



**Opportunities of the Finnish Roma and  
other actors to influence  
regional and European Roma policy**

7 July 2021

Marko Stenroos, Kati Jääskeläinen and Miriam Attias

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## Abstract

The present report was composed with three objectives in mind: exploring the possibilities for Finnish Roma and entities representing Roma to influence European Roma policy, examining the potential for Nordic and Baltic<sup>1</sup> co-operation in order to promote Roma rights, and putting forward recommendations to support Finland's actions and the contributions of Roma in the formulation of a European Roma policy.

The report has been prepared between 22 February and 7 July 2021. The report was authored by Marko Stenroos, D.Soc.Sc.; Kati Jääskeläinen, M.A.; and Miriam Attias, M.Ed., M.Soc.Sc. The authors interviewed a total of 34 authorities and Roma representatives from Finland, the Nordic countries and the Baltic states, as well as representatives of European institutions and Roma organisations for the report. In addition, two dialogue meetings were organised during the data collection phase involving Finnish as well as Nordic and Baltic authorities and Roma representatives. A third dialogue meeting was organised during the finalisation phase, with the aim of enabling those involved in the earlier stages of the process to learn how their contributions were utilised and also have a say on the report content at its finalisation stage. The report was commissioned by the Ministry for Foreign Affairs, and the views and recommendations expressed in the report do not necessarily reflect those of the Ministry for Foreign Affairs.

The making and implementation of Roma policy are necessarily interlinked with the general local and European political climate and the current economic situation. The fundamental aim of Roma policy is to promote the non-discrimination of Roma. A particular priority is the involvement of Roma in the formulating, implementing and evaluating policy programmes and strategies affecting them.

The 2030 Agenda for Sustainable Development has set the objective of making decision-making inclusive, participatory and representative at all levels<sup>2</sup>. According to the Office of the UN High Commissioner for Human Rights, meaningful participation requires a long-term commitment by public authorities, together with their genuine political will, an emphasis on agency, and a shift in mindset regarding the way of doing things<sup>3</sup>. One important element in meaningful participation is the feedback to participants on the concrete impact of their contribution.

The general European political climate has a bearing on the position of Roma. From the point of view of human rights, international developments in recent years have been largely negative. Attempts have been made to undermine the efforts of human rights and minority rights actors, which is reflected in the level of involvement of Roma in the decision-making processes affecting them<sup>4</sup>. Moreover, the COVID-19 pandemic has exposed the extreme vulnerability of the discriminated Roma communities to adverse health effects and their socioeconomic implications. At the same time, the Member States of the European Union have adopted a 10-year strategic framework by which they are committed to strengthening equality, inclusion and participation of Roma. According to the programme, there is, within the context of rising populism and racism

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<sup>1</sup> Finland, Sweden, Norway, Denmark, Estonia, Latvia and Lithuania.

<sup>2</sup> Goal 16.7, <https://kestavakehitys.fi/en/agenda2030/goal-16>.

<sup>3</sup> The UN High Commissioner for Human Rights guidelines make recommendations on safeguarding the right to participate in its various forms and at different levels and stages of decision-making. Office of the High Commissioner for Human Rights, Guidelines for States on the effective implementation of the right to participate in public affairs, 2018, [https://www.ohchr.org/Documents/Issues/PublicAffairs/GuidelinesRightParticipatePublicAffairs\\_web.pdf](https://www.ohchr.org/Documents/Issues/PublicAffairs/GuidelinesRightParticipatePublicAffairs_web.pdf).

<sup>4</sup> See, e.g., OSCE/ODIHR: Third Status Report. Implementation of the Action Plan on Improving the Situation of Roma and Sinti within the OSCE Area. For Roma, With Roma, 2018, <https://www.osce.org/files/f/documents/6/8/406127.pdf>. The right of every citizen to take part in the conduct of public affairs, either directly or indirectly, is enshrined in the International Covenant on Civil and Political Rights (ICCPR) (Article 25). The UN Human Rights Committee has stated that the conduct of public affairs is a broad concept which relates to various forms of the exercise of political power and that it covers all aspects of public administration, including the formulation and implementation of policy at all levels from local to international. UN Human Rights Committee, CCPR General Comment No. 25: Article 25, CCPR/C/21/Rev.1/Add.7, 1996, <https://digitallibrary.un.org/record/221930>.

within the Union, a need to focus on combating and preventing discrimination, including the tackling of antigypsyism. The Council of Europe, which includes 47 member States, also adopted a Strategic Action Plan for Roma and Traveller Inclusion (2020–2025). The Action Plan aims to combat antigypsyism and discrimination and support real and effective equality, support democratic participation and promote public trust and accountability, and support access to inclusive quality education and training.

Finland implements the European Roma policy as part of its human rights policy. With regard to human rights, Finland has adopted a long-term policy that spans government terms. In addition, Finland's activities have been guided by the focal areas and measures of Finland's European policy on Roma laid down in Finland's National Roma Policy 2018–2022 (ROMPO2)<sup>5</sup> as well as by the Ministry for Foreign Affairs' 2011 handbook Objectives of Finland for Advancing the European Policy on Roma<sup>6</sup>, the main objective of which is to support participation of Roma in decision-making concerning them. Rather than to assess the success of the measures laid out in ROMPO, the role of the present report is to discuss the relevance and effectiveness of participation and put forward possible development measures. Furthermore, owing to the limited scope of the report, the status of mobile EU citizens is also excluded from the discussion, though safeguarding and improving the rights of mobile EU citizens is of great importance. The present report also takes a position on the equality of the mobile Roma population by expressing their need to be taken into account as part of country-specific Roma policy measures. The report does not cover all Baltic Sea countries, but it does make a recommendation that a more extensive study be compiled at a later date.

The present report examines the potential for co-operation in the Nordic and Baltic countries for the development of Roma policy at both the regional and European level. Particular attention will be paid to the participation of Roma in Roma policy-making and facilitating co-operation between the various actors. This geographic limitation is motivated by the anticipation that stronger regional co-operation could make the voice of the Roma population in the Nordic and Baltic countries more pronounced in the European fora. Both the Nordic and the Baltic countries have a relatively small Roma population compared to many other European countries, such as Romania, Bulgaria and Hungary. The smallness of the Roma population is often used as a justification for the limited scope of measures taken. However, from the point of view of human rights and minority rights, the size of the population should not play a role in the enforcement of those rights.

The report finds that the participation of Roma in national Roma policy programmes and in the European Roma policy is relatively limited, both in terms of numbers and scope. It is essential for the effectiveness of Roma policy that the Roma population, Roma organisations and politically active Roma should be involved in the political debate and decision-making that concerns them. It is also essential that actors in the field of Roma policy have the support of the wider Roma population, which can be built through more intensive communication and co-operation. For the purpose of more transparent participation of the Roma population in policymaking, the processes must also be transparent as well as to ensure the involvement of Roma themselves in the planning of the content and implementation of Roma policy. Moreover, Roma should be involved in monitoring and evaluating Roma policy measures and their impact. This requires, on the one hand, the erosion of Roma elitism<sup>7</sup> through, for example, more extensive co-operation with Roma liaison activities, and, on the other hand, the readiness of officials operating in the field of Roma policymaking to encounter people from linguistically, socially, and culturally different backgrounds – those who will be affected by such political measures. Interviews show that mistrust remains between the various actors in the field of Roma

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<sup>5</sup> [Finland's National Roma Policy \(ROMPO\) 2018-2022](#), Publications of the Ministry of Social Affairs and Health 3/2018, Ministry of Social Affairs and Health, Helsinki, 2018.

<sup>6</sup> [The Objectives of Finland for Advancing the European Policy on Roma: Finland's Handbook on the European Policy on Roma](#), Working Group Report, Publications of the Ministry for Foreign Affairs 2/2011.

<sup>7</sup> Like any community, Roma communities have multiple social layers. People who are active in various Roma organisations and other activities related to the implementation of Roma policy are generally more highly-educated and of a higher socioeconomic standing than average. (Stenroos, 2020; Voiculescu, 2019).

policymaking. In the implementation of Roma policy, however, insufficient advantage has been taken of the various methods of participation that could increase efficiency and effectiveness of the processes. Instead, the focus has remained on the traditional methods of hearings and consultation. Through these traditional methods, the involvement of the Roma community has been inadequate<sup>8</sup>, with the possible outcome that Roma policy programmes fail to sufficiently reflect the situations and challenges faced by Roma and therefore do not meet their expectations: the goal must be to achieve an agenda subscribed to by all parties. It would also appear that research into Roma policies and participation is not being used sufficiently and consistently in Roma policymaking. The challenges in the social status of Roma are multi-dimensional, spanning several societal sectors. As a generalisation of Roma participation and inclusion, many Roma actors find participation unsatisfactory and, on the other hand, the authorities consider the engagement of Roma a challenging task. A similar challenge also applies to the European institutions: the challenges in Roma participation are cross-cutting in the field of policymaking, and therefore these challenges should be addressed at various levels of the activities.

Chapter 1 introduces the model of relevant inclusion as part of the study conducted for this report. Interviews with actors from various countries were conducted before the dialogue process were held with the aim of making the challenges of meaningful participation visible (the sections on the dialogue process were authored by Miriam Attias). Chapter 2 examines the Roma policy guidelines and measures adopted by European institutions and organisations as well as the participation of Roma, together with Finland's approach regarding these measures (authored by Kati Jääskeläinen). Chapter 3 focuses on the implementation of Roma policy in the Nordic and Baltic countries (authored by Marko Stenroos). In the remaining sections of the report, the collected material is analysed, the outcomes of the dialogues are discussed, and recommendations for the development of Roma policy are put forward.

## Chapter 1: The role of the dialogue process in this study: a model for meaningful inclusion

As part of the preparation of this report, three dialogue meetings were organised bringing together authorities and Roma actors to discuss the theme. The discussions explored the participants' experiences, needs and interests; these contributions were then used to establish a general overview of the current situation and to identify key forward-looking and common questions to be addressed. The aim of the dialogue meetings was to improve the shared understanding by making it visible how various actors perceive the issues at hand, as well as which types of opportunities for involvement they have access to. Another aim was to help find ways of working together at the European level and, as a new approach, within the Baltic Sea region.

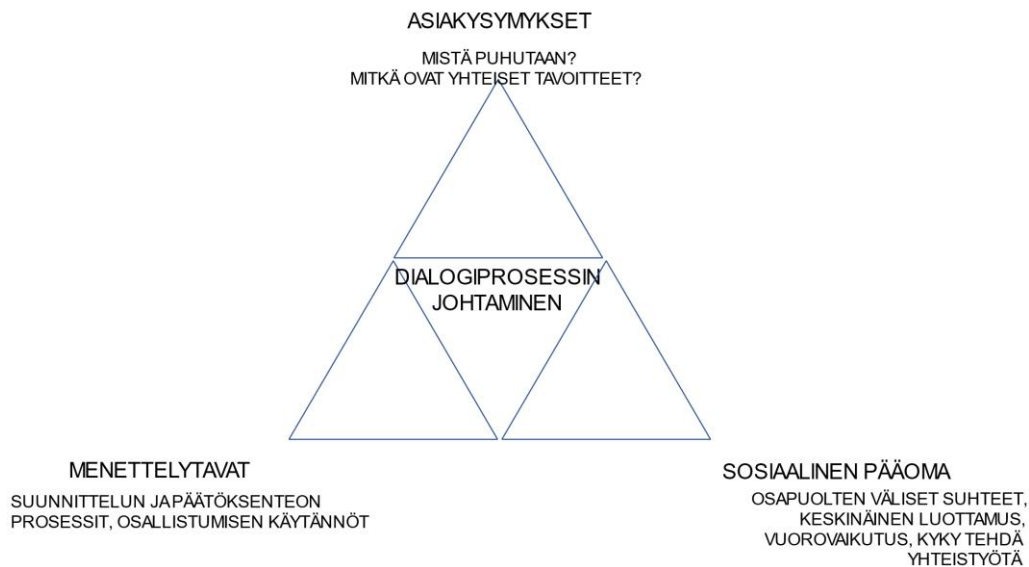
The dialogue process itself was designed so that it would represent a good practice of meaningful inclusion. Methodologically, this meant that the following aspects were given equal weight in the process:

- factual questions, i.e. the mapping out the information and views expressed by the participants themselves on the content topics relevant to the study,
- practices, i.e. the preparation and guidance of the dialogue in such a way that its purpose, principles and the importance of participating in it were clear to everyone involved and that people had the opportunity to prepare for the process in advance;

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<sup>8</sup> The inefficiency of traditional methods is linked to the approach, actors and ways of communication adopted. The present report provides one example of how methods and approaches can be developed.

– social capital, i.e. the building of communication, relationships and co-operation and achieving functional relations and interaction between the parties.



|                                                                                                                        |                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| DIALOGIPROESSIN JOHTAMINEN                                                                                             | LEADING THE DIALOGUE PROCESS                                                                         |
| ASIAKYSYMYKSET<br>MISTÄ PUHUTAAN?<br>MITKÄ OVAT YHTEISET TAVOITTEET?                                                   | FACTUAL QUESTIONS<br>WHAT ARE WE TALKING ABOUT?<br>WHAT ARE THE COMMON GOALS?                        |
| MENETTELYTAVAT<br>SUUNNITTELUN JA PÄÄTÖKSENTEON PROSESSIT,<br>OSALLISTUMISEN KÄYTÖNNÖT                                 | PRACTICES<br>PLANNING AND DECISION-MAKING PROCESSES,<br>PARTICIPATION PRACTICES                      |
| SOSIAALINEN PÄÄOMA<br>OSAPUOLTEN VÄLISET SUHTEET, KESKINÄINEN<br>LUOTTAMUS, VUOROVAIKUTUS, KYKY TEHDÄ YH-<br>TEISTYÖTÄ | SOCIAL CAPITAL<br>RELATIONS BETWEEN THE PARTIES, MUTUAL<br>TRUST, INTERACTION, ABILITY TO CO-OPERATE |

The dialogue process started with preliminary discussions with the parties involved. The actual joint discussions were conducted virtually.

The principles of the brave space and the politics of listening were used in facilitating the debate.

One of the principles of the brave space is that risk, disagreement and inconvenience are not defined as an opposite to safety. A space can be safe without being comfortable, even if the discussion feels uncomfortable or difficult. The word ‘brave’ refers to a practice that helps create an encouraging and supportive environment, in which each party is able to participate in a dialogue on difficult and controversial topics. The existence of the risk that the conversation may create discomfort, inconvenience, awkwardness and pain is acknowledged in advance. When the possible risks, disagreements and difficulties and inconveniences are identified and embraced in advance, all parties can be supported if they surface.

The politics of listening refers to listening as a social and political process aimed at equality in participation, particularly in situations where the participants are not of equal status. ‘Listening’ means that using one’s voice and sharing one’s narrative is a value in itself, while ‘politics’ refers to actively looking at and being aware of the forces that direct our attention and determine whose voice is or is not heard. The aim of a

discussion is to manifest the varying positions, realities and networks of the parties involved, and in this way address conflicts of perception. People perceive things from various realities, adding to the difficulty of encountering and understanding each other.

## Chapter 2: Roma policy in European institutions

*In this chapter we will introduce the intergovernmental organisations that are the most relevant in view of the European Roma policy – the Council of Europe, the Organisation for Security and co-operation in Europe and the European Union – as well as the structures, outlines and implementation of their Roma policies. We have paid special attention to how the participation of Roma is reflected in them. After this, we have examined the participation of Roma actors and how the dialogue with each institution is facilitated in practice. This chapter also provides a brief overview of Finland's activities in promoting the rights of Roma in each institution. In addition, we provide an overview of the current co-operation between European institutions as well as between European Roma organisations, and what the needs and opportunities for such co-operation are.*

### Council of Europe

#### The Roma policy of the Council of Europe

The Council of Europe's current Roma policy was initiated by the Strasbourg Declaration on Roma adopted by the Council of Europe High Level Meeting on Roma in 2010<sup>9</sup>. The declaration contains a list of objectives related to non-discrimination and citizenship, empowerment and international co-operation. The declaration was followed by the Council of Europe's first Thematic Action Plan on the Inclusion of Roma and Travellers 2016-2019. The three key priorities of the Action Plan identified were tackling anti-Roma and anti-Traveller prejudice, discrimination and crimes more effectively (antigypsyism); demonstrating innovative models for protection against discrimination and inclusive policies for the most vulnerable, particularly children, young people and women; and promoting innovative models for local-level solutions to increase the social inclusion of Roma.<sup>10</sup>

The Action Plan led to the creation of new standards, the most notable of which was the recommendation adopted by the Committee of Ministers in 2017 on improving access to justice for Roma<sup>11</sup>. The theme has been promoted in three JUSTROM projects jointly run by the European Commission and the Council of Europe, which have raised awareness among Roma women about anti-discrimination mechanisms and improved the capacity of legal professionals to apply anti-discrimination standards. Co-funded by the EU, the Council of Europe has also launched the INSCHOOL project for inclusive education and continued and expanded the ROMACT and ROMACTED projects, which address Roma inclusion at local level.<sup>12</sup> Geographically, the projects concentrate on the EU countries with the largest Roma populations, the Western Balkans and

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<sup>9</sup> Prior to this, the Parliamentary Assembly of the Council of Europe, Congress of Local and Regional Authorities, and Committee of Ministers had adopted a number of Roma-related recommendations. <https://www.coe.int/en/web/roma-and-travellers/adopted-texts>.

<sup>10</sup> Council of Europe, Thematic Action Plan on the Inclusion of Roma and Travellers (2016-2019), Information Documents SG/Inf(2015)38 final, Strasbourg, 2 March 2016, <https://rm.coe.int/1680684b5e>.

<sup>11</sup> Recommendation CM/Rec(2017)10 on improving access to justice for Roma and Travellers in Europe, <https://rm.coe.int/168075f2aa>.

<sup>12</sup> The European Union/Council of Europe Joint Programmes have received funding from four individual Directorates-General: DG Just (JUSTROM), DG Eac (INSCHOOL), DG Employment (ROMACT) and DG Near (ROMACTED).



Turkey. The role of Roma in the projects is not to act only as the beneficiaries but also as the implementers. Some of the project workers in the Council of Europe Secretariat and field offices are Roma, and the projects are implemented in co-operation with local Roma organisations.

The Youth Department of the Council of Europe has taken responsibility for implementing the Roma Youth Action Plan<sup>13</sup> in co-operation with Roma youth networks and Roma organisations. Key activities have included training, production of training materials, and campaigns for Roma youth across Europe. Since 2017, the Council of Europe has also offered internships to Roma graduates from Central European University. It has been proposed that the efforts be continued to strengthen the participation of Roma youth in the work of the Council of Europe<sup>14</sup>.

The Council of Europe has co-operated with Roma women's organisations particularly on the selection of themes, the planning and the implementation of the biannual International Roma Women's Conference. The seventh conference was held in Espoo in March 2019 during Finland's Presidency of the Committee of Ministers of the Council of Europe<sup>15</sup>. The IRWN-Phenjalipe network of Roma women, previously supported by Finland, has played a significant role in the organisation of the conferences held so far<sup>16</sup>. The eighth International Roma Women's Conference, next to be arranged, will take place in September 2021 in North Macedonia.

The objective of combating antigypsyism was furthered by establishing the European Roma Institute for Arts and Culture (ERAC)<sup>17</sup> in Berlin. In addition to the Council of Europe, the founders of ERAC include the Open Society Foundation and the Alliance for ERAC, which consists of Roma activists and influencers. The purpose of the institute is to strengthen the self-esteem of Roma and to reduce the negative prejudices of the mainstream population against Roma by means of the arts, culture, history and the media. ERAC became a registered association in June 2017.

The thematic work and peer reviewed reports carried out by the Ad hoc Committee of Experts on Roma and Traveller Issues (CAHROM) form an integral part of the Thematic Action Plan. Following the 2010 Strasbourg summit, the role of the Special Representative of the Secretary General for Roma Issues was established. Since the resignation of the Special Representative in 2017, the position has remained vacant.

The implementation of the Action Plan was supported by the Parliamentary Assembly of the Council of Europe with its Resolution Promoting the inclusion of Roma and Travellers<sup>18</sup>. In addition, the Congress of Local and Regional Authorities adopted a Recommendation on the situation of Roma and Travellers in the context of rising extremism, xenophobia and the refugee crisis in Europe<sup>19</sup>. The Congress has also revised its Charter

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<sup>13</sup> The Roma Youth Action Plan was initiated as based on the results of the first Roma Youth Conference in 2011, and it was updated for 2016–2019. <https://www.coe.int/en/web/youth-roma/home>.

<sup>14</sup> The proposal to strengthen the participation of Roma youth was completed in January 2021. Vivian Isberg from Finland participated in the task force preparing the proposal as a representative of the TernYpe – International Roma Youth Network. <https://rm.coe.int/conclusions-task-force-roma-youth-participation/1680a17e37>.

<sup>15</sup> Among other things, the Conference assessed the results of the Council of Europe's Thematic Action Plan on the Inclusion of Roma and Travellers. <https://rm.coe.int/irwc-2019-4-e-final-7th-irwc-espoo-finland-analytical-summary-23-08-19/1680983454>.

<sup>16</sup> <https://www.coe.int/en/web/roma-and-travellers/international-roma-women-s-rights-conferences>.

<sup>17</sup> ERAC, <http://eriac.org/>.

<sup>18</sup> Parliamentary Assembly Resolution 2153 (2017) on Promoting the inclusion of Roma and Travellers, 27 January 2017, <http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-EN.asp?fileid=23490&lang=en>.<sup>19</sup> Congress of Local and Regional Authorities, The situation of Roma and Travellers in the context of rising extremism, xenophobia and the refugee crisis in Europe. Recommendation 388(2016), <https://rm.coe.int/the-situation-of-roma-and-travellers-in-the-context-of-rising-extremis/168071a5ab>.

<sup>19</sup> Congress of Local and Regional Authorities, The situation of Roma and Travellers in the context of rising extremism, xenophobia and the refugee crisis in Europe. Recommendation 388(2016), <https://rm.coe.int/the-situation-of-roma-and-travellers-in-the-context-of-rising-extremis/168071a5ab>.



of European Political Parties for a Non-Racist Society by stating that antigypsyism is a manifestation of racism, which must be combated on local level<sup>20</sup>.

The principle of participation is articulated in the Council of Europe's second Roma Action Plan, the Strategic Action Plan for Roma and Traveller Inclusion 2020–2025 even more emphatically than in the first Action Plan. The participation of Roma and Travellers has been defined as a fundamental principle of the Action Plan in two senses: participation as full members of society, and participation in all decisions affecting Roma and Travellers, at both the individual and collective level through their representative organisations.

The participation of Roma in political decision-making has also been made one of the main lines of action in the plan. The Council of Europe will continue to organise Roma Political School to those members of the Roma and Traveller community who intend to stand for election as representatives of their communities<sup>21</sup>. Special attention will be paid to Roma women and young people interested in advocacy activities. The Action Plan stresses the importance of measures at local level to improve the social inclusion of Roma. The Council of Europe will also continue to provide technical support to local and national authorities through EU-funded projects to enable authorities to better plan and implement Roma policies and projects. In addition, the capabilities of local authorities to seek funding to support the implementation of Roma strategies as well as the readiness of Roma to participate actively in public and political life will be strengthened.

The two other main lines of action of the Strategic Action Plan are a continuation to the previous programme but partly with new priorities. The first of these is the continuing need to combat the various manifestations of antigypsyism and discrimination. The range of measures includes the Council of Europe's standards and legal instruments<sup>22</sup>, training of public authorities, strengthening of the capabilities of civil society, and the empowerment of women, young people and LGBTQI+ minorities. In addressing antigypsyism, more attention will be paid to the situation of Travellers. In addition, the Council of Europe will continue to support the work carried out by ERIAC. In April 2021, ERIAC opened its first branch office in Belgrade, and is set to open offices in other countries as well.

The third priority area is access to high-quality inclusive education<sup>23</sup>. INSCHOOL, a project run jointly by the EU and the Council of Europe, supports member States in developing inclusive education. With regard to the education of young people, the focus is young Roma not in employment, education or training, whose share of all young Roma has continued to increase, according to a study by the EU Agency for Fundamental Rights (FRA)<sup>24</sup>. The action plan also places greater emphasis on the development of teaching the history of Roma and Travellers. This objective is supported by the recommendation adopted by the Council of Europe Committee of Ministers in July 2020 on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials<sup>25</sup>.

