

Questionnaire on the EU anti-racism action plan 2020-2025 and lessons learned.

Fields marked with * are mandatory.

The first [EU anti-racism action plan 2020 – 2025](#)^[1], adopted in September 2020, is a key initiative of the European Commission to step up the fight against racism and racial discrimination in the EU. Civil society stakeholders welcomed its adoption, considering it to have advanced the debate on tackling all forms of racism, including systemic and structural racism, in the EU.

As mentioned in the [report on the implementation of the EU anti-racism action plan 2020-2025](#), it is imperative to carry forward the momentum and continue to strengthen the policies, practices and initiatives that have proven effective, notably in light of the worsening incidence of racial discrimination.

The mission letter addressed to the Commissioner for Equality, Ms. Hadja Lahbib, states that striving for equality for all and equality in all its senses will continue to be central to the Commission's work throughout the next five years. In that mission letter, President von der Leyen, tasks Ms. Lahbib to "present a new anti-racism strategy with the aim of ensuring that all people are able to live lives free of the barriers that racism creates. She also requests the Commissioner to put forward resolute actions to address discrimination, hate speech and hate crimes".

The objective of this consultation is to ensure that relevant stakeholders can express their views and opinions about the **current EU anti-racism action plan (2020 – 2025)**.

The questionnaire also touches upon refers to challenges, the synergies between the EU anti-racism action plan and other EU strategies, and assistance to national efforts against racism.

Targeted audience of this consultation are civil society organisations that at least partly address racism, international organisations, potentially Member State' institutions and community-based organisations.

Thank you for your participation. Please answer all questions or indicate that they are not applicable to you.

[1] This report refers to 'racial and ethnic origin' in line with the EU anti-racism action plan, as well as EU and international legal terminology. The Commission shares, however, the common understanding that 'races' are purely based on socially constructed ideas and it rejects the notion of biological 'races'.

Information about the respondent

* Full name (first and last name) of the individual respondent:

Tomas de Jong

* What is the name of your organisation/ institution?

European Public Health Alliance

* Please provide your e-mail address (this data will not be made public):

tomas.dejong@epha.org

* Type of organisation where you work

between 1 and 2 choices

- Public administration, public service
- Non-governmental organisation
- Business
- Employers' organisations
- Association
- International Organisations
- Academia, research, think tank
- Other

* Country/countries where your main areas of activities/knowledge are.

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania

- Slovak Republic
- Slovenia
- Spain
- Sweden
- European Union
- Outside of the European Union
- International Organisation

* Level on which your organisation's main activities focus

- International level
- European level
- National level
- Regional level
- Local level

* Size of the organisation you represent

- Large (> 250 employees)
- Medium (50- 249 employees)
- Small (10-49 employees)
- Micro (1-9)
- Micro (self-employed)

* Please describe how your knowledge relates to the EU anti-racism action plan and its implementation.

- I have knowledge of relevant European instruments (e.g. Anti-racism action plan, Racial Equality Directive)
- I have knowledge of relevant national instruments (e.g. national action plans against racism, national legislation to address hate speech) in several countries.
- I have knowledge regarding national instruments (e.g. national action plans against racism, national legislation to address hate speech) in one country.
- I have knowledge regarding the local situation of racialized and ethnic minorities.
- I do not have specific knowledge on anti-racism policies

THE EU ANTI-RACISM ACTION PLAN 2020-2025

1. The EU anti-racism action plan 2020-2025 is structured into individual and structural forms of racism and linked with other EU sectoral policy areas. Each translated into an action to tackling racism at EU level.

| | Very difficult | Difficult | Neutral | Easy | Very easy | No opinion |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| * In your opinion, how easy to understand is this structure? | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

1bis. The EU anti-racism action plan 2020-2025 is structured into individual and structural forms of racism and linked with other EU sectoral policy areas. Each translated into an action to tackling racism at EU level.

| | Very difficult | Difficult | Neutral | Easy | Very easy | No opinion |
|--|----------------|-----------|---------|------|-----------|------------|
| | | | | | | |

| | | | | | | |
|---|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| * In your opinion, how pertinent is this structure? | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
|---|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|

2. To what extent do you consider EU action to be beneficial and complementary to national action to meet the objectives below?

