

Directorate of Anti-Discrimination  
Intercultural Cities Unit

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**COMMITTEE OF EXPERTS ON INTERCULTURAL INTEGRATION OF MIGRANTS  
(ADI-INT)**

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**Feasibility study on a possible new instrument on comprehensive strategies for  
inclusion**

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## 1. General Introduction

The Committee of Ministers entrusted the Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI) with the task to prepare a “Feasibility study and a possible new legal and/or benchmarking instrument on comprehensive strategies for inclusion”.

CDADI has a mandate to promote equality for all and build more inclusive societies that offer effective protection from discrimination and hate, and where diversity is respected and managed as a collective advantage. This mandate covers the grounds of “race”<sup>1</sup>, ethnic/national origin, colour, citizenship, religion, language, sexual orientation and gender identity, with a particular focus on fighting antigypsyism and improving the active participation and inclusion of Roma and Travellers in society. CDADI is further mandated to safeguard the rights of persons belonging to national minorities and the use of regional or minority languages, and to promote intercultural integration.

Within this context and framework, and under the supervision of CDADI, the Committee of Experts on Intercultural Integration of Migrants (ADI-INT) was tasked to assess the feasibility of a new instrument on comprehensive strategies for inclusion, for use at the national level. A terms-of-reference for the feasibility was developed that, within this focus on comprehensive strategies for inclusion, emphasised the task of defining the concept of ‘inclusion, by taking stock of different understandings and approaches being taken in member states, and identifying how best to support impact on, and policy clarity and coherence for, inclusion, in relation to all groups covered by its mandate

This feasibility study has, therefore, been prepared to:

- establish the basis for a common understanding of inclusion, the values that underpin this goal, and the strategic directions required for its pursuit, under an overarching human rights framework;
- establish the specific needs that a new instrument on comprehensive strategies for inclusion could usefully address; and
- inform a decision on what kind of instrument would best respond to such needs.

## 2. Inventory of Action Taken

The undertaking of this feasibility study first involved the mapping and analysis of a range of existing European standards, guidance, frameworks, and tools that address and/or touch on the goal of inclusion.

This mapping and analysis sought to identify component elements, of these standards, guidance, frameworks and tools, to inform a definition of the concept of ‘inclusion’ and an identification of its underpinning values with a view to enabling policy clarity on this concept. It further sought to identify key elements of the institutional infrastructure that might be identified as necessary to enable and drive effective policy implementation in relation to a comprehensive strategy for inclusion.

The second step in this feasibility study was a survey<sup>2</sup> of member states to explore: perspectives on the concept of ‘inclusion’ and its underpinning values; and the institutional infrastructure to progress

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<sup>1</sup> As noted in the Recommendation on combating hate speech ([CM/Rec \(2022\)16](#)), the term ‘race’ is rejected on the basis that all human beings belong to the same species, but is used here solely “to ensure that those persons who are generally and erroneously perceived as ‘belonging to another race’ are not excluded” from consideration in this initiative.

<sup>2</sup> The survey questionnaire is provided in the appendix to this study.

such a goal, including a focus on multilevel governance. It sought to identify challenges of policy clarity on the concept and of policy implementation in terms of the institutional infrastructure.

The survey further sought to establish member state interest in and needs in relation to possible new instruments to be developed at European level to support action and impact on the goal of inclusion<sup>3</sup>.

This feasibility study first sets out the findings from the mapping and analysis exercise and the member state survey. It then examines the basis for a shared understanding of the concept of ‘inclusion’, and the potential for and scope of a new Council of Europe instrument(s) on comprehensive strategies for inclusion for use at national level. Finally, it draws conclusions and makes recommendations for consideration by ADI-INT.

### 3. Main Findings

#### 3.1 Mapping and Analysis of Council of Europe Documentation

##### 3.1.1 Multilevel Governance

There is an imperative for all levels of governance, national, regional and local, to contribute to advancing the goal of inclusion, within the various competences afforded to them. As such the structures and processes of multilevel governance have a relevance for policy clarity and policy implementation in relation to this concept of ‘inclusion’.

The 1985 **European Charter of Local Self-Government** establishes the right of local authorities to be consulted by higher levels of government in planning and decision-making processes on all matters that concern them<sup>4</sup>. This is further elaborated in a 2018 **resolution and guidelines on the consultation of local authorities by higher levels of government**, of the Congress of Local and Regional Authorities<sup>5</sup>. This sets down the main elements for such consultation procedures, establishing that ‘efficient consultation of local authorities by other levels of government rests on two pillars: a well-defined national regulatory framework and an appropriate institutional setting’ and that a further ‘key component to any successful consultation is the existence of an appropriate administrative practice and decision-making culture at the level of national and regional governments’. While these Guidelines are limited to the consultation phase and do not target inclusion policies in particular, they provide a useful starting point, grounded in international law, for addressing multilevel governance.

**The Recommendation of the Committee of Ministers on multilevel policies and governance for intercultural integration**, provides a valuable starting point for capturing the specific potential of multilevel governance to progress the goal of inclusion, and establishing how to realise this potential.

Multilevel governance is defined as ‘a model of governance which embraces central, regional and local governments, as well as civil society organisations’, and ideally ‘includes a bottom-up element and implies the setting up of participatory processes for policy co-creation, co-operation and co-ordination among all relevant public authorities, at all levels of governance, and with all relevant stakeholders’<sup>6</sup>

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<sup>3</sup> Twenty-one responses were received to the survey: Andorra, Austria, Azerbaijan, Belgium, Croatia, Finland, Germany, Greece, Latvia Luxembourg, Malta, North Macedonia, Norway, Mexico, Portugal, Slovenia, Switzerland, the United Kingdom, and Spain and the City of Bilbao & Valencia Region Spain. Commentary was received from the European Committee on Democracy and Governance (CDDG). The city of Reggio Emilia provided supporting material.

<sup>4</sup> The [European Charter of Local Self-Government](#), (ETS No. 122), 15 October 1985, Council of Europe, Art. 4 (6), Art. 5, Art. 9 (6), and Art. 10.

<sup>5</sup> [The Consultation of Local Authorities by Higher Levels of Government](#), Resolution 437, adopted by the Congress of Local and Regional Authorities on 8 November 2018.

<sup>6</sup> [CM/Rec\(2022\)10 on multilevel policies and governance for intercultural integration](#), Appendix - Article 2.

‘A solid governance framework for intercultural integration based on partnerships between all relevant levels of government and other stakeholders, and using, where possible, participatory and deliberative mechanisms to enable the general public to take part in policy and decision making’ is recommended<sup>7</sup>.

The Recommendation establishes an imperative for coherent, co-ordinated, efficient and effective multilevel governance at all stages of policy-making. It establishes that multilevel governance should include for: consultation on the development of policies across levels of government; and alignment of strategic needs and goals, and ensuring policy consistency, knowledge and resource sharing, good practice exchange and mutual learning across all levels of governance.

The Recommendation sets out the need for: governance structures for political dialogue and the creation of long-term strategy between levels of government; policy coordination and consultation instruments and frameworks; and horizontal networks involving different levels of government to share good practice. It further sets out the need for involvement of migrants and people of migrant background in co-design structures for intercultural integration strategies; and consultation spaces with civil society to discuss and assess implementation of such strategies.

***The work of the Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI)*** points to the key elements required for multilevel governance approach to an intercultural integration strategy<sup>8</sup>:

- Political dialogue: structural or ad hoc instruments to facilitate political dialogue and commitment between different levels of government.
- Policy co-ordination: instruments to facilitate coherence, collaboration and co-operation in developing intercultural strategies and in ensuring that the intercultural approach is a cross-cutting issue in all public policies.
- Social participation: spaces in which social entities and civil society could meet to discuss and identify challenges and needs to be promoted.

***The Recommendation of the Committee of Ministers on participation of citizens in local life*** recommends to ‘ascertain, if necessary, whether the balance of powers exercised at national, regional and local levels ensures that local authorities and elected representatives have sufficient competences and capacity for local action to provide the necessary stimulus and motivation for the involvement of citizens’.<sup>9</sup>

***The European Committee on Democracy and Governance (CDDG)*** plans to prepare a recommendation in 2023 covering vertical (and possibly horizontal) multilevel governance. The subject of social inclusion is likely to be addressed.

### **3.1.2 Inclusion**

Key component elements emerge from the work of the Council of Europe to enable policy clarity and to inform a definition of the concept of ‘inclusion’ and to identify its underpinning values.

***Initiatives by the Committee of Ministers and the work of the Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI)*** offer starting points for bringing policy clarity to the

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<sup>7</sup> [CM/Rec\(2022\)10 on multilevel policies and governance for intercultural integration](#), Article 4.

<sup>8</sup> [Model Framework for an Intercultural Integration Strategy for the National Level](#), CDADI, adopted 17 Jun 2021, p. 24.

<sup>9</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 March 2018, Explanatory Memorandum B I 2.

concept of 'inclusion'. This work emphasises the concept of 'integration', but it links this concept to that of 'inclusion' in noting its contribution to building 'inclusive societies'.<sup>10</sup> While the focus for this body of work is on migrant integration, it is emphasised that the principles underlying this intercultural integration 'address the full range of diversity challenges and maximise the impact of policy and grass-roots action in the field of equality'.<sup>11</sup>

These initiatives establish four principles that shape this concept of 'integration': ensuring equality; valuing diversity; fostering meaningful interaction; and facilitating active citizenship and participation.

Values can be seen to underpin these four principles, where:

- Equality is underpinned by: dignity, equal treatment, and inclusion.
- Diversity is underpinned by: dignity, inclusion, social justice, and pluralism.
- Interaction is underpinned by: mutual respect, dialogue, trust, solidarity, connection, cohesion, and reciprocal understanding.
- Active citizenship and participation are underpinned by: a sense of belonging, social cohesion, and empowerment.