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<sup>20</sup> Charter of European Political Parties for a Non-Racist Society (Revised), Resolution 415 (2017), 29 March 2017, <https://rm.coe.int/16806fe48b>.

<sup>21</sup> The current countries in focus are Albania, Greece, Italy, Portugal, Spain and Ukraine.

<sup>22</sup> The Council of Europe's convention system will be discussed in more detail later in this report, under the heading 'Participation of Roma actors'.

<sup>23</sup> Here, inclusive education refers to commitment to education for all – institutions which include everybody, celebrate differences, support learning, and respond to individual needs, as provided in the UNESCO Salamanca Statement (1994), <https://pjp-eu.coe.int/en/web/inclusive-education-for-roma-children/about-the-project>. See also Fighting school segregation in Europe through inclusive education, Council of Europe Commissioner for Human Rights, CommDH/PositionPaper(2017)1, 12 September 2017, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168073fb65>.

<sup>24</sup> FRA's publications concerning Roma, <https://fra.europa.eu/en/themes/roma>.

<sup>25</sup> Recommendation CM/Rec(2020)2 of the Committee of Ministers to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials, [https://search.coe.int/cm/Pages/result\\_details.aspx?Objectid=09000016809ee48c](https://search.coe.int/cm/Pages/result_details.aspx?Objectid=09000016809ee48c).

The cross-cutting theme in the action programme is the consideration of multiple discrimination and, as a new element, intersectionality<sup>26</sup>. According to the Action Plan, multiple discrimination and intersectionality have not yet been sufficiently taken into account in legal remedies, decision-making or data collection. The Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI) is a new body working to address cross-cutting issues more effectively. The broad mandate of the CDADI, set up by the Committee of Ministers in 2019, covers the issues of non-discrimination, diversity and inclusion. The CDADI is also responsible for monitoring the implementation of the Roma Action Plan (see section 'Implementation and monitoring of the Action Plan' for more information).

The main responsibility for co-ordinating the implementation of the Strategic Action Plan lies with the Roma and Travellers Team under the Council of Europe Secretariat. The role of the team is to support the member States in their measures and co-ordinate the implementation of the Council of Europe recommendations and resolutions. For this purpose, it has set up an inter-secretariat working group to support the implementation of the Action Plan<sup>27</sup>. The team operates on the basis of recommendations pertaining to compliance with the case law of the European Convention of Human Rights and other human rights conventions relevant to Roma issues.<sup>28</sup>

### *Interviews*

It was noted during the interviews that the new Roma Action Plan largely continues along the lines of the previous action plan. However, attempts have been made to limit the themes of the plan. A number of interviewees highlighted the fact that the terminating the role of the Special Representative for Roma Issues has reduced the attention paid to Roma issues within the Council of Europe. It was also found that the establishment of ERIAC did not enjoy unreserved support from the member States, Roma organisations or researchers in the field<sup>29</sup>. It was seen as an elitist, cultural project, and there were fears that it would divert the focus and resources away from work aiming at improving the human rights situation and strengthening the participation of Roma. Opinions continue to remain somewhat divided on this matter. However, several interviewees pointed out that ERIAC has been able to demonstrate in a short space of time that it is a serious player capable of challenging prejudices and stereotypes against Roma and raising awareness of Roma history and culture through its activities. According to two independent external evaluations, influencing through art and culture has a valid place, and adds value alongside other types of advocacy<sup>30</sup>.

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<sup>26</sup> The Action Plan does not provide a definition for multiple discrimination or intersectionality. According to the glossary of definitions adopted by the Finnish Institute of Health and Welfare, THL, "(m)ultiple discrimination happens when a person is discriminated against in a situation on several different grounds or on various grounds in different kinds of situations." Discrimination is not explained by one factor alone, which is why several aspects need to be addressed to eliminate it. Intersectionality, in contrast, can be understood as intersecting differences or intersectional inequality. According to THL's definition, "(i)ntersectionality refers to a practice in which many factors are considered to simultaneously affect an individual's identity and positioning in social power relationships. According to intersectional thinking, single factors, such as gender, social class, age, ethnicity, functional capacity or sexual orientation, cannot be analysed in isolation from others. The promotion of equality and non-discrimination requires that the impact of various factors is also examined in relation to each other. <https://thl.fi/fi/web/sukupuoiten-tasa-arvo/sukupuoli/tasa-arvosanasto> [in Finnish and Swedish]

<sup>27</sup> Inter-Secretariat Task Force on the Implementation of the Strategic Action Plan for Roma and Traveller Inclusion (2020-2025).

<sup>28</sup> <https://www.coe.int/en/web/roma-and-travellers/home>.

<sup>29</sup> See, e.g., Ian Law & Martin Kovats, *Rethinking Roma: Identities, Politicisation and New Agendas*, Palgrave Macmillan, 2018, 127–128.

<sup>30</sup> External evaluations of the activities of ERIAC were carried out in 2018 and 2019, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016808da1b1](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016808da1b1) and [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=0900001680980cb3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680980cb3). In addition to the Council of Europe and the Open Society Foundation, Germany is the main funding provider for ERIAC. One of the new providers of funding is the Nordic Culture Fund. [https://eriac.org/wp-content/uploads/2020/10/ERIAC-YEARLY-REPORT-2019\\_v9\\_web.pdf](https://eriac.org/wp-content/uploads/2020/10/ERIAC-YEARLY-REPORT-2019_v9_web.pdf).

The practical implementation of the Roma Action Plan relies heavily on projects co-financed by the EU. Funding is granted in stages, and many of the projects have lasted for several years. According to the Council of Europe, the projects serve as pilot projects with the aim of identifying and producing best practices; after the pilot stage, the aim is for the member States to take over the funding. There is a risk in project activities that, after the pilot stage, states lack the readiness to take on this responsibility, and the activities will not become permanent<sup>31</sup>. Some of the European Roma organisations interviewed considered that the Council of Europe was in competition for EU project funding with the organisations while these organisations could be implementing similar projects. However, as an international organisation, the Council of Europe has years of experience in implementing multilateral projects in its member States. National NGOs can participate in the implementation of joint programmes and projects jointly run by the EU and the Council of Europe through a selection based on a call for tenders.

### *Implementation and monitoring of the Action Plan*

The Strategic Action Plan adopted by the Committee of Ministers is intended as a toolbox for practical action within the entire Council of Europe organisation. Regular internal meetings on Roma affairs within the Secretariat are organised to support co-ordination and inter-departmental co-operation. The aim on the one hand is to mainstream Roma issues under the various policy areas of the Council of Europe and, on the other, to continue with specific targeted measures.

In 2019, the monitoring of Roma issues was integrated into a wider programme of tackling various forms of discrimination. The implementation of the Roma Action Plan is monitored and supported by the Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI)<sup>32</sup> and its subcommittee, the Committee of Experts on Roma and Traveller Issues (ADI-ROM). The Committee is composed of representatives of member State governments as well as representatives of the Council of Europe institutions and other international organisations. NGOs may obtain observer status within the Committee on application<sup>33</sup>. In drawing up the mandate of the Steering Committee, Finland, among other countries, has stressed that the CDADI should hold regular thematic discussions focusing exclusively on Roma issues, offering a platform for Roma and Traveller organisations to be heard. The current Steering Committee will also be responsible for preparing a comprehensive legal instrument to combat hate speech by the end of 2022<sup>34</sup>.

The CDADI has two subcommittees: the Committee of Experts on Roma and Traveller Issues, ADI-ROM, and the Committee of Experts on Combating Hate Speech, ADI/MSI-DIS.<sup>35</sup> The ADI-ROM will continue the work of its predecessor, CAHROM<sup>36</sup>, but will report to the Steering Committee, whilst the CAHROM reported directly to the Committee of Ministers. Besides monitoring the implementation of the Roma Action Plan, the ADI-ROM's task is to produce a study on the causes, extent and repercussions of antigypsyism. The ADI-ROM collaborates with the ADI/MSI-DIS to prepare a contribution on hate speech encountered by Roma. The working methods of the ADI/MSI-DIS have remained unchanged, including reports based on thematic country visits, which examine the implementation of national Roma policy programmes and identify best practices.

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<sup>31</sup> Between 2011 and 2017, the Council of Europe carried out two ROMED projects co-financed by the EU, in which Roma mediators in 22 countries were given training and support, and Roma participation in local decision-making was enhanced in 11 countries. Since the end of the transnational phase of the project, only some of the member States have allocated national funding to continue applying the methods found successful in the project.

<sup>32</sup> <https://www.coe.int/en/web/committee-antidiscrimination-diversity-inclusion>.

<sup>33</sup> At the time of writing this report, no Roma organisation had gained the observer status.

<sup>34</sup> Jointly with the Steering Committee on Media and Information Society.

<sup>35</sup> In addition, CDADI has a Working group on intercultural integration, GT-ADI-INT.

<sup>36</sup> The Committee of Experts was set up in 1995 and until February 2011 it operated under the name MG-S-ROM. Finland's Handbook on the European Policy on Roma, p. 86. The CAHROM was an ad hoc committee, while the ADI-ROM is a standing subcommittee of the CDADI appointed for two years at a time. <https://www.coe.int/en/web/roma-and-travellers/composition>.

Member States have instated their representatives in the ADI/MSI-DIS, whose work is supported by representatives of the institutions of the Council of Europe and of international organisations. Designated Roma and Traveller organisations as well as Roma rights organisations may participate in the work as observers at their own expense. Other international NGOs may, on application, obtain observer status in the ADI/MSI-DIS.<sup>37</sup>

### *Interviews*

Some interviewees expressed the concern that, owing to structural changes, Roma issues were given less weight in the Council of Europe. With the CDADI's broad-based mandate, there is the risk that Roma issues get buried under other issues of discrimination, and the Steering Committee only creates another new layer between the ADI-ROM and the Committee of Ministers. Most interviewees, however, welcomed the change, as it was seen to reinforce the Council of Europe's anti-discrimination work. The change is seen to improve the mainstreaming of Roma issues across new areas, while Roma and Traveller issues will be the subject of more concentrated attention and action at the ADI-ROM. In addition to the two official languages of the Council of Europe, English and French, ADI-ROM meetings will be translated into Romani.

### Participation of Roma actors

#### *Dialogue with civil society*

The participation of Roma and Traveller organisations in the implementation and monitoring of the Roma Action Plan is mainly facilitated through the Council of Europe Dialogue with Roma and Traveller Organisations. The purpose of the dialogue, organised twice a year since 2015, is to serve as a platform for the exchange of information between Roma and Traveller organisations and the Secretariat and institutions of the Council of Europe, as well as for the planning of co-operation at national and local level. For NGOs, the events are also serving as an opportunity to voice their concerns and suggestions. Representatives of member States and international organisations also participate in the dialogue meetings. In addition to English and French, dialogue meetings are interpreted into Romani.

The launch of the Dialogue follows a debate in the Council of Europe on how co-operation with Roma organisations should be structured. Having assessed the activities of the European Roma and Travelling Forum (ERTF)<sup>38</sup>, which the Council of Europe supported and funded for the period 2004–2015 and having found the internal reform process of the ERTF to be insufficient, several member States expressed the need to broaden and intensify the Council of Europe's dialogue with Roma actors.<sup>39</sup>

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<sup>37</sup> At the time of writing, the following international Roma organisations held the observer status: European Roma Information Office (ERIO), European Roma Rights Centre (ERRC), Forum of European Roma Young People (FERYP), International Roma Women Network Phenjalipe (IRWN Phenjalipe), Open Society Foundations (OSF), and Roma Education Fund (REF). According to the Council of Europe, the TernYPE and Phiren Amenca Roma youth networks have also expressed an interest in participating in the work of the ADI-ROM. Amnesty International, the European Network of Equality Bodies (Equinet) and the European Network of National Human Rights Institutions (ENNHRI) participate in the subcommittee work under observer status.

<sup>38</sup> Established in 2004 on the initiative of President Tarja Halonen, the remit of the ERTF has been to serve as an advisory body for Roma and to represent Roma at the European level. The ERTF and the Council of Europe concluded a co-operation agreement which gave the ERTF special NGO status in relation to the Council of Europe. The Council of Europe supported the ERTF financially and provided it with human resources and technical assistance. Finland's Handbook on the European Policy on Roma, Publications of the Ministry for Foreign Affairs 2/2011, pp. 88–89, and [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805dbc57](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805dbc57). Following the Resolution of the Committee of Ministers, the Council of Europe's support for the ERTF ended in 2015.

<sup>39</sup> Information Documents, SG/Inf(2014)39, Council of Europe co-operation with Roma organisations, 20 October 2014, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805c59a3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805c59a3); Regular dialogue event with Roma civil society organisations, For consideration by the GR-SOC at its meeting on 31 March 2015, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805c18e0](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805c18e0); Rapporteur Group on Social and Health Questions, Synopsis, Meeting of 28 May 2015, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805c3572](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805c3572); Committee of Ministers, 1229th meeting – 3

It was decided on launching the dialogue process that the most significant representative umbrella organisations and networks of the time, including the ERTF, should be invited to each dialogue meeting and participate in the preparations of the dialogue meetings with the Secretariat of the Council of Europe. However, in 2017, the CAHROM noted that the first dialogues had produced mainly general recommendations without any concrete follow-up<sup>40</sup>. On the proposal of the CAHROM, the Committee of Ministers changed the procedure so that participants are selected through an open call, in which the applicants must demonstrate their expertise in the subject under discussion and their motivation to participate in the dialogue. Alongside Roma and Traveller organisations, other independent experts with grassroots experience of Roma issues and knowledge of the situation of Roma are invited to the events. The costs of the selected participants are reimbursed and the object is to continuously expand the participant base.<sup>41</sup> The topics of the dialogue meetings will be selected by the Secretariat of the Council of Europe on the basis of the Roma Action Plan or other priority areas of the Council of Europe. Proposals on these issues will also be invited from the Roma and Traveller organisations. The Secretariat will select the participants for the dialogue meetings on the basis of set criteria and select a representative of civil society from among them as General Rapporteur, who will present the conclusions and recommendations at the CAHROM meeting (later ADI-ROM).<sup>42</sup> In October 2020, the ERTF and Gypsies and Travellers International Evangelical Fellowship (GATIEF) announced that they would opt out of the dialogue<sup>43</sup>. One of the reasons for their decision was that these organisations had not been consulted in the preparation of the dialogue after the changes in the procedures were adopted in 2017.

### *Interviews*

From the Council of Europe's point of view, the dialogue is a reciprocal process: on the one hand, Roma and Traveller organisations and actors feed into processes<sup>44</sup> under way and in preparation in the Council of Europe while, on the other hand, they are kept informed about the possibilities for advocacy work and the work of the institutions. In addition to the dialogue meetings, the Council of Europe organises study trips twice a year for the Roma and Traveller organisations, with special emphasis on women's organisations in order to provide additional information on institutions and monitoring mechanisms.

From the organisations' perspective, the dialogue plays an advisory role. At the beginning of the dialogue process, Roma organisations pointed out that the dialogue itself is an empty shell unless its results and recommendations are turned into action. The dialogue meetings should also bring Roma operating at various levels closer to the work of the Council of Europe.<sup>45</sup> Several interviewees from Roma organisations said that they participate in dialogues sporadically, which makes it difficult to assess the effectiveness of the dialogue. The interviewees noted that there was an increasing number of Roma actors with sufficient language skills, training and know-how to participate in the dialogue. However, the pool of participants is still relatively small and obstacles to participation still remain. Some of the Roma organisations interviewed have also found it relatively difficult for the Council of Europe to accept the criticism voiced by Roma and Traveller organisations.

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June 2015, [https://search.coe.int/cm/pages/result\\_details.aspx?objectid=09000016805c3323](https://search.coe.int/cm/pages/result_details.aspx?objectid=09000016805c3323); <https://rm.coe.int/report-of-the-coe-dialogue-meeting-with-roma-and-traveller-organisatio/16808cbca1>.

<sup>40</sup> <https://rm.coe.int/cahrom-concept-paper-on-the-proposed-reform-of-the-dialogue-with-r-t-c/1680733035>.

<sup>41</sup> At best, applications for participation in the dialogue have been received from 100 individual organisations. Usually, approximately 25–30 participants are selected for each meeting.

<sup>42</sup> <https://rm.coe.int/report-from-the-4th-council-of-europe-dialogue-with-roma-and-traveller/16808cbbee>.

<sup>43</sup> <https://rm.coe.int/drto-2020-4-en-9th-dialogue-mtg-29-30-oct-2020-general-report-by-zora-/1680a18d81>.

<sup>44</sup> For example, the 6th dialogue even (October 2018) focused on the evaluation of the Roma Action Plan.

<https://www.coe.int/en/web/roma-and-travellers/6th-dialogue-meeting>.

<sup>45</sup> <https://rm.coe.int/report-of-the-coe-dialogue-meeting-with-roma-and-traveller-organisatio/16808cbca1>.



Some interviewees mentioned that the Youth Department of the Council of Europe was pioneering in adopting a co-management system<sup>46</sup> and providing opportunities for participation and funding to youth organisations. NGOs, however, still play a relatively small role in the work of the Council of Europe as a whole. For example, there is only little organisational involvement around the Committee of Ministers, because the Committee's meetings are confidential. However, organisations may participate in the work of steering committees and their subcommittees, and thus be involved in the negotiations.

During Finland's Presidency, the session of the Committee of Ministers held in May 2019 adopted a decision strengthening the role and meaningful participation of civil society organisations and National Human Rights Institutions<sup>47</sup> in the Council of Europe<sup>48</sup> with the objective of increasing its openness and transparency towards civil society, including access to information, activities and events. The Secretary General was tasked with exploring the possibilities of inviting the relevant human rights NGOs to a regular exchange with a view to further enhancing co-operation between civil society and the Council of Europe, as well as enriching the discussions within other institutions. Strengthening the rights of NGOs to participate is, however, considered to be politically very difficult and challenging to implement, as some member States are opposed to it.

*Participation of Roma organisations in the monitoring of human rights conventions and in the execution of judgments of the European Court of Human Rights*

International NGOs have the possibility to apply for participatory status within in the Council of Europe. The status is granted for a limited period and brings rights to participate and influence the work of the various institutions of the Council of Europe.<sup>49</sup> The Conference of International Non-Governmental Organisations (INGOs) serves as a communications channel between civil society, the Council of Europe, and politicians. At the moment of writing, the conference involves more than 300 organisations, only two of which are Roma organisations – the European Roma Rights Centre and the ERTF.

The participatory status will allow organisations to lodge collective complaints<sup>50</sup> under the Revised European Social Charter, among other things<sup>51</sup>. The rights guaranteed by the European Social Charter relate to housing, employment, education, health care, free movement and the welfare of children, the elderly, persons with disabilities, and the family. The European Roma Rights Centre and the ERTF have actively and successfully made use of the option of collective complaint. As the only country concerned, Finland has also granted national NGOs the right to lodge complaints against it<sup>52</sup>.

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<sup>46</sup> <https://www.coe.int/en/web/youth/co-management>.

<sup>47</sup> National Human Rights Institutions (NHRI) are autonomous and independent institutions, established by law and with a task to promote and protect human rights. The Institute for Human Rights is an institution complementary to civil society, human rights research and government activities, which monitors and assesses the activities of the above bodies and agencies. The Finnish National Human Rights Institution (NHRI) is formed by the Human Rights Centre, its Human Rights Delegation and the Office of the Parliamentary Ombudsman.

<sup>48</sup> A shared responsibility for democratic security in Europe: The need to strengthen the protection and promotion of civil society space in Europe, 129th Session of the Committee of Ministers, Helsinki, 17 May 2019, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=090000168094787f](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=090000168094787f). On the implementation of meaningful participation in international organisations, see e.g. the Guidelines of the Office of the High Commissioner for Human Rights, footnote 3.

<sup>49</sup> <https://www.coe.int/en/web/ingo/participatory-status>.

<sup>50</sup> Some parties to the agreement have opted out of the collective complaint system. There are currently 13 parties to the Additional Protocol providing for a system of collective complaints, including Finland, Sweden and Norway. <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/158/signatures?module=signatures-by-treaty&treaty=158>.

<sup>51</sup> In addition to the participating status, organisations must fulfil the additional criteria for collective complaints. The right is granted on application for a fixed period. Complaints to the Committee on Social Rights may also be lodged by international employers' and employees' organisations, as well as by national employers' and employees' organisations in the country concerned. <https://www.coe.int/en/web/european-social-charter/collective-complaints-procedure1>.

<sup>52</sup> <https://stm.fi/ministerio/kansainvaliset-asiat/en>; [https://um.fi/euroopan-neuvoston-voimassa-olevat-ihmisoikeussopimukset/-/asset\\_publisher/mnr92wS4p1l3/content/uudistettu-euroopan-sosiaalinen-peruskirja-1996-](https://um.fi/euroopan-neuvoston-voimassa-olevat-ihmisoikeussopimukset/-/asset_publisher/mnr92wS4p1l3/content/uudistettu-euroopan-sosiaalinen-peruskirja-1996-)

Regardless of their status, international and national NGOs are welcome to provide information to many of the bodies that monitor compliance with the Council of Europe's human rights conventions.

The Framework Convention for the Protection of National Minorities<sup>53</sup> (1998), adopted by the Council of Europe, is the first legally binding international document specifically focusing on the protection of national minorities. The signatory States undertake, among other things, to respect the principle of non-discrimination and equality and to support the maintenance and development of minority cultures in various ways. The States must also create the conditions necessary for the effective participation of persons belonging to national minorities in cultural, social and economic life and in public affairs, in particular those affecting them (Article 15)<sup>54</sup>. The Advisory Committee on the Framework Convention for the Protection of National Minorities (ACFC) has in several of its reports, some of those also concerning Finland<sup>55</sup>, drawn attention to the status of Roma in questions related to housing, education, discrimination and language<sup>56</sup>.

The European Charter for Regional or Minority Languages<sup>57</sup> (1998) promotes the use of regional and minority languages in education, with judicial authorities, local and national government and public services, media, cultural activities, economic and social life and transnational co-operation. Finland has designated Romani as a traditional non-territorial minority language<sup>58</sup>. In the case of non-territorial languages, the provisions of Part II of the Charter are applied as far as possible. This allows for the state to define the measures flexibly while the measures must take into account the needs and wishes of the language groups affected and respect their traditions and characteristics. Compliance with the Charter is also monitored by the Committee of Experts.

NGOs may also report, among other things, on the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention, 2014)<sup>59</sup>. The Convention obliges the Parties to protect the rights of victims of violence without discrimination on the basis of belonging to a national minority, and to take into account the specific needs of vulnerable persons. The first country-specific evaluations and recommendations of the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) have also drawn attention to the rights of Roma women in, for example, Finland<sup>60</sup> and Sweden.

NGOs are encouraged to time their reporting particularly at the stage when the State has submitted its periodic report on the implementation of the treaty and the committee monitoring compliance with the treaty is preparing a country visit<sup>61</sup>. During a country visit, the committees will meet not only with the authorities but also civil society representatives.

The European Commission against Racism and Intolerance (ECRI)<sup>62</sup> is an independent human rights body set up by the Council of Europe to monitor the human rights situation and the efforts made by member States

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<sup>53</sup> <https://www.coe.int/en/web/minorities>.

<sup>54</sup> See also the ACFC Thematic Commentary No. 2 (2008) on the interpretation of Article 15, <https://rm.coe.int/16800c108c>

<sup>55</sup> On ratifying the Framework Agreement, Finland did not specify the national minorities governed by the agreement. In practice, it has been considered that the Framework Agreement would apply to the Sámi, Roma, Jews, Tatars, so-called Old Russians and, *de facto*, also Swedish-speaking Finns. See [Reports, statements, conclusions and recommendations concerning Finland](#).

<sup>56</sup> Council of Europe Thematic Action Plan on the Inclusion of Roma and Travellers (2016-2019) - Implementing the Action Plan, 6 July 2018, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016808afb22](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016808afb22)

<sup>57</sup> <https://www.coe.int/en/web/european-charter-regional-or-minority-languages>.

<sup>58</sup> "Non-territorial languages" means languages used by nationals of the State which differ from the language or languages used by the rest of the State's population but which, although traditionally used within the territory of the State, cannot be identified with a particular area thereof (Article 1(c)).

