

Memorandum on the human rights of Roma in Finland

Introduction

1. The Council of Europe Commissioner for Human Rights (hereinafter the Commissioner) carried out a visit to Finland from 23 to 26 September 2024. The visit was part of a series of country visits taking place in the context of the Commissioner's priority work on the human rights of Roma and Travellers¹ across the Council of Europe area. It also provided the Commissioner with an opportunity to follow up on his dialogue with the authorities regarding the human rights situation for migrants and asylum seekers at the eastern land border with Russia.²
2. According to his mandate, the Commissioner fosters effective observance of human rights; assists member states in the implementation of Council of Europe human rights instruments, in particular the Convention; identifies possible shortcomings in law and practice concerning human rights; and provides advice and information regarding the protection of human rights across the region.³
3. This memorandum contains the Commissioner's key findings and recommendations from the visit in relation to selected human rights issues faced by Roma in Finland, particularly regarding their inclusion, representation and participation, drawing on his engagement with the authorities, members of the Roma communities, as well as civil society and other actors.
4. These recommendations are not exhaustive and should be considered in conjunction with recommendations by other Council of Europe and other international human rights bodies,⁴ as well as the guidance provided by national human rights structures.
5. During the visit, the Commissioner met with the Minister of Social Affairs and Health Kaisa Juuso, the State Secretary to the Minister for Foreign Affairs and Minister of Defence Pasi Rajala, the State Secretary at the Prime Minister's Office Risto Artjoki, the Interim Permanent Secretary of the Ministry of Justice Antti Leinonen, the Permanent Secretary of the Ministry of the Interior Kirsi Pimiä, the Non-Discrimination Ombudsman Kristina Stenman, and members of the National Advisory Board on Romani Affairs. The Commissioner had extensive meetings with Roma representatives, including Roma women, young Roma and Roma coming from Romania and Bulgaria, who shared with him their lived experiences and concerns. He also visited the Roma War Memorial in Hietaniemi cemetery and the Deaconess Foundation, who run the Hirundo drop-in centre for mobile Roma. The Commissioner further held an exchange with the Finnish Human Rights' Centre's Human Rights Delegation on a range of contemporary human rights issues.

¹ The term "Roma and Travellers" is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of Roma and/or Travellers.

² See Council of Europe Commissioner for Human Rights, End-of visit [statement](#): Finland should strengthen the protection of Roma and migrants (September 2024).

³ [Resolution \(99\)50](#) of the Council of Europe Commissioner for Human Rights, adopted by the Committee of Ministers on 7 May 1999.

⁴ See, among others, European Commission against Racism and Intolerance (ECRI), [Fifth report on Finland \(adopted 18 June 2019\)](#), September 2019 (sixth monitoring cycle underway); Advisory Committee on the Framework Convention for the Protection of National Minorities (ACFC), [Fifth opinion on Finland \(adopted 27 June 2019\)](#), October 2019 (sixth monitoring cycle underway).

6. The Commissioner thanks the Finnish authorities in Strasbourg and in Finland for their assistance in organising this visit. He is also grateful to the members of the Roma communities, civil society organisations and other interlocutors for their insights.
7. Section I of this memorandum provides an overview of general developments in Finland as they relate to the human rights of Roma. Section II outlines the main barriers to the inclusion of Roma communities within society, including antigypsyism and discrimination. Section III pays particular attention to the needs of and challenges faced by Roma women, youth and Roma from other EU member states. Section IV examines representation of Roma and their participation in different areas of life, notably their participation in policy-making and implementation, and representation of Roma, their culture and history.⁵
8. The Commissioner looks forward to continuing his dialogue with the Finnish authorities on the issues addressed in this memorandum.