The work of CDADI through the Committee of Experts on Intercultural Integration of migrants (ADI-INT) on a model framework for a national intercultural integration strategy includes a definition of inclusion in terms of this particular focus:

'Inclusion is the goal of intercultural integration policies that value diversity and aim to afford equal rights and opportunities by creating conditions for the full and active participation of every member of society based on a common set of values, a shared sense of belonging to the city/community, and a pluralist local identity'<sup>12</sup>.

These initiatives point to the value of a comprehensive strategy for inclusion, understood as:

- targeting society as a whole and institutions at all levels of governance;
- addressing the full spectrum of policy fields at all levels of governance; and
- application to a wider field of: human rights implementation; anti-discrimination; gender equality; and equality with regard to sexual orientation.

There are parallels with these initiatives in the Committee of Ministers Recommendation on intercultural integration (CM/Rec(2015)1)<sup>13</sup> and the work it references of the Intercultural Cities Programme on intercultural inclusion<sup>14</sup>. The Intercultural Cities Programme sets out three principles that shape intercultural inclusion, that have a relevance for any definition of the concept of 'inclusion'. These are: equality; diversity advantage; and intercultural interaction.

There is a wider body of work by the Council of Europe that offers insights into how the concept of 'inclusion' might be defined, and how its underpinning values might be identified.

***The Committee of Ministers has adopted a range of relevant Recommendations*** including on: measures to combat discrimination on the ground of sexual orientation and gender identity;

<sup>10</sup> [CM/Rec\(2022\)10 on multilevel policies and governance for intercultural integration](#), Appendix Article 12.

<sup>11</sup> [Model Framework for an Intercultural Integration Strategy for the National Level](#) (adopted by the CDADI on 17 June 2021), p.15

<sup>12</sup> [Model Framework for an Intercultural Integration Strategy for the National Level](#) (adopted by CDADI, 17 June 2021), p.11.

<sup>13</sup> [CM/Rec\(2015\)1 on intercultural integration](#), adopted on 25 January 2015.

<sup>14</sup> [The Intercultural City Step by Step: A practical guide for applying the urban model of intercultural inclusion](#), Intercultural Cities Programme, Council of Europe, updated in 2021.

participation of citizens in local public life<sup>15</sup>; interaction between migrants and receiving societies; and combating hate speech. Key component elements of relevance to defining the concept of ‘inclusion’ established within such Recommendations encompass:

- Non-discrimination; respect for human rights; freedoms of association, expression and peaceful assembly; mutual respect; diversity and taking account of specific needs; and intersectionality and the issue of multiple discrimination.<sup>16</sup>
- Democratic participation; direct participation; dialogue; deliberative decision-making; belonging to community; and responsibility to contribute to community life.<sup>17</sup>
- Social cohesion, human dignity; sense of belonging; interaction; dialogue; and empowerment.<sup>18</sup>
- Culture of human rights; culture of understanding; and intergroup understanding.<sup>19</sup>

Values that can be seen to underpin these component elements include: respect, dignity, safety, equal treatment, agency, and diversity<sup>20</sup>; active participation, balanced participation, partnership, transparency, accountability, and empowerment<sup>21</sup>; interaction, diversity, and empowerment<sup>22</sup>; and understanding.<sup>23</sup>

***Guidelines for the protection and promotion of human rights in culturally diverse societies adopted by the Committee of Ministers***<sup>24</sup>, establish component elements of use in defining the concept of ‘inclusion’, such as: respect for human rights; equal opportunities and good relations; freedoms of thought, conscience and religion, of expression, and of assembly and association; living together in diversity; non-discrimination, including multiple discrimination; participation in decision-making; social cohesion; effective participation on an equal footing for all in social, economic and cultural life; and enjoyment and exercise of rights.

Values that can be seen to underpin these component elements include: dignity, agency, pluralism, broad-mindedness, mutual respect, diversity, and inclusivity.

The ***Council of Europe guide for policy-makers and practitioners on building migrants’ belonging through positive interactions***<sup>25</sup>, establishes component elements of use in defining the concept of ‘inclusion’, including: enable, create opportunities, create supportive contexts, and ensure a policy basis for positive interactions, where migrants engage with each other and with receiving

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<sup>15</sup> The European Committee on Democracy and Governance (CDDG) is completing work on deliberative democracy (participation of people in policy-making, typically through citizens’ assemblies) to complement CM/Rec(2018)4 on the participation of citizens in local public life.

<sup>16</sup> [CM/Rec\(2010\)5 on measures to combat discrimination on grounds of sexual orientation or gender identity](#), 31 March 2010, Art. 1 and Art. 2, and Appendix – Art. 32, Art. 33, and Art. 46.

<sup>17</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 March 2018, Explanatory Memorandum A 2, A 3, A 5, B III 1, and B III 3.

<sup>18</sup> [CM/Rec\(2011\)1 on interaction between migrants and receiving societies](#), 19 January 2011, Preamble.

<sup>19</sup> [CM/Rec\(2022\)16 on combating hate speech](#), 20 May 2022, Principles and Guidelines 28, 39, and 53.

<sup>20</sup> [CM/Rec\(2010\)5 on measures to combat discrimination on grounds of sexual orientation or gender identity](#), 31 March 2010.

<sup>21</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 March 2018.

<sup>22</sup> [CM/Rec\(2011\)1 on interaction between migrants and receiving societies](#), 19 January 2011.

<sup>23</sup> [CM/Rec\(2022\)16 on combating hate speech](#), 20 May 2022.

<sup>24</sup> [Human rights in culturally diverse societies](#), adopted by the Committee of Ministers and Compilation of Council of Europe Standards, published Jun 2016.

<sup>25</sup> Orton A., [Building Migrants’ Belonging through Positive Interactions](#), A guide for policy-makers and practitioners, Council of Europe, 2012

communities, that empower migrants, enable the wider community to recognise their contribution, provide a relational basis for addressing difficulties, and help build a cohesive society.

Values that can be seen to underpin these component elements include: dialogue, belonging, empowerment, diversity, solidarity, and social cohesion.

***The Council of Europe Gender Equality Strategy 2018-2023 adopted by the Committee of Ministers***<sup>26</sup>, establishes component elements of relevance for defining the concept of 'inclusion', including: elimination of sexism and gender stereotypes; women's access to economic resources and opportunities including jobs, services, property and skills; addressing persistent gender gaps in employment, pay, poverty, pensions; balanced participation of women and men in political and public decision-making; equal access to justice; equal sharing of unpaid household and care work and women's and men's work/life balance; and an intersectional approach.

Values that can be seen to underpin these component elements include: substantive and full gender equality, dignity, economic independence, empowerment, and partnership.

***The strategic action plan for Roma and Travellers approved by the Committee of Ministers***<sup>27</sup> establishes component elements of relevance for defining the concept of 'inclusion', including: improving the social and economic situation; non-discrimination; human rights; real and effective equality; dialogue; democratic participation; participation in decision-making and including representative organisations; active participation; empowerment; capacity building; fostering inclusion; and taking account of intersectional needs of specific groups.

Values that can be seen to underpin these component elements include: empowerment; respect; agency; social justice; and diversity.

***The work of the European Committee against Racism and Intolerance (ECRI)*** has involved adoption of a wide range of General Policy Recommendations including on: equality bodies; anti-discrimination legislation; education; employment; and combating hate speech. Key component elements of relevance to defining the concept of 'inclusion' established within such Recommendations encompass:

- Equality, non-discrimination (individual and structural), social cohesion, and positive action to remedy inequality<sup>28</sup>;
- Equality, non-discrimination, and redress<sup>29</sup>;
- Equality, non-discrimination and positive action<sup>30</sup>;
- Access and participation on an equal footing<sup>31</sup>; and
- Dialogue, awareness and exercise of rights, and pluralism<sup>32</sup>.

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<sup>26</sup> [Council of Europe Gender Equality Strategy 2018-2023](#), adopted by the Committee of Ministers March 2018.

<sup>27</sup> [Council of Europe Strategic Action Plan for Roma and Traveller Inclusion \(2020-2025\)](#), approved by the Committee of Ministers 22 Jan 2020.

<sup>28</sup> [GPR No. 2: Equality bodies to combat racism and intolerance at the national level](#), amended 7 Dec 2017.

<sup>29</sup> [GPR No. 7 on National legislation to combat racism and racial discrimination](#), amended 7 December 2017.

<sup>30</sup> [GPR No. 14 on Combating racism and racial discrimination in employment](#), adopted 22 June 2012.

<sup>31</sup> [GPR No. 10 on Combating racism and racial discrimination in and through education](#), adopted 15 Dec 2006.

<sup>32</sup> [GPR No. 15 on Combating hate speech](#), 8 Dec 2015.



Values that can be seen to underpin these component elements include: diversity, and accessibility<sup>33</sup>; diversity<sup>34</sup>; equal dignity, cohesion, and diversity<sup>35</sup>.

**The Framework Convention for the Protection of National Minorities** establishes key component elements of relevance to defining the concept of 'inclusion', including: guarantee of non-discrimination; promotion of 'full and effective equality' in 'all areas of economic, social, political and cultural life'; and freedoms of peaceful assembly, association, expression, and thought, conscience and religion<sup>36</sup>.

Values that can be seen to underpin these component elements include: respect, diversity, agency, dialogue, and empowerment.

**The European Charter for Regional or Minority Languages** establishes key component element for relevance to defining the concept of 'inclusion, including: recognition and valuing of diversity of languages; meeting specific needs arising from this diversity; elimination of discrimination; and promotion of equality<sup>37</sup>.