<sup>59</sup> <https://www.coe.int/en/web/istanbul-convention>.

<sup>60</sup> <https://rm.coe.int/grevio-report-on-finland/168097129d>.

<sup>61</sup> In Finland, NGOs are encouraged to participate in the initial reporting phase by issuing statements and by participating in commenting on the contents of a report before its finalisation.

<sup>62</sup> <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance>.



to combat racism and intolerance. ECRI produces a country-specific country report approximately every five years analysing the situation in racism and intolerance and putting forward initiatives and proposals to address identified problems. ECRI has repeatedly raised the specific problems concerning Roma and made recommendations to the member States to remedy them.

ECRI also makes general policy recommendations to all member States on combating racism and racial or other forms of discrimination in various areas of society, including the general recommendation to combat antigypsyism and discrimination against Roma<sup>63</sup>. NGOs are an important source of information for ECRI in its assessment of the situation of the various groups and the racism and discrimination they face. After the publication of the country reports, ECRI will review the implementation of the priority recommendations and will also organise round table consultations and bring together officials, representatives of equality and non-discrimination bodies and NGOs.<sup>64</sup>

NGOs also play an important role in monitoring the execution of judgments of the European Court of Human Rights<sup>65</sup>. The Council of Europe Committee of Ministers monitors the national execution of the judgments. In meetings held four times a year, the Committee assesses how the defendant state parties have enforced the judgment and how the identified violations should be remedied. The information provided by the NGOs plays a role in carrying out this assessment. The European Roma Rights Centre has also acted as a representative or submitted written observations in dozens of complaints regarding Roma to the European Court of Human Rights<sup>66</sup>. National Roma organisations have also acted as representatives in some cases.

The 8th dialogue meeting<sup>67</sup> called for the involvement of Roma organisations in the execution of the judgments of the European Court of Human Rights and in monitoring the implementation of human rights conventions. The monitoring bodies should ensure that Roma and Traveller organisations are able to provide shadow reports and participate in the round table consultations during country visits<sup>68</sup>.

The interviewees noted that the Council of Europe's human rights convention system is extensive, and that the effective use of legal channels requires training, know-how and resources. According to the Council of Europe, Roma organisations use these opportunities to some extent<sup>69</sup>, but many organisations lack sufficient resources and know-how required for, for example, shadow reporting. In the interviews, emphasis was given to the importance of the treaty monitoring bodies and the country visits made by the Council of Europe's High Commissioner for Human Rights, not only for assessing the realisation of rights, but also for the publicity they receive. The Secretariat also seeks to organise meetings between the monitoring bodies and Roma organisations during country visits. An example of the disparity between the opportunities available and the existing resources is that sometimes travel costs become the obstacle for the participation of Roma organisations.

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<sup>63</sup> Combating antigypsyism and discrimination against Roma, ECRI General Policy Recommendation No. 13 (2011), <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/recommendation-no.13>.

<sup>64</sup> In Finland, the round table consultation took place in 2015. <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/finland-2015>.

<sup>65</sup> <https://www.echr.coe.int/>.

<sup>66</sup> European Convention on Human Rights Article 36 (2) Third party intervention. Legal cases advocated or supported by the European Roma Rights Centre, <http://www.errc.org/what-we-do/strategic-litigation/european-court-cases>.

<sup>67</sup> <https://rm.coe.int/8th-dialogue-mtg-10-11-oct-2019-conclusions-and-recommendations-final-/168098e490>.

<sup>68</sup> See, e.g., Working methods of the Advisory Committee of the Framework Convention for the Protection of National Minorities (Section 6), [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016809940d5](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016809940d5).

<sup>69</sup> In 2014, the Advisory Committee on the Framework Convention for the Protection of National Minorities consulted with more than 80 and the Committee of Experts of the European Charter for Regional or Minority Languages with more than 30 international, national or local Roma organisations who had either regularly or sporadically contributed to their work, [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016805c59a3#\\_ftnref17](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016805c59a3#_ftnref17).

## Activities of Finland and Finnish actors

Finland implements its European Roma policy as part of the human rights policy. With regard to human rights, Finland has adopted a long-term policy that spans government terms. The thematic priorities of the international Roma policy are broadly the same as in the human rights policy in general: participation and inclusion, on the one hand, and equality and women's/girls' rights on the other. In addition, some sub-themes have been raised, such as the education of Roma, but the big picture has remained the unchanged for years. Finland's permanent representation to the Council of Europe operates with a small team. The main task of the representation is to promote aspects of Finland's foreign policy, including human rights policy and democracy and the rule of law, in the decision-making body of the Council of Europe, the Committee of Ministers, and in the preparatory negotiations. This work is not transparent, as the meetings of the Committee of Ministers are not open. Finland is politically active particularly concerning non-discrimination and participation of civil society, and, when possible, also raises aspects of Roma policy for discussion.<sup>70</sup> One of the main tasks of the permanent representation is to monitor the execution of the judgments of European Court of Human Rights. Judicial work is a long-term and often invisible process, but its results are important for safeguarding the rights of Roma in Europe.

In the Council of Europe, Finland's support for the participation of NGOs has been built on a policy guideline that emphasises the right to participate. The interviewees referred to the decision made by the Committee of Ministers' Helsinki Session to strengthen the participation of NGOs and National Human Rights Institutions as one of Finland's most significant political achievements in the Council of Europe in recent years. Finland supports the implementation of the decision by, among other things, seconding<sup>71</sup> an expert in this matter in the Secretariat.

Prior to the period under review in this report, Finland had supported the partnership between the European Roma and the Travelling Forum (ERTF) and the Council of Europe with the aim of amplifying the voice of Roma in the decision-making process within the Council of Europe. Finland offered general support to the ERTF and supported mutual contacts between Roma organisations in the process of amending the ERTF rules and the discussion between the ERTF and the Council of Europe with a view to developing co-operation<sup>72</sup>. The termination of the partnership agreement between the Council of Europe and the ERTF ended the funding provided by the Council of Europe. After this, Finland went on to provide modest support to the ERTF, but since the original partnership idea was abandoned, Finland's funding for the forum also ended.

In the Council of Europe's budget negotiations, Finland has emphasised performance-based management and a broader and more robust evaluation of the operations. As regards voluntary financing, Finland is one of the few and largest supporters of the Council of Europe's Roma policy<sup>73</sup>. In 2015–2020, Finland's annual voluntary funding averaged EUR 70,000, which was allocated to the implementation of the Roma Action Plan with improvement of the position of women and their access to rights as the priorities. In addition, Finland has channelled refunds from the European Directorate for the Quality of Medicines and HealthCare (European Pharmacopoeia), which operates under the Council of Europe, to various Roma projects<sup>74</sup>. During the

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<sup>70</sup> The meetings of the Committee of Ministers are prepared on a weekly basis in six Rapporteur Groups.

<sup>71</sup> In secondments, a member State appoints and pays the expenses of a seconded expert, who technically is employed by the host organisation.

<sup>72</sup> [https://um.fi/documents/35732/48132/fcnm\\_fourth\\_periodic\\_review\\_of\\_finland/32085528-1209-a691-ef8f-ca23733565de?t=1525646797983](https://um.fi/documents/35732/48132/fcnm_fourth_periodic_review_of_finland/32085528-1209-a691-ef8f-ca23733565de?t=1525646797983).

<sup>73</sup> In addition to Finland, the implementation of the Thematic Action Plan for 2016–2019 received voluntary funding from Germany, Greece and Hungary, and Finland, Greece and Poland also seconded experts.

<sup>74</sup> The use of refunds is decided on by the Ministry of Social Affairs and Health. The amount refunded annually is approximately EUR 7,000–12,000.

period under review, Finland has seconded one expert on Roma issues to the Council of Europe (Programme Manager, Roma and Travellers Team, 6/2019–2022).

Finland's funding has been used, for example, to cover the expenses of Roma women's conferences and their follow-up, and for the implementation of the Roma Youth Action Plan. Support has also been directed to the JUSTROM project and the further development of the KAMIRA SOS phone app for reporting cases of discrimination.<sup>75</sup> Finland's support has also enabled the production of child-friendly materials for the Dosta! awareness-raising campaign (2006–2019). The campaign sought to bring Roma and non-Roma communities closer together by dispelling prejudices and stereotypes and defusing conflicts arising from them.

Finland is represented in the ADI-ROM by a senior specialist from the Ministry of Social Affairs and Health/National Advisory Board on Romani Affairs. During the period under review, Finland hosted two thematic visits by the CAHROM, which focused on the access of Roma to justice (2018) and the role of health authorities in promoting the health of Roma (2019). In addition, Finnish authorities and Roma representatives participated in three other thematic visits<sup>76</sup>.

Individual Finnish delegates have participated in dialogue events as representatives of the ERTF and the Finnish Romani Forum. In addition, Finnish Roma youth participated in the 7th International Roma women's conference in Espoo and the implementation of the Roma Youth Action Plan.

## Organization for Security and Co-operation in Europe (OSCE)

### The Roma policy of the OSCE

The Organisation for Security and Co-operation in Europe (OSCE) (until 1995 the CSCE) specifically recognised the need to improve the status of Roma in the 1990 Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE<sup>77</sup>. The key document guiding the Roma-related activities of the OSCE is the Action Plan on Improving the Situation of Roma and Sinti within the OSCE Area<sup>78</sup>, which was adopted by the OSCE Ministerial Council in Maastricht in 2003. The aim of the Action Plan is to strengthen the efforts of the OSCE participating States and institutions<sup>79</sup> to safeguard the full and equal social inclusion of Roma and Sinti and to eradicate discrimination against them. The Action Plan contains recommendations for both the participating States and OSCE institutions and structures. The political commitments have been complemented and bolstered by three Ministerial Council decisions regarding the situation of Roma and Sinti<sup>80</sup>.

The extensive Action Plan covers a wide range of themes: combating racism and discrimination, socio-economic issues, access to education, participation in public and political life, and the protection of Roma in crisis

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<sup>75</sup> The phone app lowers the threshold for reporting cases, and the notification is also admissible as evidenced in court. The app was developed by the Spanish Roma women's organisation Kamira and is now also available in English and Italian. <https://federacionkamira.com/disponibles-las-versiones-de-la-app-sos-kamira-en-italiano-e-ingles-para-italia-y-finlandia/>.

<sup>76</sup> The visit to Latvia in October 2018 covered Roma policy in countries with small Roma populations. The Baltic Sea states were represented in the thematic visits by Finland, Norway and the Baltic countries. <https://rm.coe.int/thv-latvia-final-report/1680996860>.

<sup>77</sup> <https://www.osce.org/odihr/elections/14304>. The human dimension refers to the promotion of democracy and the rule of law as well as the safeguarding of human rights and fundamental freedoms.

<sup>78</sup> <https://www.osce.org/odihr/17554>.

<sup>79</sup> The OSCE institutions are the Office for Democratic Institutions and Human Rights (ODIHR), the High Commissioner on National Minorities (HCNM), and the Representative on Freedom of the Media (RFoM).

<sup>80</sup> Helsinki 2008, Athens 2009, and Kiev 2013, <https://www.osce.org/odihr/154691>.

and post-crisis situations. The Action Plan also guides OSCE's collaboration with other international organisations and NGOs on Roma issues.

The Action Plan is based on the principle of Roma inclusion and participation: for Roma, with Roma. According to this principle, national strategies should respond to the real needs and problems of Roma and Sinti communities, be comprehensive, combine human rights and social policy objectives, and ensure Roma ownership of the political decisions that affect them. Roma and Sinti communities should have a real opportunity to influence decisions and to participate as equal partners in the development and implementation of policies and action plans affecting them. Roma and Sinti women should have similar opportunities for participation as men, and Roma women's issues should be systematically mainstreamed into various policies.

The main responsibility for co-ordinating the Roma Action Plan lies with the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and the Contact Point for Roma and Sinti Issues (CPRSI), which has operated under the aegis of ODIHR since 1994<sup>81</sup>. In addition to ODIHR, the Action Plan defines tasks for the OSCE High Commissioner on National Minorities (HCNM), the OSCE Representative on Freedom of the Media (RFoM), the Office of the Co-ordinator of OSCE Economic and Environmental Activities (OCEEA) and the OSCE Strategic Police Matters Unit (SPMU). The CPRSI is one of the five thematic departments of ODIHR and operates with small resources: the basic annual budget has remained at the same level for a decade due to zero growth policy and was EUR 555,700 in 2020<sup>82</sup>. The CPRSI employs four senior advisers, and a significant number of the CPRSI employees has been of Roma background.

The main task of the CPRSI is to support the participating States in implementing the commitments based on the Action Plan. ODIHR may, on request, provide advice and technical support, including in the preparation of Roma-related legislation and the development of Roma policies. Recently, at the request of a number of participating States, ODIHR has evaluated national Roma strategies and their consultative structures as they are coming to their end. In Ukraine, ODIHR has supported the dialogue between authorities and Roma organisations on the implementation of national and regional Roma action plans. In addition, the Action Plan gives ODIHR the mandate to act proactively in crisis situations to protect the Roma population and to seek early intervention to alleviate tensions that could otherwise lead to conflicts.

The role of the CPRSI is also to support the capabilities of Roma and Sinti civil society. The main theme in the recent years has been the participation of Roma in public and political life. The consultations held during the period under review have particularly focused on the political participation of Roma youth and women. Between 2019 and 2020, ODIHR organised two training courses on political advocacy (the Roma Leadership Academy "Nicolae Gheorghe") for Roma representatives who hold public offices, aspire to be or have been elected as policy makers or are involved in policy advocacy in NGOs. In the future, similar training will also be offered at the national level. ODIHR has also focused efforts on empowering Roma and Sinti youth and promoting their political participation through the Roma and Sinti Youth Initiative. In 2019, ODIHR carried out an election observation training course for young Roma. The aim for the future is to strengthen the capabilities of Roma to act as long-term observers in OSCE election observation missions.

In order to support the building of trust between the police and Roma, ODIHR has developed human rights-based training for local police officers working with Roma and Sinti. Since 2018, the training has been expanded to include training for police trainers and instructors at police colleges and academies.<sup>83</sup> In Ukraine,

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<sup>81</sup> <https://www.osce.org/odihr/roma-and-sinti>.

<sup>82</sup> ODIHR Annual Report 2020, [https://www.osce.org/files/f/documents/e/1/483026\\_0.pdf](https://www.osce.org/files/f/documents/e/1/483026_0.pdf).<sup>83</sup> About 15 police training courses have been organised in individual OSCE countries during the period under review. Effective and Human Rights-Compliant Policing in Roma and Sinti Communities: OSCE/ODIHR Training for Law Enforcement Officers, <https://www.osce.org/odihr/280556>.

<sup>83</sup> About 15 police training courses have been organised in individual OSCE countries during the period under review. Effective and Human Rights-Compliant Policing in Roma and Sinti Communities: OSCE/ODIHR Training for Law Enforcement Officers, <https://www.osce.org/odihr/280556>.

in addition to the police, ODIHR has provided training for Roma human rights defenders<sup>84</sup>. The training focuses on human rights monitoring, will also be rolled out to other OSCE countries. As a result of the coronavirus pandemic, the training content has been adapted for implementation online.

Progress has been made in mainstreaming Roma issues within ODIHR as well as between various OSCE institutions. For example, ODIHR has served as a platform for actors joining forces to raise awareness and increase the collection of data on hate crimes against Roma and Sinti and combating the phenomenon<sup>85</sup>. The role of the Personal Representatives appointed by the OSCE Chairperson-in-Office is to promote tolerance and the fight against racism, xenophobia and discrimination. In co-operation with the offices of the HCNM and the Representative on Freedom of the Media, ODIHR is developing practices for regular monitoring of hate speech against Roma and Sinti in the media. During the coronavirus pandemic, the CPRSI carried out media monitoring in ten OSCE participating States. The study highlighted that prejudices against Roma had only grown in momentum during the pandemic as well as best practices for assisting the families most affected by community actions<sup>86</sup>.

The mandate, role and size of OSCE field operations or missions vary depending on the country. Strengthening the rights, inclusion and participation of Roma is part of the activities of mainly the missions in the Western Balkans. In Bosnia and Herzegovina, for example, the OSCE mission has several field offices and Roma focal points, which enables work with Roma communities at the local level. During the period under review, the Western Balkan missions have, among other things, shared information on election participation and voting, and have supported Roma participation in decision-making affecting them. During the pandemic, some of the missions have distributed material assistance to disadvantaged communities. The Roma focal points from the field operations and the CPRSI personnel meet at least once a year to exchange information.

Furthermore, ODIHR compiles a review report every five years on the implementation of the commitments and recommendations of the Roma Action Plan. Unlike previous reports, the third Status Report<sup>87</sup> published in 2018, focused exclusively on one topic, the participation of Roma in public and political life. The report is based on responses from OSCE participating States, field operations and NGOs, as well as research data produced by international organisations. Roma organisations also evaluate the implementation of the commitments in consultation workshops<sup>88</sup>. The conclusions of the report give direction for further development of the programmatic work.

The participating States and civil society actors review the implementation of the Roma Action Plan at the annual Human Dimension Implementation Meeting (HDIM)<sup>89</sup>. Owing to the extensive scope of the Action Plan, the Roma session usually focuses on a specific area. Usually the main speakers are Roma experts (see below under 'Roma participation'). Issues related to the situation of Roma and Sinti are also periodically discussed at other human dimension meetings<sup>90</sup>.

The situation of Roma and Sinti rarely appears on the agenda of the OSCE's regular political decision-making body, the Permanent Council, as a separate issue. Roma affairs form a part of broader reporting duties of

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<sup>84</sup> ODIHR's Advancing the Human Dimension of Security in Ukraine project, which will come to a close in 2021, has worked with the country's authorities and civil society on several human dimensions as part of the OSCE's response to resolving the crisis in and around Ukraine. <https://www.osce.org/odihr/ukraine>.

<sup>85</sup> Hate crime reporting, <https://hatecrime.osce.org/>.

<sup>86</sup> <https://www.osce.org/odihr/roma-sinti-monitoring-infographic>.

<sup>87</sup> <https://www.osce.org/odihr/roma-sinti-action-plan-2018-status-report>.

<sup>88</sup> <https://www.osce.org/odihr/383397>.

<sup>89</sup> <https://www.osce.org/odihr/hdim>.

<sup>90</sup> Other human dimension meetings include the Human Dimension Seminars (HDS), organised by ODIHR, and informal Supplementary Human Dimension Meetings (SHDM), organised three times a year by the Chairpersonship.

ODIHR, other institutions and field operations. However, the Human Dimension Committee operating under the Permanent Council occasionally organises thematic discussions on Roma issues.

### *Interviews*

The interviewees stated that the OSCE has a strong mandate to improve the status of Roma and Sinti thanks to its extensive Roma Action Plan. The themes of the Action Plan remain as topical as ever. However, the potential of this mandate has not been sufficiently leveraged and the implementation of the Action Plan and the monitoring of the implementation has not been systematic.

The advantage of the extensive scope of the Action Plan is that the OSCE has the opportunity, and often also the readiness, to raise various issues flexibly. In terms of themes raised, the interviewees expressed the hope that ODIHR focus more on its strengths, such as the collection of hate crime data and work against hate crime and racism. The OSCE was found to be often the first European institution to take a position on human rights violations against Roma.

While the CPRSI was found to be a more visible actor than its size would merit, its limited resources and uncertainty of funding remain a challenge. As a result of the OSCE's consensus-based decision-making process, the organisation's annual budget is often not adopted until the spring, which leaves a very limited time for implementation. Therefore, more long-term external and voluntary funding is playing an increasing role in the implementation of the Action Plan. The funding of the Roma Action Plan has rested on the voluntary contributions of a few participating States. Since 2018, ODIHR has been applying for external funding through the more long-term, cross-sectoral programmes, which also include Roma-related elements. This was also estimated to improve access to more funding for Roma-related activities.

OSCE's field missions operating closer to the grassroots were considered to have the potential to step up their efforts on Roma issues, particularly in the Western Balkan countries seeking EU membership. The rights of Roma are an integral part of the development of the legislative framework concerning human rights and the rule of law required by the EU. EU funding is also presumable available for work towards EU membership.

### Roma participation

Of all the European institutions, the CSCE/OSCE has the longest traditions in involving NGOs in its structures and activities. The organisation's more open approach is based on the decision of the CSCE Helsinki Summit Document 1992 to allow access for NGOs to the Human Dimension Implementation Meetings. The participating States were invited to engage in proactive contacts with NGOs and to hold discussions with organisations both at and between the meetings.<sup>91</sup> NGOs may currently attend meetings and contribute on an equal footing with state participants, and all written statements are published<sup>92</sup>. NGOs may also organise side events that allow for a more informal and in-depth discussions on the themes of the meeting. The threshold for attendance in the meetings is low, with prior registration as the only requirement.

The two-week Human Dimension Implementation Meeting (HDIM) is considered the largest annual human rights conference in Europe. The meeting sessions are also streamed live. In addition to the six official languages of the OSCE, the sessions discussing the status of Roma and Sinti are also translated into Romani. However, the working sessions with the well-prepared and concise contributions do not support dialogue. A freer exchange of views is also prevented by the fact that the EU Members States deliver joint contributions

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<sup>91</sup> Persons and organisations who resort to violence or publicly condone the use of terrorism or violence were excluded from the provision. CSCE Helsinki Document 1992: The Challenges of Change, 9-10 July 1992, Chapter IV, paragraphs 14-17. <https://www.osce.org/files/f/documents/7/c/39530.pdf>.

<sup>92</sup> However, only participating States have the right of reply.



in the working sessions, which is supported by the EU candidate countries. As the contributions delivered by the EU tend not to discuss the situation in the EU Member States and the candidate countries in a critical light, this means that the discussion on the situation of Roma and Sinti often remains narrow.

The side events and informal meetings held during the HDIM offer a better platform for dialogue. The side events make the work of organisations more visible and enable a more spontaneous exchange of views. The number of Roma organisations at the HDIM varies, and many of them participate with ODIHR's support. The OSCE has also invited Roma to other human dimension meetings, both as representatives of NGOs and as independent experts. Whilst the meetings produce a wealth of recommendations aimed at various parties, monitoring their implementation remains sporadic. ODIHR compiles the recommendations of the HDIM and reports on the outcomes of the meeting to the OSCE Permanent Council.

Over the past few years, ODIHR has revitalised the activities of the International Roma Contact Group mentioned in the Action Plan. The Contact Group is intended as a platform for the exchange of views between Roma organisations operating at various levels across the OSCE region. The group convenes once a year on an invitational basis and with a variable composition. The aim is to bring in active Roma organisations and actors operating in various fields. The meeting participants select the topics for discussion. The aim is to give space to self-critical discussion without an externally imposed agenda as well as consolidate co-operation and the common positions shared by Roma actors.

The tasks assigned to ODIHR in the Action Plan also include clearing house activities. This means gathering information on the initiatives and models of the participating States, sharing information with Roma organisations on the activities and opportunities for participation within the OSCE and other institutions, and supporting the exchange of information between Roma organisations.

### *Interviews*

The interviewees noted that ODIHR is one of the European institutions most open to the participation of Roma organisations. Many of the civil society representatives interviewed had participated in the OSCE activities through the HDIM and consultations but were largely unfamiliar with the other aspects of OSCE's work on Roma.

Forums such as the Contact Group also provide a space for Roma organisations at the national and local level to express their views on the needs of Roma. Some of the interviewees pointed out the fact that CPRSI's employment of several people with Roma background lowers the threshold for participation. The interviewees found it a challenge that the meetings are fairly unstructured and that the discussions remain fragmented.

Roma organisations are encouraged to submit data for the annual hate crime report published by ODIHR. The data provided by NGOs complement the information obtained from the authorities of the OSCE participating States and international organisations on hate crime cases and could also highlight cases that have not come to the attention of the authorities. Every year, only some of the OSCE participating States provide data on hate crime against Roma, which is why an overall picture of the phenomenon is lacking. Until now, only a few Roma organisations have submitted their data for the purpose of hate crime reporting.<sup>93</sup>

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<sup>93</sup> <https://hatecrime.osce.org/taxonomy/term/229>.

## Activities of Finland and Finnish actors

As in the Council of Europe, Finland's thematic priorities for OSCE's Roma activities are the political and social participation of Roma, the rights of women/girls and education. Another topical theme is hate speech on social media.

