



Finland's National Roma Policy (ROMPO) 2023–2030

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Finland's National Roma Policy (ROMPO) 2023–2030

Marko Stenroos

Finnish Institute for Health and Welfare &
National Advisory Board on Romani Affairs

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Finland's National Roma Policy (ROMPO) 2023–2030

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Abstract

Finland's National Roma Policy (Rompo 3) has been drawn up for the period 2023–2030. It is based on the EU Roma strategic framework for equality, inclusion and participation. As an EU Member State, Finland is committed to the objectives of the strategic framework, and aims to promote the equality and inclusion of the Roma in different areas of life.

The cross-cutting objectives of the National Roma Policy are equality, inclusion and participation, as well as the elimination of discrimination by tackling antigypsyism. These priorities will guide the mainstreaming of the Roma policy measures. The National Roma Policy also includes four sectoral sets of objectives related to education, employment, housing and health. It also contains measures to strengthen the social, linguistic and cultural rights of Roma people. Finland's National Roma Policy was prepared in collaboration with different stakeholders, and the measures will be targeted correctly using the lifecycle model. In accordance with the guidelines of the European Commission, a report on the implementation of the National Roma Policy will be submitted to the Commission every two years. The Commission will monitor progress by making use of surveys carried out by the European Union Agency for Fundamental Rights and the feedback received from civil society. An in-depth mid-term evaluation will be carried out of the EU's current 10-year strategic framework at the EU level, and conducting a mid-term evaluation of Finland's national strategic framework is also included in the National Roma Policy.

Keywords Roma, inclusion, equality, Roma policy, minority policy**ISBN PDF** 978-952-00-8345-8**ISSN PDF**

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Suomen Romanipoliittinen ohjelma 2023–2030

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Julkaisija Sosiaali- ja terveysministeriö

Tekijä/t Marko Stenroos

Toimittaja/t Janette Grönfors & Anneli Weiste

Yhteisötekijä Terveyden ja hyvinvoinnin laitos & Romaniasiaien neuvottelukunta

Kieli Englanti

Sivumäärä

114

Tiivistelmä

Suomen romanipoliittinen ohjelma (Rompo3) on voimassa vuosina 2023–2030. Rompo3 perustuu EU:n strategiseen puiteohjelmaan romanien yhdenvertaisuudesta, osallisuudesta ja osallistumisesta. Suomi EU:n jäsenmaana on sitoutunut puiteohjelman tavoitteisiin ja pyrkii edistämään romanien yhdenvertaisuutta ja osallisuutta eri elämänalueilla.

Rompo3 -ohjelman läpileikkaavina tavoitteina on yhdenvertaisuus, osallisuus ja osallistuminen sekä syrjinnän poistaminen puuttamalla romanivastaisuuteen. Nämä painopisteet ohjaavat romanipoliittisten toimenpiteiden valtavirtaistamista. Rompo3- ohjelmassa on myös neljä sektoraalista tavoitekokonaisuutta liittyen koulutukseen, työllisyyteen, asumiseen sekä terveyteen. Rompo 3 sisältää myös toimenpiteitä, joilla vahvistetaan romanien sosiaalisia, kielellisiä ja kulttuurisia oikeuksia. Rompo3 on toteutettu yhteistyössä eri sidosryhmien kanssa ja toimenpiteiden oikein kohdentaminen toteutuu elinkaarimallin avulla.

Euroopan komission ohjeistuksen mukaisesti täytäntöönpanosta raportoidaan kahden vuoden välein. Komissio seuraa edistymistä hyödyntäen Euroopan unionin perusoikeusviraston kyselyjä ja kansalaisyhteiskunnan antamaa palautetta. Nykyisestä EU:n 10-vuotissuunnitelmasta tehdään EU-tason perusteellinen väliarviointi ja Suomen osalta väliarviointi on kirjattu myös osaksi Rompo3 -ohjelmaa.

Asiasanat romani, romanit, osallisuus, yhdenvertaisuus, romanipolitiikka, vähemmistöpolitiikka

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Referat

Finlands program för romsk politik (Rompo3) gäller åren 2023–2030. Rompo3 grundar sig på EU:s strategiska ram för romers jämlikhet, inkludering och delaktighet. Som EU-medlemsstat har Finland förbundit sig till målen i ramprogrammet och strävar efter att främja romers jämlikhet och inkludering inom olika livsområden.

Genomgående mål för programmet Rompo3 är jämlikhet, inkludering och delaktighet samt att undanröja diskrimineringen av romer genom ingripande. Dessa prioriteringar styr integreringen av de rompolitiska åtgärderna. I programmet Rompo3 ingår fyra sektorspecifika målhelheter som gäller utbildning, sysselsättning, boende och hälsa och dessutom åtgärder som stärker romernas sociala, språkliga och kulturella rättigheter. Rompo3 har utarbetats i samarbete med olika intressentgrupper och åtgärderna riktas med hjälp av livscykelmodellen.

I enlighet med Europeiska kommissionens riktlinjer rapporteras om genomförandet vartannat år. Kommissionen följer upp framstegen med hjälp av enkäter som EU:s byrå för grundläggande rättigheter gör och genom respons från det civila samhället. EU:s nuvarande 10-årsplan genomgår en grundlig halvtidsutvärdering på EU-nivå och en halvtidsutvärdering för Finlands del har också skrivits in i programmet Rompo3.

Nyckelord romer, romer, delaktighet, jämlikhet, romsk politik, minoritetspolitik

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Sosiaalo- ta sastibosko ministerios

Tšeeriboskiiro

Marko Stenroos

Ĥanjibongiire

Janette Grönfors & Anneli Weiste

**Tšetano
tšeeriboskiiro**Sastibosko ta tšihko aahhibosko instituutos &
Romano saakengo rakkibosko komiteos**Tšimb****Paĥesko moola**

114

Gustiba

Fintiko romano politikako programmos (Rompo 3) hin aro džoor bereĥĥi 2023–2030 ta botnila EU:sko strategiako programmos kaalengo itveeribosta, dielibosta, dielos liijibosta. Fintiko them sar iek EU:sko lendako them hin phandidas pes aro programmosko faatibi ta kammela te fendjaves kaalengo itveeriba ta dieliba aro froo dživibosko thaane. Rompo3-programmosko gliisuno faatiba hin itveeriba, dieliba ta dielosko liijiba ta panna ring tšuuuibosko nikki laagiba, jakkes te vojuvaha te len phallo dola saakenna so hin prissi kaalen. Dala veegune punkti rikavena romano politikako tšeeribi aro sakka thaane. Aro Rompo3-programmos hin panna staar sektorikaano hilo faatiba sar skooliba, buttilijiba, buuriba ta sastiba. Rompo3 hin tšerdo tšetanes froo phandime gruppensa ta tšeeribi pherjuvena horttas dživibosko modellesko paalal. Paalal Europa komissiosko sikjiba pherdo tšuuuibosta mote raportera maĥkar dui bereĥ. Komissio följila fendjiba jakkes, te douva vojula te hyövyves Europako unionesko botnosko tšenstako puĥĥibi ta folkengo tšetano thaanengo paalal diijiba. Aka diivesko EU:sko 10-bereĥesko plaani-bosta tšeeraha EU:sko ĥleetime perfekto verdiba ta Fintiko themmesko dielosta maĥkurno verdiba hin ranlo panna aro Rompo3-programmos.

Saakako laave

romane, kaale, dieliba, it veeriba, politika, minoriteetengo politika

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1 Preface and strategic policies of Finland's National Roma Policy

The main objective of Finland's National Roma Policy 2023–2030 (ROMPO 3) is to support the inclusion, participation and equality of Roma in accordance with the EU Roma strategic framework. The cross-cutting objective of the ROMPO 3 policy programme is to eradicate antigypsyism and the discrimination of Roma and to ensure the equal realisation of the fundamental rights of Roma. The human rights-based approach is the starting point for the mainstreaming of the programme.

Finland's previous National Roma Policies for 2009–2017 and for 2018–2022 outlined the main objectives for Roma policy at the national as well as regional and local levels. During the ROMPO 1 programme period, steps forward were taken particularly in promoting the education and training level of Roma. ROMPO 2 in turn developed Roma participation in regional- and local-level work in a variety of sectors by means of improved access to employment, education and training, and social inclusion. The new programme period pays particular attention to the harmonisation of Roma policy timelines and objectives with the EU framework and Finland's national action plans promoting equality and non-discrimination. This policy programme enters into force at the same time as the structural reform of Finland's health and social services and rescue services. There has long been awareness in Finland of diversity within the Roma population and of the need to take account of the Roma population in a needs-driven way, reflecting age, gender and other factors affecting the position and functional capacity of the individual through an intersectional approach. The aim is to implement the programme in a coordinated and Roma-driven manner.

Implementation and monitoring will take place with a knowledge-based approach by making use of research data already collected during previous programme periods and developing monitoring, particularly the assessment of the effectiveness of actions. The effectiveness of the Roma policy with regard to the realisation of equality must be the primary topic of assessment, and the next Roma policy programme must be linked as extensively as possible with the cross-cutting integration of the Roma policy into action to promote fundamental rights and to eliminate antigypsyism.

The strategic policies of Finland's National Roma Policy are as follows:

1. The main objective of Finland's National Roma Policy 2023–2030 (ROMPO 3) is to support the inclusion, participation and equality of Roma in accordance with the EU Roma strategic framework. The cross-cutting goal of the policy programme is to eliminate antigypsyism and the discrimination of Roma and to ensure the equal realisation of the fundamental rights of Roma.
2. ROMPO 3 is based on the EU Roma strategic framework, on the evaluation of Finland's previous National Roma Policy (ROMPO 2) and the continuity required by the main objectives, on research data on the realisation of fundamental and human rights among the Roma population, and on the Roma population's own views and assessments.
3. ROMPO 3 consists of strategic areas for which actions are proposed in order to reach the objective of continuing and creating inter-administrative collaboration and cooperation.
4. The proposed actions are recommendations but not legally binding. The authorities, organisations and other identified cooperation partners will decide independently on the potential implementation, form, scope and contents of the actions.
5. Under its duty to coordinate Roma policy, the Government seeks to bring the cooperation partners together to consider actions, and a separate implementation plan will be drawn up on the basis of this for the implementation of the programme.
6. The main objectives of ROMPO 3 to support inclusion, participation and equality and to eradicate discrimination have been integrated into the proposed actions in all of the strategic areas.
7. The proposals are based on mainstreaming the main objectives and the realisation of the fundamental rights of the Roma population in existing or future programmes, projects and implementation of statutory duties at the national as well as regional level.
8. ROMPO 3 is aligned with separately adopted Government strategies and programmes and forms part of their implementation in a manner to be agreed separately.
9. The special priorities of ROMPO 3 are the rights and inclusion of Roma children and young people, the equal opportunities of older and particularly vulnerable Roma, diversity and non-discrimination in access to employment, and the maintenance of the language and culture of Roma. The priorities require the accessibility and mainstreaming of information and awareness concerning the Roma population.

10. ROMPO 3 also calls for the development of structures and cooperation for national Roma policy and Roma-specific work. There must be an emphasis in the monitoring of the policy programme on effectiveness and a sufficient knowledge base that takes account of the relevant legal conditions.

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Ministry of Social Affairs and Health

January 2023

2 Introduction

Finland's National Roma Policy for 2023–2030 (ROMPO 3) is the third policy programme of its kind. ROMPO 3 is based on the recommendation of the Council of the European Union on Roma equality, inclusion and participation (2021/C 93/01). The National Institute for Health and Welfare (THL) has drawn up the policy programme in cooperation of a variety of actors as assigned by the Ministry of Social Affairs and Health. The ROMPO 1 (2009–2017) and ROMPO 2 (2018–2022) programmes were comprehensive in terms of both the number of actions and the background information provided. Many of the proposed actions included in the ROMPO 3 programme follow on from the previous programme periods. However, the number of actions has been limited and, consequently, some sets of topics have been prioritised in the policy programme at hand. ROMPO 3 allows less space for background information concerning the actions, as many things have remained unchanged from the ROMPO 2 programme period, except for the structural reform of Finland's health, social and rescue services, which entered into force on 1 January 2023. The restructuring of health, social and rescue services has highlighted the need to take account of the Roma perspective and accessibility of services in the new service structure of health, social and rescue services, too.

ROMPO 3 has been made lighter to make it easy for the various cooperation partners to find the actions prioritised for their sector. That the same themes follow on from the previous programmes is partly due to the challenges concerned not yet having been resolved or requiring a period beyond one operating period to be implemented. The ROMPO 2 programme period saw the completion of several studies and reports relating to Roma, such as the Roma Wellbeing Study of the Finnish Institute for Health and Welfare (Weiste-Paakkanen et al., 2018), the Follow-up Report on Equality of the Roma in Housing of the Ministry of the Environment (Törmä & Huotari, 2018), the Employment, Entrepreneurship and Labour Market Integration of the Roma report of the Ministry of Economic Affairs and Employment (Jauhola et al., 2019), the report of the Finnish National Agency for Education on Roma Children in Early Childhood Education and Care and Pre-Primary Education (Rajala & Schwartz, 2020), the Police and the Roma – Issues of Equality and Cooperation publication of the Police University College (Vanhanen, 2021), the survey of the wellbeing of Roma children and youth and the realisation of their rights in Finland of the Office of the Ombudsman for Children (Weckström et al., 2023) and the Programme for the Revival of the Finnish Romani Language and Proposal for Measures *Mo džiiwel romani tšimb!* – Long Live the Romani language! (Finnish National Agency for Education,

2022). Recommendations and measures from these programmes, accounts and reports are included in this programme.

Actions implemented regionally have been placed at the core of ROMPO 3. The EU underlines that measures need to be concrete and measurable, and the same principle is also applied in ROMPO 3. Accounts and reports from the previous programme period enable the planning of concrete knowledge-based actions that have extensive regional coverage. This seeks to ensure regional equality among the Roma population.

Because of the actions aimed at the regions, an increasing role will be played not only by the National Advisory Board on Romani Affairs (RONK) but also by the Regional Advisory Boards on Romani Affairs (ARONK) and by the Local Roma Working Groups of municipalities and cities. Local Roma Working Groups operate by maintaining interaction between the Roma population and the various administrative branches of the municipalities and wellbeing services counties. The groups consist of Roma members and representatives of the various municipal services, the wellbeing services county and the parish. The groups aim to promote the objectives of Finland's National Roma Policy locally and advance the position of Roma as municipal residents. The aim is to strengthen the inclusion and equality of Roma, tackle discrimination, promote issues relating to housing, employment, education and training and to support communality. In Finland's National Roma Policy, the development of regional and local work in practice means more efficient monitoring of and reporting on the implementation of the actions. ROMPO 3 has a separate section for actions to develop and increase the efficiency of the implementation of Roma policy at different levels.

The public authorities must ensure the realisation of fundamental rights and human rights. The means available to the authorities to prevent and tackle discrimination, racism and antigypsyism and to promote good relations between population groups are related to anti-racism policy, equality promotion, resource allocation, support for civil society capacities, collection of data on racism, and measures to promote the rights of the various population groups, such as linguistic and religious groups, the Sámi, Roma and immigrant groups, in the various administrative branches. Human rights obligations binding on Finland and recommendations received by Finland from international human rights treaty monitoring bodies have key relevance to all of the themes of this policy programme.

The lifecycle model has been utilised as regards the implementation of ROMPO 3. This means the themes are addressed by age group: children, young people, families and working-age population, and ageing Roma population. This division supports the objectives of the EU Roma strategic framework to target measures clearly at the correct target group and to clarify implementation and its monitoring. The lifecycle model brings the themes closer to people, making the themes easier to approach in the planning

process. The lifecycle model also supports the intersectional approach: the actions must take account of age, gender and other factors affecting a person's position, capacities and opportunities. The lifecycle model makes it easier for the various actors to perceive the wholes formed by the actions and the mutual impacts of the actions.

Based on recent European studies of challenges faced in Roma policy implementation, the basic idea underlying ROMPO 3 is to propose actions brought up by Roma and those working on Roma issues and to put an emphasis on them. In practice this means the de facto opportunity of the Roma to influence the content and implementation of the programme. The guiding principle throughout the planning of Finland's National Roma Policy and also its future implementation is inclusion. To ensure inclusion, the planning stage of the actions has involved suggesting cooperation partners instead of responsible actors for the actions, with this constituting a change from the previous National Roma Policies. This change seeks to increase inclusion in the concrete planning and implementation of the actions. Attention has also been paid to cooperation between the various actors in the planning stage. This is how the processes relating to the actions can be made as equal as possible from the perspective of all actors regardless of their background organisation. A joint implementation plan for ROMPO 3 will also be prepared with the actors, clarifying the roles and responsibilities of the various actors in the implementation of ROMPO 3. This will also make implementation inclusive.

ROMPO 3 aims to achieve multiprofessional and cross-sectoral cooperation. This change responds in part to the need to mainstream Roma issues into the practices of Finnish society. The cross-cutting idea is the realisation of the rights of Roma and eradication of discrimination and antigypsyism. Equality, inclusion and participation are also clearly covered by the various actions of the programme.

The planning of the implementation of ROMPO 3 has enabled the broad participation of the various actors in the joint development process. It is hoped the process will set an example for other actors, as Roma must be included in the planning and implementation of matters affecting them in the various cooperation networks. Forms of consultation must be developed so that they enable the inclusion of Roma in the different sectors and as regards the different themes. Consultation with and inclusion of Roma should also be included in national and regional strategies.

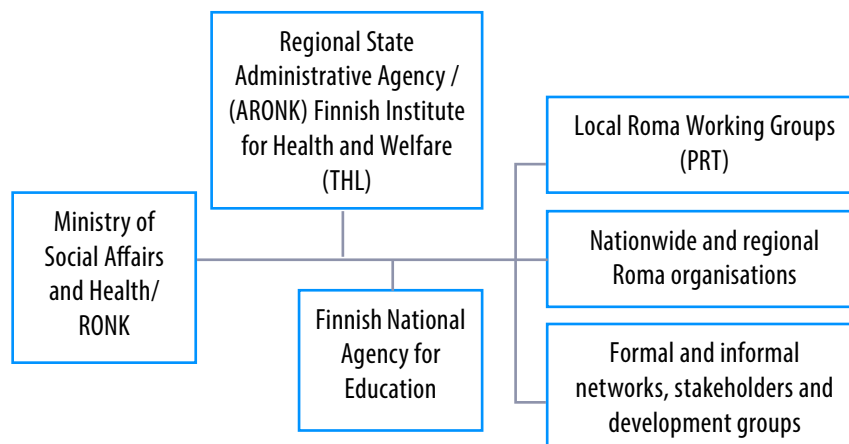
The ROMPO 3 programme is in effect in 2023–2030. Since the programme spans over seven years, there is, however, a need to prepare for changes in Finnish society as well as at the European level. This is why ROMPO 3 includes the option for a mid-term review and potential additions.

3 Structure of Finnish Roma policy and Roma-specific work

Finland's Roma policy aims to make the equality and inclusion of Roma a reality in the various sectors of societal life. Founded as early as in 1956, the Advisory Board on Romani Affairs (RONK) operates in connection with the Ministry of Social Affairs and Health. Representatives of the Finnish Roma population have been an integral part of the composition of RONK since the 1970s. The government decrees on the National Advisory Board on Romani Affairs (Government Decree 1019/2003) and on the Regional Advisory Boards on Romani Affairs (Government Decree 1350/2009) strengthen the agency and position of the Roma in policymaking and policy development relating to Roma. At the 1997 Conference on Security and Co-operation in Europe (CSCE) held in Helsinki, the "RONK model" was raised as a positive example of long-term cooperation between central government and the Roma minority.

Roma organisations operating at the nationwide level have played a key role in Roma-specific work and the activities of RONK. The diverse competences and expertise of the Roma organisations are recognised in Finland's new National Roma Policy. In addition to this, the Regional Advisory Boards on Romani Affairs (ARONK) and Local Roma Working Groups (PRT) play an important role in the deployment of the National Roma Policy. Under the respective decrees, half of the members of RONK and the ARONKs must be Roma. RONK members play an important role in taking Roma policy to their own administrative branch and, consequently, the deployment of Roma policy actions.

Figure 1. Structural implementation of Finland's Roma policy



The National Advisory Board on Romani Affairs (RONK) serves as a cooperation and expert body between Roma and the authorities in Finland. It is tasked with promoting the equal inclusion and participation of the Roma population in decision-making concerning them (Government Decree 1019/2003). The following ministries are represented in RONK: the Ministry of Social Affairs and Health, Ministry of Education and Culture, Ministry of the Interior, Ministry of Economic Affairs and Employment, Ministry for Foreign Affairs and the Ministry of the Environment. Half of the 16 members of RONK have a Roma background, representing nationwide Roma organisations and the Regional Advisory Councils on Romani Affairs (ARONKs). Under the relevant decree, members representing the Association of Finnish Local and Regional Authorities and the Finnish National Agency for Education (EDUFI) may also be appointed. RONK may establish divisions within RONK, to which permanent members may be invited subject to authorisation by the Ministry of Social Affairs and Health. The duties of the RONK Secretary General in the Ministry of Social Affairs and Health also include national and EU Roma policy.

The Regional Advisory Boards on Romani Affairs (ARONK) act as inter-administrative cooperation bodies for the Roma population and the authorities. They play a key role in collecting information from the local Roma population to ensure local differences in the position of Roma are taken into account. They also have a clear role in the local deployment of Finland's National Roma Policy. The role of the ARONKs is based on Government Decree 1019/2003.

There are four ARONKs in Finland: within the area of operation of the Regional State Administrative Agency for Southern Finland, of the Regional State Administrative Agency for Eastern Finland, of the Regional State Administrative Agencies for Northern Finland and Lapland, and of the Regional State Administrative Agencies for Southwestern and Western and Inland Finland. Each ARONK has a planning official for Roma affairs.