Values that can be seen to underpin these component elements include: respect, diversity, equality, and mutual understanding.

### 3.1.3 Institutional Infrastructure

This body of work of the Council of Europe further informs an identification of the key elements for an institutional infrastructure that would be relevant to underpinning policy implementation in operationalising a comprehensive strategy for inclusion.

**The Recommendation of the Committee of Ministers on multilevel policies and governance for intercultural integration**, provide a starting point with elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>38</sup>

- **Legislative/policy initiative such as to:** address the potential of diversity and inclusion in institutions, organisations, living environments and the public space; maximise the value of diversity for society as a whole and minimise the risk of conflicts in all spheres; foster trust and a sense of living together and of belonging; and target supports to those with specific needs.
- **Institutional initiative such as:** anti-discrimination audits; charters and action plans; and staff training.
- **Public discourse initiative such as to:** prevent and combat prejudice and hate speech; build shared values and a pluralist and open identity within society; and communicate intercultural integration policies and their rationale

**The work of the Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI)** offer similar starting points with further detail on the elements:<sup>39</sup>

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<sup>33</sup> [GPR No. 2: Equality bodies to combat racism and intolerance at the national level](#), amended 7 Dec 2017.

<sup>34</sup> [GPR No. 14 on Combating racism and racial discrimination in employment](#), adopted 22 June 2012.

<sup>35</sup> [GPR No. 15 on Combating hate speech](#), 8 Dec 2015.

<sup>36</sup> [Framework Convention for the Protection of National Minorities](#), (ETS No. 157), 01/02/1995, Art. 4 (1) and (2), and Art. 7.

<sup>37</sup> [The European Charter for Regional or Minority Languages](#) (ETS No. 148), 5 September 1992, Art. 7 (1), Art. 7 (2), Art. 7 (3).

<sup>38</sup> [CM/Rec\(2022\)10 on multilevel policies and governance for intercultural integration](#), Appendix - Art. 19-24, Art. 31, Art. 33.

<sup>39</sup> [Model Framework for an Intercultural Integration Strategy for the National Level](#) (adopted by the CDADI on 17 June 2021), pp. 16 to 22.

- **Legislative/policy initiative such as to:** guarantee equality and freedom from discrimination and intolerance in all arenas; eliminate all inequalities and direct or indirect discrimination across all policy fields; allow for adaptations and exceptions to meet individual specificities; incorporate an “intercultural lens” into policies and programmes; and address structural disadvantage and inequality for minority groups through positive measures.
- **Institutional initiative such as to:** enable power sharing between people and between public institutions and civil society; foster cultural mixing and positive interaction; co-create public policies; implement policy-making processes in a participatory and inclusive manner; make institutions and officials culturally competent; and enable redress for discrimination.
- **Public discourse initiative such as to:** foster a pluralist common identity; value diversity and its positive potential; engage values of equality, democracy and rule of law; address “symbolic” equality in the way different societal groups are portrayed in legal and policy texts and in political and institutional discourse; promote intercultural dialogue; and address stereotypes, rumours and prejudice.

**The work of the Intercultural Cities Programme** includes elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>40</sup>

- **Legislative/policy initiative such as:** policies and actions to encourage more mixing and interaction between diverse groups; and creating spaces and opportunities for interaction and co-creation between the diversity of people.
- **Institutional initiative such as to:** involve people of diverse origins in decision-making; foster intercultural competence; combat prejudice and discrimination and ensure equal opportunities for all by adapting governance structures, institutions and services to the needs of a diverse population; set up a governance model empowering all members of the community to develop their potential; and embrace cultural pluralism and complexity of identities through leadership discourse and symbolic actions.
- **Public discourse initiative such as to:** develop inclusive narratives and manage conflict positively, busting stereotypes and engaging in a debate about the impact and potential of diversity; and advocate respect for diversity and a pluralistic city identity.

**The wider range of Recommendations of the Committee of Ministers** include elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:

- **Legislative/policy initiatives such as to:**
  - legislate to combat discrimination; keep legislation under review to ensure no discrimination; and gather and analyse relevant data.<sup>41</sup>
  - legislate or regulate for petitions, popular initiatives, referenda, co-options, and citizen involvement; and set targets for representation and/or participation of particular groups and introduce specific measures for these groups.<sup>42</sup>

<sup>40</sup> [The Intercultural City Step by Step: A practical guide for applying the urban model of intercultural inclusion](#), Intercultural Cities Programme, Council of Europe, updated in 2021, p. 14.

<sup>41</sup> [CM/Rec\(2010\)5 on measures to combat discrimination on grounds of sexual orientation or gender identity](#), 31 March 2010, Art. 1, Art. 2, and Appendix – Art. 5,

<sup>42</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 March 2018, Explanatory Memorandum B III 4, B IV 2

- consider how existing policies can promote or inhibit interaction while providing flexible, tailored services; and develop policies which make the most of the potential in the multiple aspects and/or dimensions of everyone’s identity.<sup>43</sup>
- prepare and implement broad policies, legislation, policy strategies or action plans on the issue of hate speech, allocate appropriate resources for their implementation, and engage stakeholders; ensure anti-discrimination legislation addresses hate speech; and include requirements in law for named bodies to take certain measures.<sup>44</sup>
- ***Institutional initiatives such as to:***
  - mandate a relevant institution to ensure redress for discrimination and promotion of equality.<sup>45</sup>
  - provide a wide range of participation instruments; recognise and enhance the role of associations as key partners in sustaining a culture of participation and as a driving force for democratic participation; establish participatory structures at neighbourhood level; and develop feedback mechanisms.<sup>46</sup>
  - ensure that policy makers and practitioners recognise and respect the complexity of diversity; and build networks across diverse groups.<sup>47</sup>
  - empower equality bodies, national human rights institutions and civil society organisations with a mandate in combating hate speech to assist and represent those targeted by hate speech; and enable these bodies to create and promote counter-speech and alternative speech, and to involve those targeted by hate speech in this process.<sup>48</sup>
- ***Public discourse initiatives such as to:***
  - promote openness and respect for human rights in dialogue; raise awareness of responsibilities in relation to hate speech; and awareness raising activities regarding discrimination.<sup>49</sup>
  - promote a culture of democratic participation; ensure communication between public authorities and citizens; and implement a communication policy on issues of concern to community and on the implications of political decisions.<sup>50</sup>
  - promote recognition of migrants’ contributions; create opportunities for and improve skills and processes for public interaction; and empower migrants.<sup>51</sup>
  - promote awareness raising, education, training, counter-speech, alternative speech and intercultural dialogue in relation to hate speech; raise awareness of the extent of hate speech and the harm it causes and ways to counter it; and support formal and non- formal educational activities and cultural programmes for the general public that enhance commitment to human rights.<sup>52</sup>

<sup>43</sup> [CM/Rec\(2011\)1 on interaction between migrants and receiving societies](#), 19 January 2011, Art.6, Art.8.

<sup>44</sup> [CM/Rec\(2022\)16 on combating hate speech](#), 20 May 2022, Principles and Guidelines 5, 14, 15, and 22.

<sup>45</sup> [CM/Rec\(2010\)5 on measures to combat discrimination on grounds of sexual orientation or gender identity](#), 31 March 2010, Art. 3, and Appendix – Art 45.

<sup>46</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 March 2018, Explanatory Memorandum A 6, A 12, B I 3, B III 6,

<sup>47</sup> [CM/Rec\(2011\)1 on interaction between migrants and receiving societies](#), 19 January 2011, Art.7, Art.9.

<sup>48</sup> [CM/Rec\(2022\)16 on combating hate speech](#), 20 May 2022, Principles and Guidelines 10 and 54.

<sup>49</sup> [CM/Rec\(2010\)5 on measures to combat discrimination on grounds of sexual orientation or gender identity](#), 31 March 2010, Appendix – Art. 7, Art. 8, Art. 41.

<sup>50</sup> [CM/Rec\(2018\)4 on the participation of citizens in local public life](#), 21 Mar 2018, Explanatory Memorandum A 2, A 4, B I 7.

<sup>51</sup> [CM/Rec\(2011\)1 on interaction between migrants and receiving societies](#), 19 January 2011, Art.1, Art.2, Art.3, Art.4.

<sup>52</sup> [CM/Rec\(2022\)16 on combating hate speech](#), 20 May 2022, Principles and Guidelines 45, 46, and 49.

***Guidelines for the protection and promotion of human rights in culturally diverse societies adopted by the Committee of Ministers*** include elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>53</sup>

- ***Legislative/policy initiatives such as to:*** ensure that the policies and actions of public authorities comply with human rights obligations; and ensure that every member of society has adequate opportunities to effectively participate in public affairs and democratic decision making.
- ***Institutional initiatives such as to:*** enable all relevant segments of society, including non-governmental organisations, to participate in the preparation and consideration of legislation; establish an effective, pluralist and independent national human rights institution; create an environment conducive to the development of civil society; and make consultation and collaboration with civil society a common practice.
- ***Public discourse initiatives such as to:*** promote the principle of equality and the right of every person to be free from all forms of discrimination on any ground; and promote mutual respect and diversity.

***The Council of Europe Gender Equality Strategy 2018-2023 adopted by the Committee of Ministers***<sup>54</sup>, establishes elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion, including:

- ***Legislative/policy initiatives such as:*** legal and policy instruments to prevent and combat gender stereotypes and sexism, ensure equal access to justice, prevent and combat violence against women, and advance balanced participation in political and public decision-making; actions to promote equal economic independence, remove obstacles to women's labour market participation, and encourage more men to take on caring responsibilities and make use of flexible working arrangements; a dual track approach of specific policies and actions, including positive action, and gender mainstreaming in all policies and programmes, data collection; and an intersectional approach.
- ***Institutional initiatives such as to:*** address impact of gender stereotyping on decision-making; promote work and strengthening of national equality bodies; achieving balanced participation of women and men in political and public decision-making; and training of decision-makers.
- ***Public discourse initiatives such as to:*** address stereotypes in education and in the media; and address sexist hate speech and internet pornography.