Finland has also been a long-term supporter of Roma issues and a provider of voluntary funding in the OSCE. In 2016–2019, Finland financed the ODIHR Roma and Sinti Youth Initiative with EUR 100,000<sup>94</sup>. The initiative has supported grassroots projects developed and carried out by Roma youth in eight OSCE countries<sup>95</sup>. In 2017, ODIHR and Finland organised a side event at the Human Dimension Implementation Meeting. At this event, representatives of Roma youth presented the results and impacts of projects carried out by their organisations in their communities. The participation of young Roma in the HDIM has been supported in general and the young Roma participants have been offered preparatory training for effective conduct at meetings. The participants have also included few Finnish Roma. In addition, project funding has been used towards employing Roma youth for six-month internships at the CPRSI in Warsaw, organising election observer training for Roma youth, and supporting the participation of two Roma representatives in elections as short-term election observers. During the period under review, Finland has also seconded one Associate Programme Officer to the CPRSI (9/2016–9/2019).

In addition, the Ministry for Foreign Affairs provides annual grants to Finnish organisations and human rights organisations that support the activities of the OSCE. The purpose of this assistance is to increase the participation of Finnish NGOs in the OSCE's activities and to support co-operation based on the OSCE's comprehensive concept of security.<sup>96</sup>

Over the past few years, a few Finnish Roma have participated in consultations and the human dimension events. The ERTF participates in the meetings of the International Roma Contact Group.

## European Union

### The European Union's Roma policy

In October 2020, the European Commission published a Communication on the second EU Roma strategic framework<sup>97</sup>. Extending up to 2030, the strategic framework aims to promote effective equality, socioeconomic inclusion and meaningful participation of Roma. In March 2021, the Council of the European Union unanimously adopted the recommendation on the measures to be taken by the Member States to achieve the objectives of strategic framework<sup>98</sup>.

In the preparation of the strategic framework, the results of extensive consultations and the evaluation of the first framework, EU framework for national Roma integration strategies up to 2020, were utilized. Among

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<sup>94</sup> The project has also been supported by Austria, Bulgaria and the Czech Republic.

<sup>95</sup> Croatia, the Czech Republic, Georgia, Hungary, Italy, Poland, Serbia and Spain.

<sup>96</sup> In 2021, an appropriation of EUR 40,000 has been set aside for the purpose. <https://um.fi/etyjin-toimintaa-tukevien-jarjestojen-rahoitus>.

<sup>97</sup> Communication from the Commission to the European Parliament and the Council, A Union of Equality: EU Roma strategic framework for equality, inclusion and participation, 7 October 2020, COM (2020) 620 final, <https://eur-lex.europa.eu/legal-content/FI/ALL/?uri=CELEX:52020DC0620>. In addition to the communication and the documents supporting it, the Commission submitted a proposal for Council recommendations.

<sup>98</sup> Council Recommendation on Roma equality, inclusion and participation, 12 March 2021, 2021/C 93/01, [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOC\\_2021\\_093\\_R\\_0001&qid=1616142185824](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOC_2021_093_R_0001&qid=1616142185824).

the positive outcomes of the framework is the strengthening of structures and co-ordination: Roma inclusion has gained a higher profile on the EU and Member States' agendas, new national Roma strategies and fora have been created, a network of national Roma contact points and a monitoring system in collaboration with the European Union Agency for Fundamental Rights (FRA) has been built, and the implementation of national strategies has been facilitated through EU funding and support measures. However, the substantive objectives of the strategic framework were not achieved. The main conclusion of the evaluation was that little progress has been made in the integration of Roma over the past ten years, though there are significant differences between countries and the policies adopted by them. Whilst progress has been made in the fields of education, income, employment, health care and housing, in some respects the situation of Roma has even deteriorated.<sup>99</sup>

In its Communication, the Commission has identified seven EU-level objectives to be achieved by 2030. While the previous framework focused on the socioeconomic integration of Roma, the new framework has highlighted the promotion of equality and participation of Roma alongside socioeconomic inclusion. They constitute the three horizontal, cross-cutting objectives of the framework. As in the previous framework programme, the four sectoral objectives concern Roma education, employment, health and housing.

The Council Recommendation provides the Member States with a host of measures to promote each objective. The objective of Roma participation emphasises the importance of participation and consultation and the acknowledgement of Roma diversity (including women, children, young people, the elderly, and people with disabilities). These measures should contribute to capacity building and leadership in Roma civil society in order to enable Roma to participate at all stages of political decision-making and in public life in general. The measures place particular emphasis on supporting the active citizenship of Roma women and young people.

What is also new in the framework are the quantitative EU headline targets that require minimum progress to be achieved by 2030. It is stressed, however, that the long-term aim remains to ensure effective equality and to close the gap between Roma and the general population. In order to monitor progress, the Commission proposes the use of a portfolio of indicators. The indicators have been developed under FRA's leadership in co-operation with the Member States and the Commission.

The guidelines for national strategies include both common features and minimum commitments for all Member States and complementary national commitments. The approach aims to take account of differences in the sizes and situations of Roma populations in the Member States. The features shared by all national strategies highlight the cross-cutting objectives of the programme. Firstly, equality, in particular the fight against discrimination and antigypsyism, should be a key objective and priority in each policy area, and complement the approach based on inclusion. The choice of priority should ensure that Roma have real possibility of both economic and social inclusion and equal opportunities. Secondly, the meaningful participation of Roma should be ensured at all stages of decision-making. The participation of Roma should be promoted in such a way that they feel they are full members of society. Participation should be promoted by empowering and developing the capabilities of the various stakeholders involved and by building co-operation and trust.

The common features also emphasise the importance of taking the diversity within the Roma community into account. National strategies should cover all Roma living in the country in question and take into account the needs of varying groups in accordance with the intersectional approach. In addition, national strategies should combine mainstreaming and targeted actions<sup>100</sup>, and ensure that public services are inclusive and that

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<sup>99</sup> COM/2018/785 final.

<sup>100</sup> The 10 Common Basic Principles on Roma Inclusion, Principle 2 (Explicit but not exclusive targeting) implies focusing on Roma people as a target group without excluding others who live under similar socioeconomic conditions.

additional targeted support is available. The common features also emphasise the importance of regular data collection to support monitoring and reporting, improve transparency and accountability, and promote policy learning.

For the implementation of the EU-level targets, common minimum commitments are proposed to be included in national strategies. The setting of national targets should be based on a comprehensive needs assessment, and the strategy should include a system for consultation with Roma, Roma advocacy organisations, public authorities and various stakeholders. A separate budget should be set aside for the implementation and monitoring of the strategy, and adequate resources and staff should be secured for the national contact point. Member States are invited to complement the minimum commitments with additional national commitments and to set national qualitative and quantitative targets reflecting EU-level objectives. In addition, a Member State with a significant Roma population (more than 1%) is invited to make more ambitious commitments.

Member States hold the main competences in the areas covered by the framework. The role of the EU is to guide, co-ordinate and monitor the implementation. Member States shall monitor and evaluate the implementation of their strategies using, where appropriate, the portfolio of indicators developed under the lead of FRA or using national indicators. National actions are reported and monitored at both EU and national level. National reporting will take place every two years from 2023 onwards. The reports should be public and should also be debated at national parliaments. Similarly, FRA carries out a study every four years to provide information on baseline, mid-term and final results, indicating possible changes in the status of Roma. FRA will also support the data collection and reporting carried out in Member States. Co-ordinated independent NGO monitoring is also a key element in reporting. National reports will serve as a basis for the Commission's periodic monitoring reports on the implementation of national strategies, issued every two years.

On issuing the Communication, the Commission also published guidelines on policy design and implementation. The guidelines also set out guidance to better meet emerging challenges, such as tackling the disproportionate impact on Roma of crises such as the COVID-19 pandemic, ensuring digital inclusion and delivering environmental justice.

The Commission will continue to enforce existing EU legislation protecting Roma against discrimination and racism, and fill gaps where necessary. Above all, this means enforcing the application and implementation of the Racial Equality Directive<sup>101</sup> and the Council Framework Decision on Racism and Xenophobia and, where appropriate, launching infringement procedures. During the previous framework, the Commission initiated infringement proceedings under the Racial Equality Directive against three EU Member States for the segregation of Roma children at school.

The Commission intends to mainstream Roma equality in EU policy initiatives. The framework is the first direct contribution to the implementation of the recent EU Anti-Racism Action Plan (2020–2025). Frameworks are part of the current Commission's efforts to build a Union of Equality.

The framework will also be closely linked to the EU's new 2021-2027 multi-annual financial framework (MFF). A key funding programme for the implementation of the framework is the European Social Fund Plus (ESF+). The proposal for the programme calls on Member States and the Commission to ensure equality and non-discrimination in the implementation of programmes and refers to the promotion of the socio-economic integration of third country nationals and the inclusion of marginalised communities such as Roma. At least

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<sup>101</sup> Council Directive implementing the principle of equal treatment between persons irrespective of racial or ethnic origin (2000/43/EC).

25% of ESF+ resources must be promoted for social inclusion, and a minimum contribution should be allocated to those most in need. The Commission emphasises the non-discrimination aspect of programmes as well as the partnership principle, i.e. the involvement of all relevant stakeholders in the preparation, implementation and monitoring committees of the programmes. As the main beneficiaries of the EU budget, Member States have a key role to play in maximising the use of funding programmes to support Roma. Financial support is proposed, for example, for the implementation of national Roma strategies and measures.

The non-discrimination aspect has also been given more weight in, for example, the EU funding programmes in the field of justice. The new Citizens, Equality, Rights and Values programme (CERV) promotes the realisation of the EU's common values, as well as fundamental rights, equality and non-discrimination. The regulation on the establishment of the CERV Programme refers to the Roma strategic framework as well as measures to prevent and combat antigypsyism as measures to be supported. A new element in the CERV Programme are the Programme contact points to be established nationally with the aim of providing access to impartial guidance, practical information and assistance to applicants, stakeholders and beneficiaries with respect to all aspects of the Programme. In line with the European Parliament policy, the Programme places a strong emphasis on the role of NGOs. The Parliament has stressed that increased funding and adequate financial support are essential for NGOs to strengthen their role and carry out their tasks independently and effectively. The CERV Programme should also be available to grassroots NGOs and implemented in a user-friendly manner.<sup>102</sup>

#### *Support for Roma participation, diversity and equality*

During the previous framework, the EU financed the activities of national Roma platforms in 12 Member States, and in the new funding period funding will be directed towards the revitalisation of the platforms. The aim is to increase the representation of Roma and to involve civil society and other stakeholders advocating Roma issues in these platforms. The Communication places particular emphasis on promoting the active platform participation of women and young people, including the provision of traineeships for young people. Member States should also make full use of all other channels of co-operation and dialogue and increase networking between national and European Roma platforms.

As proposed by the European Parliament, the Commission will launch co-ordinated independent civil monitoring and reporting, building on lessons from the Roma Civil Monitor pilot project<sup>103</sup> (2017–2020). Co-ordinated independent civil monitoring reports are planned in two-year cycles starting in 2022, and they will be taken into account in the Commission's monitoring reports alongside national reports and data collected by FRA. At the national level, synergies between NGO monitoring and national Roma contact points are encouraged in order to align their reporting.

The Council Recommendations call on Member States to ensure funding to support the plurality and independence of Roma and pro-Roma civil society, including Roma youth organisations, thus enabling them to report on and monitor national Roma strategic frameworks as independent watchdog organisations as well as maintain their administrative capacity. Member States should support civil society in monitoring and reporting hate crimes and hate speech as well as other crimes against Roma and assist victims in reporting hate crimes and hate speech.

The Commission will continue to organise regular meetings with civil society and international organisations at the EU level. The Commission will also continue the work of the European Roma Platform. The Platform

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<sup>102</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0692&from=EN>.

<sup>103</sup> <https://cps.ceu.edu/roma-civil-monitor>.

brings together national and local authorities in EU Member States and candidate countries, as well as representatives of EU institutions, international organisations and Roma organisations, and aims at promoting co-operation and the exchange of experiences.

As part of the EU Anti-Racism Action Plan, the Commission is committed to measures that would significantly improve the representation of minorities, including Roma, in Commission staff. In order to support Roma equality, the Commission also supports measures to promote positive narratives and role models with Roma background, combat negative stereotypes, raise awareness of Roma history and culture, and promote truth and reconciliation.

### *Interviews*

In the interviews, the new framework was described as more ambitious and broader than the previous one. The framework has clear objectives and there are pressures to achieve these objectives, due to the insufficient results from the previous framework period.

The interviewees welcomed the fact that the new 10-year framework has been finalised and unanimously adopted by the Member States, despite the various crises affecting the EU. The interviewees invariably considered that the views of the civil society had been consulted in the preparation of the framework and taken into account in the setting of the objectives. The framework contains a number of themes pursued by NGOs, raising, in particular, the fight against discrimination and antigypsyism as a cross-cutting objective for the framework. The advocacy work has continued longer than a decade. The European Parliament, which has been using the term 'antigypsyism'<sup>104</sup> in its reports since 2005, has played an important role in the shift in discourse. NGOs were also consulted in the development of the indicators, with many of the indicators selected proposed by NGOs.

The interviewees stressed the need for action alongside the recognition of antigypsyism and discrimination. According to the interviewed NGOs, some of the EU level objectives of the framework are quite modest and problematic. For example, in the field of education, the aim is to halve the proportion of Roma children attending segregated primary schools by 2030. According to the organisations, the objective is problematic, because segregation is an illegal and discriminatory practice. The organisations also called for stronger wording in tackling, for example, racist practices among the police. Eradication-based anti-discrimination will require more robust methods alongside training. The interviewees also stated that much-emphasised 'participation' and 'empowerment' require that the basic living conditions are in order.

Following the adoption of the framework, attention will turn to the design of national strategies. The interviewees noted that the framework provides an extensive package of material and tools for discussion and target setting at the national level. The interviewees underlined the importance of consultation and participation of Roma in assessing the national strategies that are nearing their end or are under preparation. It is important to monitor that, in addition to minimum commitments, the additional commitments to be defined are appropriate and the strategies are implemented effectively.

The new framework includes a recommendation to make the biennial national reports public and to discuss the reports in national parliaments. In the view of the NGO representatives interviewed, greater transparency also supports civil society reporting. Most organisations had participated in the Roma Civil Monitor pilot and had found it a useful albeit demanding exercise. The pilot expanded the network of Roma organisations

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<sup>104</sup> The Commission communication uses the Alliance Against Antigypsyism network's definition of antigypsyism. <https://www.antigypsyism.eu>. In October 2020, the International Holocaust Remembrance Alliance (IHRA), an organisation promoting Holocaust remembrance, adopted the non-legally binding working definition of antigypsyism/anti-Roma discrimination. <https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antigypsyism-anti-roma-discrimination>. Finland has been a member of IHRA since 2010.



and provided information on advocacy work. It was considered challenging that the pilot included an empowerment element, while the time reserved for reporting was at the same time very short. In addition, the reporting required the identification of best practices. This was considered not to be the task of civil society, as it would require a longer-term review and a research-based approach. The organisations found the pilot application procedure cumbersome and noted that civil society reporting should be made a permanent element in EU budgeting.

The NGO representatives interviewed stressed the importance of strengthening national coalitions of Roma and pro-Roma organisations alongside co-operation with the authorities. Roma civil society should retain its role as a counterweight and a watchdog for public authorities.

### Roma participation

As a result of the strategic frameworks, Roma actors' dialogue with the EU Commission has intensified and become a standard practice. During the new framework period, the Commission will continue to consult Roma organisations. Organisations interested in participating in the consultation process are sought through an open call. All organisations that have registered their interest are regularly informed about current issues. On the basis of the applications, the Commission will also select the organisations to be consulted on the implementation of the framework at EU level. The Commission's Directorate-General for Justice (DG Justice) will organise meetings with the organisations selected for the consultation process three to four times a year. Various parties interviewed stressed the importance of the European umbrella organisations participating in consultations to maintain contacts with national and local organisations.

The organisations consider the annual European Roma Platform, which focuses on Roma inclusion, to be a useful forum for exchanging information. In addition to the Member States, the Commission consults NGOs on the agenda and preparation of the Platform. The organisations expressed the hope that Member States participate at a higher level and that the debate would be more inclusive. The results and recommendations of the Platform will be discussed at meetings of the national Roma contact points. It was also pointed out that better monitoring and continuity bridging the Platforms would be necessary.

The most visible of the regular events is the EU Roma Week, which was launched as a joint initiative of the European Parliament and NGOs. Since its launch, the number of event organisers has expanded, and nowadays the event brings between 300 and 400 participants to Brussels. The purpose of the event is to bring EU decision-making closer to Roma actors and to increase the visibility of Roma issues in the EU. Because of the initial format of the event, NGOs have stronger ownership of the programme, and they see the event as an important forum for networking and discussion. In connection with the week, the Roma organisations Tern-Ype, ERGO and Phiren Amenca arrange training for 50–60 young Roma on lobbying and EU decision-making. Young Roma from Finland and the Baltic Sea region have also participated in the trainings.

Like the Commission, FRA aims to include Roma organisations in its data collection and monitoring activities. There is also an ongoing dialogue with Roma organisations on the development of monitoring. In addition, the Fundamental Rights Forum<sup>105</sup>, held every three years, is increasingly highlighting Roma issues.

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<sup>105</sup> <https://fundamentalrightsforum.eu/>.

## Activities of Finland and Finnish actors

Finland<sup>106</sup> has supported the Council Recommendation and considers the strategic framework to have considerable European added value. Finland welcomes the fact that the programme is linked to other major EU policy programmes in line with the principle of mainstreaming, whilst also supporting targeted actions. Finland has also supported the proposal to take into account the impact of the COVID-19 crisis on the Roma population as a particularly vulnerable group. It is important to take into account the digital inclusion of Roma and environmental justice. In its contributions, Finland has also emphasised the efforts to improve the employment of Roma.

Finland considers it important that the EU Roma strategic framework be implemented and monitored effectively at the national and EU level. In implementing Roma strategies, it is important to make use of EU's financial instruments. Finland has stressed the importance of creating opportunities for Roma to participate in the implementation, monitoring and evaluation of the Roma strategy itself, and has emphasised the importance of taking the internal diversity of Roma communities and promotion of gender equality into account. Finland welcomes the flexible development of the strategy monitoring toolbox and reporting practices in a way that respects national data collection legislation and Roma populations. During the first Roma framework period, the Roma organisations involved in the Advisory Board on Romani Affairs, in particular, participated in data collection for the national monitoring reports.

The interviewees noted that the closer interconnectedness between the framework and the financial instruments provides an excellent opportunity to finance the implementation of national strategies. In the EU funding negotiations in the field of justice, Finland has pushed for the inclusion of an emphasis on discrimination in the programmes and for raising public awareness of discrimination and factors preventing inclusion. The interviewees welcomed the introduction of the contact point to support the new Citizenship, Equality, Rights and Values Programme, as it can lower the threshold for applying for funding as well as facilitate and develop partnerships. Many organisations have met with obstacles for participating in EU project application rounds. In addition to the self-financing requirements, the obstacles include language barriers and fear of the substantial administrative and auditing duties involved in EU projects. During the 2014–2020 framework period, ten Roma projects were implemented in Finland with ESF funding, some of which are still ongoing. In addition, two *Sanoista tekoihin* projects (Building Roma platform project and Upscaling the Roma Platform project) were implemented in 2016–2019 with funding from the Rights, Equality and Citizenship Programme. The projects, co-ordinated by the Ministry of Social Affairs and Health, promoted and monitored general awareness of the Roma Policy Programme (ROMPO) at the regional and local level<sup>107</sup>.

During the period under review, Finland has seconded an expert on Roma issues to the European Commission (Policy Officer, 5/2013–4/2015). A senior specialist from the Ministry of Social Affairs and Health / Advisory Board on Romani Affairs participates in the operations of the national Roma contact point network. NGO representatives may also attend the meetings of the contact points, and Finland is the only country to have brought a representative of the mobile Roma to the meeting. In addition, Finland has, as far as possible, been involved in the EURoma network<sup>108</sup>, which is co-ordinated by Spain and aims to improve the use of EU Structural and Investment Fund programmes to strengthen Roma inclusion.

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<sup>106</sup> Ministry of Social Affairs and Health, Basic Memorandum, Ministry of Social Affairs and Health 2021-00083, 6 March 2021.

<sup>107</sup> <https://romani.fi/sanoista-tekoihin>.

<sup>108</sup> <https://www.euromanet.eu/>.

## Situation and need for co-operation between European institutions

Co-operation with other European institutions is enshrined in both the Council of Europe, the OSCE and the EU Roma strategies and action plans. The institutions also have mutual co-operation agreements covering Roma issues. There are many similarities between the priorities and policies of the Roma policies of each institution. However, closer co-ordination between the policies has been found challenging owing to the various points of departure of the institutions in terms of their legal basis, competences, tasks, membership base and funding. Each institution was found to have its own basis of existence and follow its specific intervention logics.

The interviewees saw solid expertise and long experience in safeguarding and promoting human rights as the key strength of the Council of Europe. Normative work and independent monitoring and evaluation mechanisms as well as co-operation networks offer an extensive portfolio of tools for promoting Roma and Traveller rights. For example, monitoring the implementation of Member States' commitments through country visits and independent evaluations would also be suitable as a best practice for others.

The OSCE's broad mandate was seen both as its strength and partly as a weakness. The OSCE was often found to be the first of the institutions to react to attacks against Roma. The nature of the OSCE as an organisation includes building co-operation and engaging in dialogue with participating States as well as civil society. The OSCE's unique characteristic is its geographical scope and prominence in the field. It is the only institution in whose work the United States is involved, and the United States has been one of the most active participating States in Roma issues and has also supported the operation of the Contact Point for Roma and Sinti Issues. However, the limited resources compared to other institutions as well as the political nature of the decision-making make it difficult to develop activities on a long-term basis.

The European Union, in turn, has extensive political programmes, legal remedies and financial instruments in place to promote Roma inclusion and equality. For the first time, the EU Roma strategic framework and the financial instruments programming period will coincide, allowing for stronger interconnectedness between them. Although the objective and implementation of Roma strategies is the responsibility of the Member States, the EU may exercise significant guidance powers. The independent research-based expertise held by FRA has been found to be an asset not only for the EU but also for all bodies working on Roma issues. FRA is considered the most reliable and the most efficient provider of information on the situation of Roma populations, including Travellers.

Practical institutional co-operation takes place mainly between the secretariats and units responsible for Roma affairs. They invite each other's representatives as speakers and observers at events and organise joint events. Institutions also issue joint statements from time to time, such as on forced evictions of Roma and Travellers<sup>109</sup>. Topical themes common to all institutions are, for instance, addressing the disproportionate impact of the COVID-19 pandemic on vulnerable Roma<sup>110</sup> and combating hate speech targeted at Roma.

The closest practical-level co-operation in Roma affairs takes place between the European Union and the Council of Europe through their joint programmes. Mainly funded by the EU, the purpose of the projects is twofold: they form part of the implementation of the objectives of the Council of Europe Strategic Action Plan for Roma and Traveller Inclusion and bring the countries participating in the projects closer to a European Union membership through achieved human rights objectives.

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<sup>109</sup> See, e.g. <https://www.osce.org/files/f/documents/7/6/249056.pdf>.

<sup>110</sup> FRA report: <https://fra.europa.eu/en/publication/2020/covid19-rights-impact-september-1>; ODIHR report, <https://www.osce.org/odihr/human-rights-states-of-emergency-covid19>; Council of Europe Publications, <https://www.coe.int/en/web/committee-antidiscrimination-diversity-inclusion/publications>.

The Council of Europe and ODIHR co-operate in the field of police training in order to improve synergies and co-operation. Another common theme is the strengthening of the political participation of Roma. Both institutions have developed their own training content on the subject, but with varying emphases. The Council of Europe and ODIHR also share a website providing information on the Genocide of Roma in the Second World War<sup>111</sup>. In September 2016, ODIHR and the Council of Europe held a High Level Meeting on discrimination, racism, hate crime and violence against Roma communities. The meeting was hosted by Germany as the OSCE Chairmanship, and co-organised by the Central Council of German Sinti and Roma. The event was attended by representatives of the OSCE and the Parliamentary Assembly of the Council of Europe, members of the European Parliament and national parliaments, representatives of governments, and NGOs. The meeting aimed to strengthen coalitions and the role of political leaders in the fight against antigypsyism.<sup>112</sup>

Co-operation with UN organisations is less active. By way of publications and study visits, the OSCE and UNHCR have mutually raised awareness of the situation of stateless Roma who have no access to identity documents<sup>113</sup>. Practical co-operation between UN organisations and European institutions on Roma issues is mainly taking place in the Western Balkans and Ukraine; for example, in relation to the joint EU and Council of Europe programme ROMACTED and UNDP co-operation connected with Roma returnees in the Western Balkans<sup>114</sup>.