| | Not at all | To a limited extent | To some extent | To a large extent | I don't know |
|---|-----------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| <p>* Pursuing an intersectional approach[1] to ensure effective responses to all forms of racism, including systemic and structural racism.</p> <p>[1] In combatting racism, the Commission pursues an intersectional approach that pays attention to the combination of different grounds of discrimination to deepen the understanding of structural racism and to ensure that responses are more effective. Thereby 'intersectionality' is understood as an 'analytical tool for studying, understanding and responding to the ways in which race and ethnic origin intersect with other personal characteristics/identities, and how these intersections contribute to unique experiences of discrimination'.</p> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <p>* Mainstreaming[1] anti-racism policy into all policy areas.</p> <p>[1] According to the anti-racism action plan, the Commission mainstreams anti-racism into all its policy-areas and has also invited Member States to assess their initiatives through an anti-racism lens and incorporate anti-racism measures into all their policy areas. This means taking into consideration potential racial bias – conscious or unconscious – and patterns of discrimination in the rules, norms and processes that they apply, and in their attitudes, and behaviours.</p> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <p>Addressing the forms of racism against different groups</p> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <p>* Addressing anti-black racism[1]</p> <p>[1] In some Member States referred to as Afrophobia.</p> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Addressing antigypsyism | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Addressing anti-Asian racism | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Addressing antisemitism | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <p>* Addressing anti-Muslim hatred[1]</p> <p>[1] In some Member States referred to as Islamophobia or anti-Muslim racism</p> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | |
|---|-----------------------|----------------------------------|-----------------------|-----------------------|----------------------------------|
| * Addressing anti-migrant racism[1]. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| [1] In some Member States referred to as anti-migrant sentiments, xenophobia, or other. | | | | | |
| * Other forms: please specify below | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

* 2bis. If you indicated EU action to **be slightly or be not at all beneficial**, please explain why?

1500 character(s) maximum

The EU's Union of Equality Strategies generally are somewhat conscious of the intersectional nature of discrimination and racism, illustrated by sectoral breakdowns, explicit mentioning of several dimensions relevant for example hate speech or policy brutality in addition to intersectional topics such as education, health, employment and housing)

Mainstreaming of anti-racism and anti-discrimination does take place in the EU, mainly through the Equality taskforce and through connecting the different initiatives across policy documents or frameworks. However, action often does not move beyond words; explicit mention of mainstreaming policy instruments does not equate to concrete action. This translates to a European context where action on anti-racism and anti-discrimination is fragmented. Racism and discrimination are rarely covered in policy instruments that do not directly cover them.

In addition, out of the Union of Equality Strategies, the EU Roma Strategic Framework, addressing antigypsyism, appears to be the most developed, with clear sectoral objectives and indicators, supported by some (though not enough) data collection. The same cannot be said for other strategies, or indeed for other types of discrimination, which must be more explicitly addressed with concrete action. Moving towards a more binding nature for these Union of Equality strategies would be a good development, and it would require strong objectives, supported by indicators and data collection

3. To what extent have the following **EU-level housing-related initiatives** contributed to combating racism and discrimination in access to housing?

| | Not at all | To a limited extent | To some extent | To a large extent | Not aware of this initiative | Do not know |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|------------------------------|----------------------------------|
| * Council Conclusions on Measures to ensure equal access for Roma to adequate and desegregated housing | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * EU funding for affordable housing (e.g. HORIZON, SMP[1], etc.) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| [1] Single Market Programme | | | | | | |
| * Other (please specify below) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

* 3bis. If other, please specify

300 character(s) maximum

N/A

4. How would you rate the progress achieved at the **EU, national and local levels** in combating racism and discrimination in **access to housing**, specifically as a result of the adoption/implementation of the ARAP?

| | Excellent progress | Good progress | Moderate progress | Little progress | No progress | No opinion/ Do not know |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| * EU level (EU initiatives) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| * National level (national level policies) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| * Local level (local housing policies, city action plans) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* 4bis. For each level, please explain your choice, specifying the Member State(s) where relevant.

800 character(s) maximum

EPHA operates mainly at the EU level. From this perspective it is too early to tell if general positive developments have been achieved on access to housing before more widespread reporting and/or data is released on this.

5. To efficiently address racism, how relevant are the following instruments in your view?

| | Very relevant | Relevant | Neutral | Not relevant | I do not know |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| * Communication on the list of 'EU crimes'[1]. [1] COM(2021) 777 final, Communication on 'A more inclusive and protective Europe: extending the list of EU crimes to hate speech and hate crime', European Commission, Brussels, 9 December 2021. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Communication on 'No place for hate: a Europe united against hatred' . | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * The High-level group on combating hate speech and hate crime. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * The organization of the European Citizens Panel on tackling hatred in society . | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

* 5bis. If you **do not agree with the relevance of the listed instruments**, please elaborate.

1500 character(s) maximum

N/A

* 6. In your opinion, which of the Commission actions to support Member States in **law enforcement** is being successful in preventing racism? Please elaborate.

