



Civil society monitoring report on the quality
of the national strategic framework
for Roma equality, inclusion, and participation
in Finland

Prepared by:
Finnish Roma Association
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LIST OF ABBREVIATIONS

AVI	Regional State Administrative Agency
CERV	Citizens, Equality, Rights and Values Programme
CSO	Civil Society Organisation
DIAK	Diakonia University of Applied Sciences
ECEC	Early childhood education and care
EDUFI	The Finnish National Agency for Education
ELY	Centre of Economic Development, Transport and the Environment
ESF	European Social Fund
EU	European Union
FRA	EU Agency for Fundamental Rights
HUS	Helsinki and Uusimaa Healthcare District
KELA	Social Insurance Institution of Finland
NRSF	National Roma Strategic Framework
RCM	Roma Civil Monitor
ROMPO 1	Finland's National Roma Policy 2009-2017
ROMPO 2	Finland's National Roma Policy 2018-2022
ROMPO 3	Finland's National Roma Policy 2023-2030
RY	Registered association
SNA	Special needs assistant
STEA	Funding Centre for Social Welfare and Health Organisations
TE	Employment and Economic Development
THL	Finnish Institute for Health and Welfare
YLE	The Finnish Public Service Media Company

EXECUTIVE SUMMARY

This report assesses the third National Roma Strategic Framework (NRSF) of Finland for the years 2023–2030. A clear positive trajectory is identified compared to the previous NRSF. Notably the NRSF is now much more coherent with the related domestic and European policies. In addition, the number of actions has been reduced, the monitoring and evaluation process has been strengthened, and the number of participants in the preparation of the NRSF has increased. However, it remains that the NRSF is not particularly well known by Roma civil society or the authorities, which has serious implications for its effectiveness and sustainability.

The regional welfare counties are important bodies in implementing the national Roma policies, but the implementation of the NRSF should have been incorporated into their structures long before they started operations in 2023. Roma civil society has some suggestions on how to improve the situation, but the prospects remain grim as the regional welfare counties are planning major spending cuts to cover growing funding deficits.

Furthermore, because the proposed actions of the NRSF are recommendations and thus not legally binding, it is possible to bypass them altogether. Finally, there are great expectations associated with the forthcoming Action Plan of the NRSF, which was not yet available at the time of writing this report. It remains to be seen just how concrete it will be and whether the proposed cooperation partners in national, regional and local levels will eventually commit to the implementation of the NRSF.

Participation

In Finland, the primary method for policy consultation typically involves requesting comments. However, this has not been well-received by Roma civil society, which remains suspicious of all kinds of data collection. Hence, organising open workshops – with the participation of 150 individuals mainly representing the different Roma civil society organisations (CSO) and authorities working with the Roma – proved to be an effective approach.

A separate working group was organised for the migrant Roma who have moved from Romania to Finland, which was a great advancement over the previous NRSF.

The preparation of the NRSF was, however, criticised for being Helsinki-centred. Roma civil society also criticised the preparation of the NRSF for having been a high-level discussion with concepts that are not understood at the grassroots level. It is widely agreed that a lot of effort was made to increase the participation of Roma in the preparation, implementation, and monitoring of the NRSF, but many Roma were still left with the experience of not being heard in relation to their own issues.

Relevance

As Finland continues to rank as one of the most racist countries in the EU, according to the EU Agency for Fundamental Rights (FRA), many respondents covered in this report were very pleased that tackling antigypsyism was raised as one of the two priorities and a cross-cutting objective of the NRSF, as this will guide all mainstreaming of the Roma policy measures. It was agreed that antigypsyism as a concept must, however, be made more accessible and understandable to the Roma themselves but also to the majority population. Indeed, this issue becomes even more challenging in the Finnish context, where the whole discussion on racism, even in general, is still very much in its infancy. Furthermore, the Finnish discussion about racism, at the moment, is so focused on the proper terminology and racism experienced by individuals that the numerous other aspects of racism, such as the structural racism that affects the lives of many, are easily forgotten. Even so, agreeing on which terms are to be used in discussions remains important, as it can lower the threshold of members of the majority to act as whistleblowers when they encounter racist behaviour among their peers.

Expected effectiveness

Roma policymaking should be evidence-based. At present, there is a lack of accurate data on the Roma population as Finland does not keep official statistics on ethnicity. Promisingly, the NRSF addresses this, as it aims to produce ethical guidelines for research and data collection involving Roma in collaboration with the ministries, universities and Roma CSOs.

Another concern is related to the fact that no government funding is allocated for the NRSF, albeit the long-term nature of the NRSF from 2023-2030 makes it possible to plan for projects and apply for European Social Fund (ESF) and 'Citizens, Equality, Rights and Values Programme' (CERV) funding, for example, which could be used to address the needs of Roma. Roma civil society still hopes that the government will contribute even a small amount of money to the NRSF because with government funding comes monitoring and evaluation obligations, which, in turn, would strengthen the programme and its credibility.

Alignment with the EU Strategic Framework

Similar to the previous Roma strategy, the current NRSF does not sufficiently cover the needs of marginalised Roma within the community, notably gender and sexual minorities, nor divorced women and youngsters living with substance abuse, to name a few. It was notable that this time, it was the Roma themselves who brought up gender and sexual minorities as subgroups and did so by using their proper names instead of the earlier roundabout terms. It was mentioned that when compiling data for the EU, for example, it is no longer possible to hide behind cultural restrictions, as comparable information must be produced. The Council Recommendation is clearly discussed throughout the NRSF. Nevertheless, some of the recommendations do not apply to Finland, while in some parts, the NRSF needed to compromise between addressing the different needs and requirements of the entire Roma population in Finland and the most vulnerable groups the Council Recommendation refers to.

INTRODUCTION

This report assesses the third National Roma Strategic Framework (NRSF) of Finland for the years 2023–2030. In Finland, the NRSF is known as the ‘Finland’s National Roma Policy’, or ROMPO3, an abbreviation from Roma Policy, *romanipolitiikka* in Finnish.

The NRSF is based on the European Roma Strategic Framework 2020-2030 and the Council Recommendation on Roma equality, inclusion and participation, and preceded by the first National Policy on Roma for 2009-2017 (ROMPO1) and Finland’s National Roma Policy 2018-2022 (ROMPO2). Unlike previous strategies, the third NRSF is clearly linked to the European level; it pays particular attention to the harmonisation of Roma policy timelines and objectives with the EU framework.

About this report

The purpose of this report is to describe the participatory and inclusive monitoring of the design and implementation of the NRSF in Finland by Roma civil society. The report provides feedback both to the national authorities as well as the European Commission, which is monitoring the NRSF. It examines the alignment of the NRSF with the requirements of the EU Roma Strategic Framework 2020-2030 and the ‘Council Recommendations’.

As for the methodology, the report builds on a combination of desk study and interviews. The desk study covered the following areas:

- the horizontal policy objectives of the EU Roma Strategic Framework (fighting antigypsyism, anti-discrimination, reducing poverty and social exclusion, participation),
- sectoral policy objectives (education, employment, health, housing),
- other policy areas identified by the ‘Roma Civil Monitor’ (RCM) project as important for Roma equality, inclusion, and participation (Roma culture, environmental justice, digital inclusion, social services, child protection, and income support).

Basically, the NRSF covers most of the policy objectives and policy areas mentioned above, albeit they are organised differently in terms of form and order. The NRSF’s main objective is in line with the EU Roma strategic framework and its two cross-cutting objectives, namely equality, inclusion and participation, as well as eliminating discrimination by tackling antigypsyism. These two priorities guide all the mainstreaming of the Roma policy measures.

The NRSF lists ten strategic policies and seven strategic areas, which are broken down into 71 Actions, among which many follow from the previous programme period. The seven strategic areas include four sectoral sets of objectives related to education (Actions 31-38), employment (Actions 39-45), housing (Actions 46-49) and health (Actions 50-53). In addition, there are three sets of actions related to wider objectives. These are antigypsyism, racism and discrimination (Actions 1-4), the structural reform of Finland’s health, social and rescue services (Action 5), as well as the social, linguistic and cultural rights of Roma people (Actions 54-63).

Part of the NRSF adopts a lifecycle model, which means that the themes are structured by age group. It addresses age-specific measures for children and young people (Actions 6-15), families and the working-age population (Actions 16-20), and the ageing Roma population (Actions 21-26). Vulnerable persons are discussed as a distinct group (Actions 27-30). Finally, measures related to the international Roma policy (Actions 64-66), the development of implementation (Actions 67-70), and monitoring (Action 71) of the NRSF have been defined.

The desk study was followed by interviews conducted from November 2023 to February 2024. Key informant interviews took the form of in-depth interviews carried out via the online video call software MS Teams by Päivi Majaniemi and Kristiina Elenius. In addition, two group interviews were organised in Helsinki and Seinäjoki, and the interview material was collected by Anca Enache and Jaakko Laakso, respectively. Altogether, 36 persons were interviewed, consisting of representatives of the national Roma contact point (1), the Regional Advisory Boards on Romani Affairs under the Regional State Administrative Agency for Southern Finland, for Northern Finland, for Eastern Finland and for South-Western Finland (4), ministries (3), the police (2), municipalities (2), specialised ombudsmen (4), civil society organisations (CSO) (14), and Roma migrants (6).

More specifically, ministry interviews were conducted with representatives of the Finnish National Agency for Education under the Ministry of Education and Culture and at the Finnish Institute for Health and Welfare (THL) under the Finnish Ministry of Social Affairs and Health. Likewise, interviews with police were conducted with representatives of the National Police Board and the Police University College of Finland. Similarly, municipality interviews were conducted with representatives of the Association of Finnish Municipalities and the Office of the Non-Discrimination Ombudsman, Ombudsman for Children, and Ombudsman for older people.

Among the Roma CSOs, interviews were conducted with *Suomen Romanifoorumi* (the Federation of the Roma organisations in Finland), *ROM-Mikkeli*, *Romano Missio*, *Länsi-Suomen romanit* and *Lakeuden romanit*. Additionally, staff of the Deaconess Foundation working with Roma migrants originating from Romania and Bulgaria were interviewed in Jakobstad (on the upper West Coast of Finland). Roma migrants originating from Romania were interviewed in Helsinki.

In addition to the NRSF itself, other relevant policy documents, monitoring reports, and studies were reviewed.

The report was prepared by the Finnish Roma Association involving the team of Kristiina Elenius (Finance Manager), Anca Enache (Board Member), Yoon-Hee Choi (Development Coordinator) and Päivi Majaniemi (Chair of the Board). The team would like to thank all the individuals and organisations who generously shared their time, experience and materials for the purpose of this report.

1. PARTICIPATION

1.1. Roma participation in the NRSF preparation

The Roma policymaking process in Finland has a long history of being participatory. Therefore, the preparation of the NRSF was grounded on the Roma population's own views and assessments in addition to many written sources.

The NRSF was prepared by the National Institute for Health and Welfare (THL) as assigned by the Ministry of Social Affairs and Health. In late 2021, THL organised several working groups that were open to all, albeit partly took place online due to the COVID-19 restrictions that had yet to be lifted at the time. Several working groups were created based on the life cycle model: children and young people, families and working-age population, ageing Roma population, particularly vulnerable Roma, and the joint development of Roma policy. A total of 150 people took part in these events, mainly representing the different Roma CSOs and authorities working with the Roma.

The open working groups sought a broad understanding of the objectives to be defined for the NRSF. At each event, the participants were divided into smaller groups, where they formulated proposals for action. Towards the end of each event, all actions were collected, and the working group decided by voting on the most important of them. As only the most active Roma participated, the voting did not necessarily guarantee that the most relevant topics were chosen. Next, the action proposals formulated during the open working groups were discussed and made more concrete and as measurable as possible by the smaller expert groups.

The regional setting came across strongly in the interviews of the Roma CSOs. The Roma CSOs based in Helsinki said how pleased they had been with the long NRSF preparation period, which already started in 2021. They felt that they had had an opportunity to read and comment on the NRSF draft; they had also participated in all of the workshops. They also felt that their proposals had been included in the final NRSF. However, the experiences of those Roma CSOs located outside the capital region had been different. Some of the Roma CSOs located far from Helsinki had participated in the regional event organised by the Regional Advisory Board on Romani Affairs, yet most of the Roma CSOs outside of Helsinki had not even heard about the NRSF preparation process and obviously could not participate.

The preparation of the NRSF was criticised for being Helsinki-centred. Some of the Roma CSOs also criticised the preparation of the NRSF for having been a high-level discussion with concepts that are not understood at all at the grassroots level. According to them, there is a Roma 'elite' that discusses Roma policy over the heads of the community, which made some wonder if they could still remember why they had got involved in the first place. Some Roma respondents voiced open suspicion about whether there had even been any real attempt to reach out to the grassroots, not to mention the most vulnerable groups during the preparation of the NRSF. The respondent wondered how it is possible that there is an NRSF that is not known about by the Roma people themselves. Another Roma activist confirmed this lack of information and estimated that "90% of the Roma people have never even heard of the NRSF".

According to some Roma CSOs who actively participated in the working groups, the question is, in the end, about individuals' motivation to participate. Working in small groups was praised, as it gave everyone in the group an equal opportunity to voice their opinion, in comparison to larger groups where designated persons are likely to dominate any discussion. Among some CSOs, however, there were some feelings of frustration as there were always new people in each working group to whom everything was new and thus, things had to be explained from scratch, which meant that the process of consultations slowed down, as the same topics had to be discussed over and over again. Some of the participants said that it was difficult to get the big picture, as the NRSF appeared quite fragmented to them. Last, it was considered to be a very important factor that the person who wrote the draft was also a Roma.

Roma CSOs agreed that if the main goal of the NRSF is to improve the social status of Roma, then the minimum requirement is that the Roma themselves take an active part in it. However, at present, a vast number of Roma people are not even interested in participating because they think their opinion does not matter or that the NRSF is irrelevant to them. According to respondents, this lack of interest shows that no sufficient groundwork has been done within the Roma population, and it has not been well enough justified why it is important for them to participate and have an impact. Members of the middle-aged and older population especially believe that they cannot influence anything. Therefore, the Roma CSOs should make home visits, for example, but there

are certainly no resources for that. Other techniques that were proposed included video presentations in plain language or the formulation of an 'elevator pitch'.

