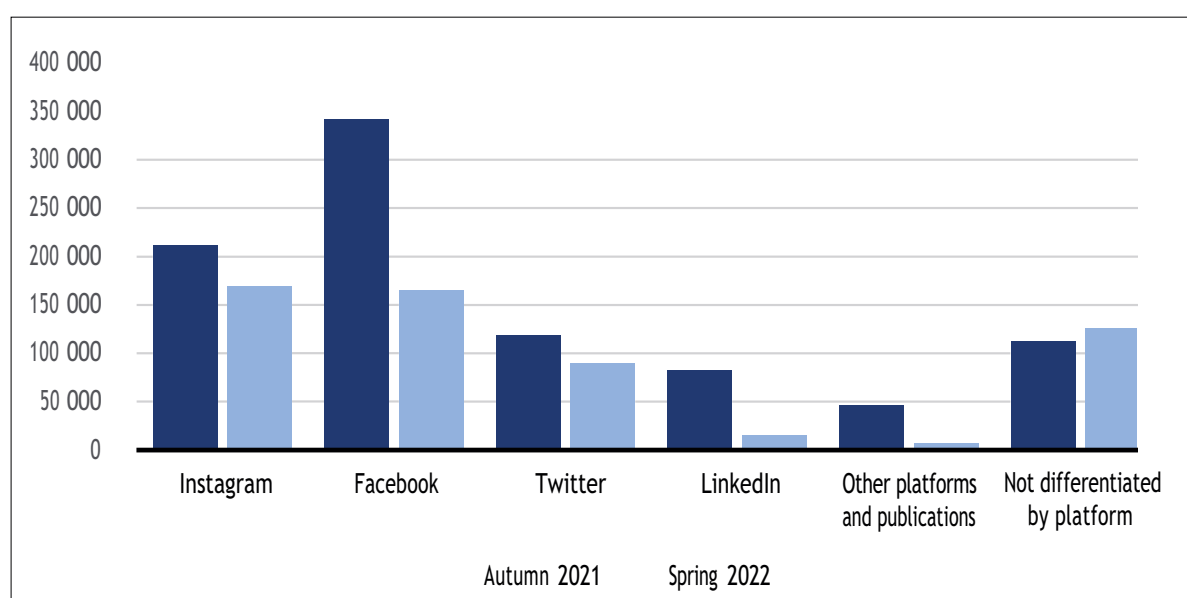


Figure 5. Visibility of campaign posts

In autumn 2021 and spring 2022, the total visibility was about 945,725 and 573,274 respectively. The campaign was very positively evaluated by the actors involved. The campaign was praised for its important topic, ease of participation, quality materials and good coordination. The campaign was also seen as inspiring and had generated important discussions among staff. Areas for improvement included, for example, a clearer definition of anti-racism and anti-racism work, e.g. by organising anti-racism training prior to participation in a web campaign and by communicating the issue as clearly as possible. It was also hoped that disability as part of multiple discrimination and religion as the basis of racism would be more clearly visible in campaign content.

Information on the effectiveness of the activities was also collected in the field of working life. Activities to promote diversity in working life were implemented in particular through the “IMAGO – strong employer image” training. A separate impact study was carried out on the training, to identify, among other things, the results of the IMAGO training and its effectiveness at both individual and organisational level. The impact study showed that training is an effective way to bring new skills to the development of employer image.

After the training, around 93% of the participating organisations had recruited a new employee. Around 70% of all recruitments increased the diversity of the organisation, particularly in terms of cultural background. After the training, the organisations had undertaken a wide range of development work, such as updating strategy, developing internal communication, clarifying company values and implementing

employee feedback surveys on a regular basis. The main lesson that respondents highlighted was how to build a strong and diverse employer image from within. The open feedback praised both the training package and, for example, the small group discussions. The data for the impact study was collected through a digital survey, individual and focus group interviews in spring 2023 (N = 76) and a training feedback survey (N = 251).