The Roma policies of each of these institutions focus on the strengthening of Roma participation. Regular dialogues, consultations and exchanges of information with Roma organisations and experts are also an integral part of their respective activities. Many of the European Roma organisation representatives interviewed said they were involved in the activities of all three institutions. According to the organisations, inter-institutional co-ordination should be significantly strengthened. For example, in matters related to young Roma, NGOs often find themselves in a co-ordinating role, because the exchange of information between institutions is inadequate. Due to their limited resources, NGOs are required to be selective with regard to their participation in the various platforms. Roma youth networks also saw maintaining young people's interest in advocacy activities as a challenge, as these institutions are felt to be distant<sup>115</sup>.

ODIHR has put forward an initiative to step up the work of the Informal Contact Group on Roma of the Intergovernmental Organisations, as mentioned in the OSCE Roma Action Plan. The purpose of regular meetings would initially be to share information on plans and, moreover, eventually co-ordinate actions and co-operation in order to avoid overlaps.

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<sup>111</sup> <https://www.coe.int/en/web/roma-genocide>.

<sup>112</sup> <https://www.osce.org/cio/262606>.

<sup>113</sup> <https://www.osce.org/handbook/statelessness-in-the-OSCE-area>.

<sup>114</sup> [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa\\_ii\\_2019-040-826.17\\_roma\\_action.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2019-040-826.17_roma_action.pdf).

<sup>115</sup> In a recent survey conducted by Phiren Amenca, young European Roma identified the ignorance of general youth programmes and distrust of public institutions as the main obstacles to participation. [https://phirenamenca.eu/category/projects/roma\\_youth\\_voices/](https://phirenamenca.eu/category/projects/roma_youth_voices/).

## Co-operation between European Roma organisations and networks

Over the past few years, an increasing number of European Roma organisations have appointed a Roma leader. Some of the organisations interviewed have directed more resources towards advocacy work and have carried out EU-funded projects.

The informal coalition of Roma and pro-Roma organisations in Brussels has been active particularly during the preparation of the EU Roma strategic framework and multi-annual funding programmes. The European Roma Coalition network co-ordinated by the ERGO Network has been used for the exchange of information, the preparation of joint statements<sup>116</sup>, and preparatory meetings prior to consultations organised by the Commission. The network has grown organically and includes both Roma umbrella organisations and grassroots Roma organisations, including the ERTF. In addition to Roma-specific issues, organisations are increasingly working towards mainstreaming Roma issues into the various EU policy programmes and participating in various thematic networks at the EU level. The number of topics to be monitored is so large that organisations have shared responsibilities in accordance with their areas of expertise.

As part of the preparatory process for the EU strategic framework, an expert report on the involvement of Roma actors particularly in EU Roma policy-making, was published<sup>117</sup>. One of the proposals put forward in the report concerned the creation of an umbrella organisation for European Roma organisations. Each national Roma coalition would have its representative in the umbrella organisation, which would have a small secretariat with funding from the EU (a similar structure exists in the European Women's Lobby).

Some of the NGO representatives interviewed felt that there is still a need for a common, legitimate voice of Roma. At the same time, however, the organisations felt that the creation of a new European, representative umbrella organisation was unrealistic. Roma organisations are so diverse in their nature and objectives that attempting to fit them under one organisation would not be feasible. The organisations took the position that the necessary capacity and funding for building a common umbrella organisation did not exist.

Several of the NGO representatives interviewed favoured a pragmatic approach to the development of co-operation. Priority should be given to strengthening existing networks and supporting their sustainability. Many organisations are struggling with the lack of continuity in their funding. Funding for basic activities is difficult to obtain, which is why organisations depend on project funding, usually provided by the EU. Some organisations do not accept funding from individual governments and focus exclusively on EU projects. However, the continuity of the activities launched under projects is uncertain, and their results cannot be disseminated without further funding. Consolidating operations and basic funding is a lengthy process. This is related to the resource vulnerability mentioned in the recommendations.

Some of the NGO representatives interviewed saw a need to expand the current coalition. Whilst the most intensive phase of lobbying is over with the adoption of the framework, it is believed that the coalition will continue as an informal information exchange network. However, the network should be developed to include thematic subgroups. A more ambitious objective would be to set up a co-ordination group of a few organisations to maintain a network of key European organisations and researchers representing expertise in various fields. Similar coalitions could be built at national level.

There is a continuing need for strengthening the links and exchange of information between organisations at the local, national and European level. For example, the ERGO Network has 30 member organisations in 24

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<sup>116</sup> See, e.g. [statement on the Recommendation](#) of the Council of the EU of 17 March 2021.

<sup>117</sup> Violetta Zentai, Georgeta Munteanu and Simona Torotco: The Quality of Participation in a post-2020 EU-Initiative for Roma Equality and Inclusion, European Commission, DG Justice and Consumers, January 2020, [https://ec.europa.eu/info/sites/default/files/post2020\\_eu\\_roma\\_in\\_participation.pdf](https://ec.europa.eu/info/sites/default/files/post2020_eu_roma_in_participation.pdf).

countries, and it uses its network to build bridges between grassroots and European level actors<sup>118</sup>. The European organisation representatives interviewed have some contacts with organisations in Finland and the Baltic Sea region. Roma youth networks are more closely-knit. Extending networks towards northern Europe is one of the identified areas of development for several organisations.

One positive example of the grassroots activities of European Roma networks mentioned in the interviews concerned the Roma genocide remembrance initiative *Dikh He Na Bister* ('Look and don't forget')<sup>119</sup>. Launched by TernYpe - International Roma Youth Network and its partners in 2010, the initiative brings between 500 and 1,000 young people to Krakow and Auschwitz in connection with the Roma Holocaust Memorial Day. Several young Finnish Roma have also participated in the event. The week-long event offers an opportunity to learn about history and reflect on the role of young people in the remembrance of the Holocaust. Young people nowadays also have a role in the official memorial event. The movement, which started without external funding, has gained considerable visibility, and is now receiving support from the Council of Europe and funding from the EU.

## Chapter 3: Roma inclusion in the Nordic and Baltic regions

*One of the aims of this explanatory study is to explore ways to increase the opportunities of Finnish Roma to participate in European Roma policy-making. One option that has been raised is to increase co-operation between the Nordic and Baltic regions and, subsequently, to develop meaningful participation at the national, regional and European level. In this section, we examine the specific characteristics of Roma policies in Finland, Sweden, Norway, Denmark, Estonia, Latvia and Lithuania. For this section, public officials responsible for Roma policies as well as Roma actors were interviewed with the aim of obtaining a comprehensive situational overview. In addition to providing an overview of the structures and actors of Roma policy in each country, the interviews have also provided a basis for the Baltic Sea dialogue. Interviews and the dialogue together form a process that supports meaningful and effective participation and promotes Roma participation in decision-making that affects them.*

### Structures and actors of the Finnish Roma policy

Finland has a long history of co-operation between the Roma community and the State administration. The Advisory Board on Romani Affairs (RONK)<sup>120</sup> was established in 1956 under the aegis of the Ministry of Social Affairs and Health. However, the first few decades of the Advisory Board operations did not support Roma participation: the body had only one Roma representative and engaged in a strong assimilation policy. The change in policy took place at the turn of the 1970s and the number of Roma in the Advisory Board increased, partly as a result of the empowerment of Roma activism and the changing general political climate, which was more supportive of minority rights<sup>121</sup>. At the same time, the assimilation policy was given less weight and more attention was paid to the rights of Roma (Friman-Korpela, 2014; Stenroos, 2019). Today, Advisory Board members equally represent Roma organisations and Government agencies (Finlex 1019/2003). In addition, in accordance with the Finnish Act on Equality between Women and Men, the proportion of both women and men in the Advisory Board is at least 40 per cent.

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<sup>118</sup> <https://ergonetnetwork.org/>.

<sup>119</sup> <https://2august.eu/>.

<sup>120</sup> <https://romani.fi/en/front-page>.

<sup>121</sup> <https://www.romarchive.eu/en/roma-civil-rights-movement/roma-civil-rights-movement-counter-weight-religiou/>.



In the Finnish section, the interviewees represented four Roma organisations which geographically cover almost the entire country. In addition, an official from the Ministry and two individual actors representing European-level bodies were interviewed.

Finland adopted its first Roma strategy (Roma Policy Strategies) as early as 1999, a decade before the European Union encouraged its Member States to implement Roma policy programmes<sup>122</sup>. Finland's National Roma Policy as required by the National Roma Integration Strategies up to 2020 (NRIS) was initially issued for 2009–2017 (ROMPO1)<sup>123</sup>, followed by the second policy for 2018–2022 (ROMPO2)<sup>124</sup>. The policies issued by Finland are not, therefore, fully co-ordinated in line with the EU strategy periods. In the summer of 2021, work will begin on the next policy, aligned with the new EU Roma strategic framework for equality, inclusion and participation, until 2030. Finland ratified the Framework Convention for the Protection of National Minorities of the Council of Europe in 1997 and it entered into force in 1998.

Finland's national Roma population consists of the Finnish Kale, of whom there are around 10,000 –12,000 in Finland. In addition, a few thousand Finnish Kale live in Sweden. This report excludes mobile Roma, which are groups that have recently arrived from Central and Eastern European countries and who are residing in Finland, in many cases, only temporarily. The fact that mobile Roma are seen as a group separate and excluded from national Roma policies is seen by some Roma actors as an anomaly that should be addressed.

In addition to the Advisory Board on Romani Affairs, four separate regional Roma Advisory Boards<sup>125</sup> have been set up, working as cross-administrative co-operation bodies between the authorities and the Roma population under the Regional State Administrative Agencies. The regional Roma Advisory Boards contribute to the implementation of the Roma policy agenda. In addition, separate Roma working groups and various working networks have been set up in cities, but they do not cover all municipalities and cities. To serve the needs of the local implementation of the National Roma Policy, additional guidance for regional and local actors (ROMPO2, 2018) (MAARO guide) has been published<sup>126</sup>. The implementation of Finland's National Roma Policy has been commended by European actors for the long history of co-operation between the Roma population and the government.

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<sup>122</sup> <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/70957/Selv199909.pdf>.

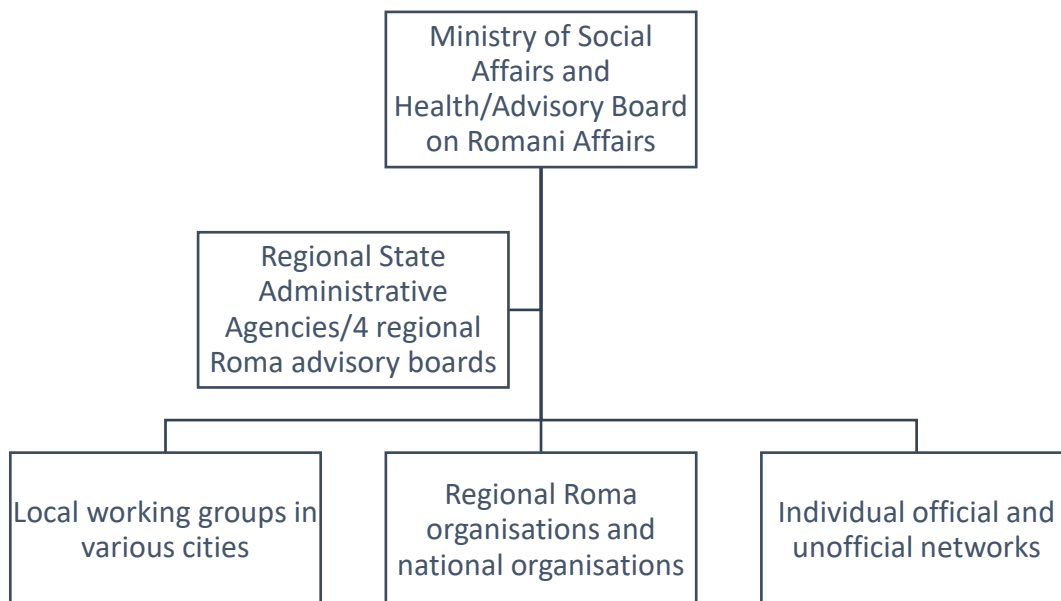
<sup>123</sup> <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/72788/URN%3aBNB%3afi-fe201504225296.pdf?sequence=1&isAllowed=y>.

<sup>124</sup> [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/160845/03\\_18\\_Suomen%20romanipoliittinen%20ohjelma\\_2018\\_2022\\_web.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/160845/03_18_Suomen%20romanipoliittinen%20ohjelma_2018_2022_web.pdf?sequence=1&isAllowed=y).

<sup>125</sup> <https://romani.fi/alueelliset-romaniasiain-neuvottelukunnat>.

<sup>126</sup> <https://romani.fi/suomen-romanipoliittinen-ohjelma>.

The graphic below illustrates the structural implementation of Finland's National Roma Policy.



The implementation of Finland's Roma policy is institutionalised and comprehensive. This means that Roma policy-making in Finland is rooted in administrative structures, making the system unique compared to many other European countries. Despite this, interviews with Roma actors have revealed that, in reality, Roma policy-making remains in the hands of a few actors, and the implementation of Roma policy does not enjoy wide support among the Roma population as the policy remains unknown to many of Roma. Since Roma policy-making is considered an exercise reserved to an exclusive group of people, it is considered elitist. In sum, Finland has a relatively feasible and comprehensive mechanism for the implementation of Roma policy, but there is a wide gap between the ordinary Roma population and Roma policy-making, despite the efforts of mainstreaming. According to a Roma activist, the Roma community at large is not necessarily aware what the Roma policy in Finland involves. In the opinion of the NGO representatives, openness, transparency and efficient information dissemination are challenges that should be addressed. In addition, the resourcing of RONK is considered problematic: 'It is up to one person to engage the entire Finnish Roma from small children to the elderly while juggling a huge number of international tasks. One person simply cannot do everything,' one Advisory Board representative asserts.

#### Themes raised in the interviews

Information on how to participate in either national and international meetings and events is not widely available. This means that the expert knowledge obtained through these platforms will not be shared in a systematic and structured manner amongst various actors in the field. As a result, there is an image that certain things are accessible only to a small, privileged section of the Roma population. One of the NGO representatives noted that, as long as Roma policy-makers do not have the support of the general Roma population, Roma policy in Finland will not move forward. In Finland, the involvement of citizens in policy-making is often channelled through various online consultation portals. Roma participation and advocacy are also largely consultation-based, which makes this model unsuitable for many Roma due to, among other things, low educational attainment. Therefore, there is a need to develop and introduce new methods for participation and influencing. At local level, it was also considered a challenge that pursuing Roma-related

issues can depend on an individual official, and when the official is replaced, matters may become complicated.

It was also considered a problem that the recommendations for action in the Nation Roma Policy are not being implemented locally and to the desired extent in practice<sup>127</sup> and, for example, substance abuse and drug problems among young people are not being given sufficient attention<sup>128</sup>. A proportion of young Roma are highly disadvantaged; though, at the same time, there are a number of Roma youth who are more educated than the generation before them. According to the interviews with Roma actors, such polarisation among the Roma community has increased. Young people active in organisations and various youth networks are often also interested in European co-operation, but obtaining information about participation channels is sporadic, and young people would need support in gaining access to different kinds of events and initiatives. Being involved in the development of international Roma politics requires familiarisation, language skills and the knowledge of the development structure. Inclusion could potentially be promoted by offering training and coaching to Roma youth.

The fact that the division of labour between the Advisory Board on Romani Affairs and regional Roma Advisory Board workers is not clearly defined was seen as a problem. The regional Roman Advisory Boards are tasked with serving as a bridge between the Roma population and the authorities. However, the attendance in the consultations regarding Roma policy-making is, in reality, relatively low. According to NGO representatives, this does not meet the criteria of wide Roma participation. From an officials' point of view, targeted consultations for women, for example, have been highly successful. This shows that the views on effective and meaningful participation vary. Some actors feel that the participation and inclusion of Roma in Finnish Roma policy-making is currently poor, necessitating a more active approach to developing Roma policy. An idea raised at the dialogue meeting was that, since Roma questions in Finland have been addressed relatively well in the past compared to many other countries, the Roma policy-developers in Finland "rest on their laurels" and risk falling behind in learning new methods along their European counterparts to effectively participate and make a difference.

### European co-operation

Co-operation between Roma organisations in the international and Nordic and Baltic regions takes place mainly through religious and humanitarian activities, especially in the Baltic states. The past few decades have seen a significant deterioration in the co-operation between the Nordic countries in Roma affairs. Now that young Roma are becoming increasingly involved in the field of Roma policy-making, interest in international Roma policy has been rekindled. A lot also depends on how efficiently information about international opportunities for co-operation is shared, as well as how successfully the interest of the actors can be aroused and the commitment to their work solidified. Young Roma have been involved in the activities of the Phiren Amenca and<sup>129</sup> TernYpe networks<sup>130</sup>, and have developed European-wide contacts as a result. In this respect, the Roma actors expressed the wish that Finland would pay closer political attention to the mobile Roma population in Central and Eastern Europe.

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<sup>127</sup> According to a government official, the problem is that no time limits have been set for the implementation of the measures and no budget appropriations have been allocated to them, which means that the execution of the measures depends mainly on project funding.

<sup>128</sup> Roma Civil Monitor Report 3 (RCM). See <https://cps.ceu.edu/roma-civil-monitor-reports>.

<sup>129</sup> <https://phirenamenca.eu/>. Phiren Amenca is a network that seeks to improve Roma inclusion and dialogue and to challenge the stereotypes and racism faced by Roma.

<sup>130</sup> <http://www.ternype.eu/about-ternype>. TernYpe is a Roma youth network promoting the interests of Roma youth.

According to the interviewees, there is a clear need for co-operation between the Nordic countries and Baltic states. At the same time, it is recognised that such co-operation required new resources and solutions. The benefits of international activities should be tangible in order for parties to invest in them.

## Structures and actors of the Swedish Roma policy

At the turn of the millennium, Sweden alongside other Nordic countries (excluding Iceland) ratified the Council of Europe Framework Convention for the Protection of National Minorities (Treaty 157<sup>131</sup>). Sweden has also ratified the European Charter for Regional or Minority Languages. In addition, Sweden, as a member of the European Union, aligns its Roma policy with the EU Roma strategic framework for equality, inclusion and participation up to 2030<sup>132</sup>. The interviewees for the Swedish section of the report included a government official, Roma organisation representatives, a member of the monitoring group *romska referensgrupp*, and, in addition, written materials were provided by the Roma Centre of the Municipality of Malmö (*Romskt informations- och kunskapscenter*)<sup>133</sup>.

Sweden's Roma policy took a step forward at the turn of the millennium, when the above treaties were ratified (Helakorpi, 2020, s. 31). At this juncture, Sweden also defined the five national minority groups (Jews, Sámi, Swedish Finns, Tornedalers and Roma), which meant that a widely heterogeneous group of varying Roma communities were assigned under the same ethnic category<sup>134</sup>. The Act on National Minorities and Minority Languages (2009:724)<sup>135</sup> was revised in 2018<sup>136</sup>. Laws and programmes that support minority rights can be seen as the result of pan-European policies and agreements between European (EN and EU) institutions. The Council of Europe estimates that the number of Roma in Sweden is approximately 42,000<sup>137</sup>.

Sweden has adopted a co-ordinated long-term strategy for Roma inclusion 2012–2032. The aim of the policy is for every Roma born in Sweden in 2012 onwards to have equal opportunities for social participation by the person's 20th birthday (by 2032)<sup>138</sup> (Skr. 2011/12:56<sup>139</sup>). In Sweden, Roma policy forms part of the country's general minority policy. An interim delegation was appointed for the long-term planning to prepare the Roma strategy in January 2007<sup>140</sup> (SOU 2010:55<sup>141</sup>). That delegation included Roma representatives and various sectors of central government, such as housing, employment and education authorities.

Sweden's Roma policy is aimed at Roma who have lived permanently in the country for a long time, which leaves the mobile Roma population outside the scope of the Roma policy measures. The exclusion of the mobile population from the Roma strategy is a specifically Nordic approach<sup>142</sup>, as in many European countries

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<sup>131</sup> Framework Convention for the Protection of National Minorities.

Reference; ETS No.157. <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/157>.

<sup>132</sup> The Council of the European Union adopted the Commission's proposal for a new strategy in March 2021 (COM/2020/621 final). The previous strategy was entitled the EU Framework for National Roma Integration Strategies up to 2020 (NRIS).

<sup>133</sup> <https://malmo.se/Romskt-informations--och-kunskapscenter.html>.

<sup>134</sup> The Roma community in Sweden consists of several individual groups, such as Arli, Lovara, Polska Roma, Finnish Kale and Sweden's old Roma population, Rom(Granqvist, 2021, p. 9).

<sup>135</sup> <https://www.minoritet.se/6714>.

<sup>136</sup> 2017/18:199 En stärkt minoritetspolitik.

<sup>137</sup> [https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-sweden\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-sweden_en).

<sup>138</sup> This was widely criticised by Roma organisations, as equality is something that should be achievable now.

<sup>139</sup> [https://ec.europa.eu/info/sites/default/files/roma\\_sweden\\_strategy\\_en\\_0.pdf](https://ec.europa.eu/info/sites/default/files/roma_sweden_strategy_en_0.pdf) The coordinated long-term strategy for Roma inclusion 2012–2032.

<sup>140</sup> [http://arkiv.minoritet.se/romadelegationen/www.romadelegationen.se/dynamaster/file\\_ar-chive/080924/8649012cecd4affc58173c3a2dcbfc84/Infofolder\\_engelsk\\_080904.pdf](http://arkiv.minoritet.se/romadelegationen/www.romadelegationen.se/dynamaster/file_ar-chive/080924/8649012cecd4affc58173c3a2dcbfc84/Infofolder_engelsk_080904.pdf).

<sup>141</sup> <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2010/07/sou-201055/>

<sup>142</sup> While the travelling Roma population is mentioned, for example, in the Finland's National Roma Policy, the policy does not, as such, apply to them.

Roma policy also covers the mobile Roma population. According to a government official, the mobile Roma matters mostly fall within the remit of the social welfare and the police. In the future, Sweden as well as Finland and Norway will have to consider how they will safeguard the rights of the mobile Roma populations and improve their living conditions.

The Swedish Act on National Minorities, adopted in 2019, obliges municipalities to engage in dialogue with minority representatives. Initially, the implementation of Roma policy was piloted in five municipalities (Luleå, Malmö, Helsingborg, Linköping and Göteborg) where investments were made in Roma inclusion. Currently there are five municipalities (Gävle, Borås, Stockholm, Haninge and Uppsala) participating in the municipal pilot scheme. In 2021, Sweden was to choose five new municipalities to make investments in Roma inclusion, but the Government did not allocate funds for this purpose. In 2016, the Swedish Government divided the responsibility for Roma involvement amongst various administrative branches, with the overall responsibility for developing the Roma strategy transferred to the County Administrative Board of Stockholm (*länsstyrelsen Stockholm*). According to a Roma actor, it is up to the various administrative branches to decide for independently how to manage Roma affairs and how to develop Roma inclusion. According to the interviewee, the result was that in 2021 many previous measures remain unfinished because the Swedish State does not oblige administrative sectors to adopt specific measures or practices, nor does it allocate funds for this.

While Sweden's minority policy is ambitious and goal-oriented, according to the Roma Civil Monitor shadow report<sup>143</sup>, the challenges in implementing the policy at the municipal level have rendered the national strategy a “paper tiger”. The challenge in the implementation has also been acknowledged at the governmental level. According to an official working in this area, the challenge has been precisely the relatively limited measures taken by the municipalities despite them being a statutory requirement. In particular, the financial discipline exercised during the pandemic has led to municipalities neglecting their commitment to meet the obligation as desired. Municipalities receive state aid for launching minority policy measures, but after initial funding, responsibility for funding rests with the municipality. Swedish municipalities act independently and decide on their own measures. A case in point is the City of Malmö with its Roma information and resource centre, *Romskt informations- och kunskapscenter*, which specialises in the implementation of local Roma policy. The City of Malmö has its own implementation plan for 2020–2022<sup>144</sup>, and the implementation is monitored and reported on annually.