***The strategic action plan for Roma and Travellers approved by the Committee of Ministers*** includes elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>55</sup>

- ***Legislative/policy initiatives such as to:*** introduce a legal instrument to combat hate speech; promote Roma arts, culture, history and language; and inclusive policy measures at local level to improve the social inclusion of Roma in education, housing, employment and health care.

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<sup>53</sup> [Human rights in culturally diverse societies](#), adopted by the Committee of Ministers and Compilation of Council of Europe Standards, published Jun 2016.

<sup>54</sup> [Council of Europe Gender Equality Strategy 2018-2023](#), adopted by the Committee of Ministers March 2018.

<sup>55</sup> [Council of Europe Strategic Action Plan for Roma and Traveller Inclusion](#) (2020-2025), approved by the Committee of Ministers 22 Jan 2020.

- ***Institutional initiatives such as to:*** capacity building of national, regional and local level authorities and civil society; improve performance of institutions to protect rights; and capacity of national and local authorities to perform their roles and responsibilities to improve the situation of Roma and Travellers.
- ***Public discourse initiatives such as to:*** awareness raising actions for the general public; and rights awareness.

***The General Policy Recommendations of ECRI*** include elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:

- ***Legislative policy initiatives such as to:***
  - enact legislation against racism and racial discrimination, special measures to prevent or compensate for disadvantage, a duty to promote equality and prevent discrimination<sup>56</sup>.
  - a comprehensive multidisciplinary strategy to promote equality and eliminate and prevent racism in employment, including policy strategies for improving integration of groups and their equal participation in employment and economic activity; adopt legislation permitting positive action and promote and provide clear guidance on positive action measures in employment; enact anti-discrimination legislation on more than one ground, including multiple discrimination; provide for a duty on public authorities and employers to promote equality and prevent discrimination; and develop indicators and set benchmarks, gathering and monitoring equality data, and establishing criteria for measuring and evaluating the impact of actions<sup>57</sup>.
  - ensure an obligation on schools to promote equality in education<sup>58</sup>.
  - encourage the adoption of appropriate codes of conduct, and ensure that the data gathered is appropriately disaggregated<sup>59</sup>.
- ***Institutional initiatives such as to:***
  - establish and enable independent, effective and accessible equality bodies<sup>60</sup>.
  - establishment of one or more equality bodies<sup>61</sup>.
  - promote the engagement of civil society groups representing the interests of those who experience racial inequality in the national strategy to eliminate racial discrimination; and ensure specialised bodies and other national institutions that combat racism and racial discrimination have appropriate organisational structures, accountability mechanisms, leadership and adequate resources to be independent and effective<sup>62</sup>.
  - support non-governmental organisations, equality bodies and national human rights institutions working to combat hate speech<sup>63</sup>.

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<sup>56</sup> [GPR No. 7 on National legislation to combat racism and racial discrimination](#), amended 7 December 2017.

<sup>57</sup> [GPR No. 14 on Combating racism and racial discrimination in employment](#), adopted 22 June 2012.

<sup>58</sup> [GPR No. 10 on Combating racism and racial discrimination in and through education](#), adopted 15 Dec 2006.

<sup>59</sup> [GPR No. 15 on Combating hate speech](#), 8 Dec 2015.

<sup>60</sup> [GPR No. 2: Equality bodies to combat racism and intolerance at the national level](#), amended 7 Dec 2017.

<sup>61</sup> [GPR No. 7 on National legislation to combat racism and racial discrimination](#), amended 7 December 2017.

<sup>62</sup> [GPR No. 14 on Combating racism and racial discrimination in employment](#), adopted 22 June 2012.

<sup>63</sup> [GPR No. 15 on Combating hate speech](#), 8 Dec 2015.

- **Public discourse initiatives such as to:**
  - build across society awareness, knowledge, valuing of and respect for equality, diversity, equal treatment legislation, non-discrimination and mutual understanding<sup>64</sup>.
  - take steps to improve knowledge of equality rights and of the existence of specialised bodies and complaint mechanisms<sup>65</sup>.
  - ensure that school education plays a key-role in the fight against racism and racial discrimination in society<sup>66</sup>.
  - raising public awareness of the importance of respecting pluralism and of the dangers posed by hate speech<sup>67</sup>.

**The Framework Convention for the Protection of National Minorities** includes elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>68</sup>

- **Legislative policy initiative such as to:** promote the conditions necessary for persons belonging to national minorities to maintain and develop their culture, and preserve the essential elements of their identity, and foster knowledge of the culture, history, language and religion of national minorities and of the majority.
- **Institutional initiative such as to:** create the conditions necessary for the effective participation in cultural, social and economic life and in public affairs, in particular those affecting national minorities.
- **Public discourse initiative such as to:** encourage a spirit of openness and intercultural dialogue and promote mutual respect and understanding and co-operation among all persons.

**The European Charter for Regional or Minority Languages** includes elements relevant for an institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion:<sup>69</sup>

- **Legislative/policy initiative such as to:** eliminate discrimination; advance positive action to promote equality; promote, sustain, provide for, accommodate, and safeguard diversity, in terms of languages; and enable interaction and mutual understanding across this diversity.
- **Institutional initiative such as to:** recognise and make provision for specific needs arising from diversity and having a competency in this regard.

### 3.2 Member State Perspectives and Needs

#### 3.2.1 Policy Clarity – Inclusion

##### Policy Clarity

Policy clarity in relation to the concept of ‘inclusion’ is identified as a challenge by a number of respondents to the survey questionnaire. No broad explicit definition of the concept of ‘inclusion’ is

<sup>64</sup> [GPR No. 2: Equality bodies to combat racism and intolerance at the national level](#), amended 7 Dec 2017.

<sup>65</sup> [GPR No. 14 on Combating racism and racial discrimination in employment](#), adopted 22 June 2012.

<sup>66</sup> [GPR No. 10 on Combating racism and racial discrimination in and through education](#), adopted 15 Dec 2006.

<sup>67</sup> [GPR No. 15 on Combating hate speech](#), 8 Dec 2015.

<sup>68</sup> [Framework Convention for the Protection of National Minorities](#), (ETS No. 157), 01/02/1995, Art. 15 (1), Art. 5 (1), Art. 12 (1), and Art. 6 (1).

<sup>69</sup> The [European Charter for Regional or Minority Languages](#) (ETS No. 148), 5 September 1992, Art. 7 (1), Art. 7 (2), Art 7 (3), Art. 8, Art. 9

immediately apparent from member state legislation or policy. There is an absence noted, of shared definition and understanding of 'inclusion' across relevant stakeholders.

In the absence of an explicit definition, an 'inclusive view', in the words of one respondent, is evident in instances such as: at a Constitutional level; in equal treatment legislation; in integration legislation and policy; and in specific targeted policy strategies. Group specific understandings of inclusion, or understandings of inclusion specific to particular areas or fields are noted. In the absence of a set definition for the concept, another respondent noted the importance of the main principles that shape the concept of 'inclusion' being shared.

The definitions presented point to the following elements as making up the concept of 'inclusion':

- equality of rights, opportunities, obligations, and freedoms for everyone;
- engagement in public administration decision making and policy making processes;
- participation of everyone in all aspects of social and daily life, with the same freedom of choice as others, eliminating obstacles to guarantee the full enjoyment of this right as well as full inclusion and participation in society;
- promote social cohesion, peaceful co-existence, and situations where people – whatever their background – live, work, learn and socialise together, based on shared rights, responsibilities, and opportunities;
- celebration, valuing, recognition, and reflection of diversity;
- sense of shared identity and sense of belonging to a community that is important to you and an opportunity to influence your own life and community. A precondition for inclusion is that the person has sufficient resources, an opportunity to make decisions concerning his or her own life and to maintain socially significant and important relationships;
- comprehensively improve people's living conditions, in addition to offering the same job, economic and educational opportunities that the rest of society enjoys; and
- people's adequate access to the existing social protection systems, and the ease with which people can use the information they need to access the rights and duties to which they are entitled as citizens; people's personal and social capacities to relate to each other and to social participation.
- Social inclusion should not only be understood from a material perspective, as participation in the labour market in order to generate and consume goods and services. Social inclusion, as well as involving the activation of people in the production and consumption of social goods, entails their active participation in society, their awareness, their capacity to choose and make decisions, their involvement as members of the community.

There can be a reluctance to define the concept of 'inclusion', it is suggested, for fear of excluding part of the population. There can be a lack of ambition in relation to inclusion and a failure to appreciate the importance of the concept. There can be resistance to change required by the concept of 'inclusion', and an imperative for cultural change is noted within institutions to enable policy clarity.

There is a challenge noted to secure a consensus of understanding of the concept of 'inclusion' across the responsible stakeholders, and shared ownership for this understanding. There are different visions of the concept of 'inclusion' within society and among stakeholders. There is a complexity in the porosity between this concept of 'inclusion' and other policy concepts such as integration and

participation. Participation from the groups concerned by the issue, it is noted, would enable the development of policy clarity.

The concept of 'inclusion' can lack a common definition and be fragmented across different foci or different interpretations due to sectoral approaches to this policy area by different parts of government, and due to federal structures within member states.

There can be misinformation spread about the concept of 'inclusion' and its implications which builds resistance to the concept. Communication of the concept and its underpinning values is seen to enable policy clarity, alongside a focus on this in education and training.