The NRSF uses the expression "Europe's mobile Roma" to refer to those Roma who do not have municipal rights in Finland, as well as to those who are residents who have moved to Finland from other countries, especially from Eastern Europe. The expression is widely used in Europe in reference to those Roma who migrate to different European countries in the context of the EU free mobility regime but cannot access residency rights in the host countries. Since Roma in Finland, and in many European contexts, have been stigmatised and policed as 'nomads', Roma civil society reminds us that the currently used expression 'mobile Roma' can also have stigmatising and racialising effects. Using terms like 'Roma EU citizens' or 'migrant Roma' could send a clearer signal that Roma migrate inside Europe, just like any other Europeans, and that states have a duty to safeguard their rights and to remove the barriers limiting their access to residency rights in the countries of migration.

The respondents from Roma civil society were very pleased that the needs of the migrant Roma were heard during the NRSF preparation, as THL organised a separate working group for Roma from Romania and Bulgaria who lack residency in Finland. The working group was carried out in cooperation with the Deaconess Foundation, which provides community services for undocumented Roma. The participation of both undocumented Roma and migrant Roma who have a residency permit in Finland has been limited to this one hearing. The main reason for this is that these communities have not been a part of the policy-making processes in the same way the Finnish Roma communities have. For example, the undocumented Roma have been targeted largely through emergency social and health services, whereas those migrant Roma who have residency have been mainly targeted through mainstream and migrant services and policies rather than by Roma policies. For these communities, getting involved with influencing policy is all the more challenging as they are not represented by CSOs of their own who are dedicated to such work, whereas those who face homelessness and are living in poverty usually do not have the necessary time or the possibility to join initiatives launched by Finnish Roma CSOs. Furthermore, a lack of a common language may also be a barrier to such collaborations.

Before the final publication, the Ministry of Social Affairs and Health circulated the NRSF draft for comments in October 2022 through the public administration's online service lausuntopalvelu.fi. Feedback was received from 49 organisations, many more than during the earlier processes of the first NRSF (2009-2017) and the second NRSF (2018-2023). The vast majority of the respondents represented ministries, municipalities, government agencies or other national institutions, as well as some non-Roma CSOs, but there was only one Roma CSO, namely the Finnish Roma Association. As the most typical means of policy consultation in Finland is requesting comments, it is clear that this approach does not reach Roma civil society. This outcome alone shows what an absolutely brilliant idea it was to organise the open workshops.

1.2. Roma participation in the NRSF implementation, monitoring, and evaluation

Regarding the implementation of the NRSF, the programme will be combined with an additional Action Plan that details more concrete ways in which the actions mentioned in the NRSF will be implemented. Unfortunately, this additional Action Plan was not yet available at the time of writing this report.

The Roma CSOs see themselves as among the stakeholders responsible for the implementation of the NRSF. Therefore, the NRSF is of utmost importance to them as they plan their forthcoming actions and write their forthcoming annual plans while constantly keeping an eye on what is written in the NRSF. In addition, the Roma CSOs have learned how important it is to refer to the NRSF whenever they apply for funding for their operations. With the help of NRSF, they are better able to identify joint interfaces through which to collaborate with stakeholders. They can also co-apply for European Social Fund (ESF) funding as a part of a consortium that aims to implement the various actions suggested by the NRSF. Ultimately, the NRSF sets the direction in which the Roma CSOs should go and highlights the importance of the Roma CSOs and their activities in the eyes of stakeholders.

According to the NRSF, many of the proposed actions followed from the previous programme period (2018-2022), as the related challenges have not yet been resolved or their implementation requires more than one operating period. Actions that originate from the previous programme are clearly indicated, regardless of their rather brief coverage in the evaluation section of the previous NRSF. Some of the Roma CSOs, however, had quite strong opinions regarding the transferred actions. They said that no new actions ought to be introduced before the postponed or unrealised actions of the previous NRSF have been implemented.

The regional welfare counties and municipalities, which are important bodies in implementing the national Roma policies together with the Roma CSOs, highlighted that the NRSF is useless to them if it does not penetrate into their service structures. Therefore, the implementation of the NRSF should have been incorporated into the structures of the regional welfare counties even at the stage of their planned establishment in 2023. Since it was not, a unique opportunity was wasted, according to the most pessimistic respondents. In order to really take the NRSF from paper to practice, a Roma Contact Person should be employed in each and every regional welfare country with the main responsibility of making the NRSF known to both the authorities and the Roma. Although the idea of Roma Contact Persons has been discussed in the Ministry for Social Affairs and Health, the respondents have doubts about whether it will ever become a reality.

According to the respondents, the welfare services counties have lots of explanations ready for why the Roma are not taken into account, such as that they are “not yet ready” as they only started their operations in 2023. Furthermore, saying “everyone is treated equally” and “we cannot classify people according to ethnicity” are all considered excuses for not addressing the needs of the Roma. Additionally, the respondents said that there is no real understanding of positive discrimination (defined as temporary action aiming to help achieve equality or at least reduce the harm caused by discrimination). When true equality is reached, positive discrimination will become unnecessary.

The role of the Regional Advisory Boards on Romani Affairs in the NRSF implementation divides Roma civil society. Some of the respondents thought the advisory boards were very useful, while others thought they were totally unnecessary and did not really understand the living conditions of the Roma outside their own immediate location. Nevertheless, Roma civil society suggests that the role of the Regional Advisory Boards on Romani Affairs will be clarified and transparency strengthened along with the forthcoming reform of the Regional State Administration Agencies under which the Regional Advisory Boards on Romani Affairs operate.

Some of the Roma CSOs also suggested that the Evangelical Lutheran Church of Finland be invited to collaborate in the implementation of the NRSF. Therefore, the NRSF should be introduced to the Church Council or even to the General Synod. If the Church committed to the implementation of the NRSF within its own structures, it could easily reach the Roma, as the Evangelical Lutheran Church is present even in the most remote villages in Finland and already has contacts with the local Roma. Better yet, the parishes already have their own resources, notably human resources like pastors, deaconesses, and other employees, as well as volunteers.

As to monitoring and evaluation of the NRSF, most respondents were not at all aware of the topic. Rather than being interested in the monitoring and evaluation of the NRSF, the respondents were concerned about who monitors the welfare services counties in relation to Roma affairs.

1.3. System of policy consultation with civil society and stakeholders

In Finland, citizens generally have wide trust in public institutions, which also applies in the case of Roma affairs, as authorities shoulder many such functions that in other countries are carried out by CSOs. Therefore, the authorities represent the main stakeholders in the policy consultation of the NRSF.

Many authorities had given comments on the NRSF draft; they just did not consider comment-giving as participation. Some authorities were in for a rather unpleasant surprise as, while giving the requested comments on the NRSF draft, they learned that many actions had been assigned as their responsibility to implement without any prior discussion. The authorities stated quite clearly that they are independent authorities who cannot simply accept to undertake tasks ‘from the outside’ as they have to prioritise their own tasks themselves. The authorities continued that, in the future, it is extremely important to identify the relevant parties, call them together, and agree on what the possible measures and responsibilities for the implementation will be.

Furthermore, along with commenting on the NRSF draft, the authorities noticed that there were errors both in the content and terminology, which were not up-to-date. It appeared that the mandates of the authorities had neither been understood nor respected. Moreover, the NRSF lists a number of cooperation parties but no responsible parties at all. According to the authorities who were interviewed, the connections between the Ministry for Social Affairs of Health, or THL, and other ministries remained weak.

Although the preparation process received criticism, most of the proposed actions in the NRSF were nevertheless very reasonable, according to the authorities. However, some authorities had strongly suggested that themes such as internal discrimination among the Roma communities should be addressed in the NRSF

but said that their proposals had been rejected in this programme period, similarly to in earlier periods. The human-rights-based approach, however, must also be required from the minority itself.

Authorities who participated in the open working groups said that this time, they were better informed about the existence of these structures than during any of the earlier programme periods. According to respondents, the number of participants in the events, however, remained small, and the various groups were still largely attended by the same people. Nevertheless, speakers from the audience remained anonymous, which the authorities were slightly disappointed by, as many great speeches were heard, but without names, there is no possibility of, for example, contacting individuals later on to act as informants for decision-makers. Undeniably, the best thing about the working groups was that young people were involved. Despite all the wins, part of the Roma population remained completely unheard, according to the interviewed authorities.

In the process of NRSF preparation, communication was specifically targeted at municipalities, and the effort has clearly paid off. In large municipalities, the NRSF is already quite well known, according to the respondents, while in small municipalities, it is less known. Roma CSOs had the same exact message, stating that the local authorities do not know the NRSF at all, although they do not dare to admit it.

From the municipality's perspective, the NRSF programme seems to be better defined and more goal-oriented than before. Similarly, the communication on the NRSF preparation was good, especially between the Regional Advisory Boards on Romani Affairs and municipalities, although there is always room for some improvement as well. Two specific problems were, however, mentioned at the local level. First, the municipalities do not have any data on the number of Roma people in their area, which makes it difficult to direct any targeted activities to the Roma population. The second, more serious problem is the lack of resources. Currently, it is left up to municipalities to decide how to approach the implementation of NRSF.

In about 20 municipalities all over the country, Local Roma Working Groups have been established. The Local Roma Working Groups could be used in the preparation of the equality planning of the municipalities. In many cases, the municipalities are busy with the provision of basic services, and thus equality planning is not anyone's main responsibility but rather done alongside other work (e.g., by the mayor or the director of the library, for example), which in turn is reflected in the quality of the equality plans.

1.4. Empowerment of Roma communities at the local level

Empowering and strengthening the inclusion of the Roma population was one of the central policy guideline areas of the previous NRSF, and along with the current NRSF, it has been developed further. It has also taken a more concrete form as concerns Roma rights. This becomes evident as the very first strategic policy objective mentioned in the NRSF is to eliminate antigypsyism and discrimination against the Roma and to ensure the equal realisation of the fundamental rights of Roma.

The Roma CSOs experienced being left alone to introduce the NRSF in municipalities and regional welfare counties and suggest collaboration for implementing the NRSF actions. The CSOs state that they do not have the necessary resources to do it all by themselves and that really it should be the task of the central government. In many cases, according to the CSOs, the reason why the NRSF actions have not been implemented is, in reality, not even the lack of funding but the lack of awareness of the local authorities. Therefore, Roma civil society calls for more paid personnel to work on the implementation of the NRSF. There should be civil servants, preferably with a Roma background, who travel to the provinces to spread knowledge about the Roma policy on the one hand and gather data concerning potential additions to the NRSF along with the mid-term evaluation on the other hand. According to respondents, there are plenty of small Roma CSOs, not to mention ordinary Roma, who would have slightly different perspectives on the life of Roma instead of constantly listening to the same people in the NRSF preparation.

As Roma people are scattered around a large country, the Roma culture has also developed certain regional characteristics that differ from one place to another. In the same vein, the Roma CSOs have very different objectives, motivations, resources and networks. This represents a challenge that is not taken into account properly. In some areas, there are Local Roma Working Groups, but if they are the only available structure aimed at influencing Roma policy, it is quite understandable why Roma people will not be lining up at their doorstep.

The NRSF would benefit enormously if the Roma themselves were to create a vision of what their ideal future looked like. One thing that the writers of the NRSF hoped for was a more in-depth effort from the Roma CSOs

concerning the planning of the programme. However, currently, the NRSF just appears on people's desks, often quite unexpectedly, which tends to mean that no one has time to give it the attention it naturally deserves nor to properly familiarise themselves with its contents. The NRSF, with all of its stages, from planning and implementation all the way to the monitoring and evaluation, is a long-term project which requires a great deal of commitment, not just for personal gain but to make real improvements in the life of the Roma population.

The Roma population's low interest in the NRSF goes back to their insufficient education, inability to contribute to political processes and formulate their ideas using the proper terminology and idioms, as well as a sense of general hopelessness. Most of the Roma have not inherited any model of political influence nor the tenacity for long-term processes. Besides, there are always other things that seem to be more crucial than obtaining political influence, notably one's commitment to the family or parish. Hopelessness, in this case, refers to the argument that improvements in Roma affairs just take too long. It was restated that the Roma are probably the only minority in Finland not represented by one of their own members in the Finnish parliament, for example.

Roma CSOs were criticised by the respondents from the Roma community for not sharing, not collaborating and being jealous of other Roma CSOs' projects and funding. One solution for this kind of pettiness would be creating the long-awaited Roma Centre of Expertise, where all the current projects could be brought together to be shared and flourish. The NRSF's Action 68, which aims at establishing a virtual Centre of Expertise utilising digitalisation and new technology – a Roma hub –, although quite different from the physical centre suggested by the respondents, could still be a good place to start.

Similarly, migrant Roma are not aware of the national or municipal Roma policies. Moreover, what they are aware of are single projects and services they can use. For example, in the city of Pietarsaari the local migrant Roma know about the 'Roma Gate' Project, and in Helsinki they know about 'Hirundo', both of which are run by the Deaconess Foundation. Similarly, they know about Iso Numero, which is a social enterprise that creates opportunities for work for people who cannot generate an income elsewhere. This also demonstrates how there are only a few projects that address the wellbeing of the migrant Roma rather than any long-term policies.

1.5. Capacity-building of Roma civil society

The NRSF does not include a task labelled 'capacity building of Roma CSOs', although it includes a couple of Actions targeted around specific themes that lead to the capacity building of Roma. Basically, all of the Roma CSOs in Finland are somewhat small and operate with very limited resources. Nevertheless, all of them have knowledge and experience with a wide range of Roma policies, whether targeting education, employment, housing, health care, social services, or social protection. One explanation for this wide information pool is that the challenges faced by the Roma communities are usually intertwined and complex.

Still, the difference between smaller and larger Roma CSOs is remarkable. Larger Roma CSOs that implement publicly funded projects need to be able to position their actions within the framework of the NRSF and even the EU Roma strategic framework to get such projects. At present, only the largest Roma CSOs possess the necessary policy monitoring and analysis skills, as well as report-writing capacity. Most of the Roma CSOs assessed that they have no experience or only limited experience in writing reports or policy papers, collecting data through desk research, or conducting research interviews with the authorities.