### Forms, means and challenges of Roma inclusion

In early 2010, Sweden invested in the training of Roma mediators at the Södertörn University in Stockholm. The aim was to train Roma mediators to act between local authorities and the Roma population in order to gain better mutual understanding and increase Roma inclusion<sup>145</sup>. According to both the government official interviewed for this report and the survey on the activities, the training had positive impacts, but this practice also faced challenges when introduced at the municipal level. Due to the challenges at municipal level, the measure has partly remained a short-term experiment, even if the effects were convincing.

Sweden also planned to set up a separate authority for Roma affairs and to open a special Roma centre. However, this initiative was strongly opposed by various Roma groups in Sweden<sup>146</sup> and it was eventually abandoned. According to the government official interviewed, the Roma position was correct: the initiative

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<sup>143</sup> Roma Civil Monitor (2018) Civil society monitoring report on implementation of the national Roma integration strategies in Sweden. <sup>144</sup> Action plan for the Roma national minority in Malmö 2020–2022.

<sup>144</sup> Action plan for the Roma national minority in Malmö 2020–2022.

<sup>145</sup> <https://www.statskontoret.se/In-English/publications/2016---summaries-of-publications/evaluation-of-the-bridge-building-investment-in-the-strategy-for-roma-inclusion-20163/>.

<sup>146</sup> In the Facebook group “Vi säger NEJ till ett myndighets strukturerat romskt center!” (“We say NO to an official Roma centre!”), there was a lively discussion about setting up an authority focusing on Roma affairs.

might have slowed down or hampered the mainstreaming of Roma policy issues, as matters would have been channelled through one agency while cross-sectoral issues (employment, housing, education) would have been overlooked.

The interim committee set up to design the long-term Roma strategy terminated its activities after the strategy was completed. The Roma strategy makes it a mandatory requirement to involve Roma in the making and evaluation of Roma policy, for which purpose the first monitoring group (*referencesgrupp*) was appointed in 2013. The Government is inviting Roma participants through an open call<sup>147</sup>, and the current group (20 members) will operate until 2022<sup>148</sup>. In order to prevent discrimination against Roma and protect Roma rights, the government also set up the Antiziganism<sup>149</sup> Committee in 2014, but after a few years of operation, according to the government official interviewed, this committee was no longer considered necessary, as it had achieved its objective.

### Other themes raised in the interviews

Despite the above measures, the Roma actors in Sweden do not feel that their involvement in Roma policy-making is meaningful and satisfactory. The monitoring group receives the meeting documents related to Roma policy decisions for comment, but there are no Roma representatives at the actual meetings. A Roma representative describes the situation by saying 'they invite us to the door but do not let us in'. The problem in this model is that the monitoring group works with finalised documents and policy decisions which the Roma members will be able to comment on, but not directly influence during their preparation. According to a representative of a Roma umbrella organisation, the authorities go to meetings to discuss Roma issues without a single Roma being present. The previously mentioned Roma campaign against a special Roma authority indicated that to be heard and noted, requires active intervention while the plans are still pending, and hence Roma are not involved in the planning of the actual measures. Of course, since the Roma population in Sweden is quite heterogeneous, there are also varying views on Roma policy implementation. However, on the basis of the interviews, the Roma in Sweden feel that as long as Roma themselves are not involved in designing and implementing Roma policy measures, Swedish Roma policy will not work in practice; 'You have to have influence in politics, not just be there to listen,' says a Roma representative. Although according to the government official interviewed, the Roma are deeply involved in the decision-making process related to Roma issues, not all Roma share this view and achieving a common approach is still a challenge for the future. At this point, however, it is important to recognise that only some Roma groups in Sweden were interviewed for this report. The government official interviewed noted that all the elements of the Roma strategy are there, but the challenge is in the implementation. There is dialogue with Roma groups, but it is not enough: Roma should also be aware of their rights and demand them at the municipal level and, moreover, local authorities must be committed to implementing minority policies, the government official emphasises.

Two overriding themes emerge from the data: trust and lack of resources. Sweden's Roma policy seems ineffective from the Roma's point of view, as implementation does not extend to the local government sector and Roma themselves are not involved in designing or implementing the measures. The lack of trust stems from the experiences of Roma at the local level. Based on the data collected for the report, it seems that the challenges in Sweden and Finland are very similar: the grassroots needs are not met in a concrete way or at the expected level. As an abstract document, the Roma strategy is ambitious in its objective and appears to offer an effective tool for policy-making, but it ultimately fails to engage its target group. 'Roma involvement

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<sup>147</sup> <https://www.minoritet.se/5297>.

<sup>148</sup> Author's note: a similar selection procedure could also work for ABRA, as this would create rotation among the various actors.

<sup>149</sup> Antigypsyism. <https://www.minoritet.se/user/motantiziganism/english/about-us/index.html>.<sup>150</sup> The Nordic Romani Council served as a Roma organisation from the 1970s to the 2000s.



is important and should be strengthened. However, the likelihood of achieving the goals is minimal because there is no budget for the necessary measures,' as a Roma representative concludes.

### European co-operation

As part of the European Union, Sweden complies in its Roma policy programmes with the EU frameworks and the Council of Europe conventions on minority rights. In relation to this, the officials work closely with European actors (e.g. ADI-ROM, FRA). Sweden has less co-operation with Norway and Denmark; co-operation with Finland should also be increased as soon as pandemic situation allows.

Co-operation between Roma organisations in other Nordic and Baltic countries remains limited. Efforts have been made in the past to establish co-operation with Norway, for example, but these initiatives have fallen short due to a lack of funding and resources. However, Finland and Sweden have a long history of Roma co-operation<sup>150</sup>. The continuation and rekindling of co-operation between the Nordic countries is considered important. Swedish Roma actors have participated in some joint European events and meetings but, in practice, it is difficult for anyone who does not work on Roma issues on a daily basis to understand the complicated structure of the European Roma policy or even the measures taken by their own country as part of the implementation of the European Roma policy. As a rule, this view was held by all the Roma actors who participated in the interviews in Sweden and Finland.

### Structures and actors of the Norwegian Roma policy

Norway is the only country included in the report that is not a member of the European Union. This has a direct impact on the compilation of Roma policy programmes, as the Recommendations of the European Commission do not apply to Norway and do not bind Norway's Roma policy (such as the reporting practices). However, Norway, like Finland and Sweden, has ratified the Council of Europe Framework Convention for the Protection of National Minorities (Treaty 157<sup>151</sup>). Likewise, Norway has ratified the European Charter for Regional or Minority Languages. Both the Framework and the Charter apply to the Norwegian Roma (Rom) and the travelling Roma (Romani people/Tater). These two Roma populations both belong to the national minorities and their status is protected by both the Framework and the Charter<sup>152</sup>. However, the Roma (Rom) and the travelling Romani people (Tater) are two separate groups; Romani people have been part of Norwegian history for a longer period of time than the Rom. The Romani people communities live in various parts of Norway, whilst the Rom community is located mainly in the region of the capital city Oslo. For the purposes of this report, two ministerial officials were interviewed as well as two individual entities representing both the Rom and the travelling Romani people.

The number of Tater Romani is difficult to estimate, but it is thought to range between 4,000 and 10,000<sup>153</sup>. The Rom community residing in the Oslo region is estimated to have 600–900 members. Unlike Sweden and Finland, Norway does not have a separate Roma policy programme, but both the Tater Romani people and

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<sup>150</sup> The Nordic Romani Council served as a Roma organisation from the 1970s to the 2000s.

<sup>151</sup> Framework Convention for the Protection of National Minorities.

Reference; ETS No.157. <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/157>.

<sup>152</sup> The boundaries of ethnic categories are often blurred, and different names used to refer to a group may be controversial. However, the scope of the present report does not allow for a discussion on the problematics of ethnic identities. According to Helakorpi (2020), the generic concept pair "Roma and Travellers" may be used in reference to Roma in Norway, where the group's own way of naming themselves (e.g. Romanifolket) does not as a term serve an international readership.

<sup>153</sup> NOU 2015 7, p. 18 (Assimilation and Resistance – Norwegian policies towards Tater/Romani people from 1850 to the present). The actual number is difficult to estimate, and therefore the Norwegian Government rarely uses the figures to indicate the size of the group.

Rom groups are considered national minorities. The national minorities in Norway include five separate minority groups, all of which are represented in the White Paper on National Minorities in Norway<sup>154</sup>. The previous White Paper was published in 2000<sup>155</sup>. In December 2020, a new document on improving the status of the Romani (Tater) was finalised and is awaiting implementation. A separate action plan was published for the Rom community in the Oslo region in 2009<sup>156</sup>. In addition, a document on the Tater Romani community<sup>157</sup> (NOU 2015) was published in 2015. NOU 2015, among other surveys and studies, also serves as a basis for the 2020 White Paper. In relation to NOU 2015, the Norwegian Government has apologised to the Roma/Romani population for the atrocities it suffered during the period of the assimilation policy<sup>158</sup>. As part of the official apology and compensation measures, a Roma cultural and resource centre<sup>159</sup>, *Romano kher – Romsk kultur- og ressurscenter*, was established in Oslo. Romano Kher and a programme supporting children's education<sup>160</sup> engage with the Rom group living in the Oslo region. The Tater Romani people have been compensated in a different form, as they have a more structured organisational representation than the Rom population in the Oslo region. Consequently, the compensation has been directed as support for the culture and language of Tater Romani, and this funding channel is co-ordinated by the Art Council, a government agency. However, Romani people have criticised the fact that a government agency holds the power to determine how the funds intended as compensation are to be used. The background to this solution is in disagreements over the use of the funds.

In Norway, the implementation of the White Paper is the responsibility of the Department of Sami and Minority Affairs under the Ministry of Local Government and Modernisation<sup>161</sup>, but due to the historical, linguistic and social diversity of the “Roma communities”, the Rom and Tater Romani people are, for practical reasons, the responsibility of various officials.

#### Forms, means and challenges of Roma inclusion

As in most countries, the representation of the Tater Romani people in the design of Roma policies in Norway is mainly based on the involvement of the third sector, i.e. Romani and pro-Romani, organisations. Since not all Romani people want to be linked or identified as representatives of organisations, people outside such organisations, known as the fourth sector, have also been invited to various consultations.

The Romani people community is represented by two organisation that meet the criteria for the representativeness of organisations set by the Norwegian State, such as the minimum number of members required. Annual consultations are to be held for all groups with national minority status. In addition, thematic consultations are to be arranged for the Romani people when matters concerning them are being discussed. There is no separate action plan for Tater Romani to eliminate, for example, social discrimination against them, as the White Paper places main emphasis on maintaining their culture. The 2020 White Paper has attracted criticism from Tater Romani organisations because it does not include any proposals for future measures.

<sup>154</sup> Meld. St. 12 (2020–2021) Nasjonale minoriteter i Norge — En helhetlig politikk.

<sup>155</sup> National minorities in Norway: about state policy on Jews, Kvens, Roma, Travellers and Forest Finns (St. Meld 2000).

<sup>156</sup> Action plan for improvement of the living conditions of Roma in Oslo (AID 2009).

<sup>157</sup> Assimilation and Resistance: Norwegian policies towards Tater/Romani people from 1850 to the present (NOU 2015).

<sup>158</sup> The 2015 official apology specifically referred to the interwar period, when Roma groups in Norway were made stateless, which led to the mass murder of Norwegian Roma during World War II by Nazi Germany (under the so-called Gypsy Paragraph, 1927). Part of this process were the claims for compensation made by the Holocaust Center and the Roma population. In this context, the interviewees also highlighted the forced sterilisation of Roma women and forced adoption of Roma children (see also Helakorpi 2020, 25).

<sup>159</sup> <https://kirkensbymisjon.no/romano-kher/>.

<sup>160</sup> Municipality of Oslo education department's programme Skolelosordningen.

<sup>161</sup> Kommunal- og moderniseringsdepartementet (Ministry of Local Government and Modernisation).

From the point of view of central government, the arrangements for the consultations are challenging, because the group is internally divided in their opinions. Government officials assert that the Tater Romani people are further integrated into Norwegian society than the Rom minority in the Oslo region.

In 2019, some of the national minority groups in Norway<sup>162</sup> established a joint association. This association members are the Norwegian Kven Organisation<sup>163</sup>, the Forest Finns, and the two organisations representing the Tater Romani people, but not the Oslo Rom. This organisation was set up because the members felt that they had no word on influencing the process of formulating the national minority policy. From the Tater Romani's point of view, the 2000 White Paper was feasible, whereas the 2020 White Paper fails to meet their needs and expectations. According to one of the organisations representing the Romani people, they continue to be excluded from the political decision-making process, and the 2020 White Paper only legitimises this practice. Criticism against the Norwegian Government's minority policy has been increasing, particularly following the report published by the Telemark Research Institute. The report discussed the impact of minority policy measures between 2000 and 2019. There are differences of opinions between the authorities and the Romani Tater representative as to how the report has been utilised: The Tater Romani people see that the report has hardly been acknowledged, whereas the authorities say that only a few recommendations for action in the Telemark study have failed to be implemented. The purpose of the report was to provide evidence-based data for the 2020 White Paper. For example, in 2017, the Council of Europe criticised Norway for the low level of trust between the Romani Tater population and the government as well as for the lack of measures to support the Tater Romani identity<sup>164</sup>.

The situation with the Oslo Rom is different, as they are not represented by any organisation, and instead their representation is based on various families. Participation takes place largely through the culture and resource centre established as part of the compensation awarded (see, e.g. Helakorpi & Fagerheim Kalsås, 2020). The centre, *Romano kher – Romsk kultur- og ressurscenter* is managed by a Christian organisation but it also employs people with Roma background. In addition, the Centre maintains a "house council", which consists mainly of senior Roma representatives. Consultations with the Norwegian state take place mainly through Romano Kher. Previous measures targeted at the Rom community in the Oslo region have not been successful, due to the lack of co-operation between the actors. According to the Romano Kher Centre, Roma live relatively isolated from Norwegian society and face significant discrimination and prejudice. As the community operates as family units, the lack of organisational representation poses certain challenges for the authorities in developing comprehensive and meaningful forms of participation.

#### Other themes raised in the interviews

Partly for historical reasons, both Roma groups (Tater Romani and Rom) lack trust in the authorities. The lack of trust is hampering the inclusion of Roma groups and the work done by the authorities. The problem according to an interviewee is that the Rom in Oslo have been subjected to police violence, whilst the police fail to intervene in violence against the group. In recent years, however, efforts have been made to improve relations. In addition, the Rom in Oslo have a great deal of mistrust towards welfare services, which is reflected, among other things, in the fear of sending children to school. However, the level of education among the group is slowly improving.

According to Tater Romani, their particular grievance is that they have been given no role in the new White Paper (2020) in the actual decision-making process, though they will be consulted if necessary. In their opinion, consultation is not an adequate form of participation. They also see that, as compensation for historical

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<sup>162</sup> Nasjonale Minoriteter i Norge (NMN).

<sup>163</sup> Norske kveners forbund.

<sup>164</sup> [Council of Europe opinion](#).

abuse by the Norwegian State, they should have the opportunity to be involved in deciding how compensation funds are used. The Tater Romani are also of the view that Norway should support their lifestyles, including allowing children to go to school remotely when they are travelling.

Based on the interviews, Norway still has work to do to improve the meaningful inclusion of Roma. Both Roma groups experience not only structural but institutional and personal discrimination, and prejudice against them is strong and widespread.

### European co-operation

The interviewee representing a Tater Romani organisation considered European bodies and actors as an important channel for influencing policy-making processes. The Tater Romani organisation has submitted its shadow reports both to the Council of Europe's Advisory Committee on the Framework Convention on Minorities and the European Commission against Racism and Intolerance (ECRI). The organisation's representatives also attach particular importance to Nordic co-operation and have, in fact, previously co-operated with Sweden and Finland. In recent years, there has been no co-operation. Romano Kher collaborates with Swedish, Czech and German Roma organisations and with ERIAC.

At ministerial level, the representatives of the Oslo Rom, in particular, co-operate with other Nordic countries and also at the European level (ADI-ROM). According to the government official interviewed, the European-level discussion often revolves round the affairs of countries with large Roma populations. Therefore, co-operation between countries with smaller Roma could be fruitful.

### Structures and actors of the Danish Roma policy

In the Nordic context, Denmark's role is challenging, as Denmark does not recognise the existence of national minorities<sup>165</sup>. For this reason, for example, in Helakorpi's (2020) doctoral thesis on Nordic Roma policy and the Roma education, Denmark was excluded from the study. Similarly, it is noted in the RCM shadow report<sup>166</sup> on Denmark that Roma are included in the general measures supporting integration in Denmark. There is no specific Roma policy in place, and the government does not even feel that this is necessary, owing to the small size of the Roma community in the country (0.1%)<sup>167</sup>. Measures targeted at Roma are essentially isolated measures and therefore do not constitute an actual policy. Various events related to Roma culture have been organised over the years, including on International Roma Day, celebrated 8 April. Roma are not considered a national minority in Denmark because Roma groups do not have a historical continuum in Denmark<sup>168</sup>.

According to the Danish Ministry of Social Affairs and the Interior, it is difficult to estimate the exact number of Roma in the country. Estimates range between 1,500 and 10,000<sup>169</sup>. According to the Danish Refugee Council, there could be about 2,000 people of Roma background in Denmark, whilst the Council of Europe estimates the number of Roma in Denmark at approximately 5,500. Most Roma in Denmark have arrived as migrant workers during the 1960s and 1970s, and an unknown number of people of Roma background have arrived from the former Yugoslavia during the Yugoslav Wars.

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<sup>165</sup> With the exception of the German-speaking population in Northern Jutland.

<sup>166</sup> Roma Civil Monitor (2018) Civil society monitoring report on implementation of the national Roma integration strategies in Denmark.

<sup>167</sup> [https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-denmark\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-denmark_en).

<sup>168</sup> [https://ec.europa.eu/info/sites/default/files/roma\\_denmark\\_strategy\\_en.pdf](https://ec.europa.eu/info/sites/default/files/roma_denmark_strategy_en.pdf).

<sup>169</sup> Ministry for Social Affairs and Integration, Copenhagen, Denmark.

As it has been difficult to obtain information on Denmark within the time constraints of this report, contacts were made with people of Finnish Kale background residing in Denmark through Finnish and Swedish actors. They operate in a multicultural organisation which was originally founded by a Finnish Kale Roma. Their interview revealed that separate schooling has previously been organised for Roma, especially for those from Eastern European countries. The Council of Europe has therefore raised the issue of Denmark's segregated schools and classes for Roma, especially in the municipality of Helsingør (RCM Shadow Report 2018). ECRI has noted Denmark for discrimination of Roma in the labour market. However, in its report to the EU Commission<sup>170</sup>, Denmark states that the majority of Roma in Denmark are well-integrated into society.

One of the interviewees was brought up and educated in Denmark and now lives in Sweden. The interviewee stated that no confrontation with racism had occurred until the move to Sweden. Another interviewee also said that no personal problems had been faced in receiving education or finding employment. Their families have lived in the same area for decades and have long since been accepted by the surrounding society. However, they did admit that the same may not apply to the mobile Roma population of Eastern Europe, whose situation may be different. On the basis of documents and interviews, it would appear that the Danish Roma population is in a very different position, depending on when they arrived in Denmark and what their country of origin was. Discussion on inclusion in Roma policy-making, or even integration policy-making, is hardly relevant. Compared to Finland, Sweden and Norway, the situation and approach in Denmark is very different and would require more in-depth research before further conclusions.

### Structures and actors of Estonian Roma policy

At the time of writing this report (spring 2021), Estonia was working on a new programme to support population integration and cohesion. The programme will be the third of its kind. The previous programme, *Integrating Estonia 2020*, focused on social cohesion as well as Estonia's competitiveness and security. There is no specific action plan for the Roma population in Estonia and, instead, the work carried out with Roma is part of the overall integration objective, which encompasses a number of minority groups (e.g. the Russian-speaking minority in Estonia). Estonia's Roma strategy falls under the remit of the Ministry of Culture, but efforts are being made to mainstream the measures through cross-ministerial co-operation. In 2015, the Ministry of Culture set up a committee for Roma integration, the members of which consist mainly of representatives of other ministries and two representatives of Roma background.

Estonia is a member of the European Union and is therefore involved in the implementation of a European Roma strategy. Estonia has ratified the Council of Europe Framework Convention for the Protection of National Minorities as early as 1997.

Estonia's Roma population is relatively small in number, according to official estimates, about 650 people. According to unofficial estimates, the number varies between 1,000 and 1,500 people. However, the number of Roma rises every year due to migration from the UK (e.g. Brexit) and Latvia. Although the Estonian Roma population is small, there are three distinct Roma groups: Estonian Roma, Latvian Roma and Russian Roma. As a member of the European Union, Estonia seeks to follow the guidelines of the EU strategic framework<sup>171</sup>. However, Estonia has not fully followed the EU's recommendations because of the small Roma population and because according to the Estonian approach, universal services are considered sufficient in Estonia. Planning services specifically targeted at Roma is not perceived necessary. The aim is for Roma communities in

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<sup>170</sup> [https://ec.europa.eu/info/sites/default/files/roma\\_denmark\\_strategy\\_en.pdf](https://ec.europa.eu/info/sites/default/files/roma_denmark_strategy_en.pdf).

<sup>171</sup> The current Roma policy measures are still based on the National Roma Integration Strategies up to 2020. The current EU strategic framework was adopted in March 2021 and, at the time of writing the report, several Member States are in the process of modifying their Roma policy programmes.

Estonia to find and avail themselves to the existing service offering. However, universalism in the provision of services does not seem to be sufficient for Roma, as in its 2018 proposal, the Ministry of Culture states that Roma are still suffering from low levels of education and employment<sup>172</sup>. According to the proposal, the other obstacles to the equality of Roma include low capabilities and lack of organisational representation. According to a government official, there is also room for improvement in attitudes towards integration among the Roma population.

Estonia applied for its first project fund from EU for Roma issues (EU, Horizon 2020) in 2016 and the implementation of the project started in 2017. One of the objectives of the project was to develop the work of the national network of actors and a model for Roma mediators (Roma Platform)<sup>173</sup>. According to the Council of Europe CAHROM report (2019), Estonia, which has a small Roma population, would also benefit from direct contact between State authorities and Roma in order to increase trust and awareness of the content of Roma policy<sup>174</sup>. According to a government official, this suggestion has since been followed through, and this will likely increase the confidence among Roma in the authorities. With such an approach, Roma will be more likely to allow their children to participate in various activities arranged by the Government officials and local actors. The CAHROM report identifies the very low level of educational attainment, discontinuation of education, crime and lack of contact outside the Roma community as the main challenges facing the Roma population in Estonia. In addition, it appears a challenging task for the local authorities to engage in implementing measures targeting Roma<sup>175</sup>.

According to the RCM shadow report<sup>176</sup> produced by the Estonian Human Rights Centre in 2018, Estonia has had a minority policy programme in place since its independence (1991), which has focused particularly on the position of Russian speakers in Estonia. This has meant that Roma, as a separate minority group, has not been mentioned in Estonia's integration policy. The current policy mentions the objective of developing Roma mediators' work<sup>177</sup> (see also page 10). The fact that the Roma mediator are in the national policy also secures an appropriation from the state budget. This is an important achievement, as in the past the development of work has been based on short-term projects. To utilize Roma mediators' work in policy implementation are practiced also in Latvia and Lithuania, and these countries are working together in developing their mediator approach.

According to a report produced by the Estonian Human Rights Centre<sup>178</sup>, Estonia's biggest challenge is that Estonia has almost no measures targeted specifically towards the Roma population and, instead, it relies on the universal access to services. However, this universalist approach does not reach Roma (due, among other things, to distrust of the authorities). According to the report, local governments are also awaiting state-level measures to improve the position of Roma. Estonia seems to have firm confidence in integration, based on the assumption that every Estonian, despite his/her background, would be equally involved in Estonian society.