There were 16 **local and regional Roma working groups** in Finland in 2022, but their number varies. A Local Roma Working Group (PRT) is a commission appointed by the local executive and tasked with promoting the inclusion and participation of Roma at the local level, taking account of local special needs.

The Finnish National Agency for Education (EDUFI) develops the education and training of Roma and promotes the Romani language and Roma culture. EDUFI also produces accounts and reports concerning the education and training of Roma together with Roma actors. It also publishes the *Latšo Diives* magazine. EDUFI has a steering group supporting the education and training of Roma (2022–2025).

The Finnish Institute for Health and Welfare (THL) provides support for the development, implementation, monitoring and evaluation of the National Roma Policy.

It produces research data on the wellbeing and health of Roma and develops equality in health and social services.

The Advisory Board on the Roma and the Church (Evangelical Lutheran Church) was established in 1994 and half of its members are Roma.

There are several **Roma organisations** in Finland, with the largest nationwide organisations being the National Roma Forum of Finland (Fintiko Romano Forum, FRF), which also acts as an umbrella organisation, as well as Romano Missio, the Finnish Roma Association, and Elämä ja Valo (Life and Light) association. Roma organisations are mainly based in southern and central Finland, whereas there are much fewer or no Roma organisations based elsewhere in the country, such as northern Finland. With no Roma organisations active in these locations, the role of Local Roma Working Groups and ARONKs is emphasised even further.

Stakeholders, informal networks and development working groups. Roma issues are promoted nationally and internationally in close cooperation with the various stakeholders. Formal and informal networks operate under a variety of themes, including the Finnish Institute for Health and Welfare (THL) expert group for cultural diversity (MONET) and its Roma partner panel and networks of young Roma people. Many non-profit foundations and educational institutions, such as Diaconia University of Applied Sciences (DIAK) and the STEP Education of the Church Resources Agency as well as the Deaconess Foundation are also committed to Roma-specific work.

4 Actions carried over from ROMPO 2, reporting and mid-term evaluation

Before the preparation of ROMPO 3, any actions under ROMPO 2 not yet completed or not implemented were surveyed. The follow-up report on the ROMPO 2 programme used the traffic light method to assess the total of 97 proposed actions implemented under the programme. Particular attention was paid to the high-priority actions, as the aim was to assess which actions should be carried over to the next programme period, too. Where appropriate, actions that are incomplete or not implemented have been carried over to ROMPO 3. The follow-up report does not contain any quantitative assessment of the actions, with no quantitative indicators having been defined in ROMPO 2. Likewise, it was not possible to examine the de facto impacts of the actions in the report, and this is why the ROMPO 3 programme now includes elements improving measurement with regard to monitoring, implementation and effectiveness. (Ministry of Social Affairs and Health, 2022)

The European Commission will carry out an 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 Finland’s national strategic framework. Finland’s seven-year National Roma Policy programme contains a mid-term review where its contents can be supplemented or specified further if necessary. Any supplementation or further specification may only take place in the event that the policy programme criteria are met. ROMPO 3 focuses on setting objectives, which means that those implementing the actions will be able to select the actual methods and tools for action and will be responsible for them. The methods and tools selected for implementation will also be assessed and reported on. This introduces a qualitative dimension to monitoring, with the scale of ‘implemented’–‘in progress’– ‘not implemented’ no longer being sufficient as a monitoring indicator.

Regardless of many of the themes, issues and action proposals of ROMPO 3 having already been covered by the previous policy programmes (education and training, employment, wellbeing, housing), it is also necessary to create space for any phenomena emerging during the programme period to which response at the societal level is required. For example, the follow-up report on ROMPO 2 examined the potential impacts of the COVID-19 pandemic on the implementation of Roma policy. This provisional option should be used particularly in the context of the mid-term review.

5 EU Roma strategic framework for equality, inclusion and participation as starting point for Finland's National Roma Policy

The preparation of the new EU Roma strategic framework drew on the findings from the evaluation of the first framework (until 2020) and from extensive consultation. The EU's Roma policy instruments (laws, policy programmes and funding instruments) are in line with each other. Laws, regulations and the strategic framework are supported by the various EU funding instruments (such as the European Regional Development Fund (ERDF) and the European Social Fund (ESF)). References to the EU Roma strategic framework are made in the context of many actions in ROMPO 3. This supports maximum efficiency in making use of EU Roma policy instruments in national implementation.

The EU Roma strategic framework guides the planning of national Roma strategic frameworks, but it also enables taking national special characteristics into account. European Roma organisations collaborated closely with the EU in the preparation of the EU strategic framework. In addition, national reporting is based on the contents of the EU framework. This ensures the minimum targets are reached in each country.

In recent years, the EU has developed cooperation structures to promote Roma inclusion. The EU also seeks to promote the position and inclusion of Roma in the Member States (priorities and regulation). The EU has adopted objectives for Roma policy development in EU Member States. These objectives also guide Finland's National Roma Policy. On 12 October 2020, the European Commission published a communication and accompanying documents concerning the EU Roma strategic framework for equality, inclusion and participation until 2030. As part of the strategic framework, a list of specific measures recommended by the Council was published. The recommendations were adopted on 12 March 2021.

The EU Roma strategic framework emphasises monitoring and appropriate data collection. The strategic framework acknowledges that Member States should choose their own monitoring methods, including appropriate methods for data collection, and takes into account the fact that collecting data related to ethnicity is a sensitive matter and not possible in certain Member States. This is why ROMPO 3 presents new technological solutions to facilitate data collection. Any data collection on the Roma population must be in compliance with the recommendations of the Fundamental Rights Agency (FRA) of the European Union on human rights-based data collection.

5.1 Equality, inclusion and participation in the preparation of Finland's National Roma Policy

The preparation of Finland's National Roma Policy draws on the horizontal objectives of the EU Roma strategic framework: equality, inclusion and participation. Particular attention was paid in the preparation of ROMPO 3 to enabling meaningful participation, and this is why the preparation process was allowed as much weight as the decision-making process.

In late 2021, the Finnish Institute for Health and Welfare (THL) organised working groups that were open to all, mainly taking place online due to COVID-19 restrictions. The naming of the working groups was based on the lifecycle model: children and young people, families and working-age population, ageing Roma population, particularly vulnerable Roma, and joint development of Roma policy. A total of 150 people took part in the open events, mainly representing Roma organisations and those working with Roma in the field. The open working groups sought a broad understanding of the objectives to be set for ROMPO 3. At each event, the participants were divided into small groups formulating proposals for actions. Finally, a vote was taken in the working group on the most important actions. The action proposals of these open working groups were discussed and made more concrete and as measurable as possible by smaller expert groups. The action proposals have been honed throughout the process in cooperation with the Roma population and stakeholders. Europe's mobile Roma also took part in the working groups, and objectives and needs concerning them have been included in the sets of actions.

All those participating in the process and other interested parties were provided with the opportunity to comment on the ROMPO 3 drafts. The opportunity to comment ensures adherence to the principles of meaningful participation where the participating person sees the outcome of their participation and is able to influence it in the various stages of the process. The Ministry of Social Affairs and Health circulated the draft of Finland's National Roma Policy for comments in October 2022 via the lausuntopalvelu.fi service

(Appendix 2). Feedback received in the comments has been taken into account in the policy programme.

The starting point for ROMPO 3 was to make the action proposals as concrete and measurable as possible. The actions are also in line with national action plans and strategies. Alignment with national strategies means mainstreaming, which in turn supports equality and action against structural discrimination. These objectives – concreteness, measurability and mainstreaming – reflect the intent expressed in the EU Roma strategic framework.

5.2 Equality and antigypsyism in Finland's National Roma Policy

Equality, inclusion and participation are the cross-cutting principles of ROMPO 3. This means that ROMPO 3 aims to strengthen them in society for the Roma population. In addition to these, a key principle is to address antigypsyism. Through these approaches, joint efforts will be made to support the equal participation of Roma in Finnish society. As the cross-cutting objectives, equality, inclusion and participation as well as the eradication of antigypsyism will be sought in the sets of actions by integrating the objectives into the actions and carrying out monitoring in a cross-cutting manner in the form of inclusion monitoring.

The EU Roma strategic framework states that: "In the context of rising populism and racism within the Union, there is a need to focus on combating and preventing discrimination, including by tackling antigypsyism, which is a root cause of and exacerbates discrimination and exclusion." Identification and recognition of antigypsyism support the realisation of the fundamental and human rights of Roma while at the same time addressing the historical continuum of antigypsyism. This continuum has created an acceptable norm for the discrimination of Roma. Antigypsyism is a prevalent form of racism which has its origins in how mainstream society views and treats those considered as 'gypsies' in a process of historical 'othering'. Racialisation and structural discrimination affect various spheres of life and must be addressed with efficient means. The EU anti-racism action plan 2020–2025 presents many concrete measures to combat racism, and the action plan was drawn on when planning ROMPO 3.

The level of agency of Roma in different contexts can be measured by inclusion indicators (Experiences of Social Inclusion Scale (ESIS)). In line with the nature the National Roma Policy, aspects examined in particular include Roma equality and inclusion as well as participation in structures of the public authorities and institutions. This provides

important perspectives on the lives of Roma in Finland. However, the lives of Roma also consist of much more than demanding their rights in service structures. When examining social problems and non-inclusion, there is a risk of overemphasising the imagery of victimisation. This must be taken into account when discussing Roma policy actions.

Roma are active participants in, for example, church and leisure activities and also take part in international solidarity work and mutual assistance between Roma. The EU Roma strategic framework emphasises the need to highlight the diversity of the Roma population and to deconstruct the homogenous, stereotypical image. This diversity being seen brings out the humanity and individuality that is important in both interactions between individuals as well as in good relations between population groups.

With regard to good relations between population groups, the 2019 Eurobarometer reports that 73% of Finnish respondents believe that the discrimination of the Roma is widespread in Finland, whereas the corresponding figure for the EU as a whole is 61%. A person who is socially included is able to influence their own life and common issues. A person who is not included is excluded from the common good: they can both generate the common good and enjoy it. Alongside access to influence and resources, it is essential to believe in the existence of one's own opportunities.

Experiences of inclusion can be measured with the Experiences of Social Inclusion Scale (ESIS) indicator developed by THL. The indicator consists of ten statements that assess the respondent's self-reported experiences of social inclusion, the meaningfulness of things they do, and their opportunities to do things. The responses to the statements are placed on a scale where one end represents the experience of non-inclusion and the other the experience of inclusion.

The use of indicators for social inclusion is recommended when reporting on actions. Inclusion indicators are used in contexts such as the UNICEF's Child-Friendly Cities model. The indicators measure experience but also any change in the experience of inclusion. This is why the ESIS questionnaire should be used when launching actions and again once the action is completed to compare results. The ESIS indicator is discussed in more detail below in the section on monitoring.

Participation means access to influence in Finnish society and, in particular, influencing matters that are related to Roma nationally or regionally. It is important in participation for Roma representatives to be included in decision-making concerning the Roma population, but it is also equally important for Roma to participate and have access to influence in processes where action plans and various policies are planned. It is therefore important to pay attention to the capacities and resourcing of Roma organisations – to take account of the so-called resource vulnerability in the field of Roma-specific work and

in the implementation of actions. The agency of Roma organisations in complementing public services and as part of the third sector's cultural, language, health and social services must be taken into account more efficiently. The horizontal principles of the EU Roma strategic framework provide the backdrop for each of the proposed actions.

The Government promotes the improvement of the social position of the Roma and the realisation of their equal rights. The national implementation of the Government of Finland Report on Human Rights Policy (2021) emphasises non-discrimination, equality and the rule of law. The report sets out the Government's measures concerning issues on which Finland has received numerous recommendations from human rights treaty monitoring bodies, human rights rapporteurs of the UN and European organisations, and country assessments of Finland's human rights situation. The Report on Human Rights Policy (2021) states that "the Government takes account of the recommendations received by Finland from international treaty monitoring bodies concerning issues, such as – promoting the teaching of the Finnish Romani language –" (2021, p. 49).

Finland's non-discrimination legislation strengthens the legal protection of those experiencing discrimination. ROMPO 3 is in line with the legislation and with the Government's human rights policies and objectives.

6 Tackling antigypsyism, racism and discrimination

Together with the horizontal approaches and sectoral measures, the EU Roma strategic framework strongly tackles the unequal treatment of Roma in European societies, including Finland. The various forms and levels of discrimination must be taken into account with regard to the Roma, too: ROMPO 3 seeks to tackle structural and institutional discrimination, discrimination at the level of the individual and discrimination at the level of relations between population groups. Hate speech and derogatory attitudes are manifestations of discrimination.

The Roma Wellbeing Study of the National Institute for Health and Welfare reports that experiences of discrimination and unfair treatment are prevalent among Roma, with almost half of the respondents having experienced unfair treatment by an unknown person during the preceding year. (Weiste-Paakkanen et al., 2018). Similar experiences were found in the survey conducted as part of the implementation of the National Child Strategy, where Roma children and young people aged 11–17 were asked about their experiences of bullying and discrimination. Around 57% of the Roma children and young people responding to the survey reported having experienced bullying and discrimination at least occasionally. Of these, almost all described the situations as having involved racist discrimination (Weckström et al., 2023). When asked directly, hardly any of them reported bullying, discrimination or fear of these as being an obstacle to anything for them. However, based on their other responses, the confidence of Roma children and young people in their own future was eroded by other people's attitudes and the ensuing obstacles to studies and employment. Roma children and young people hoped for a change in the climate of attitudes in society, awareness-raising about different cultures and people being regarded as individuals in addition to as representatives of their culture.

An Equal Finland: Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups promotes an objective set out in the Government Programme. Together with the EU anti-racism action plan and the EU Roma strategic framework, the Government Action Plan supports several action proposals included in ROMPO 3. The Finnish action plan aims to combat racism and discrimination and promote good population relations. The action plan is based on the Government Programme, a situational assessment carried out during the preparation of the action plan, research

data on discrimination, equality and population relations, and on international recommendations and good practices.

Anti-racism policy and promotion of good population relations in the different administrative branches is a key objective of the Government's anti-racism action plan. The action plan also draws attention to and proposes measures concerning population group-specific policy, such as Roma and Sámi policy. (Ministry of Justice, 2021) The National Advisory Board on Romani Affairs participated in the preparatory working group of the action plan. Consequently, the anti-racism action plan also serves as a background paper for ROMPO 3.

An Equal Finland: Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups contains the guideline that research and systematic data collection about structural racism and discrimination and their impacts on society and minority groups should be promoted. In ROMPO 3, tackling antigypsyism, hate speech and eradication of discrimination are included in several action proposals.

A Ministry of Justice (2022) policy brief examines the harassment and hate speech experiences by minority groups and provides concrete recommendations for tackling and preventing harassment and hate speech. Action to tackle antigypsyism takes place in close cooperation with the Ministry of Justice. The Government has commissioned a report in online hate speech, on the basis of which the research group proposes 19 policy actions to reduce hate speech.

| 1. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Conducting a follow-up study of the impacts of experiences of discrimination, non-inclusion and otherness on the wellbeing of Roma of different ages as part of the assessment of the effectiveness of the actions. | Ministry of Social Affairs and Health, THL, Ministry of Justice, Roma organisations. | Studies have been conducted by 2030 and issues emerging in them are taken into account in future national-level action plans. |

6.1 Ethnic profiling

Cases of ethnic profiling of Roma have emerged in Finland. Ethnic profiling means a person being stopped or their activity being addressed exclusively or primarily on the basis of their ethnic origin, colour or religion. Violations of the prohibition of ethnic profiling constitute discrimination prohibited under the Constitution of Finland and under the Non-Discrimination Act (1325/2014), and experiences of ethnic profiling erode confidence in the police and other authorities. In addition, the prohibition of ethnic profiling is included in the section of the Aliens Act (301/2004) under which monitoring measures may not be based solely or to a decisive extent on the person's actual or assumed ethnic origin. The prohibition of ethnic profiling should be cascaded down to all structures of the authorities' activities, and cooperation between the Roma population and the police should be increased. In addition to the police, profiling is performed by security guards in public spaces such as shopping centres. Equal access to public spaces must be safeguarded by informing actors clearly of the prohibition of profiling. Both Finland's Roma and mobile Roma have been subjected to profiling by guards. Regular communication between the police and the Roma population should be established with regard to the prohibition of ethnic profiling. Mutual trust is increased in particular by the transparency of activities, such as the Roma community being aware of the operating models used by the police, the types of issues dealt with by the police with the Roma population, and the associated problems.

| 2. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Developing cooperation between the police and the Roma population to prevent ethnic profiling. Monitoring the enforcement of the prohibition of profiling in cooperation between the police administration and Roma population. | Ministry of the Interior, Non-Discrimination Ombudsman, police, RONK, Roma organisations. | Based on the cooperation developed, the enforcement of the prohibition of profiling is monitored and reporting on observations of the situation takes place. Any problems identified have been addressed. |
| 3. Action proposal | Cooperation partners | Monitoring |
| Developing measures to ensure awareness of the prohibition of profiling in the structures of the security sector and police administration. Reviewing the security sector business licence also with regard to compliance with the prohibition of profiling. | Ministry of the Interior, Non-Discrimination Ombudsman, police administration, RONK, Roma organisations. | Based on the cooperation developed, the enforcement of the prohibition of profiling is monitored and reporting on observations of the situation takes place. Any problems identified have been addressed. |

6.2 Non-Discrimination Act and equality plans

In Finland, the Non-Discrimination Act requires the authorities to promote equality in society in the spirit of the Act. The authorities must have a plan for the measures required to promote equality. The Non-Discrimination Act prohibits discrimination but, on the other hand, also permits positive action. Positive action is such proportionate different treatment the purpose of which is to promote de facto equality or to prevent or eradicate disadvantages caused by discrimination. The Non-Discrimination Act is binding on the municipalities, wellbeing services counties, government ministries and other authorities.

Measure 5 of the Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups recommends the preparation of general instructions for government ministries regarding the promotion of equality in an administrative sector's performance guidance (special focus areas: improving equality abilities and increasing the diversity of personnel) and the implementation of ministry training to deploy the performance guidance instructions.

An equality plan must be knowledge-based. If there are Roma living in the municipality or wellbeing services country, account of them must be taken in equality planning and in accounts on wellbeing. The Non-Discrimination Act lays down provisions on the obligation of education providers to promote equality. Education providers and the educational institutions maintained by them must assess the realisation of equality in their activities and take any necessary measures to promote the realisation of equality.

| 4. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Including Roma in the development of equality plans in the various sectors and areas. Ensuring through municipal- and regional-level reviews that the Roma have been taken into account in the plans and promoting the Roma being taken into account in areas where there are Roma living. | Ministry of Social Affairs and Health, THL, Ministry of Justice, Regional State Administrative Agency, ARONK, Office of the Non-Discrimination Ombudsman, Association of Finnish Local and Regional Authorities, municipalities, regional councils, wellbeing services counties. | Quantitative (has been taken into account/has not been taken into account) and continuous monitoring of whether Roma have been taken into account and consulted in the equality plans of the municipalities and wellbeing services counties. |

7 Roma in the service system by age group

Structural racism may undermine the trust of people of different backgrounds in the authorities. The Ministry of Finance commissioned the OECD to conduct a Trust Survey on people's trust in government in Finland. The results were published in May 2021. The OECD report analyses citizens' trust in public institutions and provides information on how the government can develop its activities to build trust.

Many studies in other European countries have also drawn attention to a low level of trust between the Roma population and government institutions. This lack of trust may manifest in a reluctance to seek access to services and, on the other hand, lack of trust also affects service accessibility. According to the Finnish Institute for Health and Welfare (THL), Roma who have experienced discrimination use basic public services less than those who did not report having experienced discrimination (Lämsä et al., 2020).

7.1 Structural reform of Finland's health, social and rescue services and its impact on the implementation of Finland's Roma Policy

The structural reform of Finland's health, social and rescue services enters into force on 1 January 2023. This is one of the biggest reforms ever in Finnish history in terms of administration as well as substance. From the beginning of 2023, the responsibility for organising health, social and rescue services transfers from the municipalities and joint municipal authorities to 21 wellbeing services counties. The reform also has a direct impact on the implementation of the ROMPO 3 programme in the basic public services organised in the new wellbeing services counties. The planning of the structural reform and ROMPO 3 took place simultaneously. ROMPO 3 was prepared based on the boundary conditions set by the implementation phase of the reform.

The majority of the municipalities' duties are transferred to the wellbeing services counties, but education and cultural services and employment issues will still be included in the municipalities' duties going forward, too. This means that ROMPO 3 must be implemented in the municipalities as well as in the wellbeing services counties, which may increase the amount of administrative work.

A Guide for Planning the Regional and Local Implementation of the Finnish Roma Integration Strategy (MAARO Guide) was produced in conjunction with the ROMPO 2 programme. The MAARO Guide is intended for regional and national actors to support the local implementation of the National Roma Policy (ROMPO 2) 2018–2022. Since many of the actions have been carried over from the ROMPO 2 programme period to ROMPO 3, the MAARO Guide is in part usable during the current period, too, and the guide can be updated if necessary. The wellbeing services counties become operational at the same time as ROMPO 3 period begins, and the guidance of the wellbeing services counties as regards health, social and rescue services takes place as part of the negotiations process of the wellbeing services counties and is taken into account in the annual report of the Ministry of Social Affairs and Health on the wellbeing services counties.