1500 character(s) maximum

Commission initiatives such as the High level group on combating racism, xenophobia and other forms of intolerance, the related 'key guiding principles on cooperation between law enforcement authorities and civil society organisations', as well as data collected by the European Union Agency for Fundamental Rights, such as the recent 'Addressing Racism in Policing' report, all help getting a better idea of racism in law enforcement.

Even so, racism in law enforcement persists. The only way to resolve this, is for reforms in national police departments. based on national legislation that explicitly includes law enforcement pointing to concrete action

on, for example, racial profiling or explicitly naming that policy forces are not excluded from anti-discrimination legislation. Once this basis is established and national law enforcement institutions set clear goals and strategies to address racism within their systems, there cannot really be talk of successfully preventing racism in law enforcement.

* 7. Beside Member States, how have different stakeholders, including g. civil society organizations and local communities, contributed to the **prevention of racism in law enforcement**? Please give specific examples or good practices in space below.

1500 character(s) maximum

One example that was addressed in the DIsQo Stakeholder Network, was a documentary made by the Dutch Foundation for Public Broadcasting (NPO) entitled 'de Blauwe Familie ' (the Blue Family) which included testimonies of current and former police men who both saw and faced racism in the Dutch police, (including coverage of how this impacted their mental health) despite the Police's stated attempts to foster diversity and inclusion,

Such publicly funded ways to gain an understanding of what racism in law enforcement looks like are desperately needed. However, the caveat must be made that this is only naming the issue, not a solution. Decisive action is required in addition to naming the problem, basing the approach on those identified problems.

- * 8. Artificial intelligence and automated systems could reproduce (unconscious) racial bias. In your opinion, which of the EU initiatives are being successful in addressing this dangerous phenomenon of reproducing **bias in AI systems**? Please elaborate.

1500 character(s) maximum

We have looked in particular at legislation such as Artificial Intelligence Act , the Digital Services Act and the Digital Markets Act. In addition, we monitor the work of the European Health Data Space, including with a view on how AI use in healthcare could help reduce health disparities. It is too early to speak about success of this legislation and this initiative; it is still early stages and particularly marginalised groups face a risk of being further left behind if not taken sufficiently into consideration. To gain a better understanding on this, personal ownership and digital health literacy will be pivotal points.

- * 9. In your opinion, which are the Commission actions that are being successful in addressing **illegal content and disinformation online**, including racist hate speech?

Please elaborate.

1500 character(s) maximum

This falls outside our expertise

- * 10. How do you classify/judge progress achieved by the signatories' to IT platforms of the [Code of Conduct](#) on removing illegal content and hate speech online?

Maximum 1 selection(s)

- Excellent
- Very good
- Sufficient
- Insufficient
- Inexistent
- I do not know

- * 10bis. Please elaborate on your answer(s) above

1500 character(s) maximum

N/A

* 11. The anti-racism action plan calls upon Member States to adopt national action plan against racism. In your opinion, what are the EU initiatives being most successful in their support to Member States' efforts? Please elaborate

1500 character(s) maximum

Above all, the Commission Coordinator on Combating Racism plays an extremely important positive and connecting role; a strengthened position for this office is paramount, for example by placing it within the European Commission Secretariat-General. The decision to remove a dedicated Commissioner for Equality should also be reversed, as it risks weakening the EU's ability to address issues of inequity, discrimination and racism.

An aspect that makes this question difficult to answer from the civil society perspective, is that EU initiatives that support Member States' anti-racism efforts typically do not involve civil society, while initiatives that do involve civil society generally have very limited involvement of Member States.

The Permanent Anti-Racism Civil Society Forum (and the Anti-Racism Week) is an excellent platform for exchange on anti-racism and anti-discrimination policy, and for civil society organisations to engage with each other and with the European Commission, but it is unlikely that Member States are aware of the concerns shared there.

The Citizens, Equality, Rights and Values Programme (CERV) should also be mentioned as a positive funding programme which allows for concrete initiatives to drive change or conduct research on equity-, discrimination- or racism-related topics.

* 12. The anti-racism action plan calls upon Member States to improve equality data collection. The Commission published a [Guidance note on the collection and use of equality data based on racial or ethnic origin](#) in 2021? Is this Commission's action successfully addressing the lack of equality data?

Maximum 1 selection(s)

- Yes
- No
- I do not know

* 12bis. If no, please make specific recommendations for further actions.

1500 character(s) maximum

The Guidance note itself is a very useful tool to inform the collection of equality data. It makes reference to the OHCHR human-rights based approach to data and provides Member States with a good basis for equality data collection.