There are currently two Roma mediators operating in the Valga region, where the majority of Roma in Estonia live. According to a government official, the Roma community in Valga is "traditional" and follows the Romanipen customs (the Roma social system). In the Tallinn region, families are more integrated and mixed marriages with the majority population are more common. Estonia aims to increase the number of mediators in the future. In addition, two separate studies have been carried out as part of the Roma Platform activities,

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<sup>172</sup> <https://www.km.gov.lv/lv/media/881/download>.

<sup>173</sup> <https://www.km.gov.lv/lv/media/881/download>.

<sup>174</sup> <https://rm.coe.int/thv-latvia-final-report/1680996860>.

<sup>175</sup> <https://rm.coe.int/appendix-5-latvia-thematic-report/1680986e76>.

<sup>176</sup> <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-1-estonia-2017-eprint-fin.pdf>.

<sup>177</sup> As early as 2010, a joint initiative was set up to train Roma mediators <https://coe-romed.org/romed1>.

<sup>178</sup> Civil society monitoring report on implementation of the national Roma integration strategy in Estonia 2018.



focusing on Roma children's welfare and Roma inclusion<sup>179</sup>. Roma Platform has also organised four trainings events for 23 young Roma, who are hoped to become Roma influencers in the future.

### Forms, means and challenges of Roma inclusion

In general, it ought to be noted that the lack of measures aimed at Roma is a cause for disappointment in the Roma community, as some Roma are currently living in substandard housing and the employment services are not accessible to them<sup>180</sup>. Egert Rünne, Director of the Estonian Human Rights Centre and the author of the shadow report, is pleased that the RCM shadow report was published, and as a result the government announced an open call for the post of Roma mediator. The shadow report recommends that a more in-depth study into the living conditions of Roma be carried out. The report also recommends that the problem of unemployment be addressed by setting up a centre that is maintained by Roma workers and that holds special expertise in employment issues, with the purpose of addressing the specific challenges of Roma in the labour market<sup>181</sup>.

In practice, there are currently two practiced measures for Roma inclusion in Estonia: the Roma Integration Council established in 2015 and the Roma mediators at regional level (Valga).

The Council's task is, among other things, to increase dialogue on Roma integration issues, promote understanding between actors, and develop co-operation as well as discuss possible solutions in relation to Roma integration. The Council has two Roma representatives, with the rest of the representatives being central and local government officials. According to the RCM shadow report, attendance in the meetings has been low, though meetings are held relatively sparsely (min. 2 times a year). According to Roma representatives, their views are not equally acknowledged, and the work of the Roma organisation is not taken into account in the reports produced by the Ministry. Inclusion is fostered mainly around supporting Roma culture, language and identity, but Roma are given no real decision-making power in policy matters. The CAHROM encourages the development of Roma mediator<sup>182</sup> activities, and Estonia started developing its operations in 2017.

In many of the documents, some of which have been presented in this report, the forms of Roma inclusion or the lack of targeted measures are typically explained by the small size of the Roma population. The issue can, however, also be seen in a positive light: the smaller the numbers, the easier it should be to change the structures and approaches to be more supportive of the social equality of Roma.

Antigypsyism has become a theme both in the new EU strategic framework and the Council of Europe's human rights priorities. However, according to the Estonian official responsible for Roma affairs, it is more meaningful for Estonia to move forward in favour of something rather than against something. The new EU strategic framework does not appear to change Estonia's approach in its Roma policy (cf. Latvia). Roma NGO actors do not always find the available forms and practices of participation relevant, as it is not clear how effective the participation has ultimately been.

### European co-operation

The EU strategic framework and membership in the Council of Europe's ADI-ROM Committee form the links between Estonia and the European Roma policy. At the state level, the Ministry of Culture, which is responsible for Roma affairs, co-operates mainly with other Baltic countries, but according to the official interviewed, co-operation with the Nordic countries could inspire and enable mutual learning. One key barrier for

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<sup>179</sup> Fifth State Report for the Council of Europe 2019, p. 22.

<sup>180</sup> <https://cps.ceu.edu/article/2020-03-23/roma-civil-society-substandard-conditions-estonia-means-no-running-water-some>.

<sup>181</sup> <https://cps.ceu.edu/sites/cps.ceu.edu/files/attachment/basicpage/3034/rcm-civil-society-monitoring-report-2-estonia-2018-eprint-fin.pdf>.<sup>182</sup> <https://rm.coe.int/appendix-5-latvia-thematic-report/1680986e76>.

<sup>182</sup> <https://rm.coe.int/appendix-5-latvia-thematic-report/1680986e76>.

Nordic co-operation is language. The Finnish Kale dialect does not allow for deeper communication with the Estonian Roma, and most Roma in Estonia do not speak English.

Since some Roma in Estonia speak the same language as the Latvian Roma, co-operation between them is more effortless than, for example, with the Finnish Roma. Estonia and Latvia often organise joint events and families in the two countries are also widely connected. The activities of the Finnish Roma in Estonia are mainly based on humanitarian, religious and cultural activities.

## Structures and actors of the Latvian Roma policy

The development and implementation of Latvia's Roma policy is co-ordinated by the Latvian Ministry of Culture. Latvia has made efforts to involve the relevant actors in this process in order to facilitate more successful mainstreaming of Roma policy measures from one sector to another. The implementation of the Latvian Roma policy consists mainly of mainstreaming using the various existing service structures, but in addition, a number of measures specifically for Roma in Latvia have also been designed. According to the 2018 RCM shadow report<sup>183</sup>, the development in the living conditions and social inclusion of Roma has slowed down over the past few years due to the lack of cross-sectoral co-operation. This means that the interests and needs of Roma have not been reflected in the general social policy programmes, the new approach tackles this challenge. Latvia ratified the Council of Europe Framework Convention for the Protection of National Minorities in 2005<sup>184</sup>. In March 2021, the Committee of Ministers of the Council of Europe issued a positive opinion on Latvia's overall integration policy, whilst also emphasising the continued need to support Roma inclusion in the future<sup>185</sup>. According to the 2017 census, there are 7,456<sup>186</sup> Roma in Latvia.

In 2021, Latvia has changed its approach to Roma affairs, and has adopted a more inclusive approach. The change has also been noticed by the representative of the Roma organisation. Roma found the earlier approach ineffective. According to the Ministry, the new approach specifically emphasises Roma inclusion, so Latvia is taking remedial measures to tackle the problems referred to in the RCM shadow report. The change requires enhanced co-operation between ministries<sup>187</sup> as well as closer involvement of the Roma community. Latvia has set up a new working group to work on changing the direction of the country's Roma policy in line with the new (2021) European Commission strategy. With the change, the focus will shift from integration towards equality, inclusion and participation. The working group includes representatives of various ministries and Roma. The new working group will be partly based on existing structures: Latvia set up a council<sup>188</sup> in 2012 to support Roma inclusion. In addition, a network of regional actors (municipal level) was set up in 2014 to highlight local challenges in Roma inclusion. The network of local actors has played an important role in the development of mediator activities.

Mediator activities were launched in Latvia in 2014/2015 by the Centre for Education Initiatives, which works on promoting education among Roma<sup>189</sup>. The Centre will continue to play an active role in the working groups

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<sup>183</sup> Roma Civil Monitor (2018) civil society monitoring report on implementation of the national Roma integration strategies in Latvia. The report is produced by the Centre for Education Initiatives, Latvia.

<sup>184</sup> <https://www.coe.int/en/web/minorities/latvia>.

<sup>185</sup> <https://www.mfa.gov.lv/en/news/latest-news/67589-the-council-of-europe-s-council-of-ministers-at-deputy-level-gives-a-positive-evaluation-of-latvia-s-policy-for-society-integration>.

<sup>186</sup> In an interview with a Roma NGO representative, it emerged that there are many Roma in Latvia who choose not to disclose their ethnicity in the census, so the actual number of Roma may be significantly higher. <https://rm.coe.int/appendix-4-situation-of-roma-in-participating-countries/1680986e75>.

<sup>187</sup> Guidelines for the Development of a Cohesive and Civic Active Society, Social protection and labor market policy guidelines (Ministry of Welfare), Guidelines for public health policy (Ministry of Health), Guidelines for the development of education.

<sup>188</sup> Advisory Council for the Implementation of Roma Integration Policy.

<sup>189</sup> Centre for Education Initiatives (see <https://rm.coe.int/appendix-5-latvia-thematic-report/1680986e76>).

maintained by the Ministry of Culture and in this way contribute to improving the level of education of Roma<sup>190</sup>. The mediator activities are one of the priority areas in the Latvian Roma policy: workers of Roma background operate in five municipalities, acting as mediators between local governments and local Roma communities. The mediator activities have also been developed as part of Latvia's Roma Platform project<sup>191</sup>. At the heart of the activities and the general approach in Latvia's Roma policy is the involvement of Roma in social, political and cultural activities (e.g. the Latvia Holocaust<sup>192</sup> remembrance events).

### Forms, means and challenges of Roma inclusion

Roma have been taken into account in ministry-led activities. Based on the interview with a Roma NGO representative, progress has been made on some issues. However, the funding base of the Roma association in question is weak: in recent years, it has submitted a total of 21 applications for financial assistance, both nationally and to the EU funding programmes, but none of these applications have been successful. This means that Roma organisations, as independent actors, have practically no possibility to promote Roma inclusion. According to the interviewee, the poor success of the applications cannot be due to poorly composed applications, as experienced experts were consulted for each application. On the other hand, consultations with Roma and acknowledging the Roma perspective is at the heart of Latvia's Roma policy and the inclusion of Roma is facilitated through a range of measures. According to the Roma NGO representative, distrust of Roma still persists at the institutional level, and the lack of trust is mutual. According to the RCM shadow report (2018), the challenges of low attendance of Roma in activities and interest in promoting their own rights, the small number of Roma organisations, and the lack of resources for these organisations remain despite the achievements of the Roma Platforms, which make the implementation of measures difficult. According to a representative of a Roma organisation, the low interest among Roma in their own affairs is a result of the bureaucratic approach which takes little account of the context in which Roma operate and how this shapes their thinking.

A ministry representative also recognizes the challenges of participation. The purpose of mediator activities is, among other things, to bypass the challenges that are emblematic of organisational activities. There is a strong social hierarchy within the Roma community, and this must be considered in the development of inclusion to ensure equal access to participation for all Roma actors, a ministry representative asserts. In fact, the representative of the Ministry interviewed for this report finds the involvement of the fourth sector essential. With the new EU strategic framework, Latvia has stronger confidence in developing and improving Roma participation.

### Themes raised in the interviews

Although the situation of the Latvian Roma has improved in many respects (e.g. housing conditions), there are still many challenges in achieving full social equality. According to a representative of a Roma organisation, the biggest obstacle is the fear of Roma. This is reflected both in the actions of the public officials and in everyday interaction with the majority population of Latvia. Prejudice remains deeply rooted and hinders Roma inclusion on many individual levels, including education and working life. The mutual distrust and fear between Roma and the majority population is the root cause of the problems, according to the organisation representative.

From the Roma organisation perspective, a lack of trust may also be the reason why the number of Roma organisations and the overall participation of Roma in Roma policy-making is at a low level and why resources

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<sup>190</sup> Email 28 April 2021.

<sup>191</sup> <https://www.km.gov.lv/en/latvian-roma-platform-iv>.

<sup>192</sup> <https://www.km.gov.lv/en/media/1402/download>.

are not channelled to the operations of Roma organisations. The Roma actors therefore wish to see a more proactive approach from the authorities when submitting joint funding applications.

### European co-operation

Co-operation between Latvian and other Roma communities is concentrated in the Baltic region mainly for practical reasons: they are neighbours and many of the Roma population in the Baltic countries speak the Latvian Roma dialect. The co-operation mainly takes the form of various cultural and historical events (e.g. Holocaust remembrance events and various Roma festivals). Co-operation with the Nordic countries is less common and takes place mainly through religious and humanitarian activities rather than actual political advocacy or cultural activities. It is perceived as a problem that Latvia is frequently not among the recipients of, for example, education-related funding, and EU financial instruments cannot always be utilised.

In addition to co-operation between the Baltic countries, a visit to Finland is planned at the ministerial level in 2022. The visit is expected to introduce best practices in improving Roma inclusion and adopting mainstreaming measures. In the context of European actors, there has been co-operation with, for example, FRA and ERIAC. Latvia also hopes to engage in further co-operation with FRA in developing knowledge-based work.

### Structures and actors of the Lithuanian Roma policy

As with Denmark, establishing the Lithuanian authorities' perspective into Roma affairs proved a challenge for this report. According to an email received from the Lithuanian state department responsible for national minorities, they were unable to participate in the interviews due to time constraints and a shortage of staff<sup>193</sup>. Further correspondence with two individual Roma organisations proved equally unsuccessful, presumably due to the language barrier. However, some insight into the situation of Roma in Lithuania could be gained with the assistance of the Roma Community Center in Vilnius, which has decades of experience of working on Roma affairs. In addition, Lithuania's shadow RCM report (2018)<sup>194</sup> on the implementation of the European Roma strategy and other reports on the situation of Lithuanian Roma added to the overall picture.

The Council of Europe estimates that Lithuania is home to around 3,000 Roma<sup>195</sup>. The department for national minorities, which operates directly under the government, is responsible for Roma affairs in Lithuania<sup>196</sup>. During its EU Presidency in 2013, Lithuania adopted the Council recommendations for effective Roma integration measures. Lithuania ratified the Framework Convention for the Protection of National Minorities in 2000.

Lithuania has had action plans to improve Roma integration in place since 2012, and the current integration strategy covers the years 2015–2020<sup>197</sup>. Lithuania is, therefore, in the same situation as several other EU Member States: with adoption of the new strategic framework, updating of the national Roma policy is currently relevant. According to the interviews as well as the ECRI report (2016<sup>198</sup>), the biggest challenge for Roma in Lithuania are the housing conditions. Roma have been living in illegal dwellings and at some point their housing districts were completely destroyed, while alternative housing was not provided. The ECRI has

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<sup>193</sup> Email 28.4. 2021.

<sup>194</sup> Roma Civil Monitor (2018) Civil society monitoring report on implementation of the national Roma integration strategies in Lithuania.

<sup>195</sup> [https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-lithuania\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/roma-eu/roma-inclusion-eu-country/roma-inclusion-lithuania_en).

<sup>196</sup> <https://tmde.lrv.lt/en/>.

<sup>197</sup> [https://ec.europa.eu/info/sites/default/files/lithuania\\_national\\_strategy\\_2015-2020\\_en.pdf](https://ec.europa.eu/info/sites/default/files/lithuania_national_strategy_2015-2020_en.pdf).

<sup>198</sup> <https://rm.coe.int/fifth-report-on-lithuania/16808b587b>.

also reminded Lithuania that it should take more rigorous action against hate speech and racism targeted at minorities and. In its 2019 report, the European Economic and Social Committee also drew attention to the housing conditions of Roma, but further stressed that racism against Roma in various sectors of society is a serious societal challenge and should be tackled more vigorously<sup>199</sup>. In the country-specific monitoring report under the Framework Convention for the Protection of National Minorities (4th Cycle, 2017<sup>200</sup>), it is recommended that Lithuania adopt, in close consultation with minority representatives, a comprehensive legal framework protecting the rights of the minorities, take resolute action to address negative stereotypes against Roma, and pay attention to the position of minority languages in education and educational institutions.

In addition to racism and poor housing conditions, the challenge has been the involvement of Roma in the design and implementation of Roma policy measures. Lithuania has tackled these challenges through the Roma Platform project, in particular. In 2016, trained Roma mediators began their work in five Lithuanian municipalities. The third Roma Platform is currently underway. The fact that activities have been maintained through continuous projects means that the activities have not been established as part of the Lithuanian government measures and therefore depend on external funding<sup>201</sup>. The 2019 CAHROM report on Roma policy in countries with a small Roma minority states that for almost two decades these member States have been operating mainly with project funding<sup>202</sup>, and it is hoped that this will change. States are expected to take responsibility for the long-term development of the living condition of Roma.

The priorities of the Roma Platform projects in Lithuania were to empower Roma and Roma communities as well as to improve educational attainment and to provide information on Roma to society as a whole. Roma mediators played a key role in promoting the involvement of Roma communities. In 2019, the Lithuanian government confirmed August 2nd as the Roma Holocaust Day. This gesture plays a role in identifying the historical presence of Roma in Lithuania and the injustices they have met.

According to the RCM shadow report (2018), the Roma integration strategy was not feasible in practice. The reason for this is, in particular, the lack of political will and the relatively low number of Roma and Roma organisations involved in the planning and implementation of the Roma policy measures<sup>203</sup>.

### Forms, means and challenges of Roma inclusion

The organisations expressed their dissatisfaction at not being invited to the preparation of the 2012–2014 Roma integration strategy. Based on this feedback, the 2015–2020 strategy work involved Roma organisations more and Roma representatives were also involved in the implementation of the strategy. Lithuania's Roma organisation field is relatively poorly structured compared to many other European countries.

When the Roma Community Center started work in 2000, Lithuania had a large Roma village (of 500 people) that lived in almost complete isolation from the rest of society. At the outset, the Community Center focused in particular on raising the level of education attainment among Roma and acted as a link between the authorities and the Roma community. The Community Center is a pro-Roma organisation, but the partners include five individual Roma organisations (in spring 2021, however, there were no Roma on the centre's payroll). Roma are involved in Roma policy-making mainly through consultation. For example, Roma are in-

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<sup>199</sup> <https://www.eesc.europa.eu/en/documents/report/2019-10-24-25-roma-mission-report-country-visit-lithuania>.

<sup>200</sup> <https://www.coe.int/en/web/minorities/lithuania>.

<sup>201</sup> <https://rm.coe.int/appendix-5-latvia-thematic-report/1680986e76>.

<sup>202</sup> <https://rm.coe.int/thv-latvia-final-report/1680996860>. Meeting in Latvia 2018.

<sup>203</sup> Civil society monitoring report on implementation of the national Roma integration strategy in Lithuania 2018.

vited to join the planning of the Roma integration strategy, but according to an interviewee, there is a yawning gap between Roma policy-making and the everyday experience and reality of Roma, and the interests of the two do not always meet.

### European co-operation

Roma Community Center Lithuania has been co-operating at the European level for the past twenty years. However, no workers of Roma background have been employed at the centre. With the Erasmus+ programme changing its criteria so that the exchange is aimed exclusively to employees, the participation of Roma in these exchanges has become virtually impossible. Previously, the Centre invited Roma to join exchange programmes, but lack of language skills is a common problem, as English is not widely spoken among Roma. Roma Community Center Lithuania operates internationally, including within the European Roma Grassroots Organisations Network (ERGO) but, interestingly, Lithuania is the only member country with a small Roma population. According to an interviewee, however, the problems of Roma are similar to those in countries with larger Roma populations.

### Analysis: Roma inclusion in Finland, Sweden, Norway, Denmark, Estonia, Latvia and Lithuania.

The aim of the present report is to examine the possibilities for Roma participation in the decision-making and implementation of national policies and measures affecting Roma. In addition, the aim of the report is to explore the opportunities of Roma actors in Finland and other Nordic and Baltic countries to influence the European Roma policy-making. According to the feedback from the interviewees, the timing of the report is most opportune, as during the spring of 2021 many countries are preparing their new Roma policy guidelines and measures.

The new EU Roma strategic framework for equality, inclusion and participation up to 2030 include horizontal goals (equality, inclusion and participation) and sectoral targets (education, employment, housing and health). The aim of promoting equality is to eradicate discrimination against Roma, the antigypsyism. In the new strategy, inclusion and participation are divided into two objective areas: inclusion is aimed at reducing poverty and improving socioeconomic status of Roma and participation is to improve the opportunities for Roma organisations to be involved in the design, implementation and evaluation of policy measures. The aim is also to support Roma participation in political activities at regional, national and EU level (strategic framework<sup>204</sup>). The political shift from the previous strategy of Roma integration (NRIS) towards the emphasis on equality and inclusion stems from, among other things, views that the previous framework did not bring the desired change and outcomes. In addition, with the COVID-19 pandemic, inequality of Roma in Europe was thrown into relief.

At the concrete level of designing Roma policy measures and executing the work, the division of objectives under inclusion and participation is less relevant as they are overlapping themes. In the review of Roma policies adopted in the Nordic and Baltic regions, Roma participation thus means both inclusion and participation in the sense referred to the EU Roma strategic framework.

According to Article 15 of the Council of Europe Framework Convention for the Protection of National Minorities, “The States must also create the conditions necessary for the effective participation of persons belonging to national minorities in cultural, social and economic life and in public affairs, in particular those affecting them”<sup>205</sup>. In the context of participation, the report refers to the terms ‘meaningful’ as referred to

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<sup>204</sup> [https://ec.europa.eu/info/sites/default/files/eu\\_roma\\_strategic\\_framework\\_for\\_equality\\_inclusion\\_and\\_participation\\_for\\_2020\\_-\\_2030\\_0.pdf](https://ec.europa.eu/info/sites/default/files/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf).

<sup>205</sup> <https://www.finlex.fi/fi/sopimukset/sopsteksti/1998/19980002#idp448606992>.



by the Office of the High Commissioner for Human Rights (OHCHR<sup>206</sup>) and ‘effective participation’ as used by the Council of Europe (Weller, 2004). In the set of recommendations from the OSCE High Commissioner on National Minorities on the effective participation of national minorities in public life, the term ‘effective participation’ is used in a similar manner<sup>207</sup>. What makes participation meaningful is receiving feedback on the impact of one’s contribution. The recommendations and agreements for participation discussed above aim to ensure, on the one hand, the full participation of minorities in the various sectors of society and, on the other hand, to ensure a functioning and equal European democracy. Participation and inclusive practices express the will and aspiration to substantially change the nature of policy-making and emphasises the potential for participation to bring balance to the positions of power (Kelty 2020). The research of participation has long traditions: Pateman (1970) distinguishes between partial and full participation, in which full participation refers to decision-making as a joint and equal effort for better results (see also Carpentier, 2016). However, the implementation of Roma strategies has demonstrated the vagueness of participation as a practice and the challenges of reaching its full potential: although a Roma strategy may look feasible and comprehensive on paper, the real challenge is in the implementation. The challenge in implementation indicate the ineffective and less meaningful participation of the target group.

### Levels of Roma policy actions and inclusion

It is the view held by many of the parties interviewed for this report that Roma policies and grassroots Roma operate on completely different levels. The levels of actions draw attention, on the one hand, to the structures of Roma policy-making and, on the other, to the challenges that hinder the agency of Roma at all levels. National Roma strategies, or equivalent measures, are adopted at the ministerial level, and policy decisions are often made by people other than Roma. The evaluation of European Roma policy has drawn attention to the objectives shared by the European Union, the Council of Europe and the OSCE to enhance the role of Roma organisations throughout the Roma policy processes. It is particularly important to involve Roma in decision-making processes (Bhabha et al., 2017; Mirga-Kruszelnicka, 2017).

The participation of the Roma community often takes place through various working groups and consultations. The challenge in these measures is tapping into the insights of the wider Roma population, who have little confidence in the effectiveness of Roma policy measures. A broader view and understanding of the situation among Roma is sought, for example, through mediators<sup>208</sup>, the aim being to avoid situations where only organisation activists are able to express their views. The role of the fourth sector has hence become increasingly relevant. Organisational activities create a hierarchy among civil society members (Trehan, 2009), and thus organisational activities may not in all eventualities act as a bridge between a government’s Roma policy and grassroots Roma. Sweden, for example, has trained mediators at the Södertörn University, but the challenge has been the lack of commitment among municipalities to hire these mediators. At the time of writing the report, Estonia had included the Roma mediator activities in the state budget, which will ensure longer-term continuity. As a way of resourcing, other countries should follow this example.

In many of the countries that participated in the survey, the challenge has been to incorporate measures into permanent government structures, and actors are often left to rely of external funding. Short-term funding poses challenges for long-term development of actions; it is a question about resource vulnerability and the challenges of establishing pertinent and long-term measures. The CAHROM report for 2019<sup>209</sup> has also identified the project-to-project approach as one of the challenges of Roma policy implementation. Similarly, the

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<sup>206</sup> [https://www.ohchr.org/Documents/Issues/PublicAffairs/GuidelinesRightParticipatePublicAffairs\\_web.pdf](https://www.ohchr.org/Documents/Issues/PublicAffairs/GuidelinesRightParticipatePublicAffairs_web.pdf).