The reform does not, however, mean a decline in equality. The authorities must prevent any discrimination in health and social services in advance and population group-specifically by means including action-oriented equality and non-discrimination plans. Measures must be taken on the basis of the plans to promote the realisation of equality. It is therefore important that the municipalities and wellbeing services counties are responsible for equality planning, and the objectives of both of them should be coordinated to ensure coherence. The follow-up report on Finland's National Roma Policy 2018–2022 states that Roma-specific work must be examined at the interfaces of the wellbeing services counties to highlight good operating models, well-functioning practices and actors and to support Roma-specific work at the regional and local levels (Ministry of Social Affairs and Health 2022). Data must be collected using a variety of methods that take account of the sensitivity of data relating to ethnic origin under the Constitution. Services provided by the wellbeing services counties and municipalities play a key role for the promotion of the wellbeing of Roma in an equal and inclusive manner, and there are many interfaces between services with regard to the Roma population in particular.

| 5. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Cascading Roma policy down to the wellbeing services counties' and municipalities' accounts and plans on wellbeing. | Ministry of Social Affairs and Health, THL, RONK, ARONK, PRT, wellbeing services counties, municipalities, Association of Finnish Local and Regional Authorities. | ROMPO 3 actions have, where appropriate, been taken into account in the wellbeing services counties' and municipalities' accounts and plans on wellbeing. |

7.2 Children and young people

Children and young people have been provided with a section of their own in ROMPO 3 even though the wellbeing of Roma children and young people is linked fundamentally with the wellbeing of many families. There are, however, many issues relating to children and young people that need to be addressed separately and in consultation with this specific target group. ROMPO 3 emphasises promoting the rights of Roma children and young people in accordance with the Council of Europe recommendations and Strategy for the Rights of the Child 2022–2027.

The Strategy for the Rights of the Child pays particular attention to children of different backgrounds, including Roma children. Finland's National Child Strategy, including its measures, is based on the binding Council of Europe Strategy and contains the long-term objectives and measures promoted across government terms. This means that the long-term National Child Strategy and this National Roma Policy, which is in force until 2030, support each other. The youth councils of the wellbeing services counties are important channels for the inclusion of young people.

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 (Weckström et al., 2023). The ROMPO 3 actions proposed with regard to children and young people are primarily based on the study report and on proposals made by participants of open workshops organised in conjunction with the preparation of ROMPO 3 in 2021.

According to the report of the Ombudsman for Children, many Roma children and young people experience discrimination and racism, and these experiences also limit their outlooks on the future. Gaining an education and training appears in children and young people's responses as something taken for granted, but fear and lack of prospects emerge in the context of entering adulthood and access to employment and income. Children and young people enjoy school but, to support their learning, would like to see individuals encountered on more equal terms. Their own access to influence is mainly limited to their family and friends, with representativeness –influencing through voting at general elections, for example – regarded by them as something distant, which is a cause for concern as regards the inclusion of young Roma. Sources of joy reported by Roma children and young people include relations with family, friends and other people close to them. Roma children and young people are proud of their own culture and report a strong willingness to learn the Romani language.

| 6. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Ensuring that Roma children and young people are taken into account in the municipalities' and wellbeing services counties' equality and non-discrimination plans and school-specific equality plans. Deploying the results and actions in municipalities' youth services and Roma organisations. | Ministry of Social Affairs and Health, THL, ARONK, Association of Finnish Local and Regional Authorities, Non-Discrimination Ombudsman, municipalities, wellbeing services counties. | Monitoring that Roma children and young people are consulted and taken into account in equality plans. Including a question on whether they are taken into account in surveys targeted at municipalities and wellbeing services counties (cf. Ministry of Social Affairs and Health Reports and memorandums 2022:27). |

One of the objectives of the Government key programme to address reform in services for children and families is to develop child protection (see under 'Families'). Under the rights of the child, background (whether nationality or ethnic or social background) must not affect the realisation of the rights of the child. Inequality is often reflected in different ways in Finnish cultural minorities. Not all members of minority groups are in a disadvantaged position, but factors jeopardising wellbeing and health accumulate on some individuals. The position of Roma children in child protection must be examined and developed from the perspective of children's wellbeing, and capacities for proactive work must be strengthened as regards the Roma population, too. The competences of professionals working with children and young people should be strengthened, and the identification of the needs of Roma children and young people should be addressed throughout the health, social and education services field, taking account of evidence-based methods and service chains.

| 7. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Improving the position of Roma children and young people in child protection and related after-care as well as in basic public services by training professionals and producing content for the Handbook for Child Protection and other guidelines used by professionals. | THL, Ministry of Social Affairs and Health, wellbeing services counties, municipalities, family centres, child protection professionals, Roma organisations. | Content for the Handbook for Child Protection and other guidelines for professional has been produced and professionals have been trained. Monitoring based on the content produced and amount of training organised for professionals, and number of training participants and their feedback. |

Youth work and youth policy are duties of the municipalities. Youth work means supporting the growth, independence and inclusion of young people in society, whereas the purpose of youth policy is to improve young people's growing and living conditions and interaction between generations. When organising activities, municipalities must take account of both the objectives and starting points of section 2 of the Youth Act (1285/2016) and of local circumstances. When organising youth work, the municipalities must cooperate as necessary with not only young people themselves but also with their families and other stakeholders, such as authorities working with young people, youth-sector organisations, parishes and others engaged in youth work.

Research shows that it is important for young people on the other hand to take part in activity aimed at all young people, while at the same time it should be ensured that they have access to activities with their own peer group to strengthen their own cultural identity and support their inclusion. It is important for young people to do things with their own peer group, as this reduces the risk of social exclusion in young people's lives. Over the past decade, a variety of formal and informal networks of Roma youth and Roma youth work have emerged in Finland. To develop youth work with young Roma, increasing cooperation and sharing well-functioning approaches support equal opportunities for inclusion for young Roma living in different areas. For example, there are activities for young Roma supported by the Duke of Edinburgh's International Award Foundation in the Jyväskylä area, and the Finnish Roma Association has a Roma youth network.

| 8. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Developing local and national Roma youth work to improve the opportunities of young Roma people for leisure activities and their inclusion. | Ministry of Education and Culture, THL, ARONK, municipal youth services, Association of Finnish Local and Regional Authorities, youth organisations, Roma organisations, parishes. | A Roma youth work network has been established and its activities are well-established. Young Roma people's experiences of inclusion are monitored regularly with inclusion indicators. |

It is important to study the ways of participation from the perspective of young Roma people. It is often regarded as equality that a service or activity is aimed at everyone. This, however, is not automatically effective equality. Instead, accessibility issues must be examined from the user perspective.

Young Roma people's participation and influencing in representative structures are promoted alongside actions targeted at them and, in addition, by means of activities that are open to all, such as by encouraging them to participate in student bodies or

open leisure activities, the provision of information on which must be increased in communication channels used by the Roma population. The culture of leisure activities is not, however, the same in all population groups (see e.g. Kivijärvi, 2015) and the culture of leisure activities among young Roma should be developed.

The action proposal below aims to find meaningful ways for Roma youth to participate and to develop these ways further.

| 9. Action proposal | Cooperation partners | Monitoring |
|--|--|---|
| Exploring ways of participating that are meaningful from young people's perspective (such as the Digiraati digital panel). Developing for Roma children and young people new influencing channels that strengthen inclusion alongside ones regarded as traditional, employing cooperation between schools and youth work, for example. | Ministry of Education and Culture, EDUFI, ARONK, municipal youth services, youth organisations, schools, Roma organisations. | Meaningful ways of participating have been explored with young people, and new nationwide practices have been developed on the basis of this. |

Camps have in practice proved to be an efficient activity increasing the participation and inclusion of Roma youth and families, and this is why this operating model should be implemented.

| 10. Action proposal | Cooperation partners | Monitoring |
|--|--|---|
| Organising, in cooperation with Roma organisations, family camps where Roma parents and guardians can discuss issues (such as child rearing and education) with experts. | Ministry of Social Affairs and Health, RONK, ARONK, EDUFI, Roma organisations, municipalities, parishes. | Number of family camps organised each year where child rearing, early childhood education and care and other education are discussed; the number and feedback of families participating in the camps. |

As part of activities aimed at young people, young people should be educated in looking after their own finances, becoming independent, housing and family life. A bad credit record on a young person may affect their access to housing and employment and, overall, their life management. When going through the process of gaining independence, it may be easier for a young person to receive guidance and advice relating to finances,

housing and starting a family from a professional outside their family or peer group. This is why attention must be paid in youth activities to such information and skills obtained outside of the home.

The EU Roma strategic framework recommends measures to support the financial literacy of young adults and families, including better decision-making and planning skills as part of measures relating to empowerment and financial inclusion measures.

| 11. Action proposal | Cooperation partners | Monitoring |
|---|---|--|
| Increasing education, training and guidance targeted at young Roma in managing their own finances, housing, family life skills and life management in Roma youth work. Making use of existing models, making them accessible to young Roma. | Ministry of Social Affairs and Health, municipal youth services, Roma youth workers, Ohjaamo One-Stop Guidance Centres, Roma organisations. | A way of working has been developed that aims at improving the life management skills of young Roma and that reaches the majority of young Roma. |

The children of EU mobile Roma families have equal rights and their realisation must be ensured. Inter-administrative cooperation and responsibility is required with regard to the mobile Roma population, mainly arriving in Finland from Eastern Europe. Until now, the Hirundo drop-in centre of Helsinki Deaconess Foundation has provided most of the services for the mobile population. The centre's professional competence and knowledge base must be utilised to ensure the realisation of the rights of the children of the mobile Roma population. There are shortcomings in the civil registration of Roma in many EU Member States. Although EU citizens may stay legally in Finland, they often lack health insurance cover. The Parliamentary Ombudsman has issued a statement regarding the right, enshrined in the Constitution of Finland and the Convention on the Rights of the Child, of children without a municipality of residence to receive primary and lower secondary education as well as early childhood education and care. The municipality has a duty to provide early childhood education and care as well as primary and lower secondary education for children staying in its area who do not have a municipality of residence. The realisation of the social rights of persons whose status resembles that of an undocumented person must be promoted. Many Roma who have moved to Finland from Eastern Europe in particular live in a situation similar to being undocumented. From 2023 onwards, the wellbeing services counties must arrange necessary and non-urgent health services for persons who are undocumented or whose status resembles that of an undocumented person.

| 12. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Developing means for and enabling opportunities of EU mobile Roma children and young people living in Finland to access education, health care and leisure activities that support their growth. | Ministry of Social Affairs and Health, RONK, Ministry of Education and Culture, municipalities, Deaconess Foundation. | Sustainable solutions have been developed for the realisation of the rights of EU mobile Roma children and young people. Those working with the target group collect experiences of the realisation of the rights of EU mobile Roma children and young people. Producing a questionnaire that enables monitoring on the realisation of rights. |

In the same way as with regard to members of the mainstream population, acting out by means of criminal behaviour among young Roma must be addressed early enough, taking account of the societal position of Roma. The EU Roma strategic framework regards it as particularly important to take account of the position of young Roma. The Anchor model is geared towards early interventions to promote young people's wellbeing and prevent crime. Anchor activities take place in multiprofessional teams with experts from the police, social services, health services and youth services. The team meets the young person and their family at the earliest possible stage so that the young person can be supported and, where necessary, referred to assistance or support.

| 13. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Developing and modelling cooperation between the various actors to make the Anchor activity accessible by young Roma. | Ministry of the Interior, Ministry of Social Affairs and Health, Ministry of Justice, police, Roma organisations, ARONK, PRT. | A model that has increased cooperation between actors to increase awareness and accessibility has been developed. Conducting a qualitative monitoring assessment. |

| 14. Action proposal | Cooperation partners | Monitoring |
|---|---|--|
| Embedding the operating model for young people acting out by means of criminal activities (Ministry of Justice 2019:26) in the project locations and strengthening taking account of Roma in the operating model. | Ministry of Justice, Ministry of Social Affairs and Health, THL, wellbeing services counties, municipalities, Roma organisations. | The operating model is tested in the locations or areas so that the implementation and deployment of the operating model is monitored in accordance with the recommendations of the model. (Ministry of Justice 2019:26) |

In 2022, the Ministry of Justice and the Human Rights Centre organised consultation events for young Roma aged 18–28. At these events, young Roma expressed their wishes on how their issues should be promoted, with inequality and discrimination faced by them emerging as particular concerns.

| 15. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| When examining the realisation of equality and non-discrimination, paying attention to disparities faced by young people, implementing in cooperation with young Roma a project to promote equality and to strengthen young people's Roma identity. Developing approaches to support encounters and interaction with young Roma, making use of existing and tried and tested models. | Ministry of Social Affairs and Health, RONK, Ministry of Justice, Ministry of Education and Culture, Roma organisations, youth organisations. | The project to promote Roma youth issues has been implemented and its outcomes have been embedded in existing structures with a variety of methods, including training produced by young people. |

7.3 Families and working-age population

Integrating support for work ability into the services of the health and social services centres under the reformed service structure is one of the sets of measures under the work ability programme. The priority here is to develop the services of health and social services centres so that they will identify the support needs of unemployed clients relating to work ability and that they provide a work ability support service package that responds to clients' needs. One of the objectives is to identify the work ability support needs of unemployed clients at health and social services centres. Taking account of Roma in the

health and social services centres supports equal access to services and the work ability of the working-age population and, consequently, promotes access to employment.

| 16. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Providing work ability support teams with training in the wellbeing services counties in taking account of Roma in plans and accounts concerning activities. Paying attention to the realisation of equality and also taking account of stay-at-home parents. | Ministry of Social Affairs and Health, RONK, wellbeing services counties' work ability teams, THL, municipalities, ARONK, Roma organisations. | Regular training/webinars for work ability teams working in the wellbeing services counties. In conjunction with training, surveying the attitudes and intercultural interaction skills of the teams. |

Digital skills and media literacy are important indicators of equality and inclusion. Research (THL) shows that increasing digital services may further increase disparities in society. People who are more vulnerable in terms of finances, health and social position are at risk of being excluded from important services they need. Digital exclusion does not apply only to ageing Roma population. Instead, it must also be ensured for families and working-aged Roma that digital exclusion does not take place. Digital skills are also regarded by the EU framework programme as key to ensuring equality.

| 17. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Ensuring equal access to digital services by increasing digital skills and media literacy training aimed at the Roma population. | Liberal adult education, folk high schools, adult education centres, other educational institutions and organisations, Ministry of Education and Culture, ARONK. | Amount of digital training aimed at Roma per year. Qualitative monitoring of target group reach and effectiveness of training. |

The implementation of the Government key programme to address reform in services for children and families started during the 2016–2019 government term and continued under the subsequent government programme in 2020–2023. The programme develops support for the everyday lives of children, young people and families especially through family centres. The programme aims to provide children, young people and families with early support and to strengthen their wellbeing, stop the growing inequality trend, and ensure the high quality, timeliness and accessibility of preventive and remedial services.

The family centre activity is a key element of the programme. A family centre is a multidisciplinary service network promoting the wellbeing and health of children, young people and families and providing early support, care and rehabilitation. The family centre is not necessarily a specific building. Instead, its services may be provided in various ways in the area. The family centre consists of the services as well as early support, care and rehabilitation services aimed at children, young people and families promoting their health and wellbeing as well as growth and development. The family centre is where families receive services. The family centre coordinates the services and activities of municipalities and joint municipal authorities as well as civil society organisations and parishes (THL).

The stakeholder work preparing ROMPO 3 identified supporting Roma families as one of the most important and key objectives. It is essential to explore, in conjunction with the implementation of the key programme to address reform in services for children and families, Roma families' obstacles to seeking services and service accessibility in order to develop professional family work in cooperation with the authorities and Roma organisations and others engaged in family work with Roma. Improving issues relating to the family also emerged as essential with regard to Eastern European Roma. The actions presented in this section must also be applied to them as appropriate.

In 2017, the Centre of Excellence on Social Welfare in Central Finland conducted a study on Roma children, youth and families as part of the programme to address child and family services. (Boelius, 2017) This report requires an update to reflect the current structures and objectives of health and social services and the needs of Roma families.

| 18. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Identifying the service needs, obstacles to seeking services and access to services among Roma families by means of an action-oriented and multiprofessional study in cooperation with Roma organisations. Developing professional family work taking account of Roma. | Ministry of Social Affairs and Health, THL, family centres, maternity and child health clinics, parishes. | The report on the situation of Roma families, service accessibility and seeking of services is completed and serves as a basis for the development of professional family work with Roma. Accessibility of services among Roma families has improved and professional family work has been developed. Conducting a qualitative assessment. |

The aim is also to examine the diversity of Roma families and, on the other hand, dispel myths about communal responsibility and care. Prejudices against Roma in the service system, too, must be identified and recognised to provide equal services.

| 19. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Ensuring that the situation of Roma families is taken into account and embedded into the family centre activities of the health and social services centres. Particular attention must be paid to stay-at-home and young parents. | Ministry of Social Affairs and Health, Regional State Administrative Agencies, family centres of wellbeing services counties, THL, Roma organisations, ARONK. | Roma families are reflected in strategies and action plans for the development of family centre activities. |

Increasing awareness of the responsibilities of individuals and families is part of the support aimed at young families in particular. On the one hand, this involves the education of young people and families taking place within the Roma community relating to family life and the rights of the child, in particular to ensure a safe childhood. The National Action Plan for Safety Promotion among Children and Youth for 2020–2025 points out how childhood experiences have long-term effects on life and health throughout the course of life. Experiences of insecurity, violence and abuse have been reported in studies to have a later association with unhealthy behaviours. Bullying, ostracism and discrimination of children are often experienced by children whose ethnic origin differs from the mainstream population.

Challenges relating to family life and child rearing occur in society in many forms and among all groups, including ethnic and cultural minorities. For minorities, the situation is made challenging by problems relating to seeking services and accessibility of services. According to THL, violent acts may be physical, mental or communal by nature, for example. Violence may also take the form of preventing another person's basic needs being met or neglecting them. Violent interpersonal relations usually involve multiple forms of violence and there may be multiple perpetrators.

The UN Convention on the Rights of the Child requires that the States Parties make the Convention widely known to adults and children alike. Awareness of the rights of the child promotes the wellbeing of children. Finland is signed up to the UN and Council of Europe human rights conventions, including the Istanbul Convention and the Lanzarote Convention, from the perspective of the realisation of the rights of children and women, which means Finland must assess the realisation of obligations under the human rights conventions, including developing services for victims and perpetrators of violence equally so that the accessibility of services among minorities is also realised.

An action-oriented study or survey is recommended for the action proposal. A practical action focus makes actions taken to address problems immediately visible to the Roma population, in which case the study or survey is not a separate investigation but, instead, efforts are made to address issues as soon as they emerge.

| 20. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Increasing awareness among the Roma community of safe childhood and domestic violence and improving the accessibility of services to victims. Mapping out the situation and drawing up proposed measures on the basis of an action-oriented study. | THL, Ministry of Social Affairs and Health, RONK, Roma organisations. | Awareness has been increased through training and information provision. An action-oriented study means collecting information in conjunction with the various forms of work and planning further development measures based on the information obtained. Conducting an assessment of the effectiveness of the action-oriented study and the further measures. |

7.4 Ageing Roma population

This section presents actions concerning the ageing Roma population that contribute towards safeguarding the position and service access of ageing Roma. It should, however, be noted that, in addition to this, the ageing Roma population must be taken into account also in other sections of ROMPO 3 where relevant and necessary. It is also important to take account of the ageing Roma population in the National Programme on Ageing (Ministry of Social Affairs and Health, 2020) and future quality recommendations for work relating to the ageing.

There is a stereotype in Finland that the Roma population look after their older members, and this is also a common perception at the societal level. Communal culture does not, however, mean that there is no need for services for older people among the Roma population. The Government Action Plan Combating Racism and Promoting Good Relations between Population Groups addresses discrimination at the various ages, and this also includes the ageing Roma population. The Report of the UN Independent Expert on the enjoyment of all human rights by older persons, Claudia Mahler, on Finland (2022)

recommends that the Government pay increased attention to the particular needs of older Roma in access to health services.

Finland's structural reform of health and social services transfers the health and social services of older persons to the wellbeing services counties, with the exception of the City of Helsinki. The responsibility for organising health, social and rescue services is transferred to the wellbeing services counties, and duties relating to promoting health and wellbeing are carried out in cooperation with many different actors. With regard to the ageing Roma population, it is also important to take account of the roles of the municipalities and wellbeing services counties as service providers, and to examine the relevant interfaces and cooperation particularly from the perspective of the realisation of equality. Members of the ageing Roma population should be included in the councils for older people to gain up-to-date information on the situation of the ageing Roma population and for Roma to be heard.

The Ministry of Social Affairs and Health and the Association of Finnish Local and Regional Authorities have issued a quality recommendation for the development of services for older persons and to serve as an evaluation tool. The quality recommendation aims to guarantee a good quality of life and effective services for older persons in an age-friendly society. The National Programme on Ageing and the quality recommendation for services for older persons are in line with each other and support a good quality of life for the ageing. Provisions have also been included in Finnish legislation on the Resident Assessment Instrument (RAI) to be used in the assessment of the functional capacity and service needs of older persons. The municipalities must take the RAI system into use on 1 April 2023 at the latest. To be introduced for nationwide use, the RAI system increases equality and enables the availability of comparable data.

There has been relatively little work with older people covering the ageing Roma population. A project involving work with older persons funded by the Funding Centre for Social Welfare and Health Organisations (STEA) has been implemented in the Helsinki Metropolitan Area. The project implementer, the Finnish Roma Association, reports that there are around 350 older Roma persons in the Helsinki Metropolitan Area, with around 150 of them, mainly women living alone, included in project activities. A large percentage of the clients live on basic pension and housing allowance and therefore belong to the poorest section of the population. Older Roma are often not understood in healthcare and other services, and their capacity to use digital services is low. As regards the ageing, structural inequality and discrimination can be seen clearly in contexts such as housing issues. The ageing Roma population need increasing access to societal services for a meaningful and safe everyday life. Their need for services such as service housing with 24-hour assistance has increased. A service needs assessment must be carried out without delay for Roma, too, and services must be organised in a culturally sensitive manner.