We are aware of such data collection taking place to a limited degree in some member states, for example the Dutch G4 Dashboard on discrimination in Amsterdam, Rotterdam, the Hague and Utrecht, which allows for almost real-time reporting on discrimination incidents. Structural equality data collection does not truly take place, nor does it feed directly into sectoral objectives or indicators to be used in equality strategies.

They key responsibility lies in willingness on the Member State level; they have to make a conscious effort to collect equality data and integrate this in their equality strategies, providing their national statistical offices with the capacity to collect such data. The European Commission can:

-Include in the post-2025 EU ARAP a requirement for member states to set concrete goals on disaggregated equality data collection, if possible integrating these in sectoral objectives and indicators to measure progress
-taking a leadership role in the harmonisation of equality data collection in the EU based on the OHCHR Human Rights Indicators: A Guide for Measurement and Implementation), for example through FRA and the Eurostat working group on equality and non-discrimination, or International Meeting on Gender Statistics

- * 13. The anti-racism action plan emphasises the crucial role of representatives of racialised communities and civil society actors. How would you assess the **EU participatory approach** designed to accommodate effective participation of civil society actors and racialised communities in combatting racism at EU level?

Maximum 1 selection(s)

- Satisfactory
 Dissatisfactory
 Neutral
 I do not know

- * 13bis. Do you have any recommendations for improvement?

1500 character(s) maximum

The European Commission and Coordinator for Combatting Racism does a great job of engaging with civil society in our experience. However, The wider EU approach to social participation of people with lived experience is insufficient. Consultations conducted in the DisQo Stakeholder Network: anti-discrimination and health equity provided the following recommendations:

- including civil society at the heart of the of the post-2025 Anti-racism Action Plan to assist with design, implementation, monitoring and evaluation
- systematically incorporating and providing leadership to civil society stakeholders not only in the design, development and evaluation of hard and soft legislative initiatives, but also as a key source of expertise, following the Better Regulation Guidelines
- fostering - in a non-tokenistic way (i.e., ensuring real influence) - diversity and representation in its advisors/advisory bodies, in its funded projects, and, importantly, across its DGs, at all levels of governance
- including action points on empowerment or capacity-building of PAD regarding education, advocacy, and participation in consultative bodies in relation to the Right to Health and racial discrimination, as to ensure the principle 'nothing about us without us'

- * 14. Do you agree that the **High-level EU Anti-racism Summits** of 2021 and 2022 have significantly furthered the political attention to the fight against racism with the participation of European institutions, Member States, civil society and other stakeholders?

Maximum 1 selection(s)

- Disagree
 Rather disagree
 Agree
 Rather agree

No opinion

* 14bis. Please elaborate if you disagree or rather disagree

1500 character(s) maximum

The Summits (like the Anti-Racism and Diversity Weeks) are effective ways of bringing together a wide range of stakeholders and have discussions on racism and discrimination that are relevant to the current reality. They are welcome events that should be actively encouraged.

High-level representation, especially of Member States, is a point of improvement however. To show the seriousness of topic, high-level representation of the Parliament, Commission and Council should be secured. In addition, each Member State government should be represented, preferably also on a high level.

* 15. Regarding the work of your organisation, how has **civic space**[1] developed since the adoption of the anti-racism action plan in 2020?

[1] Civic space is the environment that enables people and groups – or ‘civic space actors’ – to participate meaningfully in the political, economic, social and cultural life in their societies. Vibrant civic space requires an open, secure and safe environment that is free from all acts of intimidation, harassment and reprisals, whether online and offline.

Maximum 1 selection(s)

- Civic space has increased
- Civic space has decreased
- Civic space has remained the same
- I do not know

* 15bis. If civic space has changed for your organisations, please elaborate.

1500 character(s) maximum

Civic space has decreased in large part due to funding cuts, both on the EU and national level. In EPHA's case, the massive EU4Health budget cuts have a large impact on our ability to our work. In addition, we are aware that on the national level funding for civil society is also decreasing, recently also in the Netherlands. We are aware of the fact that these effects are event more problematic for smaller or grassroots organisations.

In addition, we are aware of the fact that polarisation is strong when it comes to discussions on discrimination and racism, to the point that some organisations are faced with life-threatening violence, for example recently with NGO KISA in Cyprus.

* 16. In your opinion, is **anti-racism** in all policy areas being successfully **mainstreamed**? Does it apply to all levels of competences?