The definition of clear measurable objectives, and the gathering of data and measurement of clear and objective indicators would enable policy clarity for the concept. This policy clarity could be further strengthened through dialogue on the analysis of these data and indicators, involving the various interests and experts.

### ***Values***

Policy clarity, it is suggested, is enabled by the values that underpin the concept of 'inclusion'. Respondents emphasise values as central to any definition of the concept. There is a strong and coherent emphasis on values evident in the responses of the member states.

In this, there was a particular emphasis on values of respect, dignity, accessibility, diversity, belonging, active participation, self-determination, autonomy, dialogue, empowerment, and equality.

A number of respondents also named particular values that could be considered as encompassed by these values that were emphasised, depending on how they are defined. These further values include in particular: non-discrimination, social cohesion, integration, positive interaction, democracy, social justice, social harmony, freedom of choice, active citizenship, mutual understanding, empathy, and compassion.

Other values referenced by respondents include: transparency, universality, shared responsibility, protection, safety, shared prosperity, reciprocity, neighbourliness, solidarity, living together, mutual assistance, and learning community.

### ***Areas or Policy Fields***

Respondents emphasise the need to take a broad approach as to the policy fields that should be a focus for comprehensive strategies for inclusion. This too serves to inform any definition of the concept of 'inclusion'.

This broad approach is emphasised in such terms as a 'global approach', in the words of one respondent, or 'full and active participation' in the words of another, or 'guarantee of full exercise of rights (employment, housing, education, health, social and political participation, digital access - digital bill of rights)' in the words of another. It is suggested by respondents that the concept needs to address a broad range of policy fields, encompassing the civic, social, political, economic and cultural dimensions.

A range of policy fields are noted by respondents in this regard, including: education, training, employment, housing, health, income and economic means, social welfare, social services, public life and social relations, political life, cultural life, cultural and religious expression, and the justice system.



In these areas, there is a concern identified to achieve access and participation and an equal distribution of resources.

There is a further specific emphasis on anti-discrimination measures; equality initiatives; action to secure the use of individual freedoms; enjoyment of and exercise of rights; and initiatives to shape public awareness as part of any comprehensive strategy for inclusion. There was a particular emphasis from some respondents on processes of consultation and of access to and participation in decision-making processes within such strategies. This should involve, according to some respondents, the voice of different groups being heard and their concerns given weight, and participation by institutions and citizen organisations for the defence and promotion of fundamental rights and of academic experts in this field.

Inclusion as a policy process was noted by a number of respondents. Transversality or mainstreaming is emphasised in this regard. This reflects an imperative to:

- mainstream a focus on the groups covered by the concept in all policy making;
- adapt and transform the mainstream;
- Adaptation of structures and services to different needs;
- anchor the concept in the structures of the state; and
- establish inclusion as a horizontal principle that all public stakeholders should follow or align with; and/or develop policies benefitting all.

Cooperation between stakeholders, inter-institutional coordination, collaboration across all stakeholders, participative decision-making and policy-making; and activation of all stakeholders are emphasised.

### ***Discrimination grounds or groups***

Finally, there is a strong concern evidenced by the representatives to take a broad approach as to who is a focus within the concept of 'inclusion'. This too serves to inform any definition of the concept.

A multi-group perspective is predominant in the survey responses, including, for some respondents, a universal approach. In the words of respondents, the goal of inclusion' is:

- to 'end exclusion in all its forms';
- to achieve 'the participation of all in all dimensions of social and daily life';
- the 'inclusion for all people', a strategy to work with the whole community 'to promote the consolidation and qualification of universal public policies', addressing 'the challenges and needs of all citizens'; and
- 'all people, without distinction of any kind, have equal access to opportunities in all areas.'

The range of groups identified by respondents to be addressed by the concept of 'inclusion', encompasses the grounds included in the CDADI mandate but goes beyond this in involving all of: women, racialised minorities, people with disabilities, people of a particular religion or belief, LGBTIQ+ people, and younger and older people. A number of respondents further included: people of a particular socio-economic status. Other groups referenced include: people from a particular area of residence, place of origin, and people with particular political views.

A significant number of respondents noted that the concept of 'inclusion' should include for intersectionality<sup>70</sup>. In this it would address and be relevant to the specific needs of those people grouped at the intersections of these different groups. The gender dimension was emphasised in this regard.

### 3.2.2 Policy Implementation – Institutional Infrastructure

#### **Component Elements in Place**

The member states responding to the survey report a broad and diverse range of component elements in place as part of the institutional infrastructure with a contribution to make to developing and driving progress on a comprehensive strategy for inclusion. However, a dedicated, coherent and coordinated institutional infrastructure to ensure progress towards this goal of inclusion is not significantly evidenced.

There is a wide range of **legislative initiatives** reported at national level with a contribution to make to progressing a comprehensive strategy for inclusion. These include:

- Constitutional provisions that reference a range of discrimination grounds;
- Equal treatment legislation that is multi-ground in its formulation or involves a range of legislative acts dedicated to specific discrimination grounds, and that combines prohibition of discrimination with statutory equality duties on public authorities, employers, and service providers;
- Legislation addressing specific rights issues such as: accessibility with particular reference to people with disabilities; inclusive public services; anti-poverty and social inclusion; integration with particular reference to migrant populations; hate speech and hate crime; gender/disability/equality mainstreaming processes; and gender identity issues; and
- Charter of Rights type instruments.

A range of further legislation is reported as contributing to progressing such as strategy. These include the: Labour Code; legislation in relation to migration and international protection; and legislation governing specific policy fields, such as inclusive education.

There is a wide range of **policy strategies** reported at national level that contribute to developing and driving progress on a comprehensive strategy for inclusion. These predominantly relate to:

- action plans addressing broad themes of human rights, anti-discrimination, equality or anti-poverty across a spectrum of policy fields;
- specific action plans addressing the situation of particular groups covered by the discrimination grounds; and
- specific action plans addressing a particular policy field.

There is a wide range of **institutions** reported at national level with a role to play in developing and driving progress on a comprehensive strategy for inclusion. These include in particular:

- Ministries or Government Departments with a brief that includes elements related to this goal;

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<sup>70</sup> An intersectional approach ensures that the diversity within any group is taken into account, in respecting and responding to the intersecting identities/characteristics that people hold, and that all are included.

- Dedicated departments or directorates within Ministries or Government Departments;
- Inter-ministerial committees with this brief, and with focal points in each Ministry;
- Inter-institutional commissions with this brief with a coordination role;
- Parliamentary committees with a brief that includes elements related to this goal;
- Advisory boards and Councils addressing broad themes relevant to this goal and enabling a wider participation in its consideration;
- Monitoring bodies for the implementation of related action plans;
- Equality bodies, national human rights institutions, and ombudsman offices;
- Support units on equality in Ministries, regional authorities, and local authorities; and
- Civil society networks and platforms of representative associations.

Further such institutions reported, include: Ministries or Government Departments with a brief that contributes to developing and driving progress on such a strategy; agencies to address specific issues such as integration; and trade unions and civil society organisations.

A similar range of institutions are noted by some respondents at regional and local levels.

**Funding streams** for action on implementing comprehensive strategies for inclusion are defined in terms of state and Ministerial budgets. Dedicated budget lines are noted. The European Structural and Investment funds of the EU are referenced.

**In earlier work by CDADI, a review of the Council of Ministers Recommendation on intercultural integration** found an uneven and incomplete development and functioning of this institutional infrastructure<sup>71</sup>. It found that:

- a “holistic institutional infrastructure embracing all such elements is still to emerge in some instances”; and
- “the breadth of issues addressed through this institutional infrastructure might also benefit from some expansion in some instances”.

This review emphasised the need to address fragmentation and increase synergies, cooperation, coordination, solidarity and knowledge transfer, between the different authorities, departments, professional communities, advocacy groups, academia, business, and civil society involved, and across the different levels of governance involved, to achieve effective policy implementation for comprehensive strategies for inclusion.

### **Challenges**

A range of challenges in securing and operating an effective institutional infrastructure for developing and driving progress on a comprehensive strategy for inclusion, are noted by respondents, with a degree of commonality in this regard. These challenges include:

- The lack of a shared understanding of the concept of ‘inclusion’, its importance, and how it relates to their work, across the broad spectrum of actors that need to be involved in its achievement.
- The lack of a common policy or strategy for inclusion, across the institutions with responsibilities for its achievement.

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<sup>71</sup> The [Review report on the implementation of Recommendation to Member States CM/Rec\(2015\)1 on intercultural integration](#) (adopted by the CDADI in February 2021).

- The fragmentation of relevant legislation, across a range of laws, and the fragmentation of policy strategies, across a range of grounds or issues.
- The need for stronger coordination across the actors that need to be involved in its achievement from all policy domains, and more effective procedures for collaboration, and the need to increase effective stakeholder participation, with a lack of effective mechanism noted in this regard.
- The need for support to concretise the exchange between public authorities and civil society, with a lack of effective mechanisms for the participation of social entities and trade unions representing specific groups.
- Policy implementation presents particular challenges such as:
  - the interdisciplinary and intersectoral nature of initiative required to make implement comprehensive strategies for inclusion;
  - the specific action required to adapt budgets and processes to implement comprehensive strategies for inclusion;
  - lack of data sharing between relevant institutions, and difficulties in measuring progress and establish the current state of inclusion;
  - the need to strengthen dialogue with policy beneficiaries; and
  - reluctance to change with consultation mechanisms reduced to routine.
- The need for stronger legislative provisions in relation to particular issues and for stronger provisions on and greater investment in their enforcement.
- The need for culture change in relevant institutions and across society, and for an effective engagement of the values underpinning the concept of ‘inclusion’.
- The limited resources available and ring-fenced for investment in the institutional infrastructure, and in the policy strategies and actions required, to develop and drive progress on a comprehensive strategy for inclusion.
- Limitations in the mandates of responsible institutions and lack of reporting or accountability mechanisms.
- Administrative bureaucracy, staff turnover, and limitations of professional competence across the relevant institutions.
- The need to secure a more effective involvement of the groups targeted in policy design, implementation, monitoring and evaluation.
- The threat posed by populist discourse in particular on social media, and of the rise of the far-right.