Municipal activities relating to older persons are currently being developed towards increased cultural sensitivity, particularly in municipalities with a diverse resident profile. Older Roma are, however, often ignored in these development projects. A new central government authority, the Ombudsman for Older Persons, was established at the beginning of 2022. The duties of the Ombudsman are laid down in the Act on the Ombudsman for Older People (753/2021). The Ombudsman is an independent and autonomous authority tasked with promoting and assessing the realisation of the fundamental and human rights of older persons in legislation and societal decision-making. The key themes of the quality recommendation for work with older persons are promoting the functional capacity of older people; increasing voluntary work; utilising digitalisation and technologies; developing housing and residential environments; organising and providing services; arranging client assistance and service coordination for clients; ensuring skilled personnel who thrive in their work; and ensuring the quality of services.

Older Roma persons and their position in Finnish society should be taken into account in municipal strategies and action plans concerning older persons. EU mobile Roma also include older persons whose wellbeing should be looked after. The Social Welfare Act (1305/2014) requires that linguistic, cultural and religious background is taken into account in the service system. The EU Roma strategic framework recommends measures to combat inequality relating to access to healthcare services in particular. The digital exclusion of Roma should be prevented by measures including closing the gap in digital skills that enable access to health information. The digitalisation of services must be taken into account in work with older Roma, and access to services must be ensured. In addition, the EU framework recommends measures to ensure that Roma have access to community- and family-based services provided for persons with disabilities, older persons and children deprived of parental care, such as social housing, day activities for persons with disabilities and networks of foster parents.

| 21. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| <p>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. Employing outreach methods to reach the ageing Roma population. Formulating an action plan on the basis of the study.</p> | <p>THL, Ministry of Social Affairs and Health, RONK, municipalities, Roma organisations.</p> | <p>Study conducted to implement a knowledge-based action plan.</p> |

The study makes use of the municipalities' accounts on wellbeing and, when collecting data on the Roma population to promote wellbeing, efforts should be made to use the same indicators as for the mainstream population to generate comparative data on wellbeing. The action plan must be aligned as much as possible with the inter-administrative and action-oriented National Programme on Ageing and the planned quality recommendation for services for older persons.

The strategies of the wellbeing services counties, too, not just those of the municipalities, must reflect the equality of the different population groups and the recognition of their special characteristics.

| 22. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Based on the study of the services for ageing Roma population, implementing an action plan and monitoring the implementation of the plan. | THL, Ministry of Social Affairs and Health, RONK, Roma organisations. | The implementation of the action plan will be monitored and reported on. |
| 23. Action proposal | Cooperation partners | Monitoring |
| Increasing cooperation between those whose activities involve working with ageing Roma to mainstream the actions. | Ministry of Social Affairs and Health, THL, Ombudsman for Older Persons, wellbeing services counties, municipal services for older persons and for persons with disabilities, Finnish Association for the Welfare of Older Adults, ARONK, PRT. | Issues concerning older Roma have received attention in national and local work with older persons and progress made in taking them into account is reported on annually. |
| 24. Action proposal | Cooperation partners | Monitoring |
| Developing approaches that prevent older Roma from dropping out of the digital service system. | Ministry of Social Affairs and Health, municipalities, wellbeing services counties, Finnish Association for the Welfare of Older Adults, ARONK, Roma organisations. | Challenges arising from digitalisation in the lives of older Roma have been taken into account, they have been reported on and measures to improve the situation have been taken. |

| 25. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| The housing of and housing services for ageing Roma are taken into account in organising services for older persons and in the future implementation of the National Programme for Ageing. | Ministry of the Environment, Ministry of Social Affairs and Health, RONK, municipal housing activity and wellbeing services counties' services for older persons and for persons with disabilities, Office of the Non-Discrimination Ombudsman. | Housing-related challenges of the ageing Roma population have been taken into account particularly from the equality and non-discrimination perspective. |
| 26. Action proposal | Cooperation partners | Monitoring |
| Developing activities increasing inclusion and forms of participation among older Roma population to prevent loneliness and memory-related disorders. | Municipalities, civil society organisations, parishes, ARONK. | Regular and active activities have been organised for ageing Roma population. Where possible, inclusion indicators are used in the monitoring of the activities. |

7.5 Particularly vulnerable persons

When implementing social welfare, attention must be paid to the best interests of clients in need of special support. A person in need of special support means a person with special difficulties relating to seeking and receiving the health and social services they need and support relating to education, training and learning. A person may be in a situation where they are unable on their own to seek the help they need or access to help is at risk of being prevented because the person is incapable of sufficiently proving or receiving the information required to access help. The difficulties may be due to a cognitive or psychological condition, a serious substance abuse problem, multiple simultaneous support needs, or other corresponding reasons. Such other reasons may include a lack of language skills combined with traumatic experiences. Service needs are assessed based on individual differences and needs. This group may include persons in need of special support who are experiencing multiple discrimination. The implementation of the ROMPO 3 programme is based on an intersectional approach taking account of multiple factors and covers all of the groups mentioned in the EU Roma strategic framework as well as other groups within the Roma community. Drawing attention to the discrimination of Roma with disabilities is an important element in the oversight of health and social services. There is an Advisory Board for the Rights of Persons with Disabilities (VANE) operating under the Ministry of Social Affairs and Health.

| 27. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| 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. Seeking to include Roma with disabilities in the Handbook on Disability Services. Taking the lifecycle model into account in conjunction with services for Roma with disabilities, too. | Ministry of Social Affairs and Health, RONK, Advisory Board for the Rights of Persons with Disabilities (VANE), THL, municipalities, wellbeing services counties and their councils for people with disabilities, Roma organisations. | Data based on experiences of Roma with disabilities concerning accessibility of services has been collected. A cooperation body (such as a network) focusing on supporting the position of Roma with disabilities that generates data based on expertise by experience has been established. |

The following action proposals of this section are based on the National Mental Health Strategy 2020–2030 and the Substance Abuse and Addiction Strategy: Joint guidelines until 2030.

The National Mental Health Strategy in accordance with the Programme of Prime Minister Sanna Marin's Government was published in early 2020. Effective until 2030, the strategy aims to ensure the continuity and goal orientation of mental health work (Ministry of Social Affairs and Health).

The Substance Abuse and Addiction Strategy provides the priorities and guidelines for joint development work until 2030. Underlying the strategy is the identified need to provide more comprehensive guidance for the prevention and treatment of risks, adverse effects and problems relating to alcohol, tobacco, drugs and gambling (Ministry of Social Affairs and Health).

The section on particularly vulnerable persons applies to a relatively small percentage of the Roma population, a marginal group within a marginal group in society, and it is therefore very important to conduct a study on the realisation of equality in their seeking of access to services and their access to services. In this context, an action-oriented study means a combination of the implementation of practical work and collection of data for the study. The study must result in knowledge-based measures being developed.

| 28. Action proposal | Cooperation partners | Monitoring |
|---|---|--|
| Conducting an action-oriented study on the accessibility of mental health and substance abuse services among Roma and the challenges relating to seeking access to them, taking account of nationwide coverage. | Ministry of Social Affairs and Health/RONK, THL, in cooperation with Roma organisations, Regional State Administrative Agencies, ARONK. | Challenges in accessibility of and seeking access to mental health and substance abuse services have been studied and necessary measures have been proposed. |

Preventive substance abuse services support abstinence from intoxicating substances, reduce the risk factors involved in substance abuse and strengthen the person's resources and wellbeing. Social welfare and other mental health and substance abuse services must form a functional whole for the client, and challenges involved in seeking access to services and, on the other hand, the functional whole formed by the services, must also be examined with regard to Roma.

Mediation in criminal and civil cases is part of central government health and social welfare services, with the Finnish Institute for Health and Welfare (THL) responsible for developing these services. Mediation in criminal and civil cases is a service for the parties to a crime or dispute where external mediators assist in addressing an issue. Taking part in mediation is voluntary and free of charge to the parties. The parties are able to influence the consideration of and decision on their case. The mediators are tasked with ensuring that both parties accept the mediation outcome. The parties may discontinue the mediation at any point. The mediation office considers separately for each dispute or crime whether it can be settled through mediation. It assesses the situation as a whole, taking account of factors such as the nature and method of the offence as well as the relationship between the parties.

The Act on Conciliation in Criminal and Certain Civil Cases (1005/2005) entered into force on 1 January 2006. An amendment to the Act entered into force on 1 January 2016. The key sources of law concerning mediation are Act 1005/2005 and Act 680/2015 amending it. Mediation opportunities should also be used for Roma in the same way as for the mainstream population.

| 29. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Making mediation part of the development of social support and service models for work with Roma involved in crime. | Ministry of Social Affairs and Health, THL, municipalities, Ministry of Justice, Roma organisations. | Mediation and restorative justice have become part of Roma-specific work. |

Roma organisations have competences and effectiveness providing long-term support to municipal and central government services. Action against violence and Roma-specific work with prisoners must be developed to enable the dissemination of consistent and coordinated approaches. Particular attention must be paid to training peer actors, seeking synergies, and equality in work in prisons. The task is challenging and calls for cooperation across the boundaries of administrative branches.

The two action proposals included in ROMPO 2 for 2018–2022 that were not completed or implemented have been merged into one action in the proposal below.

| 30. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Developing, and coordinating nationally, work relating to substance abuse, violence and prisoners carried out with Roma that takes the different age groups into account. Training peer actors and professionals. | Ministry of Justice, Ministry of Social Affairs and Health, Prison and Probation Service of Finland, THL, municipalities, wellbeing services counties, Roma organisations, Church prison and substance abuse work. | National approach and coordination have been created for substance abuse, violence and prison work carried out with Roma. Awareness among professionals and actors providing assistance of the situation of Roma has increased following training. Monitoring based on the number of training sessions and the development of the national operating model. |

8 Improving education and training level of Roma

The education and training path of Roma in Finland is short and narrow compared with that of the mainstream population. Low education and training level further hinders integration into the labour market and overall social inclusion in the various spheres of life. Obstacles to access to general upper secondary and higher education still persist. Studies by the Finnish National Agency for Education (Rajala et al., 2011 and Rajala & Blomerus, 2015) report that there are no longer obstacles to access to vocational education and training. The gap between Roma pupils and all pupils completing primary and lower secondary education in terms of seeking access to further studies was already quite small at the national level more than a decade ago. The majority of all Finnish students continuing their studies went to general upper secondary schools, whereas only a few Roma students chose this path. Vocational education and training is attractive among young Roma. Today, obstacles are seen specifically in the context of young Roma continuing to general upper secondary education and further to higher education.

Work is taking place to remove these obstacles both at various levels of educational institutions and within the Roma community to create a more positive attitude towards education. Guidance counselling plays an important role in making education and training paths smoother, as the School Health Promotion Study shows that taking the special guidance counselling needs of the various minority groups into account was regarded as important. The recent expansion of the scope of compulsory education to the age of 18 must be taken into account in measures supporting the education and training of Roma.

A study commissioned by the Discrimination Monitoring Group of the Ministry of Justice (Ministry of Justice 21/2015) shows that challenges relating to the realisation of equality still remain in education. Subsequent studies and reports also indicate the occurrence of inequality in education and training. Particular attention should be paid to making use of diverse teaching and assessment methods. According to the study, a clear area in need of improvement is cooperation with employers. Discrimination in conjunction with familiarisation with working life in basic education and in on-the-job training in vocational education and training was fairly widespread. Employers have refused to accept, in particular, young people of immigrant origin and young Roma, but discrimination has also affected young people with disabilities.

Increasing the level of education and training and working life are closely interlinked, and if students do not believe in their labour market opportunities regardless of education and training, this affects their eagerness to pursue education and training. This is why education, training and working life must be examined as interlinked areas and as part of the horizontal equality principle of Finland's National Roma Policy. Attention must be paid to gender equality particularly in themes relating to education and training: it is important to raise the level of education and training of men and women alike.

According to the School Health Promotion Study (THL, 2021), 77% of pupils in grades 4 and 5, 58% of pupils in grades 8 and 9, 66% of students in general upper secondary education and 77% of students in vocational institutions in Finland enjoy going to school. According to a report by the Office of the Ombudsman for Children, 67% of Roma pupils enjoy school quite a lot or a lot, while one in four enjoys school occasionally and just under one in ten never enjoys school (Weckström et al., 2023). An earlier study by the Finnish National Agency for Education found that the majority of Roma pupils did not have problems with enjoying school, but many problems appeared to have accumulated on about one fifth of pupils. (Rajala et al., 2011.)

According to the Office of the Ombudsman for Children, one in three Roma children and young people does not hope for any changes relating to school. One in five, however, would like to see an attitude change among teachers. Children and young people hope, for example, to be taken seriously with regard to studies as well as discrimination situations at school. Receiving individual support and being encountered as equals is a clear wish expressed by Roma children and young people. (Weckström et al., 2023). Roma children and young people also suggest a change in values and attitudes as a solution, and this is something schools have the opportunity to address. Safeguarding these basic needs can be expected to result in also facilitating learning.

8.1 Early childhood education and care and pre-primary education

Early childhood education and care is an equal and statutory right of all children. The inclusion rate of Roma children in early childhood education and care services is lower than the general inclusion rate among the child population. Cooperation to address this takes place with maternity and child health clinics in municipalities to inform Roma parents and guardians of the opportunity to take part. The action proposal relating to early childhood education and care arises from the 2020 report of the Finnish National Agency for Education on Roma children in early childhood education and care and

pre-primary education in 2018–2019. The report examined the participation of Roma children and took account of the views of staff and parents alike.

Under section 26a of the Basic Education Act (628/1998), a child must attend one-year pre-primary education or other activity that achieves the objectives of pre-primary education during the year preceding the beginning of compulsory education (in the year the child turns seven). Four in five Roma children also take part in early childhood education and care. (Rajala & Schwartz, 2020). Even though the situation concerning early childhood education and care and pre-primary education is quite good, actions to ensure positive development are still required.

| 31. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Including cultural diversity, including Roma culture, in the continuing professional development of early childhood education and care and pre-primary education staff. | Ministry of Education and Culture, municipalities, universities, EDUFI for content production. | Roma children's culture and position have been taken into account in the education and training of early childhood education and care and pre-primary education staff. The amount of training and quantity assessment have been included in the monitoring indicator. |

8.2 Primary and secondary education

The recent extension of compulsory education to the age of 18 requires that, going forward, attention is paid to flexible access for Roma pupils to the next level in primary and lower secondary education. According to the Ministry of Education and Culture, the objective of extending compulsory education is to raise the level of education and competence at all levels of education, to bridge learning gaps, to improve equality and non-discrimination in education and to enhance the wellbeing of children and young people. Compulsory education after primary and lower secondary education mostly takes place in general upper secondary education or vocational education and training. Compulsory education can also be completed through transition phase education between lower secondary and secondary education. From autumn 2022 onwards, the previous transition stage education, voluntary additional basic education (grade 10), preparatory education for general upper secondary education (LUVA) and preparatory education for vocational education (VALMA) are combined into preparatory education for an upper secondary qualification (TUVA). Compulsory education can also be attended

in education and training aimed at persons within the scope of compulsory education provided by adult education centres. Students who require demanding special support may complete their compulsory education in preparatory education for work and independent living (TELMA).

In 2021, the Ministry of Education and Culture published the Interim Report of the Right to Learn working group on the preparation of measures to promote equality in education and positive discrimination in early childhood education and care, pre-primary education and comprehensive school education. Some pupils need intensified personal study guidance (section 11a of the Basic Education Act) in seeking access to studies after basic education, and this also applies to some Roma pupils under the Act.

Published in May 2022 by the Finnish National Agency for Education (EDUFI), the guide to intensified guidance counselling takes account of Roma pupils as follows: "Guidance counselling for young people belonging to a minority (such as Roma and immigrant background) must have a greater focus than usual on cooperation between the home and the school."

When paying attention to equality in education and training, some Roma background students also need intensified personal guidance. Due to these national measures and focus areas, and as the action remains in part not completed following ROMPO 2, the action below is carried over to ROMPO 3.

| 32. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Taking the needs of Roma children and young people into account in the development of guidance counselling and student welfare services, and enhancing the pupils' personal guidance counselling in basic education. | Ministry of Education and Culture, EDUFI, municipalities, Roma organisations and other education and training actors. | Roma pupils have been taken into account in intensified guidance counselling. Examining the effectiveness of intensified guidance counselling on the basis of, for example, increases in and development of cooperation between schools and families in accordance with the guide to intensified guidance counselling. |

To implement the above action, resources must be targeted at national development of coordinated guidance counselling for young Roma. The aim is network-like cooperation to, above all, disseminate information and, that way, to expand the occupations and

professions that Roma-background students seek to enter. Digital opportunities are utilised in developing the activity.

| 33. Action proposal | Cooperation partners | Monitoring |
|---|--|--|
| Developing a nationally uniform approach to guidance counselling for Roma pupils and developing the guidance counselling of Roma pupils in cooperation, expanding the knowledge base. Monitoring the development of education and training paths. | Ministry of Education and Culture, EDUFI, municipalities, ARONK, Roma organisations. | A coordinated, uniform approach to guidance counselling for Roma pupils has been developed and access of Roma students to general upper secondary education and the different occupations and professions is monitored during the operating period. Monitoring methods and opportunities to increase information on education and training paths and seeking entry to different occupations and professions have been developed in guidance counselling for Roma pupils. |

The EU Roma strategic framework recommends measures to increase awareness among teachers and other school staff of Roma history and cultures, methods to identify and combat discrimination and its root causes, including antigypsyism and unconscious prejudices and of the importance of discrimination-free and effectively equal access to mainstream education. Regardless of 500 years of history of Roma in Finland, awareness of Roma issues is still low. The need for more information on the position of Roma in Finland has emerged in contexts including training aimed at universities of applied sciences and universities. For efforts to increase awareness not to be random, a more systematic approach is required in increasing awareness. Roma as part of Finnish society should be taken into account in primary and lower secondary education, secondary education, vocational institutions and higher education institutions as part of mainstream education. This is why a review should be conducted of information and mentions of Roma in the various study materials and, on the basis of the review, the measures necessary to promote awareness should be taken. The action is carried over from ROMPO 2.

| 34. Action proposal | Cooperation partners | Monitoring |
|--|---|---|
| Implementing a project to review the sections on the Roma in basic education and vocational education materials, and making proposals for improving these contents. | Ministry of Education and Culture, EDUFI, municipalities. | The review has been conducted. |
| 35. Action proposal | Cooperation partners | Monitoring |
| Based on the review of study materials, increasing the awareness of producers of study materials of Roma-related issues and, where possible, taking account of the improvements and additions concerning study material covering Roma proposed by the review report. | Ministry of Education and Culture, EDUFI, municipalities. | Implementation of the action proposals. |

Increasing the awareness of the mainstream population of the position and shared history of Roma requires that curricula and study materials cover Roma. Many sections of ROMPO 3 include the aim of increasing information for the various actors. This need can be met by making information accessible to every student and pupil.

The action proposal included in ROMPO 2 for the National Agency for Education (EDUFI) to organise a series of information events for Roma on how to seek access to adult basic education and on the support available for these studies in cooperation with adult basic education providers and various actors requires further specification. Challenges in seeking access to adult basic education have emerged particularly for Roma prisoners. Although a small group in terms of percentage, the unequal treatment of Roma-background prisoners has also been pointed out by international human rights organisations (such as in UN human rights reports). Positive action is required for the equal opportunity of Roma prisoners to complete their basic education to be realised.

In its statement (19/2016) the Parliamentary Education and Culture Committee emphasised that research shows education and training to be one of the best ways of addressing recidivism. It is possible to participate in basic education, general upper secondary education and vocational education and training in penal institutions. The purpose of a prison sentence is to increase the prisoner's preparedness for a crime-free lifestyle and to prevent offences during the sentence. In this, education and training can play a major role.

Education and training provided in prisons is within the administrative branch of the Ministry of Education and Culture and primarily based on national legislation and its application (EDUFI, education and training organised in prisons). Completing basic education is an objective concerning persons serving a sentence that supports other actions to prevent a cycle of crime.

| 36. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Ensuring access to basic education on the basis of positive action for Roma-background adults serving a prison sentence who have dropped out of basic education and developing ways to monitor the equal accessibility of education and training provided in prisons. | Ministry of Education and Culture, EDUFI, municipalities, Prison and Probation Service of Finland, education and training providers, Roma organisations, Office of the Non-Discrimination Ombudsman. | Measures have been developed to support the schooling of Roma-background prisoners. |

8.3 Higher education

The number of Roma entering higher education has been gradually increasing, and a more positive attitude towards education has grown based on the outcomes and conclusions of a broad project to develop the education and training and access to employment of Roma implemented during the ROMPO 2 programme period (Mäenpää et al., 2018). However, a report published in 2015 (Rajala & Blomerus, 2015) showed that only 8% of the Roma respondents had completed a degree at a university applied sciences or a university. The data in the report is out of date and does not reflect the current situation, and it is estimated that the number of Roma with a higher education degree is increasing. Peer learning and support have proved to be important elements in support for access to higher education. It is essential that the planning of the path towards access to higher education is based on collected data and experience. The aim should be to increase general upper secondary education among Roma, as this naturally results in increases in higher education studies (Guide to general upper secondary education for Roma, Finnish National Agency for Education, 2018). Raising the education and training level is also important for equality in working life to be realised.

| 37. Action proposal | Cooperation partners | Monitoring |
|---|--|--|
| Developing and continuing the deployment of the national operating model to support Roma education paths to higher education, making use of the experiences and information from the Romako project of Diaconia University of Applied Sciences (DIAK), paying attention to prospective students considering a broad range of disciplines. | Ministry of Education and Culture, vocational/higher education institutions, municipalities. | The number of Roma with a higher education degree has increased. |

8.4 Vocational education and training

As stated above, the education and training path of Roma has been short and narrow. Due to existing obstacles and challenges, increased attention should be paid to vocational qualifications (basic, further and specialist vocational qualifications) and to studies at liberal adult education institutions (such as folk high schools and adult education centres). This supports the lifelong learning objective of the EU Roma strategic framework and, on the other hand, helps to lower the obstacles to seeking access to higher education.