Most of the small CSOs said they have neither the knowledge nor resources to direct attention to the political framework. In the same vein, they indicated that they do not have enough information about this. Small Roma CSOs mainly solely depend on the knowledge of a few active individuals, whether board members or volunteers. As there can be no personnel or administrative structure in the absence of permanent funding, individual knowledge never cumulates nor becomes organisational knowledge. Due to this, the operations of most of the local Roma CSOs are very fragile.

All Roma CSOs, however, possess strong grassroots competence and good networks. This is not surprising in the least, as interpersonal relations are highly valued in the Roma culture. At the local level, the Roma CSOs are able to reach the Roma people, albeit connections have been somewhat weakened due to the COVID-19 restrictions. Similarly, they often have excellent relations with local stakeholders, including the local media, but only a few or no relations at the regional and national levels.

Regarding weaknesses, everyone agreed that the major problem is the lack of permanent funding. Therefore, most of the Roma CSOs do not have any paid staff but have to rely on volunteers. Although the level of

education of the Roma has increased, this is not yet visible in the field, so even Roma CSOs suffer from a lack of competent personnel with sufficient academic education and language skills.

The Roma CSOs need to be equipped with the skills, knowledge, and attitudes required to participate fully in the design, implementation, advocacy, monitoring, and reporting of the NRSF and other public policies relevant to Roma equality, inclusion, and participation. Most of the Roma CSOs lack the administrative structures and the basic skills to manage their organisations. Therefore, it appears at present that the most productive way forward would be to focus energy on further developing the organisational skills of the Roma CSOs so that they can better serve the needs of the Roma community. The CSOs would need to have a clear vision, mission and strategy as well as some resources for operations, notably funds and personnel. In other words, they would need skills to build principles, systems, rules, mechanisms and practices based on which organisations are run.

Moreover, there is a burning need to strengthen the capacities of Roma CSOs to engage in constructive dialogue and cooperation with municipalities, as well as with the regional welfare counties, which are important bodies for implementing the national Roma policies, and the non-Roma CSOs who have expertise in promoting the rights of those who are in a vulnerable position and making their voices heard.

2. RELEVANCE

2.1. Fighting antigypsyism and discrimination

The EU Roma strategic framework is the first direct contribution to implementing the EU Action Plan against Racism 2020-2025. Moreover, the member countries have been invited to design their own NRSFs as well as national anti-racism action plans, which in Finland have materialised in the form of the third NRSF 2023-2030 and the 'Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups' by the Prime Minister Marin's Government (2019-2023). As Finland ranks as one of the most racist countries in the EU, according to the EU Agency for Fundamental Rights (FRA), Roma civil society was very pleased that tackling antigypsyism was raised as one of the two priorities, as well as the cross-cutting objective of the NRSF, as these guide the mainstreaming of the Roma policy measures.

The EU Roma strategic framework brings with it the concept of antigypsyism, which is a specific form of racism. Antigypsyism is defined as a historically rooted structural phenomenon that appears at institutional, social and interpersonal levels. It originates from the way in which the majority views and treats those considered to be 'gypsies'. It is similarly rooted in a process of othering that builds on negative as well as positive, exoticising stereotypes.

In Finland, the concept of antigypsyism is not recognised at all, which was stated by both the authorities and the Roma CSOs in the interviews for this report. Antigypsyism is not being recognised or acknowledged at any level of society. Furthermore, the whole defining of the concept is still in its infancy. Some Roma CSOs explained this by saying that the Roma do not have the courage to recognise or address racism because they are afraid of the consequences: both what will happen and what won't if the existence of antigypsyism is acknowledged.

Only a few respondents were familiar with the concept of antigypsyism, and they all agreed that, so far, all the attempts to translate the concept into Finnish have gone wrong. They were relatively satisfied with the use of the English word 'antigypsyism', even in Finland, because it is an analogous concept to antisemitism, which is already understood in Finland. Thus, antigypsyism, just like antisemitism, may refer to a global phenomenon, and since loanwords are widely used in Finland without translation, it would mean exactly the same in the Finnish context as it does in Europe. This is not the case in the NRSF, which translates the word 'antigypsyism' as 'romanivastaisuus', which, literally translated, means 'anti-Roma' or 'opposition against Roma', which, in our opinion, is a mistranslation. However, as the whole discussion is only just getting started in the Finnish context, there is yet no general consensus about what words ought to be used when addressing the specific form of racism faced by Roma.

The Roma themselves tend to silently accept the various kinds of discrimination they encounter. The majority of Roma children are taught early on by their parents not to touch any goods in shops, for example, as they may end up being taken to the 'back room'. Parents teach them to act in a certain way in order to be accepted. Roma children are taught to be afraid of police and child protection and told that they are going to be taken away if they do not behave properly. As such, Roma themselves also indirectly maintain racist structures.

According to the respondents, much training will be needed among the Roma community regarding antigypsyism. At present, when the Roma do not have sufficient understanding of the phenomenon, they may end up behaving defensively, even aggressively, and eventually pull out the racism card.

Notably, Roma youth and children need to learn more about racism, as they recognise when they are not liked by others but do not have sufficient knowledge or skills to deal with such a complex issue. An additional challenge is that in Roma culture, youth are considered to be children until the moment they first put on traditional Roma clothes, usually when they turn 18. After this, they go straight to being treated as adults and are expected to deal with adult matters, even though they are still initially just children who have not had a chance to be youngsters.

According to the respondents, there is a strong atmosphere of othering in Finland. Authorities have a relatively good understanding of equality, yet not all of them recognise different forms of racism or structural racism. It is relatively easy to suggest collaboration with authorities when the aim is to strengthen equality. However, it is much more difficult to suggest collaboration if the aim is to tackle structural racism. Moreover, there is no such thing as a 'true' understanding of equality either, as this does not mean the same things to everyone. After all, different groups have different needs, all of which have to be recognised.

So far, attempts to solve cases involving racism with the relevant authorities have only produced discouraging results. First and foremost, these processes are overly complicated, expensive and time-consuming, not to mention that they rarely, if ever, produce any significant changes. Second, and this happens way too often with cases involving racism, the original narrative gets twisted and turned in such a way that in the end, the original victim is painted as the 'problem' for having 'pulled out the racism card' in a matter that is 'merely a misunderstanding'.

If all the key concepts were understood and well-defined, it would be much easier to bring them up in discussions. Similarly, it would lower people's threshold for doing so, as this would diminish the fear of misusing these difficult concepts. Another side of the same problem is that, for example, in workplaces, members of the majority do not dare to bring up issues related to racism or openly voice their distaste if it appears that they are alone with their opinion, as they are afraid of being ridiculed. Similarly, it is high time for everyone to realise that jokes about the Roma, which still are all too commonly told in Finland, are not acceptable, just like people no longer tolerate jokes about Jews or members of the LGBTIQ+ community.

Creating a fine-tuned definition of these concepts is certainly important; however, it may also slow down the process of finding a solution, which has to be accepted. Furthermore, with a complex concept such as antigypsyism, it will not be enough to simply define the current situation, as remembering the history behind the concept is equally important. In addition to the current discourse that focuses heavily on terminology and racism as an individual experience, it would also be beneficial to address racism as a structural problem that does not only impact the life of a single person but the lives of a whole group of people across all minorities.

In the summer of 2023, the attitudes towards racism of the then newly elected government of Prime Minister Petteri Orpo were under a lot of scrutiny both from the media and civil society. In order to reassure Finnish citizens that it would not accept racism, the Orpo government approved and submitted to parliament a statement on promoting equality and non-discrimination. Along with the preceding policy consultation, some authorities raised the issue of intersectional discrimination against the Roma, similar to the Sámi people, as, after all, these are the two silenced groups whose position in society is significantly weaker than that of members of the majority population.

It is the duty of the Non-Discrimination Ombudsman to assess and ensure that people's rights and the legal protection of individuals are supported as equally as possible. The Non-Discrimination Ombudsman receives frequent complaints from Roma concerning discrimination, but these are apparently only the tip of the iceberg. Even Roma children face discrimination and racism both in and out of school, according to the recent survey on the wellbeing of Roma children and the realisation of their rights that was carried out by the Office of the Ombudsman for Children in cooperation with Roma stakeholders as part of the National Child Strategy.¹ Children do not necessarily learn how to report discrimination. Therefore, many Roma CSOs help young people make reports to the Non-Discrimination Ombudsman and the police.

The same applies to hate crimes. Simply setting up systems via which citizens can report crimes related to discrimination against Roma is not enough. For example, Finland has a proper system in place, but according to the monitoring data that has been collected since 2017, only a small fraction of crimes are reported.

The NRSF has four actions directly associated with the fight against antigypsyism, racism and discrimination. The first (Action 1) takes into account the need for continuous information on the impacts of experiences of discrimination, non-inclusion and otherness. The following two (Actions 2 and 3) address ethnic profiling, which was mentioned briefly in the previous programme but has now been included in the third programme, to the great satisfaction of the Roma civil society.

Action 4 aims to include Roma in the development of equality plans in various sectors and areas. These kinds of plans often come with the inherent risk of minorities being handled as a mass instead of addressing the specific needs of each minority. Therefore, according to the interviewed authorities, all actions that deal with equality, non-discrimination, and other similar themes should automatically include a Roma component. Highlighting the needs of the Roma was recommended as a task for the National Advisory Board on Romani Affairs.

¹ Weckström, Kekkonen & Kekkonen, 2023.

The respondents from Roma civil society noted that although the Non-Discrimination Act requires authorities to promote equality in society in the spirit of the Act, the problem arises when private companies run services on behalf of the government. Therefore, the NRSF should adopt an Action that specifies that whenever a public authority outsources a service, one of the criteria must be that the operator has a valid equality plan.

The experiences of the migrant Roma are similar to those of the Finnish Roma population, as they, too, talk about being followed and sometimes checked in shops by private security guards or personnel working in shops. Some also reported that private security guards stopped them from collecting recyclables in the city (doing this, for example, at private festival areas) while letting Finnish persons do it. They also feel that the risk of being profiled, interfered with, and even removed from such places is high, particularly in the case of those whose physical appearance clearly labels them as Roma. The Ombudsman for Equality has not yet received any complaints on issues concerning migrant Roma.

Additionally, both migrant Roma who do not have residency as well as those who do feel that it is more difficult to get a job in Finland if the employer finds out that they are Roma. Therefore, some feel that it is often better to be simply labelled migrants from Romania or Bulgaria. These negative attitudes towards migrant Roma are widespread and rooted deep in the labour market, and dealing with them would require extensive work with the majority population.

2.2. Education

The most important change in the field of education has been the extension of compulsory education in 2021, which raised the minimum school leaving age from 16 to 18 years. The impact is not yet fully visible, but the reception so far has been positive. Nevertheless, the change calls attention to the flexible access for Roma pupils to the next level of their education. Another problem to be kept in mind is the 'downward' guidance of Roma by study counsellors towards vocational education or the latter discouraging them from continuing their education to university level, even when they have already achieved a high level. Roma girls, particularly, are systematically guided towards care work, associated with low wages.

The NRSF has identified all the sectoral objectives related to Roma education. It recognises the Roma people's short history of education in comparison to the general population. After all, it was not until the 1980s that all Roma were housed and thus had the opportunity to enter schooling. So far, a lot of work has already been put into convincing the Roma community of the usefulness of education. Therefore, the current NRSF puts more emphasis on ensuring flexible access for Roma pupils to upper secondary education and moving further into higher education, as well as on the need for personal study guidance. Regarding discrimination, the NRSF highlights employers' reluctance to offer on-the-job training spots to young Roma.

The NRSF has compiled eight actions (31-38) that focus on improving the level of education and are directed at all levels of education, from early childhood education to higher education. The importance of the intensified personal guidance that Roma pupils need is highlighted in Action 32 concerning personal guidance counselling in basic education and actions that originate from the second NRSF and are again given emphasis. In addition, there is an important Action 17, which aims to ensure equal access to digital services by increasing digital skills and media literacy training aimed at the Roma population.

According to the respondents, Roma parents do encourage their children to attend school but are unable to concretely support their children throughout their schooling, which may lead to underperformance. Therefore, schools should take on a supporting role and hire special needs assistants (SNAs) who can work with children with specific care needs. According to a Roma CSO with experience on the SNA project, there is strong evidence that children who had an SNA with a Roma background eventually found greater balance in their everyday lives and continued to upper secondary education. These pupils did not really need help with actual learning but merely with the management of their daily lives. In addition, the Roma SNA offered significant mental support to parents.

Numerous studies have been done on the relevance of SNAs, all praising the enormous benefits of having them, yet the activity has not been continuously funded. Roma civil society requires that the SNAs be included in the structures of the regional welfare counties instead of being left as the responsibility of the CSOs and associated with discontinuous project funding.

In the municipalities, concerns were raised regarding the tendency of Roma families to take their children to be homeschooled if tensions between the school and the family arise. This may lead to a weakening of the connection between the school and the family, which again is a problem as it is the responsibility of local

authorities to monitor whether each child's compulsory education has been completed. However, nowadays, just the basic education leaving certificate alone is no longer enough, as everyone must now also obtain an upper secondary degree.

New information on Roma children at school was received along with a survey by the Office of the Ombudsman for Children in 2023. This states that Roma children still face discrimination and racism at school. At the municipal level, children and young people bully each other when they see adults do the same. Although the law obliges intervening in bullying, in the end, it is still adults' responsibility. In order to intervene, schools must have plans for how to deal with bullying, as well as community-based, multidisciplinary and multi-professional student care associated with sufficient time and resources. Additionally, data-based information is needed, and the lack of this is a very common problem in the case of Roma pupils. The small number of responses by Roma pupils means that the School Health Survey, for example, is not able to properly identify the needs of Roma children. As such, the survey fails to produce any truly relevant information; thus, the information gaps remain. In some municipalities, active and systematic work has been done to bridge the gap, while others simply write it off as too difficult to solve. The NRSF suggests that a virtual centre of expertise that utilises digitalisation and new technology should be established to improve access to information by enabling the collection, storage, monitoring and reporting of information. Nevertheless, developing such a 'Roma hub' is both a time-consuming and expensive solution, on top of which it is not expected to provide any quick answers to the current knowledge gaps.