I. General situation

9. The Commissioner acknowledges Finland's efforts to promote the human rights of Roma and the initiatives put in place to this end, which may serve as a source of inspiration for other member states. Among other things, he notes the third iteration of Finland's National Roma Policy (hereinafter ROMPO3), which focuses on equality, inclusion and participation, as well as elimination of discrimination by tackling antigypsyism.⁶ In conversations with the Commissioner, civil society spoke positively about ROMPO3, noting in particular that it had strengthened monitoring and evaluation processes compared to the first and second Plans. The Commissioner was informed, however, that there is no earmarked funding for the implementation of ROMPO3, which is left in part to the voluntary sector.
10. The Commissioner notes that a new Action Plan to combat racism and promote equality (hereinafter Equality Action Plan), which specifically includes Roma, was also launched in September 2024, when his visit took place.⁷ The implementation of the Plan will be overseen by the Office of the Prime Minister, with cross-ministerial cooperation.
11. Nevertheless, interlocutors expressed concerns about the prevalence of antigypsyism and intolerance in the country. They emphasised that antigypsyism was deeply embedded in Finnish society and should be understood within the broader climate of racism and intolerance in Finland, which appeared to be increasingly visible. Hate speech, including discriminatory speech, was also highlighted as a concern, which appeared to be worsening. Actors recounted how social media was frequently used to convey and spread hate speech and inflammatory remarks, particularly targeting young Roma.

II. Roma inclusion in society

12. In discussions with the Commissioner, Finnish Roma groups and civil society organisations broadly indicated that the general situation for Roma had improved over the past decades, including in the field of education. They noted that many Finnish Roma live in adequate and desegregated housing and can generally access healthcare and social services. The Commissioner also notes positively that tackling antigypsyism is a cross-cutting objective within the ROMPO3, and that the recent Equality Action Plan specifically mentions antigypsyism and measures to combat harassment and violence targeting Roma. Regarding research and data collection involving Roma, the Commissioner welcomes that the ROMPO3 includes practical solutions to overcoming longstanding

⁵ This memorandum was finalised on 31 January 2025. All online documents quoted in the memorandum were last accessed on that date.

⁶ Ministry of Social Affairs and Health, [Finland's National Roma Policy \(ROMPO\) 2023-2030](#).

⁷ Finnish Government, [A New Boost for Equality in Finland – Government action plan to combat racism and promote equality](#), September 2024.

challenges relating to data collection to inform policy-making, and the production of ethical guidelines to this end.

13. Nevertheless, interlocutors underlined that instances of discrimination are commonplace,⁸ and often not even recognised as such. The Commissioner was informed that Roma experience discrimination in all areas of life, including everyday situations such as the provision of private services. Typical instances include Roma being refused services in restaurants or shops, also on the basis of their traditional clothing,⁹ or being offered those services on limited or different terms compared to other customers, such as a demand for advance payment.
14. As regards access to the housing market, interlocutors also underlined instances of landlords refusing to rent apartments to Roma, or neighbours of Roma family tenants, not wishing to live next to Roma, making unjustified complaints in an attempt to make them leave. The Commissioner further heard of the discrimination faced by Roma in the field of employment, including difficulty in securing practical or training placements and interviews for job postings. Interlocutors recounted how unemployment may lead Roma to feel further marginalised from society.
15. Such an environment can prevent Roma from expressing their identity freely and safely. In this respect, the Commissioner heard accounts of Roma changing surnames or avoiding wearing their traditional clothes in certain contexts, in an effort to avoid discrimination, as well as instances of Roma experiencing shame with regard to their identity.
16. Furthermore, the Commissioner was informed of instances of ethnic profiling of Roma by the police, and in particular the KURI1-operation within the Helsinki Police Department. In 2021, it was revealed that police had monitored members of the Roma community and kept records of their movements notably between 2013 and 2015. Thousands of entries had been made under the operation, involving hundreds of individuals. The Office of the Non-Discrimination Ombudsman assessed the case, determining that the operation had been discriminatory to Roma, and issuing two sets of recommendations addressed to relevant actors (2021 and 2024).¹⁰ The authorities acknowledged that the operation had been problematic, and informed of a number of measures being taken to rectify the situation, including police training. Ethnic profiling of Roma by private security guards was also raised as a concern.
17. More broadly, the Commissioner notes a reported level of distrust in the police by Roma communities, which may result in underreporting of violations they face. This, combined with other factors such as a lack of official, comprehensive ethnicity data, may result in available information providing only a partial picture of the human rights situation for Roma in the country.

Recommendations:

18. The Commissioner recommends that the Finnish authorities ensure the effective implementation and adequate funding of the National Roma Policy (ROMPO3), in close cooperation with all relevant actors, including Roma communities and civil society organisations.
19. The authorities should combat all forms of antigypsyism, discrimination and intolerance, including through awareness-raising and education initiatives, and ensure effective, harmonised implementation of all relevant measures, including those set out in the new Action Plan to combat racism and promote equality.