Maximum 3 selection(s)

- European level
- National level
- Local level

* 16bis. Please elaborate on your answer above

1500 character(s) maximum

Anti-racism is not yet successfully mainstreamed. The 2020-2025 EU Anti-racism Action Plan make an effort to mainstream across sectors, but this was not matched with clear sectoral objectives or indicators. In relation, anti-racism and equity are not strongly mainstreamed across other policy frameworks that are relevant to these sectors either. Mainstreaming is crucial, but the EU ARAP itself should be strengthened in a more binding way, with sectoral objectives and indicators so it can more meaningfully engage with other policy frameworks and vice versa.

The Taskforce for Equality can also play a role in strengthening mainstreaming, but lacks the capacity to meaningfully do so.

When it comes to anti-racism in the EU's health policy, we do not currently see strong mainstreaming going on beyond mental health. We hope that, based on the DisQo recommendations provided to the Commission, this dimension will be significantly strengthened in the post 2025 EU ARAP.

* 17. In your opinion, is the **intersectional approach** in the anti-racism policies being successfully used?

Does it apply to all levels of competences?

Maximum 3 selection(s)

- European level
- National level
- Local level

* 17bis. Please elaborate on your answer above

1500 character(s) maximum

The EU Anti-racism action plan 2020-2025 did include intersectionality in its design through engagement with the wider Union of Equality Strategies. Similar to the other strategies, it has a sectoral breakdown to allow for a more intersectional approach. However, beyond being mentioned in the strategy, it is unclear whether this intersectional approach leads to action in practice. The Union of Equality strategies significantly differ in how active and elaborate they are (with the EU Roma Framework seemingly the most developed), which shows that there is still significant strengthening of the wider Union of Equality Strategies required before we can speak of a true intersectional approach.

On health specifically, there is also room for improvement; not only is the EU4Health budget cut, it focused only marginally on equality and not at all on anti-racism and anti-discrimination.

* 18. Are you satisfied with access to the relevant EU funding programmes (ex. CERV[1], ERASMUS+[2], Horizon[3] etc) for the anti-racism work of your organisation?

[1] Citizens, Equality, Rights and Values (CERV) - European Commission

[2] Erasmus to Erasmus+: history, funding and future - Erasmus+

[3] Funding programmes and open calls - European Commission

Maximum 1 selection(s)

- Yes
- No
- I do not know

* 18bis. Please elaborate on your answer above and add link to your project(s).

1500 character(s) maximum

For larger organisations like ourselves we have decent opportunities to get engaged with these funding programmes, but even so they are very competitive and therefore at the same time difficult to access. The co-funding rate is also a massive barrier, especially for smaller organisations, which are already struggling with capacity and funding. This applies not only to the funding instruments here but also to other EU funding instruments which should be available for anti-racism based on the concept of intersectionality. In our case the EU4Health programme should also be relevant to anti-racism work, but a massive 1 billion euro budget cut, yearly re-application process, unclarity on the Work Programme due to delayed publication, and very late confirmation of the Framework Partnership Agreements makes accessing this funding programme needlessly difficult.

There are points relevant to all EU funding programmes. Removing the co-funding rate, supporting smaller organisations, either directly or through more effective sub-granting schemes, and longer-term funding opportunities could help resolve this.

- * 19. To what extent do you consider that an organisation like yours can meaningfully participate in national decision making related to the spending of EU resources for EU-funded actions to address racism?

2000 character(s) maximum

EPHA is an organisation mainly active on the European level, which means that engaging with national governments on resources EU-funded action is difficult. Organisations based in the countries may have a larger chance to do so, but national level inclusion strategies are generally unclear on how EU funding is earmarked or used for inclusion activities. Getting engaged in these processes is even more difficult, depending on the country and whether it has an easily-accessible centralised office for inclusion policy or not. What is clear, is that anti-racism work should be centralised and well-funded nationally to make meaningful participation more accessible on EU-funded action as well.

20. To what extent is **structural and systemic racism** being addressed at:

at most 2 answered row(s)

| | To a large extent | To a satisfying extent | To a moderate extent | Not at all | I do not know |
|---------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| * At EU level | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * At national level | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

* 20bis. Please elaborate on your answer above

2000 character(s) maximum

At the EU level the existence of the Union of Equality Strategies is a positive thing. Though they do differ in how active they are, which should be resolved, it does show that the EU puts stock in addressing different kinds of inequity. The individual strategies also do encourage mainstreaming across other policy fields, though to different degrees. At any rate, their existence and design does show an EU commitment to addressing systemic and structural racism. It is important to note, however, that there is still a lot of room for improvement. Each Union of Equality Strategy ideally should include clear objectives, supported by indicators and data. In addition, there should be a dedicated Commissioner for Equality to coordinate this work, while the all of the Coordinators should have a strengthened position in the Secretariat-General.