### 3.2.3 Multilevel Governance

Inclusion is recognised across the respondents as a responsibility for all levels of governance. Coordination and collaboration between and across the different levels of governance is seen as of key importance in this regard.

There is limited reference in the survey responses to the specific mechanisms seen as needed to achieve collaboration and coordination across all levels of governance behind this goal. The type of mechanisms identified include: platforms or working groups established with the purpose of securing a dialogue and an exchange of perspectives and practices between the different levels of government; networks to engage the different levels of administration and other stakeholders on specific policy goals; representation of the local and regional levels in national level structures established to address

issues related to the goal of inclusion; representation of the national level in regional level structures; communication and information sharing systems; national policies or agreements to secure interinstitutional cooperation; and structures that allow for civil society representation.

There are impediments to coordination and collaboration between the levels of governance noted, including:

- Lack of effective mechanisms for coordination and collaboration between levels of governance is noted. In one instance, it is noted that a commitment is made to putting in place such mechanisms in national plans but there has been a failure to implement them.
- The nature of the powers and responsibilities, relevant to inclusion, that rest at the different levels of governance, varies considerably across the member states, and the hierarchies that can exist between the different levels of governance is noted as a potential barrier.
- Overlapping or unclear mandates at different levels of governance can present problems.
- Political divergences between the different levels of governance can be at issue.
- Limitations in the effectiveness of communication channels between levels of governance are noted as a challenge
- The challenge to harmonise perspectives and secure shared capacity on the concept of 'inclusion' across and between the different levels of governance is noted as a potential barrier.
- There is a challenge noted of compiling best practice measures from the different levels of governance and making these more widely available.
- Fragmentation of responsibility for this goal at each of the different levels of governance is noted as a problem.

### *3.3 Analysis of Options Compared to Assessed Needs*

#### ***Initial Options***

A number of possible new instruments, to be developed at a European level and for use at national level, were identified in advance of the study to enable member states to assess their relevance to their needs. While member states could indicate whichever of these options might respond to their needs, they could indicate additional options.

The options identified in the questionnaire for a possible new instrument were:

- a guidance instrument: establishing an agreed understanding of, and encouraging commitment to a goal of inclusion; and advancing and encouraging adoption of, the key elements required for an effective institutional infrastructure to progress this goal, across the full spectrum of relevant organisations and of governance levels.
- a benchmarking or index instrument: establishing agreed markers to assess the quality and state of development of the key elements of an effective institutional infrastructure, to progress the goal of inclusion; identifying meaningful indicators to enable tracking and monitoring of achievements in relation to progressing this goal, in a manner that serves ongoing improvements; and enabling peer-learning opportunities by informing dialogue about the situation and experience, established through a common framework, in each member state.

- a peer learning/support instrument: establishing the processes for dialogue, shared learning, knowledge dissemination, and mutual support, between member states, and within member states across different levels of governance and different sectors, on the goal of inclusion and the institutional infrastructure to achieve this goal.

### **Option Preferences**

There is clear interest expressed by respondents for new European level instruments to support action on inclusion, with interest evident in all three of the options presented, as well as further options noted in the responses.

A linkage between these three instruments was noted, which might suggest a package of instruments as being required, with an ordering in their development. The instrument on peer learning and peer support and the guidance instrument could serve as a precursor it was suggested, putting in place the necessary foundations of policy clarity and for policy implementation from which to develop a benchmarking or index instrument.

The support for an instrument of **guidance** emphasised its potential to set the conceptual framework for any further action and to establish a standard in this regard. Such an instrument was seen as serving to: achieve clarity and coherence on the definition for the concept of ‘inclusion’; guide members states in framing their specific action plans behind the goal of inclusion; and guide and establish norms and values, common objectives, and component elements for such action plans. In doing so it was suggested, it would usefully: allow for a diversity of approaches to take account of local contexts; and be operational and practical in securing a uniform application of and alignment with the values underpinning the concept of ‘inclusion’ and their implications.

More focused guidance instruments were also suggested, in relation to specific initiatives such as: engaging all levels of governance and all stakeholders; communication methodologies; and prevention and dealing with populist political speech.

The support for an instrument on **peer learning and peer support** emphasised its potential to stimulate dialogue, share learning, disseminate knowledge, and mobilise mutual support. As such, it is a process that would serve as a valuable accompaniment to the development and implementation of the other two instruments. Such an instrument was noted for its ability to build collective intelligence based on learning from practical experience rather than external expertise. This instrument would, it was suggested, need to address ideas, knowledge and experience garnered from practice; share and promote good practice and help avoid non-effective solutions; and support capacity building and training. It could involve virtual gatherings, onboarding learning platforms, multi-lateral meetings and workshops, and online workgroups.

The support for an instrument of **benchmarking or index** was less coherent. There were different perspectives on what this instrument might serve to achieve. A range of purposes were presented, including to: assess performance; adequately depict developments with regard to inclusion; enable comparative analysis of specific actions; be an instrument at the service of a learning organisation; and /or enable measurement and comparison of the level of inclusion achieved by the member states.

**Other instruments** suggested by individual respondents included: a Good Practice Charter for inclusion that would inspire member states; compendium of existing legal tools and jurisprudence at the level of supra-national and international bodies; minimum and common standard for diversity in public administration; dissemination campaigns to the general public; specific financing instruments

for action in this field; training resources; tools to support good practice; a Council of Europe covenant, with compulsory basic measures to guarantee a standard on integration, based on the respect of basic human rights, and including migrants in irregular situations; and development of a legal basis at European level to ensure clear guidance on what inclusion means and its implementation at national level.

One respondent noted a risk in a guidance instrument in that it lacked any compulsory element. Another respondent noted the need for a benchmarking or index instrument to be compatible with other linked index or benchmarking models (e.g. MIPEX, Intercultural Cities Programme) engaged in by member states. Another respondent noted the complexity and burden that can be inherent in a benchmarking or index instrument that involves reporting from a range of different actors with different responsibilities.

### ***Analysis of Options***

Member state needs in relation to policy clarity that emerge from the survey questionnaire responses establish the imperative for a guidance instrument as a key starting point.

From a policy clarity perspective, these needs include to: define and underpin a shared understanding of the concept of 'inclusion' across stakeholders and levels of governance; establish a coherent and common set of values that might underpin this concept and motivate attention to the goal of inclusion; and reduce fragmentation and provide an agreed frame for the policy and action involved in a comprehensive strategy for inclusion.

Member state needs in relation to policy implementation that emerge from the survey questionnaire responses reinforce the imperative for a benchmarking and index instrument as something that might flow from and build on this guidance instrument.

From a policy implementation perspective, these needs include to: address fragmentation of legislation, policy and institutional endeavour towards the goal of inclusion; strengthen coordination and collaboration between stakeholders and levels of governance behind this goal; stimulate and enable culture change within institutions and across society; and strengthen involvement of targeted groups and their representative associations.

Member state needs in relation to both policy clarity and policy implementation that emerge from the survey questionnaire responses reinforce the value in a peer learning and peer support instrument.

From a policy clarity perspective, these needs include to: stimulate and inform ambition and openness to the change that might be required to develop and operationalise a comprehensive strategy for inclusion. From a policy implementation perspective, these needs include to: strengthen the focus on inclusion and on implementation of comprehensive strategies for inclusion.

A guidance instrument could lay foundations for responding to these needs. An agreed definition and understanding of the concept of 'inclusion', the value-base that motivates such a goal and the concrete implications of this value-base for action on this goal, would then underpin any further instruments. A benchmarking and index instrument could identify and track a policy implementation model for developing and operationalising comprehensive strategies for inclusion. A deliberative approach to the preparation of these instruments could provide opportunities for peer learning and peer support, as well as establishing the elements for a further peer learning and peer support instrument.

#### 4. Basis for a Shared Understanding of the Concept of 'Inclusion'

##### *4.1 Shared Understanding for the Concept*

The findings, set out in Section 3, enable an identification of component elements for defining the concept of 'inclusion' and the vision that it might establish for society and for the development and implementation of public policy. These findings further enable an identification and definition of values that might motivate and inform the achievement of this vision and the development and implementation of comprehensive strategies for inclusion. These values, and their concrete implications, would serve to set criteria for the design and functioning of the institutional infrastructure to develop and drive progress on comprehensive strategies for inclusion.

***The Council of Europe standards, guidelines, recommendations, frameworks, and tools*** which address and touch on the concept of 'inclusion' are seen in Section 3 to offer a rich source when it comes to defining this concept and the values that underpin it.

Component elements evident from this work to inform a definition of the concept of 'inclusion' that predominate in this body of work encompass three strands:

- ensuring equal treatment and non-discrimination, respect for and enabling the exercise and enjoyment of human rights and enjoyment of the various freedoms protected, and achievement of full and effective equality.
- active participation in civic, social, economic, cultural and political life, social cohesion, active citizenship, including representative associations, dialogue, participation in deliberative decision-making and democratic participation.
- valuing diversity, meaningful interaction and living together in diversity, taking account of specific needs that arise from diversity, including at the intersections between groups, accessibility, and respect and understanding.