For example, many young Roma-background people have completed studies in the competence area of Roma-specific work as part of a Further or Specialist Qualification in Education and Guidance. Increasing vocational education and training among the Roma population supports access to employment. Making education and training paths longer and broadening the fields of study calls for small steps forward in study environments that Roma regard as accessible.

| 38. Action proposal | Cooperation partners | Monitoring |
|---|--|--|
| Communicating education and training opportunities. Encouraging Roma to complete further and specialist vocational qualifications nationwide and targeting the training provision of liberal and other adult education institutions at the Roma population. | EDUFI, municipalities, education and training providers, Roma organisations, ARONK, PRT. | Increases in the number of vocational qualifications and courses targeted at Roma in liberal and other adult education institutions. |

9 Improving access of Roma to employment and reducing income disparities

Employment was already a strong focus area in the previous National Roma Policies (ROMPO 1 and ROMPO 2). In 2019, the Ministry of Economic Affairs and Employment published a report on employment, entrepreneurship and labour market integration of Roma (Jauhola et al., 2019). According to the report, access to employment among Roma has improved although discrimination still persists. The increased level of and positive attitude towards education and training have improved their access to employment and their labour market position. The report shows that unemployment among Roma is still higher than among the mainstream population. Typical factors preventing and slowing access to employment include a low education and training level, shortage of work experience and discrimination in the labour market.

The Government Action Plan for Combating Racism includes the guideline to “increase diversity in working life methodically and enhance anti-discrimination measures in recruitment”. The Government Action Plan provides strong support for the objectives of the National Roma Policy to promote access to employment among Roma.

The working life diversity programme of the Ministry of Economic Affairs and Employment includes numerous measures to increase employees’ diversity competence. The aim is for the programme to improve competence and understanding relating to racism and discrimination in the public sector and in public services promoting access to employment. The Ministry’s programme contains measures to reduce structural discrimination and racism in the labour market by increasing the awareness of workplace communities of the benefits of diversity and by increasing recruitment, management and other competence relating to diversity and inclusiveness in working life.

Measures to combat discrimination in recruitment and to promote anonymous recruitment are also included in a cross-cutting manner in the programme measures. The target group of the diversity programme is employers and workplaces. The working life diversity programme is mainly aimed at immigrants, but Roma also benefit from the diversity programmes targeted at employers, especially at the municipal and wellbeing services county sectors and in health and social services. The wish to see

Roma-background staff in labour market services and service systems was expressed during the preparation of ROMPO 3 in open working groups.

Unemployment is still common among Roma, and this maintains multigenerational poverty and increases income disparities. Reducing poverty is part of the implementation of the European Pillar of Social Rights of the EU. Reducing poverty calls for broad-scale societal policy and long-term cooperation between the various actors.

According to a report by the Office of the Ombudsman for Children, the thoughts of Roma children and young people on working life are part of their lives through their parents and guardians but also with regard to their own future. Aspirations of most of the Roma children and young people participating in the study relate to work and are highly diverse with regard to, for example, the education and training required, with professions requiring a university degree as well as occupations requiring a vocational qualification included in their aspirations. Almost all of the Roma children and young people responding had a neutral or positive attitude towards the extension of compulsory education. (Weckström et al., 2023) This indicates that the young people were in any case planning to continue to secondary education.

The report shows fear of the future as the second most common fear of the children and young people. This includes fears related to life in general, getting a job, the future and becoming an adult. Fear of the future is experienced by around one in five, with fewer than this reporting fear of issues such as war, their own death or the death of someone close to them, or COVID-19. To improve the employment rate, it is essential to increase children and young people's confidence in the future and self-esteem so that they will dare and feel able to pursue their plans for the future.

| 39. Action proposal | Cooperation partners | Monitoring |
|--|---|---|
| Including Roma clearly in societal policy debate on poverty reduction and taking Roma into account in debate on diversity in society and working life. | Ministry of Economic Affairs and Employment, Ministry of Justice, municipal employment authorities, vocational institutions and universities of applied sciences. | Actors have increased attention to Roma in societal policy debate on poverty reduction and diversity in working life. |

9.1 Ensuring smoother access to practical training as part of the expansion of compulsory education

Objective 1 of the Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups – identify and dismantle the structures in society that contribute to inequality – is also in line with the horizontal objective of the EU Roma strategic framework. The Government Action Plan takes account of racism and discrimination in their various forms and in the various stages of life. The Action Plan draws attention to discrimination in practical training and recruitment. Practical training is the first point when people gain work experience. The first experience is particularly important in the life of a young Roma.

| | | |
|--|---|---|
| <p>40. Action proposal</p> <p>Developing further and deploying support measures to enable the practical training of Roma, making use of experiences from the Romako project.</p> | <p>Cooperation partners</p> <p>Ministry of Economic Affairs and Employment, Ministry of Justice, EDUFI, educational institutions, DIAK</p> | <p>Monitoring</p> <p>Carrying out an assessment of the effectiveness of the support measures that examines the accessibility of practical training periods among Roma.</p> |
| <p>41. Action proposal</p> <p>Establishing locally small-scale projects supporting employment that are able to respond to the needs of Roma in the location/area and influence local employers.</p> | <p>Cooperation partners</p> <p>Ministry of Economic Affairs and Employment, municipalities, ARONK, PRT.</p> | <p>Monitoring</p> <p>Examining the number of projects implemented regionally each year and assessing their effectiveness on the basis of the number of persons who have accessed employment.</p> |
| <p>42. Action proposal</p> <p>Implementing a national project to promote the non-discrimination of Roma in working life and recruitment.</p> | <p>Actors</p> <p>Ministry of Economic Affairs and Employment, Ministry of Justice, ARONK, municipalities, Roma organisations and actors, vocational institutions and universities of applied sciences.</p> | <p>Monitoring</p> <p>The project has been implemented and its media visibility has been monitored (metadata) to ensure dissemination of information.</p> |

The path to employment for many young Roma comes to an end already at the point when they apply for a practical training place, and this has far-reaching consequences for their future employment path. In the employer pool of the Romako project, employers are encouraged to offer a certain number of practical training opportunities each year that are earmarked for young Roma. In addition, local projects to facilitate access to employment are able to map out the needs of local Roma and act accordingly. This action also applies to Europe's mobile working-age Roma population.

9.2 Tackling discrimination and prejudice in the labour market with means promoting employment

The report of the Ministry of Economic Affairs and Employment (Jauhola et al., 2019) also showed that tailored measures can be aimed at different target groups. This, however, requires that the target group is known, and the Roma are a relatively unknown target group. With regard to accessibility of services, the recruitment of Roma-background staff for labour market services plays a key role. In addition to this, awareness of the working life situation of Roma should be increased among those working in employment issues. Prejudices must also be tackled in the activities of employment authorities to make labour market services more accessible to Roma and more reflective of their needs.

| 43. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Tackling discrimination in the labour market by increasing cooperation, concrete measures and broader visibility of the theme. | Ministry of Economic Affairs and Employment, municipalities, labour market organisations and trade unions. | Concrete measures to tackle discrimination encountered by Roma in the labour market have been developed in cooperation. |
| 44. Action proposal | Cooperation partners | Monitoring |
| Organising annual and coordinated training events nationally for employment authorities with regard to the working life situation of Roma. | Ministry of Economic Affairs and Employment, municipalities, Roma organisations, trade unions. | Training for employment authorities organised annually. Number of training events as an indicator and training feedback questionnaires as a qualitative indicator. |

9.3 Discrimination in the labour market and collecting data on experiences

Since it is challenging to gain numerical data on Roma employment and since discrimination experienced in recruitment and working life is rarely exposed in discrimination cases, different ways of demonstrating the situation must be explored. Data generated by Roma themselves on their life and experiences is vitally important.

It is also important to collect information produced by Roma themselves on working life and access to employment. Roma as producers of information are often not taken into account when planning action plans and strategies affecting them. The principle of inclusion and participation includes that the people affected by the activity also get to influence the contents.

| 45. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Collecting and publishing Roma experiences of education, training, recruitment and working life as well as societal inclusion and communicating the experiences broadly. | RONK, Finnish Literature Society, Roma organisations. | Output: Narratives of Roma on inclusion in working life and society. |

10 Solving housing-related challenges

ROMPO 2 states: “The housing conditions of the Roma population have improved thanks to previous specific measures taken by the State. The standard of housing among the majority of Roma corresponds to the average Finnish standard (ROMPO 2, p. 45)”. The extent of the housing problems among Roma is, however, encountered almost on a daily basis in the work of the Advisory Boards on Romani Affairs, the Non-Discrimination Ombudsman and Roma organisations. The majority of complaints made by Roma to an Advisory Board or the Office of the Non-Discrimination Ombudsman relate specifically to housing. According to the Finnish Fundamental Rights Barometer, more than half (53%) of the Finnish respondents would find it uncomfortable living next door to Roma. The housing-related section of ROMPO 3 is largely the same as in ROMPO 2, but the action proposals and perspectives and approaches relating to equal housing have been made more specific.

As indicated by reviews conducted by the Ministry of the Environment in 2012 and 2018, the challenges of Roma as regards housing have multiple forms and causes: firstly, there are internally discriminating practices within the Roma community that conflict with housing-related non-discrimination legislation. This includes both practices relating to moving permissions and, on the other hand, also challenges relating to young people becoming independent (Ministry of the Environment Report 6/2018, development proposals 1 and 2). These practices do not comply with the requirements of the fundamental rights system. For Roma to be able to enjoy the fundamental rights that belong to them, it would be important for Roma to receive information about their rights and practical support in their exercise of those rights, with this information and support provided as close to their living environment as possible. In addition to cultural housing practices, housing challenges are increased by prejudices against Roma, which can be seen clearly in the rental housing market.

The Housing Finance and Development Centre of Finland (ARA) is responsible for steering and monitoring concerning ARA housing stock that is subject to usage and handover limitations (just over 400,000 homes). Access to homes in the state-subsidised ARA housing stock takes place through resident selection laid down in law. Compliance with the resident selection criteria is overseen by the municipality, whereas ARA is in charge of the general steering of resident selection.

Discrimination-related oversight under the Non-Discrimination Act is the duty of the Non-Discrimination Ombudsman, who addresses discrimination occurring in private as well as public rental housing stock. The Ombudsman also oversees compliance with the duty to promote equality under section 5 of the Act with regard to all ARA properties, too.

Antigypsyism occurs, for example, as discrimination in the housing market and as racist behaviour by other residents. The National Roma Policy seeks to tackle antigypsyism by influencing local relations between population groups. The housing context provides an opportunity to influence and build well-functioning population relations between neighbours and, at the same time, to develop structures that support maintaining good relations. This focus supports the implementation of development proposals 4 and 5 of the Follow-up Report on Equality of the Roma in Housing (Törmä & Huotari, 2018), which the Ministry of the Environment has already implemented for its part.

Roma housing-related issues still remain among key topics at the national level, too, in communications received by officials including the Roma affairs planners of Regional State Administrative Agencies and in complaints submitted to the Non-Discrimination Ombudsman. In recent years, discrimination experienced in housing has also been addressed by means of criminal law, with courts having issued judgments on discrimination of Roma in housing.

Parliament has enacted an act on support to municipalities for housing advisory services in 2023–2027. The purpose of this legislation is to safeguard funding for municipal housing advisory services during the 2023–2027 evaluation period so that the municipalities will be able to provide the service. Housing advisory services can promote the wellbeing of all municipal residents and increase their awareness of their rights. The aim is to improve access to housing advisory services regardless of the form of housing. Close cooperation between Roma actors and housing advisory services can facilitate improvements in Roma housing conditions.

| 46. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Housing advisory services must be utilised with Roma, guiding Roma-background clients to using the service. The action must take account of Roma of all ages. | Ministry of Social Affairs and Health, RONK, Ministry of the Environment, ARA, municipalities, ARONK. | Accessibility and effectiveness of housing advisory services among Roma are assessed by means of a separate study, as the providers of housing advisory services do not record statistics on cultural or ethnic background and the data is not included, for example, in the ARA statistics form. |

Housing advisory services and social housing management have been found to provide help in housing problems and special issues affecting Roma. Preventive measures and advisory services as well as prevention of evictions reduce human suffering as well as the costs incurred by property companies and social services. Under their self-government, municipalities and wellbeing services counties may exercise discretion as regards which preventive services are the most appropriate from the local resident perspective. Services alternative to social housing management include strengthening the provision of housing advisory services from the Roma perspective and, overall, providing supported housing services.

| 47. Action proposal | Cooperation partners | Monitoring |
|--|--|---|
| Housing actors must be provided with information on the concepts of equality and non-discrimination, and challenges relating to Roma housing must be taken into account in the equality plans of municipalities and wellbeing services counties. | Municipalities, Non-Discrimination Ombudsman, Ministry of Social Affairs and Health, RONK, ARONK. | Entries in municipalities' equality plans on Roma housing conditions; Roma inclusion and consultation relating to housing are examined. |
| 48. Action proposal | Cooperation partners | Monitoring |
| Increasing housing actors' equality competence and capacity to address housing-related problems by means of mediation. | Finnish Forum for Mediation (FFM), municipalities, Association of Finnish Local and Regional Authorities, ARONK. | Amount of mediation process use in housing challenges encountered by Roma. |

The reason for promoting the use of mediation is that mediation is a process based on each party being heard and recognised. This increases the opportunity to reach fair decisions without issues such as conscious or unconscious prejudices affecting the way matters are dealt with. There is a need for neighbourhood mediation, as Roma experience discrimination in housing issues both when moving in and when dealing with problematic situations arising during residence. Housing disturbances and problems result in a breakdown in relations between neighbours and make the housing atmosphere uncomfortable and sometimes also unsafe.

For these measures to be implemented, the cities, municipalities, wellbeing services counties and key large property companies and Roma actors must cooperate. It is essential that preventive measures are taken and reported on to organisations such as the Advisory Boards on Romani Affairs.

1. Setting up a working group with representatives from municipalities and large property companies/ seeking partners from them. Identifying and recognising challenges experienced. Where such working groups exist, taking account of the housing-related objectives of the National Roma Policy in them.
2. Making use of the population relations tool and examining and developing organisational approaches with the tool.
3. Planning and implementing development measures, mediation activity and training.
4. Making use of the Non-Discrimination Ombudsman's recommendations on equal housing.

| 49. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Carrying out an effectiveness assessment among those participating in actions/in the action environment at the end of the operating period/once actions are completed. | Ministry of Justice, Office of the Non-Discrimination Ombudsman, ARONK, municipalities. | Effectiveness assessment has been carried out. |

The section on housing presents an operating model that is atypically detailed for the National Roma Policy. This is because housing-related challenges are regarded as particularly problematic. According to feedback from actors, progress in housing-related issues is rather slow. The EU Roma strategic framework recommends the monitoring of the Fundamental Rights Barometer indicator concerning favourable views of having Roma as neighbours. This negative indicator figure is high in Finland by European comparison and special measures are therefore required.

The Fundamental Rights Barometer is a research project of the Ministry of Justice and the Human Rights Centre (Ministry of Justice 11/014/2017) on the realisation of fundamental rights. The respondents were asked to state how they would feel about having certain population groups, including Roma, as their neighbours. The barometer is based on the 2018 Fundamental Rights Survey of the EU Agency for Fundamental Rights.

11 Health and wellbeing

This section presents three actions based on the proposals of the Roma Wellbeing Study of the Finnish Institute for Health and Welfare (THL) (Weiste-Paakkanen et al., 2018). The findings of the study were discussed with the Roma population in a participatory workshop in 2018, and the action proposals took shape on the basis of both the research findings and the improvements proposed by Roma. In addition to these three actions, actions supporting health and wellbeing have also been included in age group-specific actions. The actions below aim particularly at promoting health.

In the EU Roma strategic framework, health and wellbeing are sectoral measures supporting the horizontal objectives. The framework states that measures raising awareness among Roma people of prevention measures, such as promoting healthy lifestyle and improving access to mental health services should be included in national Roma strategic frameworks. In addition, the framework recommends that measures are included to prevent and combat discrimination against Roma people by awareness-raising concerning non-discriminatory healthcare provision and access to health. These objectives support equality and inclusion in health and social services.

According to the Government Action Plan Combating Racism and Promoting Good Relations between Population Groups, the Committee on the Elimination of Discrimination against Women (CEDAW) has commented on the status of immigrant women and Roma women, among others. It is paramount to create wellbeing structures and services in a gender sensitive manner for all ages, also taking account of communities. To be able to take effective measures to support the wellbeing of the Roma population and to improve the status of Roma, it is important to recognise the Roma perspective and take it into account in the reformed service structure for health and wellbeing promotion and health and social services. The wellbeing services counties and municipalities must cooperate to make the equality of the Roma population a reality. Wellbeing plans should include measures to ensure the realisation of the health and wellbeing objectives of the National Roma Policy, such as enabling stronger Roma participation in sports and physical activity.

According to THL, the health and wellbeing level of Roma was in many respects lower than that of the population as a whole, with anxiety symptoms, discrimination experiences as well as insecurity and physical health concerns being common among women in

particular. A study by the Office of the Ombudsman for Children reports that Roma children and young people regarded their health as good, but respondents may often tend to only refer to physical health in this context. This is also indicated by responses to the further question about how they look after their health, to which the majority responded that they look specifically after their physical health in various ways.

Children and young people have many important social relationships, and the role of the family and relatives is highly important in addition to the role of friends and acquaintances. The clear majority responded that they are satisfied with their current interpersonal relations. One in two feels lonely every now and then, and one in ten fairly often or often. Based on the School Health Promotion Study, however, their satisfaction in this respect is not lower than the national level and is even in part higher than among children and young people in general. Family camps provide a venue for addressing health and wellbeing themes age group-specifically and also for promoting the revival of the Romani language.

| 50. Action proposal | Cooperation partners | Monitoring |
|--|---|---|
| Organising family camps and supported holidays for Roma families to promote health, wellbeing and children's rights. | Ministry of Social Affairs and Health, Roma organisations, parishes, RONK, ARONK. | The number of family camps and supported family holidays for Roma has increased; number and feedback of participants. |
| 51. Action proposal | Cooperation partners | Monitoring |
| Promoting health and wellbeing in the municipalities and the new wellbeing services counties so that projects and measures taking account of dietary and physical activity habits, substance abuse and mental wellbeing are targeted at the Roma population. | Ministry of Social Affairs and Health, THL, wellbeing services counties, municipalities, Roma organisations, ARONK. | Health and wellbeing measures and projects targeted at Roma. Action methods employed in the assessment of the baseline situation, measures and impacts. |
| 52. Action proposal | Cooperation partners | Monitoring |
| Targeting at Roma age and gender sensitive measures promoting health, wellbeing and safety and preventing health problems. | Ministry of Social Affairs and Health, RONK, THL, wellbeing organisations, Roma organisations. | Number of participants in measures, and surveys of their experience of their own state of health as well as health and wellbeing checks at the start and end of the measures. |

It is also important to include the health situation of Europe’s mobile Roma and their access to health services as well as their other human rights issues in the National Roma Policy to ensure the realisation of the fundamental and human rights of everyone living in Finland. Particular attention must be paid to legal status, especially with regard to health and wellbeing. Attention to this has been paid by organisations including the WHO, Council of Europe (CoE) and the European Public Health Association (EUPHA).

| 53. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Ensuring that Europe’s mobile Roma are taken into account in the actions mentioned in the health and wellbeing section. | Ministry of Social Affairs and Health, RONK, THL, wellbeing services counties, CSOs and other actors working in the field of health and wellbeing. | Europe’s mobile Roma have been taken into account in the actions mentioned in section 11. |

12 Supporting Romani language and Roma culture and art

The Roma population is estimated to total 10,000–12,000 persons in Finland, with one third of them speaking the Romani language a little, passably or well. The Romani language is mainly used within the family. Even with the primary language of the Roma population currently being Finnish or Swedish, the Romani language still plays an important role in the culture of the Roma population. The Finnish Romani language is a seriously endangered language, and the number of its speakers is estimated to have declined by almost 40% in the past 50 years. As part of Finland's first National Action Plan on Fundamental and Human Rights, the Ministry of Justice conducted a study of the realisation of Roma linguistic rights in 2014. In 2020, the National Agency for Education (EDUFI) appointed an expert group to draw up a programme, including measures, for the revival of the seriously endangered Romani language.

All Roma in Finland regardless of their place of residence have the right to their cultural heritage and the right to develop and maintain their own art and culture in cooperation with experts in the field. Roma have the right to choose their own culture, participate in the planning and implementation of cultural policy and services and the right to protect their community's tangible and intangible cultural heritage. This right of Roma creates an obligation for producers of art and cultural services and for decision-makers to take the needs of Roma into account when planning, developing and resourcing their activities.

Roma participation in various cultural and art events as producers and consumers can be supported with clear measures relating to the agency of Roma: the visibility of Roma in productions clearly motivates the broader participation of the Roma population. The Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups states that anti-racism and good population relations should be promoted in cultural and art activities.

A survey by the Office of the Ombudsman for Children found that Roma children and young people show clear interest in and respect for the Romani language and Roma culture. A total of 92% of Roma children and young people want to study the Romani language in at least one of the contexts mentioned (56% at home within the family, 36% at school as a school subject, 31% in a Romani language club during leisure time) or in some other context (n=2). Of these, 28% mentioned more than one of the contexts. The

thoughts expressed by children and young people show respect for their own culture and, on the other hand, interest in learning in different kinds of operating environments. Based on these findings, it is important to explore opportunities to motivate learning and schooling by offering different types of learning and a variety of learning environments. This means that attention should be paid to diversity in learning and to discovering individual ways of learning. Respondents also reported seeing many good things in the customs of their own culture, with politeness and respect for other people mentioned most often. Regardless of structural problems such as prejudice and discrimination, they were proud of their culture, and the hope that the mainstream population would see these features of their culture was reflected in the survey results.