On the national level, these approaches are much more fragmented and less structural. It differs very much per country, but from our perspective it is clear that more action is taking place at the EU level than at the national level. This is unlikely to change until Union of Equality strategies get a more binding character, especially against the background of support and funding for inclusion policy being cut more and more.

* 21. In which policy areas has structural racism been addressed by the Commission and what are the outcomes? Please elaborate.

2000 character(s) maximum

The most clear fields in which the Commission is active to us seem to be the Union of Equality Strategies as dedicated policy action against structural racism. Aside from that, there is action against hate speech and discrimination. To some degree, funding instruments like Erasmus+ and Horizon address structural racism, while Horizon Europe also allows for research on the topic.

The outcomes are largely a building of knowledge on the topic, as well as incidental improvement of capacity-building. The main outcome is that the Commission can play a coordinating role on addressing structural racism by bringing together civil society, exchanging best practices and to some degree driving concrete action on the ground. This work, from our perspective, is extremely welcome and appreciated. However, it needs to be matched by structural action on anti-racism and anti-discrimination from the national level. This requires strong coordination, a dedicated Commissioner, strong Coordinators based in the Secretariat-General, and binding Union of Equality Strategies. A lot of the political will of this will have to come from the member state level

1. In your opinion, how do you evaluate the implementation of the main priorities in the EU anti-racism policies?

at most 3 answered row(s)

| Ensuring appropriate application of the EU legislation | Very poor | Poor | Fair | Good | Very good | No opinion |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| * Racial Equality Directive | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Directive on standards for equality bodies - Strengthening their role and independence | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| * Framework Decision on combating racism and xenophobia - and possible developments to strengthen the criminal law response to all forms of hate speech and hate crime. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

* 1bis. If **other/new legislation**, please specify with concrete examples.

2500 character(s) maximum

Racial Equality Directive: The Racial Equality Directive is one of the most important pieces of legislation we have to address structural racism. From this directive all rights upon which we base our work are established. It is very difficult to judge its implementation because there is such limited disaggregated data collection based on race and ethnicity. We can speak to a limited capacity about large inequities still faced when it comes to gender, income, education level, or other social determinants, while FRA also provides numbers on Roma. None of these numbers look particularly positive. At the same time, we know that the Racial Equality Directive is not fully implemented in all Member States since structural racism and inequities persist. Given a lack of attention, and given the fact that the Racial Equality Directive is now 25 years old, it either needs to be reviewed, or Member States should make work of more actively implementing it.

Equality Bodies Directive: EPHA welcomes the new Equality Bodies directive, but at this stage it is too early to say how we evaluate its implementation. The role of equality bodies in anti-racism and anti-discrimination policy cannot be overstated, however.

Framework Decision: We do not feel equipped to answer this question as we have limited experience with hate speech and hate crime

2. In your opinion, how do you evaluate the implementation of the main priorities in the EU anti-racism policies?

| EU policy areas | Very poor | Poor | Fair | Good | Very good | No opinion |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| * Digital threats | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Minimising the potential bias and discrimination in high-risk AI systems, e.g. by law enforcement, in recruitment, education and healthcare. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Reducing the threat posed by violent extremist narratives, including hate and disinformation online. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Ensuring social inclusion and educational policies and programmes. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Redress the past and shaping remembrance through history education. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Joint work with Member States | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Housing and social inequalities. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Data collection | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Participation and civic space of Civil society organisations. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * International dimension: Compliance with international human rights instruments prohibiting racial discrimination (ICERD, Durban Declaration, IDPAD, UNCRC, OHCHR, ECRI /CoE etc.). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| * Addressing racism and discrimination by law enforcement authorities. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

* 2bis. **If other/new policy**, please specify with concrete examples

2500 character(s) maximum

More specifically on health equity, the DisQo stakeholder network has provided the Commission Coordinator on combatting racism with concrete recommendations on points of improvement for the post-2025 Anti-racism Action Plan (full document in the attachment):

1. Recognising racism and discrimination against PAD as fundamental determinants of health, including in the Racial Equality Directive and as a strong thematic area in the EU ARAP
2. Meaningful involvement of affected communities, academics, experts, international organisations all other relevant stakeholders, including through direct empowerment of (grassroots) civil society
3. Respectful and inclusive language, start a discussion on a glossary and harmonisation of definitions
4. Disaggregated equality data, working on data harmonisation based on the OHCHR Human Rights Indicators
5. Breaking down silos and taking action, for example strengthening the Taskforce for Equality, fostering mainstreaming of anti-racism and anti-discrimination across all EU funding instruments

6. Addressing racism and discrimination in healthcare and science, moving from race-based to race-conscious medicine (while considering biomarkers from a clinical perspective), ensuring cultural awareness among healthcare workers, ensuring language and interpretation services

* 3. In your opinion, how could the future call for proposals address the policy areas to tackle racism?