However, there is also another kind of lack of information at the local level. If the authorities, notably teachers in this case, do not have basic information on Roma history and culture, they may not feel capable or motivated to intervene. According to the respondents, teachers and other school staff have sometimes not intervened in the case of the absence of Roma children as strongly as they would have done in the case of a majority population child. This is often due to the fact that the teachers themselves do not have sufficient understanding of Roma culture and, thus, are more hesitant to address absences as they think they are due to cultural reasons. However, in acting so, the teachers fail to see the individual pupils, instead rendering them into mere representatives of an ethnic minority. According to the local authorities, it is the task of EDUFI to supply teachers with such information. The NRSF has defined activities that aim to improve the situation so that Roma, as part of Finnish society, are taken into account at all levels of education. The minimum requirement is that the curricula and study materials cover the Roma and that all teachers receive further education on minorities.

According to a Roma CSO, which had compiled an informal survey among 400 Roma respondents, 7% had a higher university degree, and 14% had a lower-level university degree. In addition to this, many Roma had 2-3 different vocational qualifications. Basically, Roma youth are committed to education, and after primary school, they typically continue to vocational education. Also, there are young adults in their 30s who have entered universities of applied sciences – as such, dozens of Roma are expected to graduate in the near future. Yet despite these promising prospects, those who participated in the survey had many concerns, as even those with multiple degrees did not necessarily have a job, and those who were unsuccessfully looking for an internship questioned whether it was worth studying at all. These negative experiences were almost all associated with the Metropolitan Region.

Roma civil society is particularly worried about those Roma who are not interested in education at all. These youngsters would rather skip the now mandatory upper secondary education and start working right after completing their basic education. At school, they may feel that postgraduate study plans are not for them, thus they search for social recognition elsewhere. One way to do this is by quickly qualifying in just about any profession in which they are sure to get a job. As a result, there are dozens of Roma youth and community instructors working in jobs with low salaries, while almost no one applies for a vocational qualification in business, which would lead to a better income, for example.

Another way in which some Roma youngsters seek recognition from adults is by starting to wear the traditional Roma clothing, even though this is not recommended for Roma under 18 years, as it often leads to early marriage and starting a family, which in turn puts a halt to the education path. Regardless, there are still cases of young people running off from their families way too early in an attempt to achieve their independence.

Roma civil society once again reminds us how important it is to understand – in relation to educational institutions of every level – that most Roma do not have an educational role model at home. Thus, they need guidance and support from schools. This support is extremely valuable during the transition period from one level of education to the next, as young people are at risk of following the masses and going where their friends

go, even if this may not be the direction of their own dreams. Roma youths may not be aware that people who educate or work in social services are some of the lowest-paid, albeit often well-employed. A noteworthy fact is also that even after students graduate from vocational education, their level of knowledge and skills are not comparable with those of their peers who have graduated high school.

Regardless, far too few Roma still complete their matriculation exam. One hindering factor is that parents of young Roma may consider it unnecessary, expensive, or even old-fashioned. However, in the eyes of employers, successfully completing the matriculation exam signals commitment, motivation, and a desire to get ahead in life. Moreover, many high school students at least consider whether they should continue to university.

It was noted that there are many jobs where diversity would be highly appreciated. For example, more Roma are needed as police officers and security guards. It seems that the decision not to become a police officer, for example, does not only involve the young person's own choice but is more of a community-based decision, whereby this option is certainly not presented as ideal and is not supported.

Some of the Roma who were interviewed were concerned that Roma who get an education and employment will eventually only be able to work for society in general, not for the Roma community in particular. They hoped that educated Roma would remember where they came from and would be encouraged to advocate for the Roma, as thanks to their education, they would have sufficient knowledge to do that. On the other hand, some respondents specifically advocated that all Roma should first have a job that has nothing to do with Roma work, and only after they have learned the ropes while working for others should they come back to work for the sake of the Roma community.

Lifelong learning did not get much attention in the NRSF. Many of the respondents, however, brought it up in the context of digital skills. Those with a higher level of education are usually seasoned users of digital devices, while less educated people may not have had any opportunity to learn even the most basic digital skills. Moreover, even healthy and strong people of any age may become victims of digital scams, especially if they lack sufficient digital skills. Elderly people often share their online banking login details with others who take care of their banking, which is technically illegal and leads them to be deprived of all legal protection. In the case of Roma people who already have insufficient education to begin with, training in digital skills is needed regardless of their age. Therefore, Roma civil society is worried about cuts in the funding for liberal adult education institutions that have provided grassroots learning opportunities, including, but not limited to, digital skills.

Those adult Roma migrants who are municipal residents in Finland and whose children thus go to school there prefer not to talk about them being Roma, as they fear that their children will face racism as a result. Parents have both good and bad experiences with how Finnish schools have handled communication with them as parents. An additional challenge is that, as communication between parents and school is usually mediated by translators, it is difficult to establish close collaboration. On the same note, many parents also fear the child protection authorities in Finland, which further burdens the relationship with school representatives. Just like with any other child, members of Roma civil society demand that the children of migrant Roma, too, must be recognised as a distinct group of pupils in schools and that their needs must be addressed adequately.

Those Roma adults who attended the integration courses designed for migrants were usually satisfied with the courses, albeit they were disappointed that getting a job remained difficult. Similarly, progressing to the more advanced courses that would give them qualifications has proved to be quite difficult, as the criteria for being accepted to these courses are very strict. Additionally, many migrant Roma have difficulty proving that they indeed have sufficient language and other learning skills. It is easy to become unmotivated when it constantly seems like the programme is not leading to new milestones in education and employment. Thus, Roma civil society calls for tailored educational programmes to be developed alongside giving adult migrant Roma access to pre-existing educational programmes.

The interviewed non-resident Roma, too would like to attend courses and programmes during their downtime, when not selling the street magazine *Iso Numero* or collecting recyclables for living. At present, there is no opportunity to study late in the evening or on Sundays when they would have the most downtime. During the week, most of their energy goes into earning a basic income to cover family-related costs. However they too are well aware of the need for a high level of qualifications and the discrimination in Finland, and that it is very difficult to get a job in Finland.

2.3. Employment

From the Roma point of view, the pay subsidy reform that entered into force in 2023 further weakened companies' motivation to hire a person in a vulnerable labour market position for a job or apprenticeship, even in the case of members of the majority population, not to mention Roma people. Much wider legislative changes are, however, expected when the responsibility for organising public employment and business services is transferred from the central government to municipalities at the beginning of 2025. This is likely to mean that the current understanding and experience with Roma-specific features of employment, notably regarding discrimination, is unlikely to transfer to the municipalities, thus training will be needed. Nevertheless, as long as the transitional period ends, the change may increase employment services for job seekers, as according to the Roma CSOs, most of the current employment services do not offer jobs to Roma people but merely send the latter to different kinds of job coaching, over and over again. There are Roma who have worked at workshops for 4-5 years in a row at an hourly wage of 9 EUR but never entered the open labour market. Occasionally, Roma people are even recommended by the employment authorities to change their family name in order to help them get a job, which is outrageous and naturally not acceptable at all.

Another problem is that Roma do not get work at all, especially not jobs in their own field. According to the Roma respondents, labour market discrimination, however, is not the only reason, as especially Roma youth are not motivated enough to take up employment. For many youths, a vocational qualification is the primary goal, and only some of them genuinely look for jobs, while the rest wait at home for a job to be offered to them. The following example paints a clear picture of the situation: The City of Helsinki announced 50 vacancies for personal assistants, but no Roma applied because they did not understand when and how to apply. Young people may have insufficient skills for applying and writing a resume, but the real problem is that they do not understand how the labour market works, especially if they come from families that have experienced multi-generational unemployment. At the beginning of the summer, the Roma may think they will get a summer job without understanding that all the summer jobs were already allocated at the beginning of the year. The Regional Advisory Boards on Romani Affairs have organised get-togethers to promote employment, even using ready-made lists of suitable jobs for Roma to apply for, but Roma youth no longer bother to attend such events. Similar phenomena occur more widely with any discriminated or vulnerable group, as people no longer have the strength to believe that their luck will turn. Needless to even say, the strict distancing rules associated with the COVID-19 years certainly did not improve matters.

The NRSF has collected sectoral objectives related to the employment of the Roma people in one place. The NRSF recognises unemployment as a severe problem which maintains multigenerational unemployment and poverty among Roma. Throughout the years, however, the employment of Roma people has certainly improved thanks to positive attitudes towards education and training, although employment continues to represent a bottleneck as Roma people still face persistent discrimination in the labour market. The fact that the NRSF counts on the working life diversity programme of the Ministry of Economic Affairs and Employment as a relevant national policy for promoting access to employment among Roma does not please many of the respondents. According to them, the Ministry of Economic Affairs and Employment has contributed to the NRSF with meaningless content, which has been included in the programme.

Altogether, the NRSF lists seven activities aimed at promoting employment among Roma. It is especially the first one, Action 39, which aims to include Roma in the policy debate on poverty reduction and diversity in society and working life, that did not please the respondents. First, the NRSF was criticised for putting the topics of poverty and employment together in a way which implies that the poverty of Roma people can be eliminated simply by going to work. Second, Action 39 raises tensions, as it is the only action directly related to poverty, which would have deserved much more attention and should have been viewed from other angles and not just as an employment issue. There would have been room for concrete measures to support young Roma – for example, for those who cannot take student loans because they are afraid that they will not get a job after graduating and will not be able to repay it. Third, according to many of the respondents, there is no longer a need for any political debate but for practical measures that make concrete improvements to the labour market position of the Roma.

The other NRSF actions on employment are related to practical training as part of compulsory education (40-42) and to Roma discrimination in the labour market (43-45). According to the Roma CSOs, the intention is good, but they were quite pessimistic that the NRSF will actually have any concrete effect on Roma employment.

According to the Roma CSOs, the public administration and the Evangelical Lutheran Church could set an example with the hiring of Roma. As many Roma youth already have the competence to work as practical nurses (which they obtained by completing either a curriculum-based or a competence-based qualification), one would imagine they could easily find employment in the public sector. However, according to the Roma CSOs, Helsinki and Uusimaa Healthcare District (HUS), for example, does not even offer Roma practical nurses a job interview. Fortunately, private health services do employ Roma, even in Helsinki. Outside of Helsinki, attitudes towards Roma employees are much more positive. An additional means of employment is project work, and as the very aim of the ESF projects is to promote education and employment, pro-Roma projects are expected to be established in every region during the current programme period.

The NRSF correctly states that the level of employment and the level of education are closely interlinked, even though many of the Roma CSOs believe that the NRSF must continue to emphasise education rather than employment more strongly. After all, the opportunities for NRSF to influence employers are very slim. Even if employers' prejudices are well established, they are partly due to the insufficient level of education and limited experience of the Roma. It is clear that Roma with a higher level of education usually find employment more easily. Some respondents believe that positive role models are the way forward. If Roma youths hear that another Roma has been successfully employed more often, they might be encouraged to start believing more strongly in their own opportunities and eventually start looking for a job themselves.

At the same time, many Roma respondents ask how on earth the Roma people themselves can tackle discrimination in the labour market. The typical response to this dilemma is that they just always have to be better than others. Yet, if even more is demanded of Roma employees than others, isn't this also discrimination?

Migrant Roma residents in Finland who are employed typically achieve this through family and friendship networks. In many cases, it helps greatly if a person already works at a company, as they can provide good references and translate when necessary for those who may not speak Finnish, Swedish or English well enough when they start. However, the work is often in insecure employment, seasonal jobs or sectors where temporary contracts are common. Women typically work in the cleaning profession, while men work in construction if they are in the Helsinki metropolitan area; outside Helsinki, men work in agriculture.

According to CSOs that work with migrant Roma, discrimination against migrant Roma in the labour market is strong. Some employers even openly say that they do not want to hire Roma people. Even in sectors where the need for more labour is quite acute, employers still prefer contract work agencies that bring in new migrants from other countries instead of hiring local migrants who already know the country and are unemployed. Public employment services should also consider the racism faced by the migrant Roma when developing employment plans in the future.

Another difficulty that affects migrant Roma is that the labour market is associated with many written and unwritten norms that migrant Roma are not familiar with or cannot adhere to because of other responsibilities such as family-related issues. On the one hand, workplaces might be more accommodating regarding different life situations, while on the other hand, it is important to invest in ongoing dialogue between employers and employees. However, the area in which attitudes must definitely change is that of language skills, as the current language demands in Finland are needlessly high when it comes to low-skilled employment.

2.4. Healthcare

The starting point for any discussion on the health of Roma is the 'Roma Wellbeing Study' (ROOSA) conducted by THL in 2017–2018. The study demonstrated clearly that the health and wellbeing level of Roma was in many respects lower than that of the population as a whole. Roma suffer from the symptoms of anxiety, experiences of discrimination, as well as insecurity and physical health concerns which are particularly common among Roma women. A study by the Office of the Ombudsman for Children reported that while Roma children and young people regarded their health as being good, the respondents might have limited their evaluation to their physical health only.

The operating environment is undergoing change after the responsibility for organising healthcare, social welfare and rescue services was transferred from the municipalities and joint municipal authorities to the newly established 21 wellbeing services counties at the beginning of 2023. The capital city of Helsinki, however, continues to be responsible for organising health, social and rescue services on its own.

In 2023, a scandal broke out when the Finnish Public Service Media Company YLE revealed, in a series of interviews with more than a dozen doctors, the racist and discriminatory attitudes that are deeply rooted at

the very core of the Finnish healthcare system. No secret was made of the fact that these attitudes can even affect the level of care a patient may receive. Nearly all of the doctors who were interviewed agreed that discrimination and prejudice against Roma are more widely accepted than racism against other ethnic groups. One of the doctors admitted that, even among doctors who are more aware, there is a certain level of acceptance of the idea that Roma seek healthcare services for no reason and may even think that it is hilarious that the whole family can hang around the hospital. As a result, Roma civil society calls for a survey to be conducted on racism in the wellbeing services counties while simultaneously somewhat cynically agreeing that these counties are not likely yet to be ready to acknowledge racism nor to enter into these kinds of discussions.