In terms of monitoring and evaluation, the European Commission’s guidelines emphasise mid-term evaluation and final evaluation of implementation. These should include an evaluation of the effectiveness and monitoring of the programme and examine the designation of an independent mechanism, data collection, indicators and reporting of the results of the evaluation. As outlined above, the monitoring and evaluation of the Equal Finland Action Plan meets the criteria set by the Commission quite well. The monitoring structures and data collection methods were clearly

defined and reported regularly in accordance with the monitoring mechanism for government programme projects. However, the independence of monitoring activities should be enhanced in the future. The activity and event-specific feedback surveys would need to be accompanied by a permanent independent evaluation structure. **In addition to the monitoring of the Government Programme and the internal monitoring of the Action Plan, the implementation of measures in future action plans should also be monitored by an independent monitoring mechanism (recommendation 15).**

Summary and suggestions for improvement

In this report, the Government Action Plan For Combating Racism and Promoting Good Relations Between Population Groups was analysed using the EU Commission's criteria for national anti-racism action plans. In addition, the Action Plan was compared with similar programmes in other countries. The purpose of the evaluation was to highlight areas for development that should be taken into account in future national projects to combat racism.

Overall, the Equal Finland Action Plan is judged to meet the criteria set by the EU for action plans quite well. Its preparation and implementation were coordinated by a broad-based working group, the measures were designed and assessed through extensive consultation with different population groups and research, funding was earmarked for the implementation of the measures, the measures selected covered a wide range of areas of life and forms of anti-racism work, and the Action Plan was monitored and evaluated using various methods.

Despite the positive overall picture, the evaluation highlights areas for further development that could improve the different phases of the Action Plan and increase the effectiveness of the measures. The following suggestions for improvement should be taken into account when preparing and implementing anti-racism action plans:

1. Promoting community-based and participatory preparation in the local languages would increase the equality of different groups in future policy preparation processes.
2. The funding of the Action Plan should not be based on project funding alone, but should be effectively resourced by the political leadership. Governments' commitment to resourcing anti-racism policies is a key factor in measuring political commitment.
3. Identification of concrete objectives and measures may require delving into a more limited number of areas of life, where channels and measures can be designed as a whole, cutting across all levels of government and civil society.
4. The preparation of action plans against racism would be more effective if as many sectors as possible developed data collection on racism and its manifestations in their respective fields.
5. The identification of group-specific issues should be strengthened by further research on the experiences of racism among different groups.
6. Criminal law should be brought up to the standards and recommendations of the Council of Europe and the EU, including the EU Framework Decision on combating racism and xenophobia through criminal law (2008/913/JHA) and the relevant ECRI recommendations.
7. Measures to support victims of racism and low-threshold services should be strengthened in the future.
8. Future action plans should develop measures to combat Afrophobia and Islamophobia and to promote the participation of people from these groups in the preparation of anti-racism policies.
9. Measures to combat anti-Semitism should be included more extensively in future anti-racism action plans.
10. Russia's invasion of Ukraine has also increased the need to identify and address racism against people of both Russian and Ukrainian backgrounds, and the construction of relations between these groups may become a significant social issue, which should be addressed in the field of good relations policy.
11. Special good relations policies that directly promote interaction should be further developed.
12. Communication measures, especially in the field of the Action Plan itself, should consider the accessibility of communication in relation to the different target groups for anti-racism work. This could be reinforced by a more detailed analysis of the use of different communication channels by target groups and by expanding the range of languages used in communication.

13. The activities of the HVS pilot project on good community relations were very important for the implementation of the Action Plan at regional and local level, and such activities should also be included in future anti-racism action plans to ensure their effectiveness at regional and local level.
14. The analysis of the effectiveness of the activities should be extended from the internal analysis of the implementing bodies to the evaluations of the target groups (surveys or evaluation workshops).
15. In addition to the monitoring of the Government Programme and the internal monitoring of the Action Plan, the implementation of measures in future action plans should also be monitored by an independent monitoring mechanism.

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