The different forms and manifestations of art and culture should be taken into account when discussing Roma culture, and related productions should be easily accessible.

| 54. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| To promote Roma culture and support inclusion in the national cultural scene, establishing a centre for Roma culture aimed at all ages. The centre for Roma culture will serve as a diverse hub for cultural actors. The activity will be linked with the activities of the virtual centre of expertise mentioned in section 15. | Ministry of Education and Culture, Arts Promotion Centre Finland (Taike), Finnish Heritage Agency / National Museum, RONK, ARONK, Roma organisations. | The centre for promoting Roma culture has been founded and its activities have become established during the operating period. |

12.1 Programme promoting Roma culture and art

Not implemented during the ROMPO 2 period, the programme to promote Roma culture is included in ROMPO 3. According to the EU Roma strategic framework, Roma should be included in the preparation, implementation, monitoring and evaluation of all equality and inclusion strategies relating to them. This also applies to cultural policy and the planning of cultural services.

The Cultural Heritage Strategy 2022–2030 of the Ministry of Culture and Education states that “the premise of the Cultural Heritage Strategy is the preservation, development and utilisation of a diverse tangible, intangible and digital cultural heritage and cultural environments as a resource for the whole of society.” The strategy also states that “there is a need to promote the realisation of the rights of minorities in particular.

Everyone must have the opportunity to participate in defining cultural heritage, realising their cultural heritage and recognising themselves in it. Individuals and communities have the opportunity to adopt and create cultural heritage but also to place themselves outside of or abandon cultural heritage.”

Based on the above-mentioned objectives, a broad national programme for the promotion of Roma art and culture should be formulated, also taking account of tangible and intangible cultural heritage. The promotion programme will provide the framework for the activities of the cultural centre.

| 55. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Drawing up a national programme for the promotion of Roma art and culture, linked with the Cultural Heritage Strategy and the related action plan. | Ministry of Education and Culture, Arts Promotion Centre Finland (Taike), Finnish Heritage Agency/ National Museum, Roma artists and other Roma actors, various expert organisations in art and culture. | The national promotion programme has been drawn up during the operating period and the measures proposed in it have been introduced for execution. |

12.2 Roma history as part of building equality and inclusion

This section discusses the popularisation of research-based knowledge. The shared history of Finland’s Roma and mainstream populations is a theme not identified or recognised broadly in society. There is research-based, academic knowledge available on the history and societal position of Roma. In the current form, however, this knowledge will not reach a broader audience, and this is why the popularisation of this knowledge is important. The lack of knowledge of the historical status of Roma and its impacts in present-day Finland is

still reflected in issues such as problems encountered in seeking access to and in targeting of services. Many studies have raised the issue of lack of trust. Recognising minority rights starts not only with legislation but also with recognising the shared history.

The popularisation of history and other research-based knowledge should be targeted at the Roma population, too. It is particularly important for the Roma population themselves to be aware of their own history and its impacts on their lives in present-day Finland. Gaining broader and deeper knowledge of one's own population group also promotes the recognition of one's own rights.

The following action proposals involve objectives that are launched during the ROMPO 3 programme period but that may continue beyond the operating period and will have long-term impacts. The objective is to increase awareness of Roma history, culture and societal position among the mainstream population to make future encounters in everyday lives as well as in service structures more equal. The set of actions is based on the horizontal objectives of the EU Roma strategic framework and linked with the eradication of antigypsyism and promotion of equality and inclusion.

| 56. Action proposal | Cooperation partners | Monitoring |
|--|--|--|
| Linked with the study materials review action (action 34), producing on the basis of research-based knowledge and making use of archived material, popularised material that can also be utilised in teaching, particularly in higher education. | RONK, EDUFI, Finnish Literature Society, universities, Roma organisations. | Popularised study material has been produced during the operating period and measures necessary to utilise it in teaching have been taken. |
| 57. Action proposal | Cooperation partners | Monitoring |
| As part of decolonised museum activity, bringing the history and culture of the Roma population systematically as part of museum activity to increase awareness. | Finnish Heritage Agency, National Museum, RONK, ARONK. | Roma are visible in the strategies and implementation programmes of national museum activity. |

“It is important to note that decolonising means different things, changes and approaches from the perspective of, for example, indigenous peoples, minorities and the mainstream population. For indigenous peoples and minorities, it is usually about reviving their culture, recognising their cultural rights and respect for the fundamental human rights of their communities.” (Aikio and Turunen, 2022)

A national mentoring programme will be developed for young Roma during the operating period. The mentoring programme aims to increase their engagement in music and to guide them towards professionalism in music. The action involves the development of the mentoring programme and, consequently, the provision of methods and tools to increase engagement in music among young Roma. Key roles in the development of the mentoring programme are played by Roma artists and the sector's institutions, including liberal adult education and folk high schools. In addition, there is an emphasis on supporting diverse and multivoiced cultural activity, not just music education and training but also crafts and written expression and support to talented young Roma for self-expression.

| 58. Action proposal | Cooperation partners | Monitoring |
|---|---|--|
| Developing a national mentoring programme to support the engagement of young Roma in music. | Ministry of Education and Culture, municipalities, Roma actors and artists, liberal adult education and folk high schools, and institutions providing basic education in the arts, including music. | The national mentoring programme has been developed in cooperation with music and art institutions and Roma artists. |

12.3 Actions of the Romani language revival programme

Efforts have been made for several years to address issues in the realisation of the linguistic rights of Roma safeguarded under the Constitution of Finland. A 2014 report of the Ministry of Justice states that the Finnish Romani language is a seriously endangered language, with urgent measures required to revive it. Under section 17, subsection 3 of the Constitution, Roma have the right to maintain and develop their own language and culture. The Committee of Ministers of the Council of Europe recommended in March 2012 that Finnish authorities develop and implement strategies for the training of Romani teachers, expand the production of teaching materials in Romani and increase the provision of teaching of Romani.

The first Language Policy Programme was adopted in June 2022 as a government resolution. The programme outlines the Government's vision for the future of minority languages and includes the objectives and measures to support the autochthonous languages of Finland, including Romani, and to strengthen their status alongside the national languages of Finland.

Implemented under the Programme of Prime Minister Sanna Marin's Government, the Language Policy Programme (Finnish Government, 2022) covers Finland's autochthonous languages, in particular the Karelian, Romani, Sámi and sign languages. It is a programme parallel to the Strategy for the National Languages of Finland published in 2021 that covers Finnish and Swedish.

The ROMPO 3 programme encourages actors to take account of the objectives and measures of the Language Policy Programme (section 8.6). In line with the programme, higher education institutions are encouraged to invest in resources for research in the various languages. The aim is to increase language nest activities, language clubs and other activities to promote language vitality. The different needs and opportunities of languages will be taken into account. Systematic and long-term efforts will be made to revive languages. Efforts will be made to collect good practices in language revival and to disseminate information further on them as well as to also promote a dialogue and cooperation between languages. To support the objectives, an organised, permanent structure (a language policy forum or network) will be created to promote exchange of information about language planning and maintenance concerning minority languages and about language revival. A report and planning project will be launched, aiming towards the organisation of long-term revival action for minority languages and the creation of an operating structure for the purpose, with separate funding provided for the project.

The Language Policy Programme states: "The objectives of the programme are to protect, revive, support and strengthen the autochthonous languages of Finland. Children and young people are at the heart of the programme: the aim is to be able to ensure the intergenerational transmission of languages in the future too."

As part of its statutory duty, since 1995, the Finnish Broadcasting Company Yle has broadcast a 15-minute current issues programme, *Romano mirits*, which also includes the news in Romani. Also available via the Yle Areena on-demand service, this is the only radio programme aimed at Roma broadcast in nationwide media in Finland. Yle is exploring the opportunity to increase Romani language children's contents as a new form of cooperation.

The media play an important and responsible role in creating a diverse image of Roma and deconstructing stereotypes as well as in promoting a mutual dialogue and understanding between population groups. One of the objectives supporting diversity is to increase the visibility of representatives of minority and special groups in media contents in roles such as interviewees, experts or creators both regionally and nationally.

Yle is developing contents and services aimed at minorities as part of its diverse overall offering within the framework of its statutory duty and its resources. Yle hears the feedback and development ideas of the various stakeholders regularly each year and is prepared to continue the dialogue and information exchange on the issues raised in the National Roma Policy.

Formulating a programme for the revival of the Romani language, including proposals for measures, was an action included in ROMPO 2. This programme was completed in 2022. ROMPO 3 contains five actions from the Programme for the Revival of the Finnish Romani Language to improve the linguistic rights of Roma during the current operating period. More detailed background information and the grounds for the necessity of the actions are provided in the Programme for the Revival of the Finnish Romani Language (Finnish National Agency for Education 2022:6) formulated by an expert group appointed by the Finnish National Agency for Education.

| 59. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| <p>Clarifying the study path of Romani language students to becoming a qualified teacher of Romani at the University of Helsinki (Romani and Roma culture). Making efforts to increase the number of Romani language students who also include digital and remote pedagogy studies in their degree. Implementing a pilot to allow for the possibility of including the Romani language in the Bachelor of Social Services degree (20 credits) at the Diaconia University of Applied Sciences and in the Further Vocational Qualification in Education and Guidance (20 competence points) in the STEP programme. The action aims to ensure a sufficient number of Romani language teachers and instructors.</p> | <p>University of Helsinki, Diaconia University of Applied Sciences (DIAK), and STEP Education of the Church Resources Agency.</p> | <p>Number of qualified Romani language teachers, number of those who have included Romani language studies in their Bachelor of Social Services degree or Further Vocational Qualification in Education and Guidance.</p> |

| 60. Action proposal | Cooperation partners | Monitoring |
|--|---|---|
| <p>Implementing under separate funding a national Romani language pilot project utilising remote connections. Ensuring that the municipalities are able to apply for discretionary government grants for organising Romani language teaching supplementing primary and lower secondary as well as general upper secondary education. Informing Roma parents and guardians about the opportunity to study the language. The training of Romani language teachers mastering digital and remote pedagogy relating to the pilot project is included in the action above.</p> | <p>Ministry of Education and Culture, EDUFI and education and training providers.</p> | <p>Number of students studying the Romani language.</p> |
| 61. Action proposal | Cooperation partners | Monitoring |
| <p>Planning and implementing under separate funding a Romani language learning material package from early childhood education and care to adult studies. The package consists of material including textbooks, digital material, games and videos as well as support material for teachers, including recordings and practical teaching ideas.</p> | <p>EDUFI, other possible publishers and authors of study material.</p> | <p>Quantity of study material.</p> |
| 62. Action proposal | Cooperation partners | Monitoring |
| <p>Increasing the visibility of the Romani language and Roma culture in the media among children, the most important language revival target group. Yle will dub a series of children's programmes into Romani. Exploring opportunities to produce Romani discussion and family programmes also on a private TV channel.</p> | <p>Yle, national Roma organisation.</p> | <p>Amount of programmes in Romani.</p> |

| 63. Action proposal | Cooperation partners | Monitoring |
|---|-------------------------------|---|
| Making use of the opportunities provided by social media for diverse use of the Romani language. Implementing a discussion forum in Romani on social media. Providing Roma families with videos and other materials in Romani aimed at children and young people. | Nationwide Roma organisation. | Producing a Romani social media platform; usage rate. |

13 International Roma policy and Roma inclusion in its planning and implementation

The Government Report on Human Rights Policy (2021) specifies promoting Roma rights as one of Finland's human rights policy priorities in contexts such as the Council of Europe (CoE) and in the human rights activities of the Organization for Security and Co-operation in Europe (OSCE). Finland emphasises the inclusion and meaningful participation of Roma in the implementation of the Roma policy of intergovernmental organisations.

Commissioned by the Ministry for Foreign Affairs, a report entitled "Opportunities for Finnish Roma and Roma actors to influence regional and European policy on Roma" was published in 2021. The report provides a more detailed description of Finland's role in developing European Roma policy. The action proposals presented in this section are in part based on the inclusion issues emerging in the report, on the Ministry's objectives concerning the development of European Roma policy, and on action proposals expressed by those working in the field of Roma-specific work.

As regards voluntary financing, Finland is one of the few and largest supporters of CoE Roma policy. Strengthening the participation of CSOs and National Human Rights Institutions is regarded as one of Finland's most significant political achievements in the CoE in recent years. Finland also supports the development of Roma policy by seconding experts to European institutions and organisations.

Finland's support for CSO participation strengthens Roma opportunities to influence decision-making in European organisations, which means the approach in the CoE and the EU Roma Strategic framework are aligned with each other. More generally, it can be said that the OSCE, CoE and also EU objectives have remained similar for several decades.

The Ministry for Foreign Affairs and the Ministry of Social Affairs and Health have a clear division of duties in the implementation of European Roma policy. The Ministry of Social Affairs and Health is responsible for the Roma policy measures of the EU and the National Roma Policy. Together with the Ministry for Foreign Affairs, Finland's Permanent Representation to the CoE promotes the consideration of Roma rights in the Committee of Ministers and the preparatory negotiations. A senior specialist from the Ministry of

Social Affairs and Health/Advisory Board on Romani Affairs (RONK) represents Finland in the Committee of Experts on Roma and Traveller Issues (ADI-ROM), a subcommittee of the Steering Committee of Anti-Discrimination, Diversity and Inclusion (CDADI). Finland supports the efforts to develop the activities of the Roma Unit of the CoE ranging from project-based to policy and advocacy work.

The Ministry for Foreign Affairs is responsible for Finland's activities in the OSCE, where the main responsibility for coordinating Roma policy and related measures lies with the Office for Democratic Institutions and Human Rights (ODIHR) and the Contact Point for Roma and Sinti Issues (CPRSI) that has operated under the aegis of ODIHR since 1994. Its work is guided by the OSCE Action Plan for Roma and Sinti. Finland supports capacity building for OSCE Roma policy and promotes the consideration of Roma rights in inter-state institutions of OSCE participating states.

International and regional human rights treaty monitoring bodies and special rapporteurs have provided Finland with several recommendations for the development of legislation and government policy programmes, including in issues relating to Roma rights. As outlined in the Government Report on Human Rights Policy, the Government Network for Fundamental and Human Rights considers the recommendations received and monitors their implementation.

In addition, added weight is provided for measures seeking to increase the efficiency and ensure the implementation of rulings of the European Court of Human Rights and the European Committee of Social Rights concerning Roma rights in Finland as well as in other countries.

Five objectives have been promoted organisation-specifically in Finland's Roma policy in the EU and other European organisations:

1. Removing barriers to Roma employment
2. Reforming instruments in the European policy on Roma, making use of digitalisation and technology as well as social innovations to increase Roma inclusion
3. Reinforcing the Roma policy of European organisations and improving Roma access to influence
4. Empowering Roma women and supporting self-motivated activities at all levels
5. Strengthening the fundamental and human rights perspective as part of European policy on Roma.

The following actions will be monitored with regard to items 3 and 5 under the National Roma Policy. The actions below are also aligned with the priorities of the EU Roma strategic framework concerning Roma agency, inclusion and access to influence. The objectives emphasise the inclusion of Roma particularly in the planning, implementation and evaluation of policies and measures affecting them. Some of the actions were already included in ROMPO 2. The priority of Roma agency will be strengthened and forms of cooperation between the Nordic countries and more broadly in the Baltic Sea region will be explored and promoted. Alongside the Ministry for Foreign Affairs, Roma organisations will act in the development of international Roma-specific work through their own networks, and this activity must also be supported.

| 64. Action proposal | Cooperation partners | Monitoring |
|---|--|--|
| Supporting the capacity of Finnish Roma organisations and actors, particularly young Roma and Roma women, to participate in European cooperation and supporting the strengthening of cooperation between Roma organisations. Exploring and promoting opportunities for increasing Roma cooperation in the Nordic countries and Baltic Sea region. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Justice in cooperation with Roma organisations. | Clear measures to support participation capacity and inclusion are reported during the operating period. Training for Roma actors has been provided relating to international Roma policy. |

Support for Nordic and Baltic Sea region cooperation in the development of European Roma policy is aligned with the Programme of Prime Minister Sanna Marin’s Government with regard to strategic theme 3.2 Globally influential Finland. In particular objective 7: Finland will bolster Nordic cohesion and Baltic cooperation supports the spirit of the international Roma policy of ROMPO 3. The Government Programme also outlines that Finland will also promote Nordic cooperation in the EU, the UN and other international forums. The Ministry for Foreign Affairs shares the same intent.

| 65. Action proposal | Cooperation partners | Monitoring |
|---|---|--|
| Recruiting and sending experts via the international seconding procedure to develop European Roma policy. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, RONK. | Finland has offered experts for appointment and contributed towards the costs arising from the seconded experts. |
| 66. Action proposal | Cooperation partners | Monitoring |
| Finland highlights the influencing opportunities of Roma organisations and other organisations promoting Roma affairs in intergovernmental organisations. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Justice, other authorities in their sectors. | Roma actors have been provided with training enabling participation. Information about international events is provided broadly to the network of actors and Finnish actors are encouraged to participate. |

In addition to the separately raised actions, the Ministry for Foreign Affairs will continue its permanent activities to develop European Roma policy. Cooperation forms of intergovernmental organisations will be maintained and developed. Finnish missions abroad will maintain contacts with Roma organisations and increase awareness of the realisation of Roma human rights.

14 Development of Finnish field of Roma-specific work

The Advisory Board on Romani Affairs operating in conjunction with the Ministry for Social Affairs and Health has a long history, which illustrates the importance of cooperation with the Roma population and the authorities. Cooperation and development work must, however, move with the times and activities must be examined critically from time to time. The new National Roma Policy and the structural reform of health and social services will result in changes approaches and operating models in the field of Roma-specific work, too, and this is why taking Roma issues to the municipal and regional levels must receive particular attention. This is why the administrative structure of Roma policy and its functioning must also be reviewed.

| 67. Action proposal | Cooperation partners | Monitoring |
|---|--|---|
| Developing the national and regional structure of Roma-specific work and Roma policy and related cooperation. Exploring new ways to increase the efficiency and coherence of operating models and to find new solutions to regional and local level implementation to embed and monitor Roma policy measures. | Ministry of Social Affairs and Health, RONK, ARONK, Regional State Administrative Agencies, Roma organisations, PRT. | Annual negotiation days of Advisory Boards on Romani Affairs have developed concrete measures to increase cooperation and joint development between the Boards and other actors. ROMPO monitoring topics are examined by making use of, for example, consultation and facilitation. |

14.1 Development proposals for National Roma Policy implementation, data collection and monitoring

Training of the authorities is regarded as a key element of promoting the equality of Roma in various service structures. Information on Finland's Roma policy, Roma-specific work and various training materials is difficult to access. The website maintained by the National Advisory Board on Romani Affairs of the Ministry of Social Affairs and Health

(www.romani.fi) has content including key Roma policy publications and materials, current issues and the activities of the National Advisory Board on Romani Affairs, but this website alone is not sufficient to serve the needs relating to archiving of information, for example.

To improve access to information, solutions should be developed to support a) accessibility of information, b) reporting on Roma policy measures, c) training material being easy to find and d) redirection and links to websites of other Roma organisations, making use of their expertise and competence that can be utilised broadly by the various actors. The implementers of Roma policy actions and, in particular, those receiving external funding, should report in a centralised and coordinated manner on the use of actions and resources and to carry out qualitative and quantitative assessments of actions.

For the above-mentioned reasons, a virtual centre of expertise utilising digitalisation and new technology – a Roma hub – will be established. Extensive and spanning over many years, this project must be developed in cooperation with various actors that will determine in more detail the features of the virtual centre of expertise in accordance with the needs and objectives. This means the project is an IT development project the specific outcome of which will be determined by its development process. In addition to Roma policy documents, reports and analyses, digital and centralised archiving must be organised for material such as that relating to Romani language and Roma culture, art and cultural heritage. The Roma hub will also serve the action to develop a Roma cultural centre proposed under action 54.

Reporting tools must be synchronised in accordance with the requirements of the various funding sources. Information security must be ensured so that persons provided with user identifiers are committed to compliance with information security regulations and that the prohibition of the collection of sensitive data, such as ethnic origin, under Finnish personal data protection legislation is not jeopardised.

| 68. Action proposal | Cooperation partners | Monitoring |
|---|---|---|
| Making use of digitalisation and new technology, establishing a virtual centre of expertise that enables the collection, storage, monitoring and reporting of information and also the display of the competence and expertise of Roma to promote equality and inclusion. | Ministry of Social Affairs and Health, Ministry of Justice, Ministry of Education and Culture, Ministry of the Environment, RONK, ARONK, Regional State Administrative Agencies, THL, Roma organisations. | A new digital solution for the collection, production and distribution of information has been developed. |

To obtain an overall view and to support knowledge-based development, it is important to collect more specific data on issues such as differences in training level, housing form and income between population groups. The knowledge base involves structural challenges, however, as Statistics Finland collects statistical data on persons living in Finland based on nationality, language and country of birth. Statistics may also be compiled based on origin which, as in the other Nordic countries,

means the country of birth of the person's parents. This, however, leaves groups such as Finland's Roma and most Sámi and Afro-Finns outside the scope of these background factors. Statistics Finland already pointed out in its comment on the first National Roma Policy on 13 January 2010 (TK-1515-09) that there are major challenges in collecting statistical data. This challenge has long been known and, for example, reporting relating to the UN 2030 Agenda and the EU Anti-racism Action Plan creates pressure to find a practical solution to the data collection problem. Until now, data has been collected using a variety of methods, mainly by means of snowball sampling, and through the Roma community's own networks (for example, the Finnish National Agency for Education has collected data for its reports using a national network of Roma-background actors, and it is not allowed by law to determine the exact number of Roma in Finland, which is why the datasets in the studies are mainly qualitative or indicative, based on a target group that cannot, however, be randomised).