The authorities have a responsibility to prevent any discrimination in health and social service provision. It has already been shown by the THL that Roma who have experienced discrimination use basic public services less than those who have not. The hard reality is that some Roma are genuinely afraid to let their children be examined by healthcare personnel because they fear their inappropriate attitudes. It is becoming increasingly clear that a culturally sensitive approach that promotes the implementation of non-discriminatory services should be more widely promoted in the curricula of the social and health sector, and not as a voluntary subject but as a compulsory one.

Regarding the reorganisation of the health, social and rescue services, the NRSF has defined Action 5, which aims to cascade Roma policy down to the wellbeing services counties' and municipalities' accounts and plans on wellbeing. According to all of the respondents, this action is of utmost importance. However, as the newly established wellbeing services counties have started operating at a vastly different pace, it is difficult to achieve any systematic progress.

Only four specific actions are intended to promote the health and wellbeing of the Roma (Actions 50-53). In the interviews, two of these were highlighted, as they are clearly evidence-based with strong connections to the results of the Roma Wellbeing Study. These are Action 51, which aims to promote health and wellbeing in the municipalities and in the new wellbeing services counties so that projects and measures that take account of dietary and physical activity habits, substance abuse, and mental wellbeing are targeted at the Roma population. The other one is Action 52, which aims to support Roma people's uptake of age- and gender-sensitive measures that promote health, wellbeing, and safety and prevent health problems. These two actions are to be implemented with the help of an ESF project starting in 2024. The latter action was specially formulated very discreetly, but nevertheless, it refers to the intersectional approach, which is warmly welcomed as a way to support those who live at the margins of the margins.

Additionally, there are other relevant actions related to the health and wellbeing of elderly Roma population, such as Action 21, which calls for conducting a nationwide study on the health and wellbeing situation and equal access to services of the ageing Roma population as part of the National Programme on Ageing. The following Action 22 is directly linked to Action 21, as it consists of compiling an action plan with relevant monitoring processes. Moreover, Action 26 aims at increasing inclusion and participation among the elderly with memory-related disorders.

Along with the interviews, the Roma Wellbeing Study was continuously referred to, which is no wonder, as it was conducted in conjunction with the FinHealth 2017 population survey and clearly demonstrated that it is possible to gather and supply accurate knowledge on Roma people. The first-hand data and the results of the study have been used extensively throughout the years by the authorities, as well as by the Roma CSOs, to justify addressing the wide range of needs the Roma people have. Many of the respondents hoped that an updated version of the study would be compiled as soon as possible.

In the same vein, the respondents hoped that the NRSF would take a firmer stance regarding the culture of honour and harmful cultural practices stemming from it. At worst, these practices can manifest as domestic violence, which in turn generates a need for mechanisms such as shelter services. Action 20, which aims to increase awareness among the Roma community of the concepts of a safe childhood and domestic violence and improve the accessibility of services to victims, is a step in the right direction. In addition to the measures listed in Action 20, the Roma CSOs wish for culturally appropriate psychosocial support to be added, as has been done in the wellbeing services county of Lapland, where such support services that are compatible with the Sámi culture are provided and available in the Sámi languages.

Due to the low birth rate, the Finnish population is ageing faster than ever before. According to the population forecast for 2070, the number of people over the age of 65 (almost 1.2 million in 2017) will increase by almost 600,000 by 2070. Even now, more than half of all Roma people are aged 50+, which means that at least some

have spent their childhood in inappropriate housing and received insufficient education, if any. Thus, it is easy to see that in the case of the Roma population, 60 is definitely not 'the new 40', as many Roma aged 50+ suffer from the typical signs and symptoms of ageing. Roma women especially suffer from premature physical and mobility issues due to the traditionally heavy Roma clothing they wear.

As Finland's new public healthcare system struggles with budget shortfalls, the reality is that people do not get the home services they need, or they get too little of them, for example. Although there have been good experiences with the co-living of elderly Roma, it is highly unlikely that funding will be found for co-living housing when no sufficient funding can currently be found to support even those with the greatest need for round-the-clock care.

Elsewhere in the NRSF, there are two actions related to the digitalisation of services. Rapid digitalisation is not limited only to health services but occurs in all public and private services across all spheres of life. Action 17 aims at ensuring equal access to digital services by increasing digital skills and media literacy training aimed at the Roma population in general, while Action 24 aims at developing preventive approaches so that elderly Roma, in particular, do not drop out of the digital service system. The authorities who were interviewed highlighted the danger that people will be left behind because they do not know how to operate these systems. Deep down, the issue is not even whether people are capable of operating such systems but that they are too sick to navigate the welfare system, making this phenomenon a question of fundamental rights.

Previously, Roma migrants without a residence used to visit the voluntary based health clinic Global Clinic, but during the last two years, they have been increasingly using the municipal services of the Kalasatama Health and Well-being Centre, where the City of Helsinki has concentrated many of its health and social services. This is a positive development as they can now access mainstream municipal services and learn more about them. Reserving appointments through digital services poses challenges. Fortunately, as these services are mainly concentrated in this one centre, the Roma migrants can visit the place in person. Another additional challenge is the use of translators, particularly as the Centre sometimes has difficulties finding translators or the quality of the translations is poor.

At the national level, the present governmental programme states that legislation which requires local authorities to provide free basic health care for migrants without a residency right will be rolled back. Cities should decide by themselves if they will provide the services or not if the legislation package goes through Parliament. Non-resident migrant Roma will be affected if the law is changed.

Both Roma migrants who have a residence and those who do not have difficulty getting accustomed to medical practices in Finland as these may differ from the ones they are used to in their countries of origin. For example, inpatient care is more frequent in Romania than it is in Finland, which may be why some people feel that their symptoms or health issues are not being taken seriously enough. Additionally, not being able to communicate directly without the help of a translator can also influence a patient's feelings of security. Some homeless non-resident Roma have expressed concern that their health issues might not be treated properly if they do not have the Kela national health and social insurance, especially if they are perceived as foreign Roma.

2.5. Housing, essential services, and environmental justice

The EU Roma strategic framework for equality, inclusion and participation emphasises objectives related to housing, essential services and environmental justice because, in many European countries, Roma people face significant injustice regarding these specific issues. In Finland, the issue has not been highlighted for years, as all the critical problems related to the housing of the Roma population were successfully solved in the 1970s and 1980s. At the moment, there are no negative health effects associated with housing in Finland. Therefore, it was thought that there would no longer be a need to pay much attention to the housing of Roma people in Finland. Unfortunately, housing problems have not disappeared from the agenda, as the situation has taken a turn for the worse rather than getting better.

In 2023, the Finnish Parliament approved significant cuts to the general housing allowance, which will impact most housing allowance recipients. The general housing allowance scheme has already undergone reform, and, at least in the metropolitan area, is beginning to show that Roma are increasingly being housed on the outskirts of the cities where prices are lower, but public transport is bad and services non-existent. It is important to keep in mind that this problem is in no way exclusive to Roma people but rather affects those living in poverty in general. It is now feared that this kind of development will only further accelerate segregation in the future. Early examples can be seen in schools, where in the biggest cities, segregation has gradually increased in the past decade.

At the same time, municipalities have tended to outsource housing services to private or municipally owned housing companies. These do not have any obligation to justify a negative decision, thus there is no way to complain about decisions either. Particularly in large cities, there may well be a number of housing companies, but, for example, only one which offers housing to the Roma population.

One of the key problems is that changing apartments has become increasingly difficult. This is an issue, particularly for those who wish to move to a smaller and, therefore, cheaper apartment; this usually happens after children have left the nest or an (often elderly) person becomes a widow. Elderly people may also need to move to an apartment with accessibility features. However, changing apartments is not prioritised by the municipalities because the person is not homeless. In one specific case from Northern Finland, a Roma family was made to wait 14 years before they could change their apartment. In some cases, the child protection authorities may consider it to be beneficial for the child that the family moves, but as there is no cooperation between the different administrative sectors, these kinds of suggestions are not being acted on.

Promoting children's rights should be made essential in the field of housing as the deterioration of circumstances often causes a cycle of migration, which in turn impacts children's schooling, as children are assigned to their nearest school based on their address. So, every time the family moves, the child's school changes, and as a byproduct, the child's route through school is interrupted. The same thing happens with child protection as the place of residence can change often, even though it is a known fact that staying in the same school is of utmost importance for building trust. Moreover, it gives the child a chance to be with familiar, safe adults, who, in turn, learn about the child and how to best support them.

Roma people still face discrimination in the housing market, as well as racist behaviour from other residents. According to a survey associated with the Fundamental Rights Barometer by the Ministry of Justice and the Human Rights Centre conducted in 2021, as many as 53% of respondents answered that they would be uncomfortable or very uncomfortable if their next-door neighbour were Roma. One of the Roma CSOs implemented a survey among 50 Roma in their own area, finding that of these 50 Roma, 49 had faced discrimination in housing. Bluntly put, almost anyone but a Roma is more welcome as a potential neighbour. There have been an increasing number of cases of members of the majority population deliberately disturbing and even persecuting Roma. If a Roma goes to the store, for example, other people may call the police.

The NRSF addresses housing issues in a separate chapter and has defined four actions (46-49) that aim to improve the accessibility of housing advisory services for the Roma on the one hand and to increase the equality competence and capacity to address housing-related problems of housing actors on the other. Furthermore, a detailed operating model with an effectiveness assessment has been introduced. The housing of elderly Roma receives special attention elsewhere in the NRSF, such as in Action 25, which states that the housing of and housing services for ageing Roma shall be taken into account when organising services for older persons and in the future implementation of the 'National Programme for Ageing'.

Roma CSOs highlighted problems that occur due to the digitalisation of housing services in particular. Face-to-face services are rapidly decreasing in number, whether public or private. At the same time, the Finnish language used by service providers is getting more complicated and abstract. This makes life significantly more difficult for numerous groups of people, including the elderly, sick, disabled, immigrants, and different learners. In the case of Roma people, the 50+ population often has insufficient education and no digital skills to speak of, on top of which many of them struggle to access housing services and related benefits in an increasingly digital world.

Public transportation functions quite decently in the largest cities, and even the elderly, sick, and disabled can easily use it. In sparsely populated areas, the situation is more difficult. If inhabitants do not have a car or have had to give up their driver's licence, they are in real danger of being isolated in their own homes. There is no access to any services as these are concentrated in the centres of growth. Moving out of a remote area is often not possible as nobody is willing to buy 'peripheral' property, which in many cases is not even of any real value.

In the case of elderly people, it is often the small details that result in their total isolation. Old people may not be able to get out of their homes because they live in buildings without elevators, or there might be an elevator, but the door is too heavy, or a rollator or wheelchair does not fit into the elevator. As elevator and accessibility allowances have been eliminated, there are big problems on the horizon. Purchasing travel tickets is an issue all of its own. In remote areas, buses cannot be boarded without buying a smart ticket in advance, which is extremely discriminatory.

The previous long-term positive development in the field of Roma housing was very much due to the active intervention by the Ministry of the Environment. Today, the role of the Ministry is almost non-existent, which has justifiably raised concerns among Roma civil society.

Roma migrants who permanently live in Finland face similar challenges to those of the Finnish Roma, albeit applying for housing, for example, is made all the more difficult due to language barriers and the lack of experience with the Finnish system of applying for housing. Some also face problems with unpaid rent, the accumulation of debt, and evictions. In order to prevent these kinds of issues, the municipality of Pietarsaari hired a separate housing counsellor to act as a mediator between tenants and landlords. This has clearly had a positive effect on the housing contracts of many Roma migrant families in the area.

Regarding the non-resident Roma, the City of Helsinki provides temporary emergency housing. The emergency night shelter has 100 places and is provided in cooperation with the city and the Deaconess Foundation. However, the real challenge is that emergency housing is only short-term accommodation where applicants receive a referral and the possibility to use these services for just a few nights at a time. This generates an inhumane level of stress as such people have no certainty about how long they will have a roof over their heads. A small silver lining in all this is that the referral system has evoked extra effort from migrants who need to meet with municipal workers in order to get these referrals. Another clear advantage is the increase in the connection between municipal workers and non-resident Roma. The Hirundo drop-in centre also acts as a bridge between the municipality and the migrant Roma.

During the COVID-19 pandemic, most of the non-resident Roma slept at the emergency night shelter, where more places were available. Since the beginning of 2023, some of the Roma have had to sleep outdoors or at friends' apartments as they did not receive a referral or there were no other places available. All of the non-resident Roma feel that the possibility of sleeping at the emergency night shelter has become more uncertain.

2.6. Social protection

The socioeconomic status of Roma people is lower than that of the mainstream population, yet poverty is hardly mentioned in the NRSF. When the reasons for its absence were inquired into, the answer was vague, with claims of how the Finnish Roma do not live in absolute poverty like Roma people in many Eastern European countries, for example. Nevertheless, Roma civil society is very concerned about the poverty of the Roma population in general and among elderly Roma in particular. The Roma do not, however, perceive themselves as poor nor marginalised and readily consider all attempts to talk about poverty to be stigmatising.

The NRSF has only one action directly related to poverty reduction, notably Action 39, under the activities aimed at improving the employment of Roma people, including Roma in the societal policy debate on poverty reduction, and taking Roma into account in the debate on diversity in society and working life. The way in which the NRSF approaches poverty – as something that would disappear if only the Roma would go to work – does not satisfy Roma civil society, which calls for more concrete measures. Therefore, Action 11, which aims at increasing education, training and guidance targeted at young Roma concerning managing their own finances, housing, family life skills and life management in Roma youth work, was well received among the Roma CSOs.

The majority of Roma are eligible for different benefits, but according to Roma civil society, they use social assistance much less than they are entitled to. This means that some Roma people are likely to remain in a state of excessive long-term scarcity because they do not know their rights or they do not know how to apply for social assistance. Earlier, they applied for benefits from the local civil servants who they met face-to-face, but these days, many benefits can only be applied for through the digital systems of Kela. In addition to the difficulties caused by the use of digital services, Roma civil society is also afraid of arbitrariness when benefits are awarded on a discretionary basis.