⁸ According to the Eurobarometer 2023 results, approximately 72 of Finnish respondents felt that Roma were the most common targets of discrimination in the country, notably ahead of discrimination on the basis of ethnic background or skin colour – see [Discrimination in the European Union - Eurobarometer Survey](#), December 2023.

⁹ See e.g. YLE, [A Roma woman's 5-year-old son rant out of water at Kotipizza: "Mom, is there something wrong with me?"](#), 17 August 2024 (in Finnish). See also below, subsection II on "Roma Women".

¹⁰ Non Discrimination Ombudsman's [recommendations](#) to the Helsinki Police Department regarding discriminatory Kuri1 operation against Roma, 14 May 2024; Non-Discrimination Ombudsman, [Opinion and recommendations](#) regarding the prevention and information-gather operation aimed at Roma by the Helsinki Police Department, 21 December 2021 (in Finnish).

20. The Commissioner recommends that the authorities prevent and combat ethnic profiling and improve relations between the police and Roma, including through full consideration of the relevant recommendations provided by the Non-Discrimination Ombudsman.

III. The situation of Roma women, youth and Roma from other EU member states

21. Throughout the Commissioner's visit, interlocutors underlined the diversity in needs, identities and challenges within the Roma population in Finland, including those of Roma women, older Roma and youth, Roma with disabilities and Roma from other EU member states, among others. The Commissioner notes positively that the ROMPO3 recognises the need to tackle intersectional discrimination, as well as the specific needs of certain groups. It also takes into account different age groups.
22. The Commissioner was further informed of a number of projects and support services run by Roma civil society organisations and focusing on the specific needs of particular groups of Roma, including youth (through sporting and other activities), women (including women's health literacy, supporting women in employment, studies or to gain housing) and those currently or previously serving prison sentences.
23. Particular challenges nevertheless remain in securing full inclusion within Finnish society of all Roma. In the broader context of ongoing economic difficulties and extensive spending cuts in Finland, moreover, numerous actors relayed their concerns about the potential cumulative effect that this may have on the most marginalised in society, including on some members of the Roma communities.

Roma women

24. The Commissioner heard of the evolving role and status of women within Roma communities. Actors also noted that more Roma women and girls were receiving education and entering the workplace. However, it was emphasised that some may still face intergenerational poverty, combined with multiple and intersecting forms of discrimination, in particular on the ground of gender, as well as gender-based violence, stereotypes and prejudice.
25. In this respect, the Commissioner also noted that Roma women were, in some cases, more susceptible to discrimination in everyday situations due to the wearing of traditional clothing. In this connection, he was informed of recent legal proceedings involving two Roma hairdressers, whose contract of employment had been terminated due to them wearing traditional Roma skirts at work. The courts determined that the termination of employment had been based on the women's ethnic origin and was discriminatory.¹¹

Roma youth

26. The Commissioner notes positively that the new Equality Action Plan specifically recognises the issue of hate speech and harassment targeting Roma children and young people. Meanwhile, he was informed that young Roma were particularly exposed to hate and bias-motivated speech in online spaces.
27. Interlocutors also recounted that part of Roma youth felt particularly disaffected and alienated from society. A particular risk of school drop-out, drug abuse and mental health issues among this group was also mentioned. It was pointed out that such behaviour often stemmed from a sense of hopelessness for future prospects, in an environment of persistent discrimination and antigypsyism, including in areas such as education and employment.

¹¹ The Pirkanmaa District Court, 29 March 2023, decisions L 758/2022/458 and L 758/2022/455 – upheld by Turku Court of Appeal, 16 January 2025, judgements 31 and 32, Case numbers S 23/729 and S 23/730.

28. The Commissioner heard that bullying was often a problem in schools.¹² This led some children to try to hide their Roma background. He also heard of several examples of anti-Roma attitudes and behaviours displayed by school staff, such as school counsellors discouraging Roma children from pursuing higher education or higher-paid professions.

Roma from other EU member states

29. During the visit, the distinct situation of migrant Roma, mostly coming from eastern European countries, was brought to the Commissioner's attention. The Commissioner acknowledges that the ROMPO3 mentions, for the first time, the situation of migrant Roma in the country. He also appreciates the authorities' open acknowledgment that efforts need to be stepped up in order to better support Roma from other EU member states. He was further told of their ongoing dialogue with the Deaconess Foundation, one of the few organisations working with Roma from other EU member states, in this regard.