Statistics Finland has stated concerning ROMPO 3 that Finland's Roma population forms a linguistic and cultural minority the unequivocal definition and identification of which for statistical purposes is difficult. During the preparation of ROMPO 3, Statistics Finland participated in international cooperation in the UNSD Praia Group Task Team on Non-Discrimination and Equality aiming to develop an internationally comparable set of survey questions on discrimination and to prepare guidelines on how to utilise register data relating to discrimination issues.

The virtual data collection platform seeks to provide solutions to data collection challenges and, with regard to this objective, the Roma community and the collection of qualitative data plays a major role. Research-based knowledge is an absolute precondition for the planning, justifications and monitoring of Roma policy actions. The vision for the future also includes linking physical events with the virtual centre of expertise. Consultation events can be organised, and activities aimed at Roma where information accrued at the centre of expertise can be utilised. The information must be available to the municipalities free of charge and there must be open interfaces to the information so that measures such as equality plans can be implemented based on knowledge and data.

For there to be a shared view on data collection and sharing as well as on research, ethical guidelines for data collection and research must be prepared in cooperation; in this, the ethical guidelines for research involving the Sámi can be used as an example.

| 69. Action proposal | Cooperation partners | Monitoring |
|--|---|--|
| Producing ethical guidelines for research and data collection involving Roma by utilising the basic principles of Critical Romani Studies. | THL, Ministry of Social Affairs and Health/RONK, Ministry of Justice, universities, Roma organisations. | The ethical guidelines have been produced and compliance with them in research and data collection is monitored. |

14.2 Regional and local implementation and monitoring of actions

The deployment and implementation of Roma policy actions is made difficult by the division of the actions between different actors and the rigidity of inter-administrative cooperation. Authorities and professionals from organisations including central government, regional government and other agencies, bodies and expert institutions, educational organisations, municipalities and Roma organisations take part in the development of national Roma policy. Their expertise as well as their objectives and resources are in part defined by their own background organisations. Chapter 2 on the structure of Finnish Roma policy and Roma-specific work describes the administrative structures relating to Roma issues (Figure 1).

The responsibilities, duties and roles of the actors in the implementation of the National Roma Policy must be reviewed and redefined during the ROMPO 3 period and included in action plans and reports. The interfaces of regional and national Roma-specific work must be clarified so that national work supports regional work and vice versa. Regional Advisory Boards on Romani Affairs define in cooperation the themes and actions the promotion of which applies to the implementation of regional-level Roma policy. This reduces overlaps in tasks and creates synergies between regional actors. Examining the interfaces between the two levels, national and regional, enables the discovery of synergies while at the same time also enabling regional special characteristics being taken into account. Opportunities to increase the number and operating areas of Local Roma Working Groups will also be explored, making use of the new wellbeing services counties. The planning of the development of network cooperation and data collection and the regional organisation of Roma-specific work in the wellbeing services county reforms and the implementation of

ROMPO 3 should be taken into account in the implementation plan. At the regional level, discretion should be allowed for how local-level work takes place.

The development and coordination of Roma-specific work is an important element of Finland's National Roma Policy until 2030. The monitoring and mid-term evaluation should take place in a clear manner. The target-oriented monitoring of the implementation of the National Roma Policy should be clearly included in the structures. The implementation plan must show the objectives and monitoring and their timeframes and responsible actors. The actors' roles in the implementation of ROMPO 3 and related reporting responsibilities must be clearly agreed upon in the implementation plan, taking account of objectives of the target of the activity – developing Roma policy – into account. Funding for implementation of the National Roma Policy must be sought in a coordinated manner, and it would be desirable for the wellbeing services counties and the municipalities also to be able to grant funding for Roma organisations if the organisations carry out tasks belonging to the public sector.

| 70. Action proposal | Cooperation partners | Monitoring |
|--|--|---|
| As part of establishing the data collection platform, examining the contribution of the various actors to national Roma policymaking. Finding the interfaces of regional and national Roma-specific work and planning the implementation of the work between these two levels, seeking synergies in the process. | Ministry of Social Affairs and Health, Ministry of Justice, RONK, ARONK, Regional State Administrative Agencies, Association of Finnish Local and Regional Authorities, PRT. | The re-examination of the development of national Roma-specific work has begun and the development process has been documented. |

14.3 Competence development and accessibility of information, communication strategy

At the beginning of their terms of office, the members of the Advisory Boards on Romani Affairs will be provided with training in the implementation of the National Roma Policy and the duties and responsibilities of Board members, including expectations relating to commitment and reporting. Roma organisations will be provided with training in the linkages of the National Roma Policy with national strategies and action plans and with work carried out by CSOs. In addition, training will be provided in the links of Finland's National Roma Policy with the EU Roma strategic framework for equality, inclusion and

participation. In the future, this material may be included in the materials repository of the virtual centre of expertise.

The annual communication strategy for the Roma policy actions must be prepared with a clear connection to the data collection platform. Information being conveyed to Roma organisations at too short a notice also emerged as a challenge in the report commissioned by the Ministry for Foreign Affairs. Efforts will be made through a clear communication strategy to ensure that actors in the field of Roma-specific work are provided with timely information.

15 Monitoring of the effectiveness of the implementation of Finland's National Roma Policy

A separate implementation plan will be drawn up for this National Roma Policy in cooperation with stakeholders. The National Advisory Board on Romani Affairs will select the specific annual focal areas, that is, the key priorities. Examples of key priorities may include issues of children and young people, in which case progress made with actions relevant to them will be monitored particularly closely. For each action, ROMPO 3 specifies a monitoring target that must be evaluated qualitatively as well as quantitatively and reported accordingly – in the future by using the reporting tools of the virtual centre of expertise.

In addition to action-specific quantitative and qualitative assessments, the evaluation of the implementation and performance of the National Roma Policy must include evaluations of the whole in the context of, for example, the mid-term or final evaluation. These evaluations should make use of the tools and methods emerging in the field of policy research so that the evaluations are based on existing frameworks.

Particularly with regard to actions targeted directly at Roma, the Experiences of Social Inclusion Scale (ESIS) indicator and its set of questions developed by the Finnish Institute for Health and Welfare (THL) must be employed (THL/Sokra coordination project researchers must be contacted when starting a project/action). The ESIS inclusion indicator has been used in contexts such as population research (Health, working capacity and need for treatment of criminal sanction clients study, National FinSote Survey and study on the mental health of people living alone in Finland), as an indicator generating monitoring data (including the monitoring indicators for the Government's National Action Plan on Fundamental and Human Rights 2020–2023), and in evaluations of activities (the inclusion indicator is included in the indicator pilot for effectiveness assessment of the Funding Centre for Social Welfare and Health Organisations (STEA) and around 60 organisations have selected the indicator for their pilot).

An important role in the monitoring of implementation is played by the actors implementing the actions but also by those engaged on a permanent basis in regional

Roma-specific work. Reporting methods and obligations must be agreed with the various organisations, and the matters agreed must be recorded in the joint implementation plan.

| 71. Action proposal | Cooperation partners | Monitoring |
|--|---|---|
| Developing a consistent reporting procedure for Roma policy actions. | Ministry of Social Affairs and Health, Ministry of Justice, THL, RONK, ARONK, Regional State Administrative Agencies, Roma organisations. | The monitoring and reporting practices have been made consistent and agreed upon between the relevant actors. |

ABBREVIATIONS

| | |
|-------------------------|---|
| ARONK | Regional Advisory Board on Romani Affairs |
| ARA | Housing Finance and Development Centre of Finland |
| DIAK | Diaconia University of Applied Sciences |
| ERDF | European Regional Development Fund |
| CoE | Council of Europe |
| ESF | European Social Fund |
| ETNO | Advisory Board for Ethnic Relations |
| OSCE | Organization for Security and Cooperation in Europe |
| EU | European Union |
| FRA | European Union Agency for Fundamental Rights |
| HDL | Helsinki Deaconess Institute Foundation |
| LAPE key project | Government programme to reform child and family services |
| Nevo Tiija project | ESF project promoting the equality, inclusion, wellbeing and employment of Finnish Roma in 2016–2018 |
| ODIHR | Office for Democratic Institutions and Human Rights |
| OHCHR | Office of the United Nations High Commissioner for Human Rights |
| OKM | Ministry of Education and Culture |
| OM | Ministry of Justice |
| EDUFI | Finnish National Agency for Education |
| PRT | Local Roma Working Groups |
| Romano Mirits programme | News in Romani produced by Yle |
| ROMPO | Finland's National Roma Policy |
| RONK | National Advisory Board on Romani Affairs |
| SKS | Finnish Literature Society |
| SM | Ministry of the Interior |
| STEA | Funding Centre for Social Welfare and Health Organisations (formerly Finland's Slot Machine Association, RAY) |
| STM | Ministry of Social Affairs and Health |

| | |
|--------------------------|--|
| Taike | Arts Promotion Centre Finland |
| TEM | Ministry of Economic Affairs and Employment |
| TE Services | Public employment and business services |
| THL | Finnish Institute for Health and Welfare |
| Tšetanes naal project | ESF educational pathway project promoting the equality, inclusion and education of the Finnish Roma population in 2016–2018. |
| UM | Ministry for Foreign Affairs |
| VANE | Advisory Board for the Rights of Persons with Disabilities |
| VANUPO | National Youth Work and Youth Policy Programme for 2017–2019 |
| Yle | Finnish Broadcasting Company Yle |
| YM | Ministry of the Environment |

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Appendix 1. Action proposals 1–71 of Finland’s National Roma Policy as a table

| 1 Action proposal | Cooperation partners | Monitoring |
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| Conducting a follow-up study of the impacts of experiences of discrimination, non-inclusion and otherness on the wellbeing of Roma of different ages as part of the assessment of the effectiveness of the actions. | Ministry of Social Affairs and Health, THL, Ministry of Justice, Roma organisations. | Studies have been conducted by 2030 and issues emerging in them are taken into account in future national-level action plans. |
| 2 Action proposal | Cooperation partners | Monitoring |
| Developing cooperation between the police and the Roma population to prevent ethnic profiling. Monitoring the enforcement of the prohibition of profiling in cooperation between the police administration and Roma population. | Ministry of the Interior, Non-Discrimination Ombudsman, police, RONK, Roma organisations. | Based on the cooperation developed, the enforcement of the prohibition of profiling is monitored and reporting on observations of the situation takes place. Any problems identified have been addressed. |
| 3 Action proposal | Cooperation partners | Monitoring |
| Developing measures to ensure awareness of the prohibition of profiling in the structures of the security sector and police administration. Reviewing the security sector business licence also with regard to compliance with the prohibition of profiling. | Ministry of the Interior, Non-Discrimination Ombudsman, police administration, RONK, Roma organisations. | Based on the cooperation developed, the enforcement of the prohibition of profiling is monitored and reporting on observations of the situation takes place. Any problems identified have been addressed. |

| 4 Action proposal | Cooperation partners | Monitoring |
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| Including Roma in the development of equality plans in the various sectors and areas. Ensuring through municipal- and regional-level reviews that the Roma have been taken into account in the plans and promoting the Roma being taken into account in areas where there are Roma living. | Ministry of Social Affairs and Health, THL, Ministry of Justice, Regional State Administrative Agencies, ARONK, Office of the Non-Discrimination Ombudsman, Association of Finnish Local and Regional Authorities, municipalities, regional councils, wellbeing services counties. | Quantitative (has been taken into account/has not been taken into account) and continuous monitoring of whether Roma have been taken into account and consulted in the equality plans of the municipalities and wellbeing services counties. |
| 5 Action proposal | Cooperation partners | Monitoring |
| Cascading Roma policy down to the wellbeing services counties' and municipalities' accounts and plans on wellbeing. | Ministry of Social Affairs and Health, THL, RONK, ARONK, PRT, wellbeing services counties, municipalities, Association of Finnish Local and Regional Authorities. | ROMPO 3 actions have, where appropriate, been taken into account in the wellbeing services counties' and municipalities' accounts and plans on wellbeing. |
| 6 Action proposal | Cooperation partners | Monitoring |
| Cascading Roma policy down to the wellbeing services counties' and municipalities' accounts and plans on wellbeing. | Ministry of Social Affairs and Health, THL, RONK, ARONK, PRT, wellbeing services counties, municipalities, Association of Finnish Local and Regional Authorities. | ROMPO 3 actions have, where appropriate, been taken into account in the wellbeing services counties' and municipalities' accounts and plans on wellbeing. |
| 7 Action proposal | Cooperation partners | Monitoring |
| Improving the position of Roma children and young people in child protection and related after-care as well as in basic public services by training professionals and producing content for the Handbook for Child Protection and other guidelines used by professionals. | THL, Ministry of Social Affairs and Health, wellbeing services counties, municipalities, family centres, child protection professionals, Roma organisations. | Content for the Handbook for Child Protection and other guidelines for professional has been produced and professionals have been trained. Monitoring based on the content produced and amount of training organised for professionals, and number of training participants and their feedback. |

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| <p>8 Action proposal</p> <p>Developing local and national Roma youth work to improve the opportunities of young Roma people for leisure activities and their inclusion.</p> | <p>Cooperation partners</p> <p>Ministry of Education and Culture, THL, ARONK, municipal youth services, Association of Finnish Local and Regional Authorities, youth organisations, Roma organisations, parishes.</p> | <p>Monitoring</p> <p>A Roma youth work network has been established and its activities are well-established. Young Roma people's experiences of inclusion are monitored regularly with inclusion indicators.</p> |
| <p>9 Action proposal</p> <p>Exploring ways of participating that are meaningful from young people's perspective (such as the Digiraati digital panel). Developing for Roma children and young people new influencing channels that strengthen inclusion alongside ones regarded as traditional, employing cooperation between schools and youth work, for example.</p> | <p>Cooperation partners</p> <p>Ministry of Education and Culture, EDUFI, ARONK, municipal youth services, youth organisations, schools, Roma organisations.</p> | <p>Monitoring</p> <p>Meaningful ways of participating have been explored with young people and new nationwide practices have been developed on the basis of this.</p> |
| <p>10 Action proposal</p> <p>Organising, in cooperation with Roma organisations, family camps where Roma parents and guardians can discuss issues (such as child rearing and education) with experts.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, RONK, ARONK, EDUFI, Roma organisations, municipalities, parishes.</p> | <p>Monitoring</p> <p>Number of family camps organised each year where child rearing, early childhood education and care and other education are discussed; the number and feedback of families participating in the camps.</p> |
| <p>11 Action proposal</p> <p>Increasing education, training and guidance targeted at young Roma in managing their own finances, housing, family life skills and life management in Roma youth work. Making use of existing models, making them accessible to young Roma.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, THL, municipal youth services, Roma youth workers, Ohjaamo One-Stop Guidance Centres, Roma organisations.</p> | <p>Monitoring</p> <p>A way of working has been developed that aims at improving the life management skills of young Roma and that reaches the majority of young Roma.</p> |

| 12 Action proposal | Cooperation partners | Monitoring |
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| Developing means for and enabling opportunities of EU mobile Roma children and young people living in Finland to access education, health care and leisure activities that support their growth. | Ministry of Social Affairs and Health, RONK, Ministry of Education and Culture, municipalities, Deaconess Foundation. | Sustainable solutions have been developed for the realisation of the rights of EU mobile Roma children and young people. Those working with the target group collect experiences of the realisation of the rights of EU mobile Roma children and young people. Producing a questionnaire that enables monitoring on the realisation of rights. |
| 13 Action proposal | Cooperation partners | Monitoring |
| Developing and modelling cooperation between the various actors to make the Anchor activity accessible by young Roma. | Ministry of the Interior, Ministry of Social Affairs and Health, Ministry of Justice, police, Roma organisations, ARONK, PRT. | A model that has increased cooperation between actors to increase awareness and accessibility has been developed. Conducting a qualitative monitoring assessment. |
| 14 Action proposal | Cooperation partners | Monitoring |
| Embedding the operating model for young people acting out by means of criminal activities (Ministry of Justice 2019:26) in the project locations and strengthening taking account of Roma in the operating model. | Ministry of Justice, Ministry of Social Affairs and Health, THL, wellbeing services counties, municipalities, Roma organisations. | The operating model is tested in the locations or areas so that the implementation and deployment of the operating model is monitored in accordance with the recommendations of the model. (Ministry of Justice 2019:26) |
| 15 Action proposal | Cooperation partners | Monitoring |
| When examining the realisation of equality and non-discrimination, paying attention to disparities faced by young people, implementing in cooperation with young Roma a project to promote equality and to strengthen young people's Roma identity. Developing approaches to support encounters and interaction with young Roma, making use of existing and tried and tested models. | Ministry of Social Affairs and Health, RONK, Ministry of Justice, Ministry of Education and Culture, Roma organisations, Roma youth networks, youth organisations. | The project to promote Roma youth issues has been implemented and its outcomes have been embedded in existing structures with a variety of methods, including training produced by young people. |

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| <p>16 Action proposal</p> <p>Providing work ability support teams with training in the wellbeing services counties in taking account of Roma in plans and accounts concerning activities. Paying attention to the realisation of equality and also taking account of stay-at-home parents.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, RONK, wellbeing counties' work ability teams, THL, municipalities, ARONK, Roma organisations.</p> | <p>Monitoring</p> <p>Regular training/webinars for work ability teams working in the wellbeing services counties. In conjunction with training, surveying the attitudes and intercultural interaction skills of the teams.</p> |
| <p>17 Action proposal</p> <p>Ensuring equal access to digital services by increasing digital skills and media literacy training aimed at the Roma population.</p> | <p>Cooperation partners</p> <p>Liberal adult education, folk high schools, adult education centres, other educational institutions and organisations, Ministry of Education and Culture, ARONK.</p> | <p>Monitoring</p> <p>Amount of digital training aimed at Roma per year. Qualitative monitoring of target group reach and effectiveness of training.</p> |
| <p>18 Action proposal</p> <p>Identifying the service needs, obstacles to seeking services and access to services among Roma families by means of an action-oriented and multiprofessional study in cooperation with Roma organisations. Developing professional family work taking account of Roma.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, THL, family centres, maternity and child health clinics, parishes.</p> | <p>Monitoring</p> <p>The report on the situation of Roma families, service accessibility and seeking of services is completed and serves as a basis for the development of professional family work with Roma. Accessibility of services among Roma families has improved and professional family work has been developed. Conducting a qualitative assessment.</p> |
| <p>19 Action proposal</p> <p>Ensuring that the situation of Roma families is taken into account and embedded into the family centre activities of the future health and social services centres. Particular attention must be paid to stay-at-home and young parents.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, Regional State Administrative Agencies, family centres of wellbeing services counties, THL, Roma organisations, ARONK.</p> | <p>Monitoring</p> <p>Roma families are reflected in strategies and action plans for the development of family centre activities.</p> |

| 20 Action proposal | Cooperation partners | Monitoring |
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| Increasing awareness among the Roma community of safe childhood and domestic violence and improving the accessibility of services to victims. Mapping out the situation and drawing up proposed measures on the basis of an action-oriented study. | THL, Ministry of Social Affairs and Health, RONK, Roma organisations. | Awareness has been increased through training and information provision. An action-oriented study means collecting information in conjunction with the various forms of work and planning further development measures based on the information obtained. Conducting an assessment of the effectiveness of both the action-oriented study and the further measures. |
| 21 Action proposal | Cooperation partners | Monitoring |
| 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. Employing outreach methods to reach the ageing Roma population. Formulating an action plan on the basis of the study. | THL, Ministry of Social Affairs and Health, RONK, municipalities, Roma organisations. | Study conducted to implement a knowledge-based action plan. |
| 22 Action proposal | Cooperation partners | Monitoring |
| Based on the study of the services for ageing Roma population, implementing an action plan and monitoring the implementation of the plan. | THL, Ministry of Social Affairs and Health, RONK, Roma organisations. | The implementation of the action plan will be monitored and reported on. |
| 23 Action proposal | Cooperation partners | Monitoring |
| Increasing cooperation between those whose activities involve working with ageing Roma to mainstream the actions. | Ministry of Social Affairs and Health, THL, Ombudsman for Older Persons, wellbeing services counties, municipal services for older persons and for persons with disabilities, Finnish Association for the Welfare of Older Adults, ARONK, PRT. | Issues concerning older Roma have received attention in national and local work with older persons and progress made in taking them into account is reported on annually. |

| 24 Action proposal | Cooperation partners | Monitoring |
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| Developing approaches that prevent older Roma from dropping out of the digital service system. | Ministry of Social Affairs and Health, municipalities, wellbeing services counties, Finnish Association for the Welfare of Older Adults, ARONK, Roma organisations. | Challenges arising from digitalisation in the lives of older Roma have been taken into account, they have been reported on and measures to improve the situation have been taken. |
| 25 Action proposal | Cooperation partners | Monitoring |
| The housing of and housing services for ageing Roma are taken into account in organising services for older persons and in the future implementation of the National Programme for Ageing. | Ministry of the Environment, RONK, municipal housing activity and wellbeing services counties' services for older persons and for persons with disabilities, Office of the Non-Discrimination Ombudsman. | Housing-related challenges of the ageing Roma population have been taken into account particularly from the equality and non-discrimination perspective. |
| 26 Action proposal | Cooperation partners | Monitoring |
| Developing activities increasing inclusion and forms of participation among older Roma population to prevent loneliness and memory-related disorders. | Municipalities, civil society organisations, parishes, ARONK. | Regular and active activities have been organised for ageing Roma population. Where possible, inclusion indicators are used in the monitoring of the activities. |
| 27 Action proposal | Cooperation partners | Monitoring |
| 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. Seeking to include Roma with disabilities in the Handbook on Disability Services. Taking the lifecycle model into account in conjunction with services for Roma with disabilities, too. | Ministry of Social Affairs and Health, RONK, Advisory Board for the Rights of Persons with Disabilities (VANE), THL, municipalities, wellbeing services counties and their councils for people with disabilities, Roma organisations. | Data based on experiences of Roma with disabilities concerning accessibility of services has been collected. A cooperation body (such as a network) focusing on supporting the position of Roma with disabilities that generates data based on expertise by experience has been established. |