The elderly people with the lowest incomes are in the most vulnerable situation as they do not have sufficient access to services or a livelihood, they do not have sufficient digital skills, they cannot afford to purchase medicine, and they may not even be able to afford the use of public transport. Some lose their teeth, while others cannot afford to buy eyeglasses even when their eyesight declines.

Migrant Roma families face similar poverty conditions as the Finnish Roma. However, their lack of language skills and knowledge about social protection available in Finland makes their situation even more difficult. In addition, many families also have to support family members who live in another country and thus face much more precarious conditions.

The non-resident Roma are concentrated in Helsinki, albeit there are also individuals and families in other cities, such as Tampere and Turku. Their sources of income consist, in varying amounts, of selling the street magazine *Iso numero* and *Rohee*, collecting and selling recyclables, and asking for charity. The income is both precarious and insecure. On top of this, they often have to endure hostile treatment, hate speech and sometimes even violence, as most of these activities take place in public spaces.

2.7. Social services

As has already been mentioned, the NRSF entered into force at the same time as the structural reform of Finland's health and social services and rescue services. Therefore, the respondents understood health and social affairs as inseparable entities and thus had nothing much to add about social services after healthcare had already been discussed extensively. Essentially, all the respondents called for Roma Contact Persons to be named for all 21 wellbeing services counties to specialise in Roma-specific issues and maintain the interaction between the Roma population and the wellbeing services counties. According to the respondents, educated Roma personnel would be available if only the common will to establish such positions could be found.

Basically, social services came up during the interviews in relation to vulnerable groups. It is estimated that as many as 20-30% of the Roma are living with vulnerabilities related to intergenerational poverty, marginalisation, crime, and drugs. The NRSF has defined specific actions to support young Roma who engage in criminal activities, notably Actions 13 and 14. Moreover, Actions 28-30 call for a study on the accessibility of mental health and substance abuse services among the Roma, making mediation part of the development of social support and service models for work with Roma involved in crime, and the creation of a national approach and coordination related to substance abuse, violence and prison work carried out with Roma.

The NRSF also puts emphasis on the needs of Roma with disabilities, notably in the form of Action 27, which aims at taking account of multiple discrimination in access to services among Roma with disabilities and developing peer support groups and other forms of support for parents of Roma children with disabilities.

The special need for social services for the ageing Roma population was brought up by the Finnish Roma Association, which has decades-long experience of the target group at this point. In 2023, it offered services to at least 138 elderly Roma clients; during that year alone, it made 58 notifications of concern in connection to these elderly. In practice, this means that it submitted notifications on a weekly basis. The notification of concern refers to the possibility for anyone to submit a notification to Social Services if they are worried about another person's health, safety or overall wellbeing. The notification should kick-start a process in which Social Services will thoroughly investigate the situation and provide appropriate assistance to the individual in need. However, according to the experience of the Finnish Roma Association, in many cases, clients did not receive the assistance they needed. The interviewed authorities voiced the same concern, and this raised the following question: What really happens to the notifications of concern? Roma civil society suggests that THL should investigate the issue in more detail.

In general, Roma civil society has the perception that some Roma children, youngsters and families do not benefit from the services that they would be eligible for. Moreover, most of the respondents shared the same gloomy prediction that the government's savings, and especially their combined effects, will be felt by those who belong to the most vulnerable groups. Similarly, there is absolutely no reason to think that these savings will not directly impact the livelihood of the Roma population.

Again like the Finnish Roma, the migrant Roma have had many negative and even traumatic experiences with the social services. Some of them, for example, fear that accessing social support could trigger their deportation from Finland. Thus, professionals working in the field need to have more competence with migrant Roma to develop better relations with them. At the same time, the migrant Roma should be given more information on how the social services work.

2.8. Child protection

The welfare of Roma children in general, but with special reference to child protection in particular, is discussed in the NRSF as part of the lifecycle approach in which children and young people have been provided with a section of their own. The wellbeing of Roma children and the realisation of their rights was studied by the Office of the Ombudsman for Children as part of the implementation of the National Child Strategy in 2023.

In regard to child protection, the NRSF notes that factors jeopardising the wellbeing and health of children and youths have a tendency to accumulate among the same individuals, which is perhaps demonstrated by the cold fact that Roma children are still overrepresented in the area of child protection. The NRSF has defined one action (Action 7) to support improvements in the position of Roma children and young people in child protection and related after-care as well as in basic public services. This is expected to be implemented by training professionals, and Roma-specific content for the Handbook for Child Protection, as well as other professional guidelines, will be produced.

According to the respondents, the Finnish child welfare services are drastically overloaded because of the insufficient implementation of preventive activities, which refers to the insufficient availability of mental health services, problems with transition stages in education from lower level to higher, and to the decreasing number of free activities that promote the inclusion and identity of the child in schools.

In line with the NRSF Action 7, Roma civil society expressed its concern about the lack of knowledge of Roma culture among the child welfare services. In addition, they assume that much of the tension between the child welfare services and the Roma families is, in fact, based on mutual but continuous misunderstandings. From the Roma point of view, the children who are clients of child welfare services are given more rights and freedoms than those brought up in the Roma community, where they naturally learn to live according to the cultural etiquette and manners that define this community.

Roma civil society was especially worried about child welfare clients who no longer have any contact with their Roma relatives. In such cases, the whole family may be broken, and as a result, the child will lose contact not only with their immediate family but also with the entire Roma culture. For centuries, the Roma people have been proud of their culture, and their tendency to take care of themselves has been strong. Historically, if parents did not know how to raise children, other relatives took care of them. However, nowadays, people merely mind their own business, and this wonderful tradition has started to come undone. This worrisome development was only further enforced by the COVID-19 pandemic that forced separation upon families and relatives.

Roma civil society is worried about those children who make use of child welfare services for their own purposes against their parents' wishes. The children may make a child welfare notification to authorities about themselves in order to scare their parents or even to get out of their home and into custody where they think they can do whatever they want. This may lead to a situation where parents fear the possibility of losing their child and no longer dare to limit or forbid them from any behaviours. In such cases, there may no longer be anyone left who can impose limitations or hold the youth responsible for their actions.

One of the biggest fears among the migrant Roma who are in Finland with their children is that the latter will be taken into custody. Such fears are based on stories that circulate among the migrant Roma community. Some of these stories are based on facts, while others might rely more on personal experiences of tense or unpleasant discussions about childcare with social work professionals. One woman, for example, said that her child had dreamt that a police officer came to take them away. They also feel that the motifs associated with parents are not appropriate, as they often involve issues related to housing conditions, nutrition or hygiene. Many parents underline that they do not use drugs or any other addictive substances and that the wellbeing of their children is essential to them. Some families have even moved back to their countries of origin or other countries as they feared that their children would be taken into custody if they stayed in Finland.

2.9. Promoting (awareness of) Roma arts, culture, and history

Most respondents started the discussion on Roma arts, culture and history by referring to the Constitutional amendment in which the Roma people were given rights to their own language and culture. Furthermore, they emphasised that the right to language and culture is a basic right and stated that when it is not fulfilled, then this is discrimination.

A programme for promoting Roma culture was included in the previous NRSF (2018-2022) but was not implemented; thus, it was included in the current NRSF. Essentially, the NRSF relies on the 'Cultural Heritage Strategy 2022-2030' of the Ministry of Culture and Education, which states that there is a need to promote the realisation of the rights of minorities in particular. There are as many as ten actions (Actions 54-63) in the NRSF that support the Romani language and Roma culture and art, which is significantly more than with any other set of sectoral topics.

Above all, the NRSF highlights the aim of drawing up a national programme for the promotion of Roma art and culture, which is linked to the Cultural Heritage Strategy and the related action plan (Action 54). The promotional programme would provide the framework for the activities of the cultural centre. However, Roma civil society is somewhat doubtful whether it will ever happen and calls for concrete action. Some of the respondents noted that there is already a Roma museum, but unfortunately, it has remained peripheral and thus is poorly known even by the Roma people themselves, not to mention the general public. The Roma Museum is, however, not sufficient, but Roma should be part of all museum collections at the local, regional and national levels.

The Roma themselves are generally not big consumers of culture, although not many of them would be able to pay for cultural activities even if they wanted to. At the same, it would be a great statement if a Roma went to the theatre, for example, as it would signal to members of the majority that Roma are just like any other citizens.

The long-awaited 'Programme for the Revival of the Finnish Romani language and proposals for measures (2023-2030)' was launched by the Finnish National Board of Education in 2022, which was received with great satisfaction among Roma civil society. Some of the actions of the programme were directly included in the NRSF (Actions 59-63). The distance learning project is at the forefront. It refers to the need for support in situations where the teaching of the Romani language is dying out in schools due to the lack of qualified teachers. A comparable pilot project was implemented among the Sámi people, which speaks in favour of a similar project being implemented among the Roma as well. No giant leaps are to be expected, but baby steps for sure.

At the same time, there is a need for attitude-changing work with parents. In Roma families, children may speak English because of the continuous consumption of English-speaking media. Parents have been amazed at how quickly children can learn English and should now come to understand that the Roma language can be learned in just the same way. Therefore, they should start speaking the Romani language at home long before their children reach school age. In this way, the distance learning project could offer valuable support to parents. Therefore, Action 62 is intended to increase the visibility of the Romani language and Roma culture in the media among children and was embraced by the respondents. It would have a tremendous impact on Roma children if they could see Roma children represented in different forms of media.

Finally, the NRSF lists actions related to the awareness of Roma history (Actions 56-58), which is important because recognising minority rights starts with recognising the shared history. The respondents stated that the Roma population's awareness of the history of their own families and the Roma is non-existent. Similarly, the Roma genocide of World War II is completely unknown in Finland. However, what is most urgently needed is material produced for use in the education of teachers, as teachers do not learn anything about Roma history and culture at the moment, which leads to the school system being unable to provide even basic knowledge about Roma. Moreover, it is not a question of only providing material, as the teachers' education curriculum should also include courses that focus on how to understand the pervasiveness of majority narratives and the processes of oppression. After that, the next step would be to produce materials designed for schools. Currently, only 1-2 pages feature Roma in the entire elementary school curriculum.

Most of the migrant Roma speak the Roma language within their family. They want to preserve the language of the countries of origin, as they think that this may be useful if they have to deal with the institutions in these countries. Still, in many instances where it would be acceptable to use the Roma language, they hesitate to do so due to the strong external pressure to learn Finnish or Swedish. For example, when several Roma children attending the same school spoke in the Roma language during the breaks, they felt that their teachers expected them to use the language of education in order to improve it.

Most of the opportunities for celebrating one's own cultural heritage, notably when it differs from that of the majority population, take place in the private domain, through family events, or in the home countries. There is a strong demand for cultural and arts initiatives that tell about and celebrate the cultural heritage of migrant Roma. A good starting point would be to first include the migrant Roma in the initiatives which are currently already targeting the Finnish Roma culture.

3. EXPECTED EFFECTIVENESS

3.1. Coherence with related domestic and European policies

Finland has a Nordic welfare model, which is characterised by an extensive social protection system and a high level of equality. The inclusion of Finnish Roma as citizens must be analysed in relation to this specific context. Although the Finnish Roma might enjoy more social and economic rights than the Roma people in many other EU member countries, structural racism and antigypsyism are widespread, and the Finnish Roma face constant inequality and discrimination in all areas of their lives.

The EU Roma strategic framework guides the planning of the National Roma Strategic Frameworks while also enabling the consideration of the nation's special characteristics. A positive development was identified in comparison to the previous NRSF, as the current NRSF is clearly more coherent with related domestic and European policies. However, the problem is that the NRSF actions are simply recommendations and thus not legally binding. In the end, it is up to the stakeholders to decide whether they address the actions.

3.2. Responsibility for NRSF coordination and monitoring

As the programme spans seven years, it must be prepared to face many changes occurring both in Finnish society and at the European level. Therefore, an option for a mid-term review and potential additions was embedded into the NRSF. This is in line with the European Commission's in-depth mid-term evaluation of the current ten-year EU Roma strategic framework (2020–2030). The mid-term evaluation will also involve an evaluation of the NRSF; thus, a specific action (Action 71) has been defined in relation to developing a consistent reporting procedure for Roma policy actions.

Roma civil society considers it critical to add new measures to the existing NRSF in connection with the mid-term review. This is particularly relevant this time around, as the programme extends over such a long time. In practice, this means that the possibility of changes in the operating environment is not just likely but rather more of a certainty.

Another factor which Roma civil society is concerned about is whether sufficient and long-term resources, notably human resources, have been allocated in the Ministry for Social Affairs and Health to coordinate the implementation of the NRSF, not to forget its monitoring and evaluation.

3.3. Quality of the plan

A feature that immensely affects the quality of the NRSF is the lack of accurate data regarding the Roma population. Authorities do not know the exact number of Roma people in Finland nor where they live. Similarly, there are no national data from which to identify the size of a specific age group, for example, nor any local data indicating how many pupils would like to study the Romani language or how many teachers would be needed.

First and foremost, this is a question of who is a Roma. The current estimates of 10,000 – 12,000 Roma people do not include, for example, the assimilated Roma people, meaning those Roma who do not look like 'typical' Roma or do not live and breathe the Roma culture in a way which is considered traditional. This heterogeneity is not shown at all in the statistics, as the data is nearly always collected merely from those living in ways that accord with 'typical' Roma culture. The interviewees suggested that by simply including the number of hybrid Roma, the overall estimate of the number of Roma people in Finland could even double.

Second, there is the question of how to reach the Roma population. The NRSF recognises the challenges with the collection of data, as well as the external pressures to find solutions to the knowledge gap. It lists the methods that have already been used, such as snowball sampling. The respondents listed additional methods, such as the door-to-door method, which was used, for example, in the municipality of Nurmijärvi, where the results showed that 150 Roma were living in the area. According to the respondent, the only source of information available is often the NRSF itself, which only further increases the importance of ensuring the correctness and up-to-dateness of the information it contains.

The first step in tackling the problem is Action 69, which aims to produce ethical guidelines for research and data collection. All the authorities from local, regional, and national levels, however, agreed that this action was inadequate as it remains unclear whether the guidelines will pave the way for actual data collection on the

Roma. At present, there is a glaring and total lack of accurate information, which is even used as an excuse for not doing anything for the Roma.