Maximum 3 selection(s)

- Hate and disinformation online in particular social media
- Social inclusion and educational policies and programmes.
- Housing and social inequalities.
- Data collection
- Participation of and civic space for civil society organisations.

* 3bis. Please elaborate at least three of them - 1500 character(s) for each of them.

3000 character(s) maximum

All five points are relevant to tackling racism. The three selected points are particularly relevant to the civil society consultation conducted by EPHA's 'DisQo Stakeholder Network: anti-discrimination and health equity'.

Data collection: One of the most important points in which development is desperately needed. The EU ARAP does not have clear objectives, indicators or data to inform those objectives. Harmonisation of equality data collection based on the OHCHR Human Rights Indicators is crucial to make these Action Plans more effective and more binding. Further:

- developing further guidance for member states on the systematic collection of equality data and data focusing on racial discrimination
- encouraging member states to develop national strategies for equality data
- funding, and encouraging member states to fund, projects that advance the harmonisation of collection of equality data and data focusing on racial discrimination
- facilitating discussions on EU and national level, with the inclusion of civil society, on how to collect equality data and data focusing on racial discrimination in an ethical way that ensures it cannot be utilised to harm PAD
- supporting and validating community-led data collection
- exploring the creation of an EU working group of IT and data governance experts, legal and human rights experts, public health and academic experts as well as civil society to develop policy recommendations on (health) digitalisation and discrimination, particularly in relation to the European Health Data Space

Participation: Meaningful involvement of affected communities and individuals was also deemed a crucial point during the DisQo consultation. A community-based social participatory approach is crucial, and is recognised as a driver for health equity by the WHO. Further:

- including civil society at the heart of the of the post-2025 EU ARAP to assist with design, implementation, monitoring and evaluation
- systematically incorporating and providing leadership to civil society stakeholders not only in the design, development and evaluation of hard and soft legislative initiatives, but also as a key source of expertise, following the Better Regulation Guidelines
- fostering - in a non-tokenistic way (i.e., ensuring real influence) - diversity and representation in its advisors /advisory bodies, in its funded projects, and, importantly, across its DGs, at all levels of governance
- including action points on empowerment or capacity-building of PAD regarding education, advocacy, and participation in consultative bodies in relation to the Right to Health and racial discrimination, as to ensure the principle 'nothing about us without us'

Social inclusion: Any and all EU policies focused on reducing inequities or combatting racism and discrimination must include a focus on social inclusion. Equity, discrimination and racism should be mainstreamed across EU policies and funding instruments

4. In your opinion, what should be the Commission's main priorities in terms of human resources, diversity and inclusion?

at most 4 answered row(s)

| Priorities for the Public administration at EU level. | Not a priority | Low priority | Medium priority | High priority | Essential | No opinion |
|--|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| * Strengthening the role of the Diversity and Inclusion Office of DG HR (EC). | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Setting up a network of diversity partners by the European Personnel Selection Office (EPSO) | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Ensuring a more inclusive Bluebook traineeship programme. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Developing communication campaigns. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

* 4bis. In case of **medium priorities (and below)**, please specify with concrete examples how these challenges can be overcome? --1500 character(s) maximum/challenge

2500 character(s) maximum

Strengthening the Diversity and Inclusion Office and tasking it with the other priorities would likely be the best way to improve diversity in the EU's human resources. If strengthening their budget and earmarking budget to set up the proposed network of diversity partners, improving inclusivity of the Bluebook program, and matching this with communication campaigns may already be a way of lowering access barriers for underrepresented groups or individuals.

Other concrete examples could include further lowering these barriers through specific grants or programs for such groups (like FRA or EEA and Norway Grants does). It also would allow for expanding partnerships, for example with universities or grassroots organisations, to bridge easier contact with people from

underrepresented groups and build their capacity to get engaged with EU institutions.

In a way, approaches in the EU's HR policy are only addressing symptoms and not the core cause for why it is harder for certain groups or individuals to get engaged in institutions. This means that approaches to remedy this must be proactive, actively seeking out people from these communities and providing them with the tools to overcome these barriers (think grants, research programmes, internships, financial support etc.) Communication campaigns should also reflect this. There is no sense in doing general communication campaigns on diversity and inclusion across established channels if underrepresented groups or individuals you are trying to reach are also underrepresented in these channels. A communication campaign might have to be put on hold, and first prepared with analysis of how these underrepresented groups can be best reached.