30. The Commissioner had the opportunity to meet with a number of Roma from other EU member states. He learned about the migrant Roma community in Pietarsaari, a community of around 200 Roma mostly from Bulgaria and Romania, most of whom have permanent residency and are thereby fully included in the social system. He was informed that, while this community is in a less precarious position, compared to Roma from EU member states living in other parts of Finland, discrimination and prejudice against members is nevertheless present.

31. On the other hand, several Roma women from Romania recounted to the Commissioner that they had migrated to Finland to find work and send money home to support their children. Their testimonies indicated that they face near-constant prejudice and hostility while going about their daily lives. Some spoke of being humiliated by medical professionals when trying to access healthcare, or being treated poorly by guards in shops and in other areas. Despite many having come to Finland over a decade ago, finding any kind of employment was extremely challenging, and many of the women had spent significant periods of time living and begging on the streets.

32. In addition to the high levels of prejudice faced, the Commissioner was informed of several practical barriers to finding support and employment. Roma from other EU member states often lack knowledge about their rights in Finland and on how to navigate social security and other systems in the country. They also often do not speak the language and have lower levels of education. In this respect, the Commissioner notes that a limited number of projects and initiatives provide support to migrant Roma, including through provision of basic services, improving literacy or linguistic skills, and assistance in finding employment. However, this work, primarily provided by the Deaconess Foundation, was not sufficient to cover all needs.

33. The Commissioner was further informed about the government's ongoing implementation of austerity measures. Interlocutors specifically raised concern at a bill to cut access to non-emergency healthcare and social services for undocumented people,¹³ which would impact also on undocumented Roma, including those coming from other EU member states.

Recommendations:

34. The Commissioner recommends that the Finnish authorities ensure that, in the implementation of all relevant policies and measures, the needs of Roma women and youth are adequately taken into account as well as the multiple and intersectional forms of discrimination they may face.

35. The authorities should address all barriers faced by Roma from other EU member states undermining adequate access to social rights, including by reconsidering any legislative proposals which would hinder this access.

¹² See also Elina Weckström et al, Publications of the Ombudsman for Children in Finland - "[I get the feeling that these people really accept who I am](#)": [The well-being of Roma children and the realisation of their rights](#), 2023, chapter 4.4.3 "Bullying, discrimination and racism".

¹³ Ministry of Social Affairs and Health, Project number [STM054:00/2023](#) on the Preparation of legislation on the health care rights of persons residing in Finland in violation of immigration legislation.

36. The Commissioner recommends that the authorities support and work in close cooperation with civil society to enhance assistance to Roma groups in vulnerable situations.
37. The authorities should ensure that ongoing budgetary cuts do not undermine the protection of the human rights of most vulnerable groups in society, including members of the Roma communities.

IV. Participation and representation

Participation of Roma in policy-making and implementation

38. The Commissioner noted a number of positive and well-established practices in Finland, with regard to participation of Roma in policy-making and implementation. Interlocutors spoke positively of the consultative process which had led to ROMPO3, which had taken on board feedback in this regard from previous iterations of the policy. The Commissioner also noted positively the long-standing National Advisory Board on Romani Affairs (RONK, hereinafter “the National Board”), which has 50% Roma representation as well as representation of all ministries. He was also informed about four regional Boards, as well as Roma working groups within a certain number of municipalities.
39. At the same time, some interlocutors indicated that measures could be taken to further strengthen the National Board. This included the possibility of reinforced human and other resources, greater decision-making powers, including the power to make direct legislative and other proposals, as well as greater independence and more diverse representation of Roma and Roma civil society organisations within its membership, to fully reflect the concerns of local communities.
40. The Commissioner observed that civil society working with and for Roma in Finland is strong, well-organised and targeted in its work. He was informed that Roma civil society awareness and capacities have increased in recent times, and that they had in past years had access to a pool of funding, including through programmes such as STEA (Funding Centre for Social Welfare and Health Organisations). He nevertheless heard of concerns about the future availability of resources for implementation of their work, in the light of ongoing cuts to the voluntary sector. The need to ensure sustainable funding for the future operation of Roma civil society was highlighted also given the role of the voluntary sector in the successful implementation of ROMPO3.
41. The Commissioner notes that a recently-adopted resolution on the development of civic space aims to support independent fund-raising activities by civil society organisations, including through the simplification of administrative processes, and by providing information on how civil society can better take advantage of EU-level funding.¹⁴ At the same time, the Commissioner was informed that not all Roma civil society organisations would be eligible to apply for EU funding, on account of their size. The Commissioner was further informed that Roma would be supported through the budget for the new Equality Action Plan, although the scope and focus of Roma-related issues in the Plan is narrower. The Commissioner also underlines the importance of ensuring that ongoing budgetary decisions concerning the voluntary sector take into account the need to protect the most vulnerable in society from suffering disproportionate impact.
42. Roma civil society also relayed to the Commissioner the value of the Roma Civil Monitor (RCM) project,¹⁵ whose implementation is led by the Democracy Institute of the Central European University, which works with national civil society organisations to monitor, assess, and report on the implementation of national Roma strategic frameworks and policies. The project provides tools and an academic framework for producing Roma-based research, and was considered an important pathway for Roma civil society to participate in policy monitoring processes. Actors, however, expressed concern over the uncertain future of the project beyond 2025.