Third, this ties into the much more complicated question of what is allowed to be asked of Roma people. The Roma people are justifiably very suspicious of all kinds of data collection, as the past experiences of data misuse are still strong in the collective memory of the Roma community. Thus, it was suggested by the authorities that along with the mid-term evaluation of the NRSF, an action should be added that involves explaining to the Roma people why it is important to collect information about them. Having disaggregated data on the Roma population is necessary for planning and implementing well-targeted actions with measurable and effective outcomes.

Finally, the authorities reiterated that discriminatory attitudes and practices can only be tackled if the authorities have good connections with the discriminated minorities so that they can find out where the root causes truly lie. Currently, the authorities' knowledge base is too weak, and they need to hear the stories straight from the community itself.

3.4. Funding

The question nearly all respondents constantly asked was how it is possible to have no government funding for the NRSF, which is already the third iteration. They sincerely hoped that the government would contribute even a small amount to the NRSF, because with the government funding comes monitoring and evaluation obligation, which in turn would further strengthen the programme and its credibility.

Its long-term nature from 2023-2030, however, makes it possible to plan for projects and apply ESF and CERV funding that reflects the needs of Roma. ESF funding is especially available at both the national and regional levels, albeit applications are time-consuming and complicated. It was clearly stated by the authorities that municipalities are not going to be involved in ESF applications, as they have neither the time nor resources to apply. However, the regional welfare counties have recently started compiling ESF applications together with the Roma CSOs and have, on occasion, agreed to cover co-funding on behalf of the Roma CSOs. This is a giant leap for the Roma CSOs, who do not have any permanent funding which could be used to cover the requested co-funding. Another option is to apply for co-funding from the Funding Centre for Social Welfare and Health Organisations (STEA). However, it can only be applied to projects in the field of health and social affairs.

The Programme for the Revival of the Finnish Romani language and proposals for measures 2023-2030 by the Finnish National Board of Education, which was, for the most part, received with great satisfaction, was also criticised as no government funding was directed to the programme. Instead, the funding comes from the private Finnish Cultural Foundation, which has generously decided to support the revitalisation of Finnish Kalo and Romani art and culture with as much as EUR 1 million in funding to be spread over the years 2023-2030.

3.5. Monitoring and evaluation

Part of the NRSF has adopted a lifecycle model, which means that the themes are addressed by age group. In the NRSF preparation stage, the participants of the open workshops were pleased with the lifecycle approach, as they got to learn about and encounter new concepts and ideas, such as target groups they had not worked with, as well as heard what other Roma CSOs were currently working with. However, in the NRSF monitoring stage, it was found to be somewhat unclear whether a particular action would fall under the lifecycle approach or the sectoral approach.

The NRSF will be followed by a separate Action Plan. However, it was not available at the time of writing this document. The Action Plan is expected to detail more concrete actions and relevant monitoring targets specified for each action. According to NRSF, the targets will be evaluated qualitatively as well as quantitatively and reported accordingly.

Reports on the implementation of the NRSF will be submitted to the Commission every two years, and the Commission will monitor its implementation with the help of surveys conducted by the European Union Agency for Fundamental Rights (FRA). Furthermore, the feedback from civil society will also be taken into account. An in-depth mid-term evaluation will be carried out as well, although the NRSF does not clearly indicate by whom.

3.6. Assessment of the expected effectiveness and sustainability

The cross-cutting objectives of the NRSF are (1) promoting equality, inclusion and participation and (2) eliminating discrimination by tackling antigypsyism. It also includes four sectoral sets of objectives related to education, employment, housing and health. Additional measures have been introduced to strengthen the social, linguistic and cultural rights of Roma people.

Regarding equality, inclusion and participation, the unfortunate fact is that although, once again, enormous efforts were made to increase the participation of Roma in the preparation, implementation, and monitoring of the NRSF, many were still left with the experience of not being heard in relation to their own issues. Furthermore, the preparation of the NRSF was criticised for being Helsinki-centred. In addition, the preparation process was blamed for having been a higher-level discussion with concepts that are not widely understood on the grassroots level.

Regardless, the respondents from Roma civil society are very pleased to note that their contributions in the form of the previous RCM monitoring had been taken seriously and that ethnic profiling, for example, was added and addressed properly in the current NRSF. However, the concept of antigypsyism was understood only with limitations and thus requires more attention in the future. Similarly, there is still much to do regarding disability, gender issues and LGBTIQ+ issues that need to be mainstreamed into the Roma community so that the needs of the most vulnerable groups, as well as the effects of harmful cultural practices, become more widely recognised. The stigma, violence, and pressure inside the community against certain groups should likewise be eliminated.

In the field of education, the NRSF aims to provide Roma pupils and students with intensified personal guidance at all levels of education and to support them, especially during the transition periods from one level of education to the next. Furthermore, the NRSF aims to include cultural diversity, including Roma culture, into the continuing professional development of education staff. Roma civil society considers the objectives relevant but calls attention to the 'downward' guidance of Roma pupils towards vocational education and their being discouraged from continuing their education at the university level, even when they have high-level achievements. Roma girls, in particular, are systematically guided towards care work, which is associated with low wages. Moreover, it is suggested that special needs assistants (SNAs) with Roma backgrounds who could work with Roma children with specific care needs at school must be included in the structures of the regional welfare counties.

The NRSF correctly states that the level of employment and the level of education are closely intertwined. Even so, Roma civil society suggests that the NRSF would rather contribute to education issues than the employment of the Roma, as its opportunities for being able to influence the attitudes of employers are slim.

It was previously thought that there would be no need to pay much attention to the issue of the housing of Roma people in Finland. Sadly, housing problems have not disappeared from the agenda, as the situation has taken a turn for the worse rather than better, as explained in Chapter 2.5. Thus, the NRSF aims to improve the accessibility of housing advisory services for the Roma on the one hand and to increase the equality competence and capacity to address housing-related problems of the housing actors on the other. Roma civil society would also like to draw attention to the recent trend of municipalities outsourcing their housing services to private or municipally owned housing companies, which do not have any obligation to justify a rejection, thus there is no way to appeal a decision or complain about one either. The NRSF should adopt an action that whenever a public authority outsources services, one of the criteria must be that the operator has a valid equality plan.

As for the re-organisation of the health, social and rescue services, the NRSF aims to cascade Roma policy down to the wellbeing services counties' and municipalities' accounts and plans on wellbeing. The Roma civil society, however, thinks that this should have been done long before the counties started their operations in 2023 and that since it was not done, a unique opportunity has been wasted. In addition, the NRSF aims at promoting Roma age- and gender-sensitive measures when promoting health, wellbeing and safety, which inevitably refers to the intersectional approach and is thus warmly welcomed as a way of supporting those who are at the 'margin of margins'.

Finally, the NRSF contains measures to strengthen the social, linguistic and cultural rights of Roma people. These measures are well aligned with the other national strategies and programmes.

4. ALIGNMENT WITH THE EU ROMA STRATEGIC FRAMEWORK

4.1. Reflecting diversity among Roma

According to the NRSF, the implementation of the programme is based on an intersectional approach, taking into account multiple factors and covering all of the groups mentioned in the EU Roma strategic framework, as well as other groups within the Roma community. According to the interviewed authorities, however, the NRSF does not sufficiently cover the needs of marginalised Roma within the community, notably gender and sexual minorities, but also divorced women and youth living with substance abuse, to name a few. In the same vein, it was noted that Finland does not currently have any Roma associations that are focusing specifically on the needs of minorities within the Roma community.

Many respondents took note of the unpleasant fact that gender and sexual minorities had been removed from the NRSF after having already been included in the second NRSF. A noteworthy change in comparison to the previous years is that along with the interviews, it was the Roma themselves who brought up gender and sexual minorities as a subgroup that has not been covered in the current NRSF. This is the first time that several Roma respondents have spoken out loud about this particular subgroup and used its proper name, while many still talked about these minorities in roundabout ways, using phrases such as “Roma who live their life in a different way”.

The reasons why the NRSF does not deal with the minorities within minorities were considered by the authorities, and many wondered whether the subject is still taboo among the Roma community. Even some Roma said that when compiling data for the EU, for example, it is no longer possible to hide behind cultural restrictions, as they must produce comparable information. The minorities of minorities have always existed, but so has the culture of silence. There are a number of people who are not accepted either among the Roma or the mainstream population, and they remain outsiders. Some of the interviewed authorities said that they were surprised to hear about the unyielding attitudes of some of the Roma in high positions towards those who are less fortunate than them. The Roma respondents, in turn, argued that although the NRSF may not be the right place to provoke, these things must be gradually brought up.

Authorities and Roma respondents alike agreed that harmful cultural customs that negatively affect members of the community should be discussed more thoroughly in the NRSF. For example, the ‘moving-permit’ custom of the Roma community is sometimes used as an excuse to prevent an unwanted Roma from moving into another’s neighbourhood.² Ultimately, this kind of behaviour feeds the racialisation of the Roma, as understandably, they believe that their own behaviour will directly affect what the majority thinks of them and increasingly choose to reject those who do not fit the image they wish to present to the outside world.

According to the Roma CSOs, foreign Roma living in Finland have not been sufficiently addressed in the NRSF. The respondent recalled the golden years of the very first National Policy on Roma (2009–2017) and its policy visions, which stated that Finland would be the forerunner in Europe in the field of promoting equal treatment and the inclusion of the Roma population. However, this kind of European-level role is not possible without collaboration with the foreign Roma and ensuring that they are not left behind, not just in Finland but everywhere in Europe.

In reality, most Roma CSOs are not in contact with the foreign Roma community, even if they would like to reach out to them. Nevertheless, the largest Roma CSOs have supported the migrant Roma in forming their own associations in regions where there are a larger number of migrants, such as in Hyvinkää (mainly returnees from Sweden) and in Pietarsaari (work-based migration from Romania and Bulgaria).

More than simply supporting the migrant Roma in Finland, the respondents were interested in supporting foreign Roma in their countries of origin and improving their living conditions there. This is why many Roma CSOs do missionary work in Eastern European countries, for example.

² The moving-permit custom is an internal instrument of the Roma community used to control in which areas of the country a Finnish Roma family can live. It is in the hands of elder members of family groups already living in the area.

4.2. Combining mainstream and targeted approaches

As suggested in our latest report (2022), the NRSF and its actions are more in line with the national action plans and strategies than in the earlier NRSF. The most concrete example is that each policy area has now been compiled in a way that systematically addresses the relevant national action plans and strategies.

Alignment with the national strategies refers to mainstreaming, which in turn supports equality and action against structural discrimination. The objectives – concreteness, measurability and mainstreaming – reflect the intent expressed in the EU Roma strategic framework.

Regardless, Roma civil society still reminds us that the NRSF could benefit from benchmarking other minority policies as well. In Finland, the authorities have a duty to involve people with disabilities, for example, as argued in the UN Convention on the Rights of Persons with Disabilities. This creates a normative framework for the authorities regarding what inclusion means. Similar cases can also be found in relation to the Sámi (obtaining the agreement of Indigenous peoples) and children (Convention on the Rights of the Child).

4.3. Usage of instruments introduced by the Council Recommendation

The NRSF is based on the EU Council Recommendations on Roma equality, inclusion and participation (2021/C 93/01) published in 2021. The recommendation creates precedents, sets standards and raises certain expectations by setting voluntary goals while also serving as an indication of what can be expected from formally binding legislation in the near future.

Most respondents had not heard about the Council Recommendation at all, which indicates the general lack of knowledge about the EU and EU policies in Finland, as well as the fact that Roma people do not consider themselves a part of the European Roma people. It is not yet sufficiently understood that the EU Roma Strategic Framework for equality, inclusion and participation obliges member countries, including Finland.

According to those respondents who were more familiar with the Council Recommendation, it is somewhat generic, but evidently, it has clearly been discussed throughout the NRSF. However, it is important to keep in mind that, unlike the Council Recommendation, which may highlight the needs of the most vulnerable groups, the NRSF is a compromise. It has to take into account all the different needs and requirements of the entire Roma population in Finland, and because of this, it is just not possible to deal with all the issues. Some of the Council Recommendations do not apply to Finland, either.

CONCLUSIONS AND RECOMMENDATIONS

A clear positive trajectory could be identified when comparing the NRSF 2023-2030 to the previous NRSF. Notably, the NRSF is now clearly much more coherent with the related domestic and European policies, in addition to which the number of actions has been reduced, the monitoring and evaluation process has been strengthened, and the number of participants in the preparation of the NRSF has increased. As these four issues were considered to be the major weaknesses of the previous NRSF in the Roma civil monitoring report published in 2021, Roma civil society is now very pleased to note that its contributions have been taken seriously and have led to concrete improvements. Even more progress could be achieved if the NRSF were prepared, implemented and monitored according to a human-rights-based framework and approach. The human rights indicators could also be used for monitoring and evaluation, together with the national human rights indicators, in the future.

The major weakness of the NRSF is that, basically, no one knows the programme well enough. All of the respondents were able to list the key challenges affecting the Roma. However, most of them were not able to scrutinise whether the NRSF identifies and analyses the challenges properly, nor were they able to name the most useful measures introduced in the NRSF. The unfortunate fact that the NRSF is not particularly well known either by Roma civil society or the authorities has serious implications for its effectiveness and sustainability.

The regional welfare counties are important bodies in implementing the national Roma policies, but the implementation of the NRSF should have been incorporated into the structures of the regional welfare counties long before the counties started their operations in 2023. In situations when the opportunity has already been lost, Roma civil society suggests that regional welfare counties should at least recruit Contact Persons with a Roma background who can act as mediators between the authorities and the Roma community. However, the future prospects are grim as the regional welfare counties are planning major spending cuts to cover growing funding deficits.

The lost opportunity in the case of regional welfare counties is directly related to the key weakness of the NRSF, which is that although it lists a number of cooperation partners, none of them have an obligation to collaborate; rather, it is entirely up to the stakeholders to decide whether they commit to the implementation of the NRSF and address the proposed actions. Furthermore, because the proposed actions are recommendations and thus not legally binding, it is possible to bypass them altogether. Therefore, the constant opinion of the Roma civil society is that the authorities must bear their responsibility in the implementation of the NRSF, and it cannot be something that Roma civil society should be left to carry.