A wide range of values can be seen to underpin these component elements. Prominent among and shared across these component elements are values of: dignity and respect; diversity, interaction and reciprocal understanding; agency and freedom; and dialogue and empowerment. Other values that also stand out in this regard, include: social justice, pluralism, and openness.

***The respondents to the member state survey questionnaire***, while noting the absence of a broad and explicit definition of the concept of 'inclusion' in legislation and policy, point to component elements of this concept evident in their legislation, policy and practice:

- taking a comprehensive and intersectional approach that includes a wide range of groups;
- taking a global approach that includes a broad range of policy fields that encompass the social, political and economic domains;
- taking a transversal approach that seeks change in the mainstream;
- addressing participation in decision-making where the voice of groups is given weight and where civil society is included; and
- ensuring non-discrimination, protection of individual freedoms, and public awareness.

A strong and common value base is set out by respondents, that motivates a concern with the concept of 'inclusion'. The values that predominate across the responses are: respect and dignity; diversity and accessibility; active participation and equality; self-determination and autonomy; and dialogue and empowerment. Further values noted that are linked to these include: non-discrimination, social



cohesion; democracy, social justice, social harmony, freedom of choice, active citizenship, belonging, mutual understanding, empathy, and compassion.

#### *4.2 Defining the Concept*

**On the basis of these findings**, it is proposed that the concept of ‘inclusion’ is best understood in terms of a vision and underpinning values.

As a starting point for moving towards the defining this vision and these underpinning values, the following text is proposed, based on these findings and reflecting the CDADI mandate:

##### ***Vision***

Inclusion is the full and active participation of the diversity of individuals and groups in society. It is characterised by a valuing of this diversity, enabling meaningful interactions, and ensuring the specific needs of particular groups are addressed, including for those at the intersections of these groups. It is rooted in achieving full and effective equality, enabling the exercise of and enjoyment of human rights and individual freedoms, and eliminating all forms of discrimination, individual and systemic.

##### ***Values***

Respect and dignity: are about equal treatment, empathy and social harmony; and involve the exercise and enjoyment of human rights and the elimination of all forms of discrimination.

Diversity and accessibility: are about living together, experiencing meaningful interactions, a sense of belonging, and mutual understanding; and involve appreciation for and recognition of diversity and its practical implications, and provision for and adaptations to meet the specific needs of particular groups.

Agency and self-determination: are about autonomy, choice, and individual freedoms; and involve a capacity to exercise rights, having real options made available from which to choose, and being informed of these.

Participation and equality: are about social justice, social cohesion, and active citizenship; and involve the elimination of disadvantage, implementation of positive action, and creation of the conditions for outcomes of equality.

Dialogue and empowerment: are about democracy, having a say, and exercising influence; and involve deliberative and participative decision-making processes, transparency, and engagement with representative associations.

#### *4.3 Driving Progress on this Concept*

This vision and values for the concept of ‘inclusion’ would contribute to addressing the challenge of policy implementation in offering criteria for, and to be applied through a policy frame for the content of a comprehensive strategy for inclusion and the design of an institutional infrastructure to develop and drive progress on it.

The key elements of this institutional infrastructure emerge from the mapping and analysis of the work done by the Council of Europe and the responses to the survey questionnaire completed by the member states in relation to this institutional infrastructure, as identified in the findings set out in Section 3.

These findings establish three strands of elements of this institutional infrastructure:

- Legislative/policy initiative that encompass:
  - Legislation: development and implementation of legislation to address discrimination and require action on equality.
  - Policy: development and implementation of policy to address discrimination and action plans advancing equality and targeting the needs of specific groups.
  - Policy systems: mechanisms for mainstreaming a focus on specific groups and their needs by applying an ‘inclusion’ lens to policies and programmes, and a dual approach of mainstreaming and of targeting specific needs of particular groups.
- Institutional initiative that encompass:
  - Institution building: establishment and operation of equality and human rights bodies.
  - Institutional systems: operational systems of public institutions; competence of public institutions in relation to this concept; culture change within organisations; and support for and engagement with civil society organisations.
- Public discourse initiative that encompass:
  - Societal: engaging a shared value base; enabling a societal culture supportive of diversity; and building an awareness informed about diversity.
  - Rights holders: supporting an awareness that enables exercise of rights.

Respondents identify a wide spread of legislation, institutions and policy strategies already in place across the member states, with a contribution to make as part of this institutional infrastructure to develop and drive progress on a comprehensive strategy for inclusion. The policy implementation challenge is not one of building this institutional infrastructure, therefore, but one of strengthening it, enabling it, and aligning it with the vision and value-base for the concept of ‘inclusion’.

## 5. Potential in and Scope of a Council of Europe Instrument on Inclusion

### 5.1 A New Guidance Instrument

**The possible purpose** of a new guidance instrument could be to support policy clarity for member states in defining the concept of ‘inclusion’, based on the above considerations, and to support policy implementation by member states in providing a frame, based on this, for the development and operationalisation of comprehensive strategies for inclusion and for the institutional infrastructure required for this.

This guidance instrument would serve to:

- generate increased visibility for, shared commitment to, and agreed understanding of, the concept of ‘inclusion’, the values that motivate inclusion as a policy goal, and the implications of these values for policy implementation in developing and operationalising comprehensive strategies for inclusion;
- provide a policy implementation frame within which:
  - the policy fields prioritised, and their contribution to the vision of inclusion, in the development and operationalisation of comprehensive strategies for inclusion, could be defined; and
  - the institutional infrastructure established and its functioning to develop and drive progress on comprehensive strategies for inclusion, could be defined.
- enable coherent interaction and coordination across the full range of stakeholders involved at all levels of governance in the advancement of this goal of inclusion; and

- provide a basis for the development of further Council of Europe instruments in relation to inclusion.

**The possible direction** pursued within this instrument could be values-led and values-focused. This would build on the evident commitment across the member states to values that underpin and motivate the concept of ‘inclusion’, and a strong coherence across the survey respondents as to what these values might be. It would reflect the strong values-base, and concern with values, evident in the body of work done by the Council of Europe that addresses or touches on the concept of ‘inclusion’.

A values-led direction would then offer agreed values to motivate achievement of the vision agreed for the concept of ‘inclusion’ and establish criteria for each value to enable an ongoing alignment with these values in framing the policy fields and their contribution to, and the design and functioning of the institutional infrastructure for, comprehensive strategies for inclusion. It would do so by:

- giving agreed definition to the values that underpin and motivate the vision for ‘inclusion’; and
- concretising these values in terms of a set of criteria for use in a policy implementation frame to define the priority policy fields for comprehensive strategies for inclusion and their potential contribution, and the design and functioning of the institutional framework for developing and driving progress on such strategies;

A values-focused direction would further offer defined values and their associated criteria to:

- devise and apply an inclusion lens to legislation and policy-making;
- underpin an institutional culture and practice within organisations that sustains and reflects commitment to, initiative on and effective processes for inclusion; and
- underpin a wider societal culture disposed to inclusion by engaging these values in public discourse.

**The possible contents** of this guidance instrument could be:

#### Introduction

- Origins of this instrument
- Purpose of this instrument

#### Vision for and values underpinning the concept of ‘inclusion’

- Vision for ‘inclusion’
- Values and realising the power of values for strategy and for an institutional infrastructure
- Values and their definition, motivating this vision for ‘inclusion’

#### Values Criteria

- Establish criteria for each value, in relation to its practical implications for the change that is sought, through a comprehensive strategy for inclusion and its associated institutional infrastructure to develop and drive progress on such a strategy; and
- Establish criteria for each value, in relation to its practical implications for the approach to be taken in developing and operationalising a comprehensive strategy for inclusion, and in the design and functioning of its associated institutional infrastructure to develop and drive progress on such a strategy.

Establishing a frame, based on these values criteria, for the policy fields of priority in developing and operationalising a comprehensive strategy for inclusion, and the potential contribution of these fields in achieving this vision of inclusion.

Establishing a frame, based on these values criteria, for the institutional infrastructure, and its functioning in developing, and driving progress on, such a comprehensive strategy for inclusion.

In accordance with the mandate for this feasibility study, this guidance instrument would be designed for use at the national level. However, it is of a nature that allows for general application, with minimal tailoring, at different levels of governance. As such, this guidance instrument would serve to enable shared understandings of and strategic directions for this goal of inclusion across levels of governance and across all stakeholders.

Any tailoring required would be undertaken at the level of application. As such, this tailoring is most likely to focus on the criteria for each value and their application, to ensure their relevance to the competences held at the particular level of governance.

### ***5.2 Building a Peer Learning and Peer Support Instrument***

***A possible approach*** for disseminating the guidance instrument and informing the preparation of a benchmarking and index instrument, could be deliberative in nature. This would align with the value of ‘dialogue and empowerment’ identified as underpinning the concept of ‘inclusion’. It would involve a process of peer engagement, that could serve as a precursor and a source of learning for a future peer learning and peer support instrument in this field.

This deliberative approach would be pursued at European level. It would, ultimately, involve interaction between and stimulate alliances across the full range of stakeholders with a contribution to make to advancing comprehensive strategies for inclusion. In this, it would engage a representation of member states, of different levels of governances, and of civil society. This would best be done through relevant structures already engaging these representatives at a European level.

The guidance instrument will have been prepared prior to any such deliberations. It would have benefited from different forms of deliberation, in: reflecting the significant input made from the member states by the respondents to the survey questionnaire; aligning with the body of work already developed within the Council of Europe that addresses or touches on the concept of ‘inclusion’; being based on the conclusions of this feasibility study; being rooted in the deliberations of ADI-INT and CDADI, and respecting the mandate of CDADI.