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| <p>28 Action proposal</p> <p>Conducting an action-oriented study on the accessibility of mental health and substance abuse services among Roma and the challenges relating to seeking access to them, taking account of nationwide coverage.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health/RONK, THL, in cooperation with Roma organisations, Regional State Administrative Agencies, ARONK.</p> | <p>Monitoring</p> <p>Challenges in accessibility of and seeking access to mental health and substance abuse services have been studied and necessary measures have been proposed.</p> |
| <p>29 Action proposal</p> <p>Making mediation part of the development of social support and service models for work with Roma involved in crime.</p> | <p>Cooperation partners</p> <p>Ministry of Social Affairs and Health, THL, municipalities, Ministry of Justice, Roma organisations.</p> | <p>Monitoring</p> <p>Mediation and restorative justice have become part of Roma-specific work.</p> |
| <p>30 Action proposal</p> <p>Developing, and coordinating nationally, work relating to substance abuse, violence and prisoners carried out with Roma that takes the different age groups into account. Training peer actors and professionals.</p> | <p>Cooperation partners</p> <p>Ministry of Justice, Ministry of Social Affairs and Health, Prison and Probation Service of Finland, THL, municipalities, wellbeing services counties, Roma organisations, Church prison and substance abuse work.</p> | <p>Monitoring</p> <p>National approach and coordination have been created for substance abuse, violence and prison work carried out with Roma. Awareness among professionals and actors providing assistance of the situation of Roma has increased following training. Monitoring based on the number of training sessions and the development of the national operating model.</p> |
| <p>31 Action proposal</p> <p>Including cultural diversity, including Roma culture, in the continuing professional development of early childhood education and care and pre-primary education staff.</p> | <p>Cooperation partners</p> <p>Ministry of Education and Culture, municipalities, universities, EDUFI for content production.</p> | <p>Monitoring</p> <p>Roma children's culture and position have been taken into account in the education and training of early childhood education and care and pre-primary education staff. The amount of training and quantity assessment have been included in the monitoring indicator.</p> |

| 32 Action proposal | Cooperation partners | Monitoring |
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| Taking the needs of Roma children and young people into account in the development of guidance counselling and student welfare services, and enhancing the pupils' personal guidance counselling in basic education. | Ministry of Education and Culture, EDUFI, municipalities, Roma organisations and other education and training actors. | Roma pupils have been taken into account in intensified guidance counselling. Examining the effectiveness of intensified guidance counselling on the basis of, for example, increases in and development of cooperation between schools and families in accordance with the guide to intensified guidance counselling. |
| 33 Action proposal | Cooperation partners | Monitoring |
| Developing a nationally uniform approach to guidance counselling for Roma pupils and developing the guidance counselling of Roma pupils in cooperation, expanding the knowledge base. Monitoring the development of education and training paths. | Ministry of Education and Culture, EDUFI, municipalities, ARONK, Roma organisations. | A coordinated, uniform approach to guidance counselling for Roma pupils has been developed and access of Roma students to general upper secondary education and the different occupations and professions is monitored during the operating period. Monitoring methods and opportunities to increase information on education and training paths and seeking entry to different occupations and professions have been developed in guidance counselling for Roma pupils. |
| 34 Action proposal | Cooperation partners | Monitoring |
| Implementing a project to review the sections on the Roma in basic education and vocational education materials, and making proposals for improving these contents. | Ministry of Education and Culture, EDUFI, municipalities. | The review has been conducted. |

| 35 Action proposal | Cooperation partners | Monitoring |
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| Based on the review of study materials, increasing the awareness of producers of study materials of Roma-related issues and, where possible, taking account of the improvements and additions concerning study material covering Roma proposed by the review report. | Ministry of Education and Culture, EDUFI, municipalities. | Implementation of the action proposals. |
| 36 Action proposal | Cooperation partners | Monitoring |
| Ensuring access to basic education on the basis of positive action for Roma-background adults serving a prison sentence who have dropped out of basic education and developing ways to monitor the equal accessibility of education and training provided in prisons. | Ministry of Education and Culture, EDUFI, municipalities, Prison and Probation Service of Finland, education and training providers, Roma organisations, Office of the Non-Discrimination Ombudsman. | Measures have been developed to support the schooling of Roma-background prisoners. |
| 37 Action proposal | Cooperation partners | Monitoring |
| Developing and continuing the deployment of the national operating model to support Roma education paths to higher education, making use of the experiences and information from the Romako project of Diaconia University of Applied Sciences (DIAK), paying attention to prospective students considering a broad range of disciplines. | Ministry of Education and Culture, vocational/higher education institutions, municipalities. | The number of Roma with a higher education degree has increased. |

| 38 Action proposal | Cooperation partners | Monitoring |
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| Communicating education and training opportunities. Encouraging Roma to complete further and specialist vocational qualifications nationwide and targeting the training provision of liberal and other adult education institutions at the Roma population. | EDUFI, municipalities, education and training providers, Roma organisations, ARONK, PRT. | Increases in the number of vocational qualifications and courses targeted at Roma in liberal and other adult education institutions. |
| 39 Action proposal | Cooperation partners | Monitoring |
| Including Roma clearly in societal policy debate on poverty reduction and taking Roma into account in debate on diversity in society and working life. | Ministry of Economic Affairs and Employment, Ministry of Justice, municipal employment authorities, vocational institutions and universities of applied sciences. | Actors have increased attention to Roma in societal policy debate on poverty reduction and diversity in working life. |
| 40 Action proposal | Cooperation partners | Monitoring |
| Developing further and deploying support measures to enable the practical training of Roma, making use of experiences from the Romako project. | Ministry of Economic Affairs and Employment, Ministry of Justice, EDUFI, educational institutions, DIAK. | Carrying out an assessment of the effectiveness of the support measures that examines the accessibility of practical training periods among Roma. |
| 41 Action proposal | Cooperation partners | Monitoring |
| Establishing locally small-scale projects supporting employment that are able to respond to the needs of Roma in the location/area and influence local employers. | Ministry of Economic Affairs and Employment, municipalities, ARONK, PRT. | Examining the number of projects implemented regionally each year and assessing their effectiveness on the basis of the number of persons who have accessed employment. |
| 42 Action proposal | Cooperation partners | Monitoring |
| Implementing a national project to promote the non-discrimination of Roma in working life and recruitment. | Ministry of Economic Affairs and Employment, Ministry of Justice, ARONK, municipalities, Roma organisations and actors, vocational institutions and universities of applied sciences. | The project has been implemented and its media visibility has been monitored (metadata) to ensure dissemination of information. |

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| 43 Action proposal | Cooperation partners | Monitoring |
| Tackling discrimination in the labour market by increasing cooperation, concrete measures and broader visibility of the theme. | Ministry of Economic Affairs and Employment, municipalities, labour market organisations and trade unions. | Concrete measures to tackle discrimination encountered by Roma in the labour market have been developed in cooperation. |
| 44 Action proposal | Cooperation partners | Monitoring |
| Organising annual and coordinated training events nationally for employment authorities with regard to the working life situation of Roma. | TEM, local government, Roma organisations, trade unions. | Training for employment authorities organised annually. Number of training events as an indicator and training feedback questionnaires as a qualitative indicator. |
| 45 Action proposal | Cooperation partners | Monitoring |
| Collecting and publishing Roma experiences of education, training, recruitment and working life as well as societal inclusion and communicating the experiences broadly. | RONK, Finnish Literature Society, Roma organisations. | Output: Narratives of Roma on inclusion in working life and society. |
| 46 Action proposal | Cooperation partners | Monitoring |
| Housing advisory services must be utilised with Roma, guiding Roma-background clients to using the service. The action must take account of Roma of all ages. | Ministry of Social Affairs and Health, RONK, Ministry of the Environment, ARA, municipalities, ARONK. | Accessibility and effectiveness of housing advisory services among Roma are assessed by means of a separate study, as the providers of housing advisory services do not record statistics on cultural or ethnic background and the data is not included, for example, in the ARA statistics form. |
| 47 Action proposal | Cooperation partners | Monitoring |
| Housing actors must be provided with information on the concepts of equality and non-discrimination, and challenges relating to Roma housing must be taken into account in the equality plans of municipalities and wellbeing services counties. | Municipalities, Non-Discrimination Ombudsman, Ministry of Social Affairs and Health, RONK, ARONK. | Entries in municipalities' equality plans on Roma housing conditions; Roma inclusion and consultation relating to housing are examined. |

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| 48 Action proposal | Cooperation partners | Monitoring |
| Increasing housing actors' equality competence and capacity to address housing-related problems by means of mediation. | Finnish Forum for Mediation (FFM), municipalities, Association of Finnish Local and Regional Authorities, ARONK. | Amount of mediation process use in housing challenges encountered by Roma. |
| 49 Action proposal | Cooperation partners | Monitoring |
| Carrying out an effectiveness assessment among those participating in actions/in the action environment at the end of the operating period/once actions are completed. | Ministry of Justice, Office of the Non-Discrimination Ombudsman, ARONK, municipalities. | Effectiveness assessment has been carried out. |
| 50 Action proposal | Cooperation partners | Monitoring |
| Organising family camps and supported holidays for Roma families to promote health, wellbeing and children's rights. | Ministry of Social Affairs and Health, Roma organisations, parishes, RONK, ARONK. | The number of family camps and supported family holidays for Roma has increased; number and feedback of participants. |
| 51 Action proposal | Cooperation partners | Monitoring |
| Promoting health and wellbeing in the municipalities and the new wellbeing services counties so that projects and measures taking account of dietary and physical activity habits, substance abuse and mental wellbeing are targeted at the Roma population. | Ministry of Social Affairs and Health, THL, wellbeing services counties, municipalities, Roma organisations, ARONK. | Health and wellbeing measures and projects targeted at Roma. Action methods employed in the assessment of the baseline situation, measures and impacts. |
| 52 Action proposal | Cooperation partners | Monitoring |
| Targeting at Roma age and gender sensitive measures promoting health, wellbeing and safety and preventing health problems. | Ministry of Social Affairs and Health, RONK, THL, wellbeing organisations, Roma organisations. | Number of participants in measures, and surveys of their experience of their own state of health as well as health and wellbeing checks at the start and end of the measures. |

| 53 Action proposal | Cooperation partners | Monitoring |
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| Ensuring that Europe's mobile Roma are taken into account in the actions mentioned in the health and wellbeing section. | Ministry of Social Affairs and Health, RONK, THL, wellbeing services counties, CSOs and other actors working in the field of health and wellbeing.. | Europe's mobile Roma have been taken into account in the actions mentioned in section 11. |
| 54 Action proposal | Cooperation partners | Monitoring |
| To promote Roma culture and support inclusion in the national cultural scene, establishing a centre for Roma culture aimed at all ages. The centre for Roma culture will serve as a diverse hub for cultural actors. The activity will be linked with the activities of the virtual centre of expertise mentioned in section 15. | Ministry of Education and Culture, Arts Promotion Centre Finland (Taike), Finnish Heritage Agency / National Museum, RONK, ARONK, Roma organisations. | The centre for promoting Roma culture has been founded and its activities have become established during the operating period. |
| 55 Action proposal | Cooperation partners | Monitoring |
| Drawing up a national programme for the promotion of Roma art and culture, linked with the Cultural Heritage Strategy and the related action plan. | Ministry of Education and Culture, Arts Promotion Centre Finland (Taike), Finnish Heritage Agency/ National Museum, Roma artists and other Roma actors, various expert organisations in art and culture. | The national promotion programme has been drawn up during the operating period and the measures proposed in it have been introduced for execution. |
| 56 Action proposal | Cooperation partners | Monitoring |
| Linked with the study materials review action (action 34), producing on the basis of research-based knowledge and making use of archived material, popularised material that can also be utilised in teaching, particularly in higher education. | RONK, EDUFI, Finnish Literature Society, universities, Roma organisations. | Popularised study material has been produced during the operating period and measures necessary to utilise it in teaching have been taken. |

| 57 Action proposal | Cooperation partners | Monitoring |
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| As part of decolonised museum activity, bringing the history and culture of the Roma population systematically as part of museum activity to increase awareness. | Finnish Heritage Agency, National Museum, RONK, ARONK. | Roma are visible in the strategies and implementation programmes of national museum activity. |
| 58 Action proposal | Cooperation partners | Monitoring |
| Developing a national mentoring programme to support the engagement of young Roma in music. | Ministry of Education and Culture, municipalities, Roma actors and artists, liberal adult education and folk high schools, and institutions providing basic education in the arts, including music. | The national mentoring programme has been developed in cooperation with music and art institutions and Roma artists. |
| 59 Action proposal | Cooperation partners | Monitoring |
| Clarifying the study path of Romani language students to becoming a qualified teacher of Romani at the University of Helsinki (Romani and Roma culture). Making efforts to increase the number of Romani language students who also include digital and remote pedagogy studies in their degree. Implementing a pilot to allow for the possibility of including the Romani language in the Bachelor of Social Services degree (20 credits) at the Diaconia University of Applied Sciences and in the Further Vocational Qualification in Education and Guidance (20 competence points) in the STEP programme. The action aims to ensure a sufficient number of Romani language teachers and instructors.. | University of Helsinki, Diaconia University of Applied Sciences (DIAK), and STEP Education of the Church Resources Agency. | Number of qualified Romani language teachers, number of those who have included Romani language studies in their Bachelor of Social Services degree or Further Vocational Qualification in Education and Guidance. |

| 60 Action proposal | Cooperation partners | Monitoring |
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| <p>Implementing under separate funding a national Romani language pilot project utilising remote connections. Ensuring that the municipalities are able to apply for discretionary government grants for organising Romani language teaching supplementing primary and lower secondary as well as general upper secondary education. Informing Roma parents and guardians about the opportunity to study the language. The training of Romani language teachers mastering digital and remote pedagogy relating to the pilot project is included in the action above.</p> | <p>Ministry of Education and Culture, EDUFI and education and training providers.</p> | <p>Number of students studying the Romani language.</p> |
| 61 Action proposal | Cooperation partners | Monitoring |
| <p>Planning and implementing under separate funding a Romani language learning material package from early childhood education and care to adult studies. The package consists of material including textbooks, digital material, games and videos as well as support material for teachers, including recordings and practical teaching ideas.</p> | <p>EDUFI, other possible publishers and authors of study material.</p> | <p>Quantity of study material.</p> |
| 62. Action proposal | Cooperation partners | Monitoring |
| <p>Increasing the visibility of the Romani language and Roma culture in the media among children, the most important language revival target group. Yle will dub a series of children's programmes into Romani. Exploring opportunities to produce Romani discussion and family programmes also on a private TV channel.</p> | <p>Yle, national Roma organisation.</p> | <p>Amount of programmes in Romani.</p> |

| 63 Action proposal | Cooperation partners | Monitoring |
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| Making use of the opportunities provided by social media for diverse use of the Romani language. Implementing a discussion forum in Romani on social media. Providing Roma families with videos and other materials in Romani aimed at children and young people. | Nationwide Roma organisation. | Producing a Romani social media platform; usage rate. |
| 64 Action proposal | Cooperation partners | Monitoring |
| Supporting the capacity of Finnish Roma organisations and actors, particularly young Roma and Roma women, to participate in European cooperation and supporting the strengthening of cooperation between Roma organisations. Exploring and promoting opportunities for increasing Roma cooperation in the Nordic countries and Baltic Sea region. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Justice in cooperation with Roma organisations. | Clear measures to support participation capacity and inclusion are reported during the operating period. Training for Roma actors has been provided relating to international Roma policy. |
| 65 Action proposal | Cooperation partners | Monitoring |
| Recruiting and sending experts via the international seconding procedure to develop European Roma policy. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, RONK. | Finland has offered experts for appointment and contributed towards the costs arising from the seconded experts. |
| 66 Action proposal | Cooperation partners | Monitoring |
| Finland highlights the influencing opportunities of Roma organisations and other organisations promoting Roma affairs in intergovernmental organisations. | Ministry for Foreign Affairs, Ministry of Social Affairs and Health, Ministry of Justice, other authorities in their sectors. | Roma actors have been provided with training enabling participation. Information about international events is provided broadly to the network of actors and Finnish actors are encouraged to participate. |

| 67 Action proposal | Cooperation partners | Monitoring |
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| <p>Developing the national and regional structure of Roma-specific work and Roma policy and related cooperation. Exploring new ways to increase the efficiency and coherence of operating models and to find new solutions to regional and local level implementation to embed and monitor Roma policy measures.</p> | <p>Ministry of Social Affairs and Health, RONK, ARONK, Regional State Administrative Agencies, Roma organisations, PRT</p> | <p>Annual negotiation days of Advisory Boards on Romani Affairs have developed concrete measures to increase cooperation and joint development between the Boards and other actors. ROMPO monitoring topics are examined by making use of, for example, consultation and facilitation.</p> |
| 68 Action proposal | Cooperation partners | Monitoring |
| <p>Making use of digitalisation and new technology, establishing a virtual centre of expertise that enables the collection, storage, monitoring and reporting of information and also the display of the competence and expertise of Roma to promote equality and inclusion.</p> | <p>Ministry of Social Affairs and Health, Ministry of Justice, Ministry of Education and Culture, Ministry of the Environment, RONK, ARONK, Regional State Administrative Agencies, THL, Roma organisations.</p> | <p>A new digital solution for the collection, production and distribution of information has been developed.</p> |
| 69 Action proposal | Cooperation partners | Monitoring |
| <p>Producing ethical guidelines for research and data collection involving Roma by utilising the basic principles of Critical Romani Studies.</p> | <p>THL, Ministry of Social Affairs and Health, RONK, Ministry of Justice, universities, Roma organisations.</p> | <p>The ethical guidelines have been produced and compliance with them in research and data collection is monitored.</p> |

| 70 Action proposal | Cooperation partners | Monitoring |
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| <p>As part of establishing the data collection platform, examining the contribution of the various actors to national Roma policymaking. Finding the interfaces of regional and national Roma-specific work and planning the implementation of the work between these two levels, seeking synergies in the process.</p> | <p>Ministry of Social Affairs and Health, Ministry of Justice, RONK, ARONK, Regional State Administrative Agencies, Association of Finnish Local and Regional Authorities, PRT.</p> | <p>The re-examination of the development of national Roma-specific work has begun and the development process has been documented.</p> |
| 71 Action proposal | Cooperation partners | Monitoring |
| <p>Developing a consistent reporting procedure for Roma policy actions.</p> | <p>Ministry of Social Affairs and Health, Ministry of Justice, THL, RONK, ARONK, Regional State Administrative Agencies, Roma organisations.</p> | <p>The monitoring and reporting practices have been made consistent and agreed upon between the relevant actors.</p> |

Appendix 2. Providers of comments

Comments received by the Ministry of Social Affairs and Health on the draft National Roma Policy (lausuntopalvelu.fi)

1. Amnesty International Finland 31 October 2022
2. Association of Finnish Local and Regional Authorities ry. 31 October 2022
3. Central Union for the Welfare of the Aged 31 October 2022
4. Centre for Economic Development, Transport and the Environment for Lapland 28 October 2022
5. Centre for Economic Development, Transport and the Environment for Southwestern Finland 24 October 2022
6. Church Council 27 October 2022
7. City of Helsinki 25 November 2022
8. City of Imatra 26 October 2022
9. City of Kuopio 31 October 2022
10. City of Lahti 31 October 2022
11. City of Lappeenranta 31 October 2022
12. City of Oulu 26 October 2022
13. City of Riihimäki 31 October 2022
14. City of Tampere 31 October 2022
15. City of Turku 31 October 2022
16. City of Vantaa 11 November 2022
17. Diaconia University of Applied Sciences Oy 31 October. 2022
18. Finnish Broadcasting Company Yle 31 October 2022
19. Finnish Forum for Mediation 31 October 2022
20. Finnish Immigration Service 31 October 2022
21. Finnish League for Human Rights 31 October 2022
22. Finnish Literature Society 31 October 2022
23. Finnish National Agency for Education 31 October 2022
24. Finnish Roma Association 31 October 2022
25. Funding Centre for Social Welfare and Health Organisations (STEA) 25 October 2022
26. Human Rights Centre 31 October 2022
27. Institute for the Languages of Finland 28 October 2022
28. Ministry for Foreign Affairs 1 November 2022
29. Ministry of Education and Culture 28 October 2022

30. Ministry of Social Affairs and Health 31 October 2022
31. Ministry of the Environment 28 October 2022
32. Ministry of the Interior 27 October 2022
33. Municipality of Parikkala 21 October 2022
34. Municipality of Teuva 31 October 2022
35. Municipality of Tuusula 31 October 2022
36. National Board of Antiquities 28 October 2022
37. National Child Strategy 2 October 2022
38. National Institute for Health and Welfare October 2022
39. Non-Discrimination Ombudsman 31 October 2022
40. Office of Parliamentary Ombudsman 31 October 2022
41. Office of the Ombudsman for Children 24 October 2022
42. Regional State Administrative Agency for Eastern Finland, two divisions 31 October 2022
43. Regional State Administrative Agency for Lapland 31 October 2022
44. Regional State Administrative Agency for Northern Finland 31 October 2022
45. Regional State Administrative Agency for Southern Finland 31 October 2022
46. Regional State Administrative Agency for Western Finland 31 October 2022
47. Save the Children Finland 31 October 2022
48. South Savo Social and Health Care Authority Essote 31 October 2022
49. Statistics Finland 31 October 2022



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