Furthermore, the NRSF counts heavily on the positive impacts resulting from equality planning, but Roma civil society has its concerns regarding the Non-Discrimination Act, notably its ability to benefit the Roma community. After all, it is yet not sufficiently understood, even among the authorities, that simply guaranteeing equal opportunities is not going to be enough, because each person's circumstances are different. Therefore, specific approaches are required in order to reach an equal outcome.

Finally, there are great expectations associated with the forthcoming Action Plan of the NRSF, and it remains to be seen just how concrete it is and whether national, regional and local actors eventually commit to its implementation. A further concern is related to the fact that these proposed actions are only recommendations without being legally binding. This, combined with the lack of allocated government funding, does not look too promising.

Participation

The most typical means of policy consultation in Finland is requesting comments, but it was once again seen that this approach does not bode well with Roma civil society as it is suspicious of all kinds of data collection. Therefore, it was effective to organise open workshops in which 150 persons participated, mainly representing the different Roma civil society organisations and authorities working with the Roma. Furthermore, a separate working group was organised for the migrant Roma who have moved from Romania to Finland, which was a great advance in comparison to the previous NRSF.

The preparation of the NRSF was, however, criticised for being Helsinki-centred. Roma civil society also criticised the preparation of the NRSF for having been a higher-level discussion with concepts that are not understood at the grassroots level. It is widely agreed that a lot of effort has been made to increase Roma's participation

in the preparation, implementation, and monitoring of the NRSF, but many Roma were still left with the experience of not being heard in relation to their own issues.

Relevance

As Finland continues to rank as one of the most racist countries in the EU, according to FRA, many respondents associated with this report were very pleased that tackling antigypsyism was raised as one of the two priorities. They were also pleased with the cross-cutting objective of the NRSF, as these factors will guide all the mainstreaming of Roma policy measures.

It was agreed that antigypsyism as a concept must, however, be made more accessible and understandable to the Roma themselves but also to the majority population. This already challenging issue is all the more relevant in the Finnish context, where the whole discussion on racism, even in general, is still very much in its infancy. Furthermore, the Finnish discussion about racism, at the moment, is so focused on the proper terminology and racism experienced by individuals that numerous other aspects of racism, such as the structural racism that affects the lives of many, are easily forgotten. Even so, agreeing on which terms are to be used in discussions remains important, as it can lower the majority's threshold to act as whistleblowers when they encounter racist behaviour among their peers.

Expected effectiveness

Roma policymaking should be evidence-based. At present, there is a lack of accurate data on the Roma population as Finland, unlike some other European countries, does not keep official statistics on ethnicity. Promisingly, the NRSF addresses this, as it aims to produce ethical guidelines for research and data collection involving Roma. Only time will tell whether these guidelines can truly pave the way for actual data collection on the Roma.

Another concern is related to the fact that no government funding is allocated for the NRSF, albeit the long-term nature of the NRSF from 2023-2030 makes it possible to plan for projects and apply for ESF and CERV funding, for example, which address the needs of Roma. Roma civil society still hopes that the government will contribute even a small amount of money to the NRSF because with such government funding comes monitoring and evaluation obligations, which in turn would strengthen the programme and its credibility.

Alignment with the EU Strategic Framework

Similar to the previous NRSF, the current NRSF does not sufficiently cover the needs of marginalised Roma within the community, notably gender and sexual minorities, but also divorced women and youth living with substance abuse, to name a few. It was notable that this time, it was the Roma themselves who brought up gender and sexual minorities as subgroups and did so using the proper names instead of the earlier roundabout terms. It was mentioned that when compiling data for the EU, for example, it is no longer possible to hide behind cultural restrictions, as comparable information must be produced.

The Council Recommendation is clearly discussed throughout the NRSF. Nevertheless, some of the recommendations do not apply to Finland, while in some parts, the NRSF needed to build a compromise between the different needs and requirements of the entire Roma population in Finland and the most vulnerable groups the Council Recommendation brings up.

Recommendations to national authorities

1. A follow-up study to THL's Roma wellbeing survey must be compiled at the earliest opportunity.
2. Special needs assistants with a Roma background who can work with children with specific care needs at school must be included in the structures of the regional welfare counties.
3. Regional welfare counties must recruit Contact Persons with a Roma background who can act as mediators between the authorities and the Roma community.

Recommendations to European institutions

4. The EU Anti-racism Action Plan 2020-2025 must be renewed, and the transition from one plan to the next must be implemented without any significant breaks between them.

5. European institutions should call for Member States to protect and ensure the rights of migrant Roma and Roma EU citizens.

Recommendations to civil society

6. Roma CSOs and the Roma community must start addressing less pleasant topics such as internal minorities, the culture of honour, harmful cultural practices, and domestic violence, to name a few.
7. Roma people must be given a real opportunity to define and choose what words and concepts they want to be applied when antigypsyism is being discussed and how. It must be guaranteed that scholars belonging to the majority population cannot bypass the Roma community regarding this issue.

Recommendations to other stakeholders

8. The Finnish Evangelical-Lutheran church should be invited to further expand its pre-existing Roma work to all of its parishes and to implement the NRSF according to the needs of the local Roma people, to which it already has close connections.

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ANNEXE: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Antigypsyism not recognised as a specific problem in national policy frameworks	critical problems	understood with limitations	absent	absent
Prejudice against Roma	critical problems	understood with limitations	absent	absent
Hate crimes against Roma	significant problems	irrelevant	absent	absent
Hate speech towards and against Roma (online and offline)	critical problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Weak effectiveness of protection from discrimination	significant problems	understood with limitations	present but insufficient	some targets but not relevant
Segregation in education, housing, or provision of public services	minor problems	irrelevant	absent	absent
Forced evictions and demolitions leading to homelessness, inadequate housing, and social exclusion	irrelevant	irrelevant	absent	absent
Statelessness, missing ID documents	irrelevant	irrelevant	absent	absent
Misconduct and discriminatory behaviour by police (under-policing/under-policing)	significant problems	identified and analysed sufficiently	adequate but with room for improvement	some targets but not relevant
Barriers to <i>de facto</i> exercise of EU right to free movement	irrelevant	irrelevant	absent	absent

Education

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Lack of available and accessible preschool education and ECEC services for Roma	minor problems	identified and analysed sufficiently	appropriate	adequate but with room for improvement
Lower quality of pre-school education and ECEC services for Roma	irrelevant	irrelevant	absent	absent
High drop-out rate before completion of primary education	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Early leaving from secondary education	significant problems	irrelevant	present but insufficient	some targets but not relevant
Secondary education/vocational training disconnected from labour market needs	minor problems	mentioned but not analysed sufficiently	absent	absent
Misplacement of Roma pupils into special education	irrelevant	irrelevant	absent	absent
Education segregation of Roma pupils	irrelevant	irrelevant	absent	absent
Increased selectivity of the educational system resulting in concentration of Roma or other disadvantaged pupils in educational facilities of lower quality	significant problems	irrelevant	absent	absent
Limited access to second-chance education, adult education, and lifelong learning	irrelevant	irrelevant	absent	absent
Limited access to and support for online and distance learning if education and training institutions close, as occurred during the coronavirus pandemic	irrelevant	irrelevant	absent	absent
Low level of digital skills and competences and limited opportunities for their	irrelevant	irrelevant	absent	absent

development among pupils				
Low level of digital skills and competences and limited opportunities for their development among adults	minor problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement

Employment

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Poor access to or low effectiveness of public employment services	significant problems	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvements
Youth not in employment, education or training (NEET)	significant problems	irrelevant	absent	absent
Poor access to (re-) training, lifelong learning and skills development	irrelevant	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Discrimination in the labour market by employers	critical problems	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement
Risk for Roma women and girls from disadvantaged areas of being subjected to trafficking and forced prostitution	irrelevant	irrelevant	absent	absent
Primary labour market opportunities substituted by public work	significant problems	irrelevant	absent	absent
Barriers and disincentives to employment (such as indebtedness, low income from work compared to social income)	significant problems	irrelevant	absent	absent
Lack of activation measures, employment support	irrelevant	irrelevant	absent	absent

Healthcare

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
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Exclusion from public health insurance coverage (including those who are stateless, third-country nationals, or EU-mobile)	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Poor supply/availability of healthcare services (including lack of means to cover out-of-pocket health costs)	irrelevant	irrelevant	absent	absent
Limited access to emergency care	irrelevant	irrelevant	absent	absent
Limited access to primary care	irrelevant	irrelevant	absent	absent
Limited access to prenatal and postnatal care	irrelevant	irrelevant	absent	absent
Limited access to health-related information	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	irrelevant	irrelevant	absent	absent
Poor access to sexual/reproductive healthcare and family planning services	irrelevant	irrelevant	absent	absent
Specific barriers to better healthcare for vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI and others	irrelevant	irrelevant	absent	absent
Discrimination/ antigypsyism in healthcare (e.g., segregated services, forced sterilisation)	minor problems	irrelevant	absent	absent
Unrecognised historical injustices, such as forced sterilisation	irrelevant	irrelevant	absent	absent
Inequalities in measures for combating and preventing potential outbreaks of diseases in marginalised or remote localities	irrelevant	irrelevant	absent	absent

Housing, essential services, and environmental justice

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Poor physical security of housing (ruined or slum housing)	irrelevant	irrelevant	absent	absent
Lack of access to drinking water	irrelevant	irrelevant	absent	absent
Lack of access to sanitation	irrelevant	irrelevant	absent	absent
Lack of access to electricity	irrelevant	irrelevant	absent	absent
Limited or absent public waste collection	irrelevant	irrelevant	absent	absent
Restricted heating capability (families unable to heat all rooms/all times when necessary) or solid waste used for heating	irrelevant	irrelevant	absent	absent
Lack of security of tenure (legal titles are not clear and secure)	irrelevant	irrelevant	absent	absent
Lacking or limited access to social housing	irrelevant	irrelevant	absent	absent
Overcrowding (available space/room for families)	irrelevant	irrelevant	absent	absent
Housing-related indebtedness at levels which may cause eviction	irrelevant	irrelevant	absent	absent
Housing in segregated settlements/ neighbourhoods	irrelevant	irrelevant	absent	absent
Housing in informal or illegal settlements/ neighbourhoods	irrelevant	irrelevant	absent	absent
Exposure to hazardous factors (living in areas prone to natural disasters or environmentally hazardous areas)	irrelevant	irrelevant	absent	absent

Limited or lacking access to public transport	irrelevant	irrelevant	absent	absent
Limited or lacking internet access (e.g., public internet access) points in deprived areas, areas not covered by broadband internet)	irrelevant	irrelevant	absent	absent
Limited or lacking access to green spaces	irrelevant	irrelevant	absent	absent
Roma excluded from environmental democracy	irrelevant	irrelevant	absent	absent
Housing services outsourced to private companies without requiring a valid equality plan	significant problem	mentioned but not analysed sufficiently	present but insufficient	absent

Social protection

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
High at-risk-of-poverty rate and material and social deprivation	significant problems	mentioned but not sufficiently	present but insufficient	some targets but no relevant
Income support programmes fail to guarantee an acceptable level of minimum income for every household	irrelevant	irrelevant	absent	absent
Limited access to income support schemes (low awareness, barrier of administrative burdens, stigma attached)	irrelevant	irrelevant	absent	absent
Ineffective eligibility rules (well-designed means-testing ensures that those who need support can get it; job-search conditions ensure the motivation for returning to work)	irrelevant	irrelevant	absent	absent
Low flexibility of income support programmes for addressing changing conditions of the household	significant problems	irrelevant	absent	absent

Discrimination by agencies managing income-support programmes	irrelevant	irrelevant	absent	absent
Risk of municipalities misusing income support to buy votes	irrelevant	irrelevant	absent	absent

Social services

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Limited quality, capacity and comprehensiveness of help provided by social services	significant problems	irrelevant	absent	absent
Limited access to social services: low awareness of them, low accessibility (e.g., due to travel costs) or limited availability	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Services providers do not actively reach out to those in need	minor problems	irrelevant	absent	absent
Limited ability of social services to effectively work together with other agencies (e.g., public employment service) to help clients	significant problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Discrimination by social service providers	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant
Lack of adequacy of programmes for addressing indebtedness (providing counselling and financial support)	minor problems	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant

Child protection

Problems and conditions	Significance:	Identified by strategy	Measures to address	Targets defined
Child protection is not considered in the NRSF	irrelevant	identified and analysed sufficiently	appropriate	relevant targets well-defined
Specific vulnerability of Romani children as victims	irrelevant	identified and	appropriate	relevant targets well-

of violence is not considered		analysed sufficiently		defined
Segregated or discriminatory child-protection services provided to Roma	significant problems	understood with limitations	adequate but with room for improvement	relevant targets well-defined
Activities aimed at strengthening parental responsibility and skills are not available or not reaching out to Roma parents	irrelevant	mentioned but not analysed sufficiently	appropriate	relevant targets well-defined
Illegal practices of child labour	irrelevant	irrelevant	absent	absent
Large-scale and discriminatory placement of Romani children in early childhood care institutions	irrelevant	irrelevant	absent	absent
Persistence of large-scale institutions rather than family-type arrangements	irrelevant	irrelevant	absent	absent
Early marriages	irrelevant	irrelevant	absent	absent
Barriers to children's registration; statelessness	irrelevant	irrelevant	absent	absent
Biased treatment of Roma youth by security and law enforcement	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement
Inadequate child/ adolescent participation	significant problems	understood with limitations	adequate but with room for improvement	adequate but with room for improvement

Promoting (awareness of) Roma arts, culture, and history

Problems and conditions	Significance	Identified by strategy	Measures to address	Targets defined
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Exclusion of Roma communities from national cultural narratives	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant

Romani history and culture are not included in school curricula and textbooks for both Roma and non-Roma students	significant problems	identified and analysed sufficiently	present but insufficient	some targets but not relevant
Lack of inclusion of the Romani language in schools and development of necessary educational materials and resources for Romani language preservation and teaching	significant problems	identified and analysed sufficiently	appropriate	some targets but not relevant
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problems	understood with limitations	present but insufficient	some targets but not relevant

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