As such, this further deliberative approach proposed would focus on: introducing the guidance instrument and its approach; introducing models for benchmarking and indexing and exploring the possible purpose of, directions for, and content of a benchmarking and index instrument; and identifying peer learning and peer support processes to best inform and support implementation of these instruments, thus pointing towards a peer learning and peer support instrument.

The conclusions to each deliberation facilitated with the different stakeholders would be documented. All conclusions would thus be considered in preparing and agreeing the benchmarking and index instrument, and in establishing an approach for a future peer learning and peer support instrument.

### *5.3 Towards a Benchmarking and Index Instrument*

A benchmarking and index instrument would be informed by and founded on the guidance instrument developed and the vision for inclusion, the values motivating this vision, and the criteria established for each value, set out in this guidance. It would provide a focus for use in any peer learning and peer support instrument.

Support for a benchmarking and index instrument was evident among some respondents to the survey questionnaire. However, in this, it was clear that a number of different perspectives on the nature and functioning of such an instrument were at play. This would need to be explored prior to further progressing such an instrument to ensure action is taken based on common and shared understandings of what is needed and what is to be developed.

The possible purpose, direction and contents of a benchmarking and index instrument would require further definition if these are to be established in a manner that serves the concept of 'inclusion' and the needs of member states in their pursuit of this goal of inclusion. As such, the informed deliberative process across the relevant stakeholders, as set out in subsection 5.2, would have an important contribution to make.

Such a process is needed to explore the different models for a benchmarking and index instrument and to pin down the most appropriate purpose, direction, and content for such an instrument. A first step, to enable this to be an informed process of deliberation would be to develop an options paper to clarify the nature and possible approaches involved in a benchmarking and index instrument. The documented deliberations would then shape the approach selected for the benchmarking and index instrument and its contents.

## **6. Final Considerations and Recommendation**

Values provide an innovative and powerful gateway to enabling policy clarity on the concept of 'inclusion', and to policy implementation to operationalise and realise this goal. Values are ideals that motivate a commitment to the concept of 'inclusion'. Values, concretised in the form of criteria, give direction to and shape policy priorities pursued and the approach to their pursuit. Vision and values can thus inform the identification of priority policy fields to be developed and operationalised in, and the design and functioning of an institutional infrastructure for, a comprehensive strategy for inclusion.

The respondents from the member states to the survey questionnaire reflected a strong emphasis on values and a coherence as to the values underpinning the concept of 'inclusion'. The work of the Council of Europe that addresses or touches on the goal of inclusion is evidently values-based and equally coherently so.

This feasibility study recommends to the CDADI that it would:

1. progress the development of a guidance instrument to:
  - ⇒ provide policy clarity on the concept of 'inclusion' by defining:
    - a vision for inclusion;
    - the values that motivate this policy goal; and
    - criteria for each of these values to provide a policy implementation frame for the development and operationalisation of a comprehensive strategy for inclusion and its associated institutional infrastructure;

- ⇒ contribute to policy implementation by identifying
  - the policy fields to be prioritised in the development and operationalisation of a comprehensive strategy for inclusion, and the potential contribution of each policy field in achieving this vision of inclusion; and
  - the institutional infrastructure and its functioning to develop and drive progress on such a comprehensive strategy for inclusion.
- 2. advance a deliberative approach at European level to:
  - ⇒ introduce the guidance instrument;
  - ⇒ identify the peer learning and peer support processes that might best form part of a peer learning and peer support instrument; and
  - ⇒ explore the parameters for and concretise the methodology and content for a benchmarking and index instrument, based on an options paper prepared on this topic, that would provide a basis for peer learning and peer support;
- 3. develop a peer learning and peer support instrument, based on the conclusions of the deliberative process engaged in, that would inform and support implementation of the guidance instrument and use of the benchmarking and index instrument; and
- 4. progress the development of a benchmarking and index instrument based on the conclusions of the deliberative process engaged in, with the guidance instrument serving as a foundation.

## Appendix: Questionnaire

### Introduction

The Committee of Experts on Intercultural Integration of Migrants (ADI-INT) has been tasked, by the Steering Committee on Anti-discrimination, Diversity and Inclusion (CDADI), to assess the feasibility of a new instrument on comprehensive strategies for inclusion. This would reflect CDADI's mandate which covers the grounds of "race"<sup>72</sup>, ethnic/national origin, colour, citizenship, religion, language, sexual orientation and gender identity, and the intersections between these grounds and with grounds such as gender and disability.

Such an instrument would serve to: underpin Council of Europe member states' shared commitment<sup>73</sup> to comprehensive and intersectional<sup>74</sup> inclusion; increase the visibility for, and understanding of, this goal and the values that underpin it; stimulate interaction and alliances across the full range of stakeholders involved in its achievement; and enable and inform further progress towards its realisation.

The feasibility study aims to:

- establish the basis for a common understanding of inclusion, the values that underpin this goal, and the strategic directions required for its pursuit, under an overarching human rights framework;
- establish the specific needs that a new instrument, on comprehensive and intersectional strategies for inclusion, could usefully address; and
- inform any decision on what kind of instrument would best respond to such needs.

In doing so, the study will reflect the overall goal of the Council of Europe of achieving greater unity, in terms of coherence and effectiveness, among member states in progressing inclusion in diverse societies.

The rationale inspiring and framing this feasibility study is twofold:

- to enable **policy clarity** on the concept and goal of inclusion in diverse societies, and the values underpinning this goal, given the range of Council of Europe standards, guidelines, recommendations, frameworks, and tools which address and touch on this issue; and
- to inform **policy implementation** on the issue of inclusion in diverse societies, given the need: for an adequate institutional infrastructure of legislation, institutions, strategies, and funding

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<sup>72</sup> As noted in the Recommendation on combating hate speech ([CM/Rec \(2022\)16](#)), the term 'race' is rejected on the basis that all human beings belong to the same species, but is used here solely "to ensure that those persons who are generally and erroneously perceived as 'belonging to another race' are not excluded" from consideration in this initiative.

<sup>73</sup> Many Council of Europe standards and indeed the 2020/2025 Council of Europe Strategic Framework aim to promote equality, fight against discrimination, and progress on inclusion. See for instance Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).

<sup>74</sup> An intersectional approach ensures that the diversity within any group is taken into account, in respecting and responding to the intersecting identities/characteristics that people hold, and that all are included.

streams, to progress this goal; to move beyond reactive approaches to strategic proactive initiatives; and to realise the benefits from a comprehensive, coherent and consistent approach to inclusion across all policy fields and addressing all relevant groups.

The feasibility study will consider any options for a new instrument that are raised by survey respondents. Within this, the feasibility study will ensure consideration of:

- a **guidance instrument** on the goal of comprehensive and intersectional inclusion, and on the key elements required for an effective institutional infrastructure to progress this goal;
- a **benchmarking or index instrument** to establish agreed markers to assess the quality and state of development of the key elements of such an institutional infrastructure for comprehensive and intersectional inclusion, and the indicators of success required in relation to this goal; and
- a **peer learning/support instrument** that would stimulate dialogue, share learning, disseminate knowledge, and mobilise mutual support on this goal.

This questionnaire seeks information from the member states on: perspectives on the concept of inclusion and its underpinning values; challenges in progressing comprehensive and intersectional strategies for inclusion; and the type of instrument, at a European level, that might best serve their needs in this field.

The replies to this questionnaire will inform a report from the feasibility study, that will establish the basis for a shared understanding of the goal of comprehensive and intersectional inclusion and its underpinning values; the potential in and scope of a possible new Council of Europe instrument on comprehensive strategies for inclusion; and the main elements of such an instrument along with the main elements required in its elaboration.

***Member states are encouraged to consult with the other levels of governance and their representatives in monitoring bodies and relevant Committees, as much as possible, in completing this questionnaire. They are kindly requested to address the Secretariat their reply in one consolidated document to [adi-int@coe.int](mailto:adi-int@coe.int) , marked ADI-INT/FEASIBILITY STUDY, by 27 January 2023.***

## Questionnaire

**Name of the member state:**

**Name of the respondent:**

**Job title:**

**Organisation/entity:**

**E-mail address:**

**Phone number:**

## Defining the Goal of Comprehensive Inclusion



1. What does your country consider to be the key components to be included in a definition of comprehensive inclusion?

2. What are the core values that could underpin the goal of comprehensive inclusion (e.g. equality, reciprocity, diversity advantage, active participation, respect, dignity, etc.)?

3. As appropriate, how is the goal of comprehensive inclusion defined in policy or legislation in your country, at any level of governance?

**The Challenge of Clarity of Policy Objectives**

4. What are the challenges that your country faces in defining with clarity the goal of comprehensive inclusion, and what are the needs of your country to achieve clarity?

**The Challenge of Institutional Infrastructure**

5. What are the key elements of institutional infrastructure (legislation, institutions, strategies, and funding streams) in your country that contribute to effectively progressing the goal of comprehensive inclusion?

<b>Institutional Infrastructure</b>	<b>In Place?</b>	<b>Information on the nature of this element</b>
Legislation		
Institutions		
Strategies		
Funding Streams		
Other		

6. What are the challenges faced by your country in the development of an institutional infrastructure aiming to implement policies that contribute to advancing the goal of comprehensive inclusion?

**Multilevel Governance**

7. Please describe processes of multilevel governance, or channels of communication with other levels of government, that are in place to contribute to the goal of comprehensive inclusion.

8. What are the challenges encountered with respect to effective coordination and cooperation between all levels of government?

**A New Instrument**

9. Which instrument or instruments would you like to see developed at European level for use at the national level, in order to best respond to the needs of your country in achieving the goal of comprehensive inclusion? Please also provide reasons for your suggestion(s).

Tool	Commentary on Rationale for Choice
Guidelines	
Benchmarking or Index	
Peer learning/ support	
Other instrument (please specify)	