<sup>207</sup> <https://www.osce.org/files/f/documents/0/9/32240.pdf>.

<sup>208</sup> See also [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805c9f3e](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805c9f3e).

<sup>209</sup> <https://rm.coe.int/thv-latvia-final-report/1680996860>.

evaluation report commissioned by the European Commission (2019)<sup>210</sup> has reached the same conclusion. Short-term plans and measures do not support socially sustainable development. Yet, various reports have considered mediator activities an effective way of engaging various Roma groups and individuals and should therefore be part of the permanent structures. An example from Finland is the Youth Department of the City of Helsinki, where youth workers of Roma background have been trained through apprenticeship schemes, one of the inclusive principles guiding the city's youth activities being the development of Roma youth work. The efficacy of Roma policy measures requires that local actors accept the development of Roma work as part of their remit.

One of the obstacles to the extensive participation of Roma on all levels of society is perceived to be the low educational attainment and poor language skills among Roma (Miskovic, 2013). This was particularly highlighted in ministry-level interviews in respect to pan-European collaboration. The European Union's Roma policy instruments (legislation, strategies and financial instruments) call on the actors to involve the target group in Roma policy measures, particularly in countries where the measures are mainly carried out with EU funding. This supports the regional participation of Roma and also their involvement in the planning of EU projects. As an example, Sweden has adopted new legislation in 2019 obliging municipalities to engage in dialogue with minority groups to ensure participation of the target group. Participation in state-level Roma policy-making seem less accessible to Roma. An exception to this is Finland, where the involvement of Roma in Roma policy-making within is a statutory requirement in the level of central government<sup>211</sup>.

#### What is the significance of the size of the Roma population in a country?

The interviews made for the report frequently highlighted the relatively small number of Roma populations in the countries concerned. The small size of the Roma population was also often given as an explanation for some measures not having been implemented, or for the difficulty of pursuing certain issues. The CAHROM report (2019) on the member States of the Council of Europe that have only small Roma populations concluded that, precisely because of its small size, the Roma population often remains invisible to legislators and allocating resourcing to it is not considered necessary, even the opposite would seem more likely: in the case of a small minority group, it should be easier to shape structures to support their equal treatment. The CAHROM report pays particular attention to the Baltic countries and Norway (of the countries discussed in this report), where the commitment on the local government level is weak and general political interest in addressing Roma issues is low. These challenges were also highlighted in the interviews. Although cross-sectoral planning and operations are, in principle, made possible, there are still challenges in the level of commitment; naturally, there is great variation both within and between countries.

When Roma policy is based on equal rights, equality, inclusion and participation, the size of Roma populations should not play a significant role. Even if the implementation of practical measures were to require methods different to those used in countries with larger Roma communities.

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<sup>210</sup> <https://publications.jrc.ec.europa.eu/repository/handle/JRC117901>.

<sup>211</sup> Government Decree on the National Roma Advisory Board and regional Roma Advisory Boards 1019/2003.

## The challenges in the implementation from the perspective of Roma communities

From the point of view of Roma actors, two themes rose above all others: the lack of trust and prejudices, and the racism faced by Roma, which extends to all sectors and layers of society.

The lack of trust has a historical background and should be taken into account when working to build trust. Confidence will not be increased if Roma policy measures are implemented with only the government perspective and objectives in mind, without taking considering the wishes, preferences, values and attitudes of Roma. It has been noted in conjunction of the implementation of Roma policy in Finland that ready-made 'service packages' do not resonate with Roma: instead, Roma want to participate in the development of relevant services and affairs on their own terms (vrt. Metsälä, 2019; Stenroos, 2020). The common slogan subscribed to by the minorities, "Nothing about us without us", has shown its wisdom and value in practice; it is much more than a political slogan. However, if we challenge existing power relationships and share process ownership with various stakeholders, trust between individual actors increases and participation becomes more meaningful and rewarding. This shift in the working methods requires a new way of thinking and time from both the Roma communities and public officials. Also from the point of view of building trust, measures which are for long term and rooted in structures and which are implemented on the principle of equal participation are more likely to be more effective and produce the desired outcomes. This is clearly also the goal of the new EU strategic framework.

Roma participation should not be only about improving access to services. Antigypsyism, particular type of racism, was considered by the interviewees as the root cause for the lower social status of Roma compared to the majority population. The same conclusion was also reached by the European Union Agency for Fundamental Rights (FRA)<sup>212</sup>. The EU Roma strategic framework programme on equality, inclusion and participation up to 2030, as well as the Council of Europe Framework Convention on the Protection of National Minorities, follow the same principle.

## Role of organisations and regional co-operation

Roma and pro-Roma organisations have played an important role in changing the course of European Roma policy. They have strongly highlighted the merits of a new approach, after the results of the previous EU Roma strategy fell short of the targets in general. Organisations have also challenged the prevailing stereotypes and representations of Roma (McGarry, 2011; McGarry & Agarín, 2014). With the new EU strategic framework, the role of Roma organisations is likely to become more prominent. At the same time, the inclusion of Roma who do not wish to be linked to existing organisations should also be made possible. From the point of view of Roma actors in the Nordic and Baltic Sea region as well, the change is welcome. The willingness of Roma actors from various countries to co-operate indicates the need to strengthen their own positions in Roma policy making, supported by co-operation.

However, facilitating collaboration between Roma policy actors in the Baltic Sea region faces significant practical challenges. The first challenge to overcome is the language barrier, so in order to launch any co-operation or to discuss issues in depth, interpretation services will be required. The issues to be dealt with are complex and multidimensional and many of the potential participants lack the necessary English language skills to discuss them in depth. Special attention should also be paid to the transparency of operations and

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<sup>212</sup> [https://fra.europa.eu/sites/default/files/fra\\_uploads/fra-2018-anti-gypsyism-barrier-roma-inclusion\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra-2018-anti-gypsyism-barrier-roma-inclusion_en.pdf).

the dismantling of positions of power. Strong political commitment to possible regional co-operation is also needed at the ministerial level, such as clear expressions of support from foreign ministries.

Furthermore, co-operation within the Nordic and Baltic regions could have positive effects in each country, but also in the wider scope of making the European Roma policy. Transparency would in practice mean that the activities are not an exclusive domain of certain parties or people, that issues are structured, for example, according to themes, and that various communication channels are utilised. A thematic approach would engage actors from various areas of expertise, who would be more committed to developing co-operation.

## Chapter 4: Discussions held in the dialogue process on the challenges of advocacy and inclusion

The dialogue process carried out as part of the study and data collection involved three dialogues.

### Dialogue between Finnish actors

The first session was held in Finnish and it brought together Roma actors and authorities operating in Finland. It took place on 7 May 2021 as a Zoom meeting. The participants represented the Council of Europe, Finland's permanent representation to the Council of Europe, Ministry for Foreign Affairs, Ministry of Justice, Ministry of Social Affairs and Health and various organisations involved in Roma issues. It focused on views based on the participants' own experiences of the meaningful inclusion and the promotion of opportunities for Roma participation in political decision-making. Themes raised in the preliminary interviews were addressed in the discussion and the parties concerned were informed in advance of the following questions as commonly identified themes:

- *How do you find the opportunities of Roma to influence Roma policies?*
- *How can and should the opportunities for Roma participation and advocacy be strengthened?*
- *How to engage the authorities and Roma to speak the same language?*
- *How to build mutual trust between actors?*
- *What issues is Finland pursuing at the European level? What kind of issues do the various actors think should be pursued?*

The structure of the discussion was created around two issues: successful advocacy (what needs to happen so that Roma policy can be influenced in a meaningful way and the voice of Roma in the Finnish Roma policies heard) as well as its challenges. The participants were encouraged to speak from their own experiences and, to start the discussion, the obvious disagreement between the participants on certain issues was articulated. In the discussions, many different views were raised regarding activity and advocacy in the field of Roma policy.

One point of discussion was to determine what inclusion in general means. In Finland, inclusion is often seen and perceived as co-operation in addition to participation in network activities and projects. Both the public authorities and Roma actors recognised in this dialogue that it takes courage to challenge the authorities in order to express one's views as a Roma actor. This challenge is complicated by the built-in power relationships between civil society and the authorities. With vulnerable groups, it is particularly important to be aware of those power relationships. In advocacy work, authorities and NGO actors play various roles. There is a need to clarify and articulate in advance what the tasks and roles of those operating at different levels are and what their starting points are – in other words, why the parties are in the roles that they are, and

what the various parties involved expect from each other. This provides a basis for and enables good and appropriate co-operation. There are opinions according to which a good NGO from the point of view of societal structures and decision-makers is one that confirms that everything is fine, even if the reality from the Roma perspective is quite different.

Genuine debate requires courage and trust. This, too, needs to be articulated and clearly expressed. Organisations were encouraged to show courage: Roma actors should understand that there is still a need for structural changes and that those changes will not happen if people settle for how things are organised at the moment. Organisational actors should act as a watchdog and question, to challenge authorities in order to facilitate change. Sometimes, the language heard in the field is idealised and does not serve genuine social and political advocacy based on societal knowledge and capabilities. Advocacy requires courage to address difficult things without trivialising issues, to speak directly and to recognise power and power hierarchies and mechanisms.

The field of Roma advocacy relies mainly on project-based work, which creates a range of vulnerabilities. Will it be possible to criticise the funding providers, and how will the outcomes of the projects be measured? Are projects delivering outcomes relevant to the needs and opportunities for the Roma population, or are they merely generating new projects? Some criticism was also expressed about resourcing; resources do not always meet needs and can be directed towards something else than what the Roma population would require.

What information is decision-making based on in general? From an authorities' perspective, data collection is also a challenge. The lack of trust and the concerns articulated in the process are something that should be addressed. The work would be more effective if there was enough courage to openly admit to the challenges. In principle, consultations during the preparation of policy programmes have been held, but engaging people to contribute to them has proved difficult. The issues seem distant, and inclusion is, therefore, not necessarily perceived as important. This is partly due to a language that is not accessible. The lack of a common language makes it difficult to build a common situational picture and consensus, and an operational culture that is based on written documents and reports is, in itself, exclusive. For the purpose of data collection, it would be useful to find ways to make better use of the Internet and to conduct the consultations as a dialogue.

The purpose and content of Roma work and advocacy is not always clear to the Roma population. There is a need for more transparency and openness in the field. Feedback is difficult to give, as it is not always welcomed. It was hoped that the authorities would expand co-operation: in general, the authorities would benefit from consulting all actors, in addition to those who have been operating in various institutions for many years. The young feel that they are not heard or taken seriously. The Advisory Board was cited as a good example of promoting transparency, as all its meeting materials have been made public, but it was also hoped that Roma issues would gain more coverage in the media.

At the European level, advocacy and inclusion are very sporadic and the pool of actors is small: there is no continuum. The opportunities to influence exist but informing about them is a challenge. People need information about what the opportunities and best ways to exert influence are. There is currently no clear, overarching understanding of the policies and mechanisms regarding Roma policy-making. Opportunities for advocacy are perceived by the young generation as individual international events, for example, and according to some experiences, invitations to such events would be sent out too late. Sometimes opportunities to participate have materialised, for example, through Facebook communities. It is hoped that the authorities would co-ordinate the activities better and communicate where relevant information can be found.

## Discussions on successful advocacy

The participants in the dialogue were asked about their experiences of successful co-operation: what does that mean in practice? Some of the most commonly mentioned aspects of successful co-operation were genuine encounters, social relations and straightforward interaction that allows direct, brave and even critical speech.

Human encounters and mutual trust were considered important in building good co-operation. These things are the result of good team spirit and individual actors being encountered as human beings and given genuinely free rein. Co-operation feels rewarding when 'certain types of officials' – i.e. those with a heart – are involved, who have contacts with Roma outside the official context, who encounters others as human beings and do not hide behind bureaucracy or a job title, and are not restricted by protocol, but instead are courageous, open-minded and genuine in their approach.

An example of successful and positive co-operation and meaningful participation comes from a micro level encounter and is related to the planning of a training course. The course was planned in co-operation between different organisations and authorities. During the planning, the parties met approximately 15 times, jointly reflecting the ways in which matters should be pursued. The content and structure of the planning day were defined together, and though a substantial amount of time was spent on the planning, it was considered rewarding in itself. In processes that promote meaningful inclusion, attention should be paid to the process itself, which should be seen as an end and a valid goal in itself, without having to place all value on the outcomes.

Co-operation at the European level has been successful whenever the parties involved have been actively encouraged and supported in participation. Participating in international events inspires young people to engage themselves in issues, and if language help is provided, participation becomes possible. The linguistic assistance may include interpreting as well as courses and training for young people in Roma policies as well as in the English language.

## The Nordic and Baltic networking event

The second dialogue took place on 11 May 2021 and involved Finnish authorities and actors who had previously participated in the Finnish dialogue meeting, as well as authorities and Roma actors from Sweden, Norway, Estonia, Latvia and Lithuania. All participants expressed, in their preliminary interviews, an interest in building a new kind of Nordic and Baltic co-operation in order to give issues relevant to their respective region more prominence at the European level. It became apparent during the preparations for the dialogue that the absence of a common language will present a challenge in the common discussion. The issue was raised in advance as a shared concern, with the idea that participation should not be felt too formidable. Participants were encouraged to join in and help as well as ask for language assistance, and efforts were made to build the atmosphere of the discussion so that everyone would feel welcome and able to express themselves. The dialogue served as an opportunity for introductions and networking for the Roma policy actors in the region, and in preparation for it, the participants were asked to consider the answer to the question: "How should things be arranged and what do you personally need to make the co-operation network inclusive and participation meaningful for you?"

The situations in the countries are very different from each other and co-operation means different things and involved different structures in different countries. Adequate time was reserved in the dialogue meeting for introductions and understanding different situations. It was agreed that co-operation at different levels requires the involvement of both Roma and public officials. Exerting influence is easier at the micro level in,



for example, regional work and on micropolitical issues (referring to small-scale activities, as well as in the informal and unofficial use of power by individuals and groups to achieve their own goals in everyday situations within their own organisations or communities). The most important outcome of the dialogue was that all participants expressed their will to participate in co-operation in the Baltic Sea region.

As the next steps, discussions on the co-operation and a common Roma strategy at regional level were proposed with the view of putting these initiatives forward to high-level decision-makers, such as foreign ministers/ministries and national Roma actors. The new EU Roma strategy up to 2030 enables and provides good tools and resources for highly variable and innovative projects: the next step could be to propose various development projects to high-level international co-operation platforms, which would enable the formation of a common situational picture and new collaboration as well as the export of best practices and project expertise to Europe.

### The third dialogue of Finnish actors commenting on the study near its completion

The third dialogue meeting took place on 22 June 2021 and its purpose was to present the nearly finished report and to enable those involved in the process to comment and have a say in the summary and recommendations of the report.

As was characteristic for this process, the discussions took to a whole new path in the final dialogue meeting. New ideas emerged as to where attention should be directed. Some of the observations and comments were recorded and the report was modified based on them. This paragraph provides a summary of the discussion and thoughts that could not be included within the designated scope of this report. It is our hope that due note will be taken on these final ideas and acted upon at a later time.

The third dialogue meeting dealt with the 'eternal problem', namely Roma elitism, representation, and how a public authority can ensure that the Roma actors in a process have sufficient support from the field for the things they are advocating. The amount of support can be measured quantitatively, for example by monitoring the number of members of an organisation, and how many of the members are involved in various projects, events, and civil activism. However, the best way to ensure that actors enjoy sufficient backing from the community is to familiarise oneself and know the actors well and to maintain diverse networks. Participation and dialogue processes should enable people from different backgrounds and starting points to get involved. Roma activism and organisational activities have become professionalised. This aspect could be better taken into account in consultations by, for example, allowing organisations to speak on their areas of specialisation. In this model, no organisation would automatically be invited to all events, and the necessary key expertise and criteria for participation in each even would be more carefully considered and defined. Consequently, only those with relevant experience in the area concerned would be included and selected for a process.

The dissemination of and access to information are essential. The success of communications is affected by the resource vulnerability characteristic of this particular field and the field's dependence on externally funded development projects. The expectations from the 'Roma elite' are high, while they are often under pressure from actual project work, and their concrete ability to share information is limited due to the lack of time, resources and opportunities to focus their energies. Public officials use "official" channels of communication and existing structures, such as the Advisory Board on Romani Affairs, and sharing that information often rests on the proactiveness of a handful of people.

Another controversial topic was Roma policies as such. Based on the discussion, this issue has been further addressed in this report. Roma policy is often perceived as Roma work carried out with project funding, but

that in itself does not guarantee that the lessons learned from the projects will be fed into the political debate and have an impact on the development and making of Roma policy. The political debate would benefit from a perspective broader than the strict Roma perspective: a minority policy and an advisory board for minorities would help the deployment of the skills and know-how of existing minorities.

One proposal, now that the Nordic and Baltic networks are under construction, could be to involve and bring together state-level actors and to apply for ESF funding for an action research project. As a way of working, it is engaging and its strength is that it produces research data and involves experts by experience and the grassroots level through its operational and practical dimensions.

There is a role for influencing and discussion in the field of international Roma policy. For example, the ADI-ROM organises a thematic working meeting once a year, hosted by one of the participating states. For example, a thematic working meeting for countries with small Roma populations has been organised, which also included participants from Finland. Such meetings may be organised by a country who volunteers to host it with the Council of Europe providing financial support and managing the reporting. Meetings have become process-based, which means that instead of just a single meeting, the process is divided into stages including two preparatory online meetings and the face-to-face meeting takes place with a previously prepared plan. Taking advantage of such an opportunity would bring the benefits of process-based approach to the work and improve the quality of reports and recommendations.

The forms of co-operation were also discussed. Traditionally, public officials work with NGOs, but another way for collaboration available in Finland is through local Roma working groups. In these groups, the local actors work together with public official with the emphasis on local-level collaboration, and not organisation representation is required. This form of co-operation is topical as such, as many countries are working together to gain a broader focus than the NGO field, so that organisational representation would not be the avenue for participation and hearing the views of Roma groups (cf. Swedish mediator activities).

In the case of participation processes, recruitment processes were also discussed. For example, when recruiting participants in working meetings, it would be useful if the expertise required for that meeting were given priority and participants were invited, based on their specialism. This would mean that no representative would be automatically called, and it would need to be made clear by which criteria the applicants are selected: these would be qualifications, the nature of the project and competence. It should be possible for every organisation to apply for participation and, also, every organisation would have to earn its place in each process and demonstrate their relevance as actors.

Discussions also took place on the obvious disconnect between reality and ideal state of affairs, and ideas how to resolve the situation were shared. In an ideal situation, invitations and advance materials are sent early enough so that everyone has adequate time to prepare for the meetings. In reality, however, it seems that invitations to international meetings arrive at the last minute, and the timetable does not allow for careful preparation. Knowledge of the relevant actors and their operations would help authorities decide which parties could be invited to participate in processes even at a short notice. One possibility would also be to focus on fewer meetings per year, and not always respond to requests. One possibility would be to apply for funding for “contact point” activities, which would concentrate on sharing information and conducting background research and preparations for processes. Funding could be applied for jointly, as no one actor has sufficient resources to enable full commitment.

One potential solution for the resourcing would be to take advantage of the EU Presidencies and the Council of Europe Chairpersonships, which are rotated and which is when countries can earmark money for the arrangements that are subsequently spent and allocated to working meetings, for example. This would allow for, e.g. Roma-themed working meetings.

From the point of view of the authorities, co-operation takes place within the framework of existing structures and official routes, i.e. mainly through Advisory Board on Romani Affairs. Since it seems that the voice of the actors in the field does not always reach decision-makers via the official routes, and co-operation with alternative organisations and actors may create conflicting pressures, it might be useful to look at how the Advisory Board operates in practice. What kind of data collection tools does the Advisory Board use? What kind of job descriptions do the staff have? What is the communication like between individual substance areas? How are the outcomes and impact measured? Structurally, it is challenging that the Advisory Board serve as a designer and implementer of the Roma policy, and the external evaluation component has not been built into the structure of the operation. On the other hand, work is underway, varying dialogue methods and ways of doing things have been tried, but the challenge is always that these experiments have been carried out with external funding.

Discussions have begun. In the recommendations, we will take a position on how, as authors of the report, we see how this resource could be utilised.

## Recommendations

These recommendations to the Ministry for Foreign Affairs are divided into two sections. Several interviewees mentioned Roma actors' experiences of inadequate and meaningless participation. Serving as a mere rubber stamp for proposals and policies that have already been approved does not meet the real needs of Roma, according to Roma actors. Therefore, the first section of the recommendations deals with solutions for developing meaningful and effective participation on a general level.

The second part of the recommendations sets out new ways of strengthening the regional Roma policy and influencing the European Roma policy alongside the existing policies. The recommendations have been presented to the Ministry for Foreign Affairs.

### *Developing meaningful participation*

1. In order to build meaningful participation and fruitful co-operation, dialogue-based working methods are recommended whenever there is a need for consulting and involving and co-operating with a target group. In order to achieve equal dialogue, the principles of brave space and the politics of listening can be utilised. It is also important to ensure that process participants are aware of the impact of their contribution. In the process, attention should be paid equally to:
  - **substance questions** to summarise the information and views expressed by the participants. Information and views must also be given equal weight and consideration. When people are asked to express their views, care must be taken to ensure that there is a genuine willingness and readiness to pursue the issues that have been put forward at various levels;
  - **methods**, the preparation and guidance of the dialogue can be conducted so that the purpose, principles and significance of participation is clear to everyone involved and that people have the opportunity to prepare for the process in advance;
  - **open communication** to support the building of the dialogue, relations and co-operation between the parties.
2. Processes of participation itself is important, not only the end result. The process itself should be seen as an objective with its own intrinsic value. Although this will require resources and time, it will also support meaningful participation that leads to better outcomes.

3. As part of meaningful participation, participants should be informed of the concrete impact of their participation in order to avoid pseudo-participation. The participants should be informed of the measures taken and the progress of the process as agreed and within the agreed timeframe. This should be implemented as a cross-cutting principle in all Roma policymaking and implementation. Planning, implementing and monitoring matters in equal co-operation leads to an experience of genuine inclusion.
4. In the processes supporting participation attention should be paid to linguistic differences and differences in social realities in a positive way, so that they do not form an obstacle to co-operation and information from various backgrounds and frameworks is given equal value. In order to ensure the accessibility of information, communications should be produced systematically, in clear language and using various communication channels.

This report can be seen as a first step in the process and, in line with these principles, the Ministry for Foreign Affairs is invited to continue the dialogue and co-operation process with Roma actors in order to empower Finnish Roma actors in the field of European Roma policy.

#### *Development of regional co-operation as part of the European Roma policy*

1. The Ministry for Foreign Affairs will continue the process initiated by this report and the building of the network of Roma policy actors in the Nordic and Baltic countries.
2. The next step will be to extend the co-operation to cover all the Council of the Baltic Sea States, including Poland, Germany, Russia and Iceland. The measures to achieve this:
  - 2.1. The Ministry for Foreign Affairs will convene a forum consisting of officials from the ministries responsible for Roma affairs and Roma actors in the region. The purpose of the forum is to outline co-operation on Roma issues, both between the countries of the Baltic Sea region and in the joint advocacy work on the European Roma policy.
  - 2.2. A working group will be appointed to draw up a long-term plan for the implementation and financing of co-operation between the countries of the region.
3. Finland's permanent representations in the Council of Europe and the OSCE will highlight topical Roma issues at the meetings of the Nordic and Baltic countries (NB8), seek synergies and strengthen their co-operation in influencing the Roma policies of the institutions.
4. Use the Council of Europe, the OSCE and the EU meetings on Roma as a platform to raise Roma issues in the Baltic Sea region and to identify opportunities for co-operation. Engage Roma actors in these discussions.
5. Support the capacity of Finnish Roma organisations and actors, in particular Roma youth and women, to participate in co-operation in the Baltic Sea region and Europe and to strengthen co-operation between Roma organisations. In this context, it is essential to acknowledge the internal diversity within Roma populations, and attention should be paid to facilitating the participation of the diverse groups.
6. The emphasis should be consistently placed on the facilitation of equal and meaningful participation of Roma organisations and actors in the work of European institutions and on strengthening Roma participation at all stages of decision-making and measures affecting them – including planning, implementation and evaluation.

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