¹⁴ See Ministry of Justice, [CSO Strategy 2023-2027: Government resolution on the development of civic space](#), July 2024.

¹⁵ [RCM 2021-2025 project](#) on *Preparatory action – Roma Civil Monitoring: Strengthening capacity and involvement of Roma and pro-Roma civil society in policy monitoring and review*.

Representation of Roma, their history and culture

43. During his visit, the role and diversity of Roma culture in Finland was impressed upon the Commissioner, as well as communities' sense of the need to preserve and promote it. The Commissioner was pleased to hear of numerous initiatives and investments by Roma and Roma civil society to promote learning and remembrance of their culture and history. In this respect, the Commissioner met with members of the Board of the Museum of Finnish Roma Culture, which has held workshops and exhibitions on aspects of Roma culture and history, mostly aimed at young Roma. The Commissioner also took the opportunity to visit the Roma War Memorial in Hietaniemi Cemetery (Helsinki), which commemorates Roma who died in the wars of 1939-1945. The Commissioner heard of its significance to the Roma community and noted its importance in memorialising the contributions that Finnish Roma have made to the country.
44. The Commissioner notes a number of important proposed actions within ROMPO3 to support Romani language, Roma culture and art, including the establishment of a centre for Roma culture aimed at all ages, and the drawing up of a national programme for the promotion of Roma art and culture. At governmental level, the Commissioner was also informed of several ongoing measures being taken to increase education and awareness, such as a pilot programme on distance learning of the Romani language. However, certain actors indicated that many more resources and intensive investment were required, in order to ensure effective Romani language and cultural teaching.
45. Despite such initiatives, moreover, there was a reported low level of awareness among the broader Finnish public of Finnish Roma, their culture and history. It was reported, for example, that Finnish school textbooks hardly – if at all – mentioned Roma in the context of the Holocaust.¹⁶
46. The representation of Roma in the media was also raised as an important element. The Commissioner draws attention to the positive role that the media can play – including by raising visibility on discrimination faced by Roma, but also by promoting ethical reporting around Roma, their culture and history. In this respect, the National Board reported having established relations with media, and noted that seminars and European-wide trainings on how to responsibly portray Roma had previously been organised. The importance of having Roma themselves working within media was also underlined. In that regard, the Commissioner was pleased to learn of the initiative for a Finnish, Roma-run¹⁷ news website. On the other hand, interlocutors underlined that media reports on Roma could sometimes fuel further prejudice and incidents of antigypsyism.

Recommendations:

47. The Commissioner recommends that the Finnish authorities ensure the effective participation of Roma communities, as well as that of relevant civil society organisations, in the design, implementation, monitoring, and evaluation of all measures under the ROMPO3.
48. The authorities should enhance representation of Roma, in all their diversity, within the relevant advisory bodies working on the human rights of Roma, and ensure effective functioning of and coordination between these bodies at national, regional and local levels.
49. The Commissioner recommends that the authorities ensure an enabling environment for the work of Roma civil society, including through availability of long-term, sustainable and accessible funding.
50. The authorities should improve awareness and visibility of Roma history and culture, including through effective implementation of the relevant initiatives within the ROMPO3, and continuing and stepping up efforts to promote ethical media reporting.

¹⁶ See Council of Europe material on Roma history, including in the context of the Holocaust: [Roma history factsheets - Roma and Travellers](#).

¹⁷ See, <https://romanipress.com/>.