These are tasks that cannot be seen in isolation, they need to be centralised and part of a combined approach to realise diversity and inclusion in small, but steady and constructive steps.

- * 5. To what extent are you satisfied with how the EU anti-racism action plan addresses specific forms of racism such as anti-Muslim hatred?

Maximum 1 selection(s)

- Very satisfied
 Satisfied
 Not very satisfied
 Not satisfied
 I do not know

- * 5bis. Please elaborate on your answer(s) above

1500 character(s) maximum

The EU anti-racism action plan does not go very in-depth on specific forms of racism because addressing these specific forms is already fragmented across different strategies. This is not necessarily a problem, as certain types of discrimination or racism may require specific approaches, but the difference in prioritisation should not be too large, and there needs to be a strong coordinating strategy to drive action. There is no one way in which this can be done, but a potential approach could be to have one overarching strategy on combatting racism and discrimination (i.e. the EU ARAP), which coordinates the EU's approach, with the more specific strategies (such as the EU Roma Framework, Gender Equality Strategy, LGBTIQ Equality Strategy and Strategy for the Rights of Persons with Disabilities) feeding into the overarching strategy. The EU ARAP can then also encompass xenophobia, anti-Muslim hatred, and antisemitism. Such an approach should be discussed in the Permanent Anti-racism civil society forum, but such a design or a similar one would allow for more targeted and effective approaches to individual forms of racism.

All of this underlined with a binding nature, objectives, indicators, and equality data to back it up.

- * 6. Has the inclusion of actions such as funding used to prevent/address specific forms of racism, including anti-Muslim hatred, in the EU anti-racism action plan facilitated the cooperation of your organisation with stakeholders and raised awareness on different forms of racism?

Maximum 1 selection(s)

- Positive impact
 Negative impact
 No change

I do not know

- * 6bis. Please elaborate on your answer above: a) at the local level – 500 character(s) maximum; b) at the regional level – 500 character(s) maximum; c) at the national level – 500 character(s) maximum.

1500 character(s) maximum

We have not been involved with such funding initiatives on the local, regional or national level.

- * 7. What would be the **best terminology** to refer most accurately to the phenomenon at hand?

Maximum 2 selection(s)

- Anti-Muslim hatred
 Anti-Muslim racism
 Other: please specify below
 No opinion

- * 7bis. Please elaborate on your answer above

1500 character(s) maximum

N/A, a potential other option is Islamophobia, but we have no clear opinion on use of terminology here

- * 8. What are the main challenges to implement measures on combating specific forms of racism, including anti-Muslim hatred in the EU? Please elaborate.

1500 character(s) maximum

Fragmentation between the different strategies and approaches and lack of political will to address racism in general are the main challenges. This means that there is both a lack of funding or capacity to address the issue, while the actions to address racism and discrimination are also disconnected and less effective as a result.

The fragmentation is clear in the many different EU Union of Equality, and other strategies such as the EU Strategy on combating antisemitism and fostering Jewish life, which do not communicate very strongly amongst each other, and are further limited by the fact that they are not binding which means action on the

Member State level is often lacking. Addressing anti-Muslim hatred risks the same situation if actions are planned in the EU ARAP or a separate strategy is set up. Inclusion of all forms of racism and discrimination is paramount, but it must be paired with clear sectoral objectives, commitments, indicators and equality data collection.

All of this is underlined by the lack of political will from the Member State level. A large challenge is the fact that there this low political will to address racism and discrimination, is reflected in the quality of EU-level equality strategies.

Concluding questions

- * 1. In your opinion, what are the **lessons learned** from the current EU anti-racism action plan 2020-2025?

2000 character(s) maximum

-Health in the EU ARAP was covered in too limited a way, with a brief mention of health inequalities during COVID, and the Comprehensive Approach to Mental Health. Combined with a limited coverage of other sectors (education, employment etc.) the understanding of social determinants in relation to racism and discrimination has fallen short

-The EU ARAP, paired with the office of the Commission Coordinator on combatting racism and the Permanent Anti-racism Civil Society Forum altogether has allowed for a great platform to discuss racism and discrimination in Europe, the openness to cooperate of the Coordinator's office is also truly appreciated

-The EU ARAP has had effect; some Member States have set up anti-racism strategies with new or already established national equality coordinators. Though the strategies or offices differ significantly and still require much more expansion, the fact that the process has been started shows the importance of having an EU ARAP

-Since the introduction of the EU ARAP (Union of Equality Strategies) there has been an increase in funding opportunities that focus on discrimination and racism (we have noticed this for sure in Horizon Europe and CERV). Though this should still be further developed, and though accessibility needs to be improved significantly, the EU ARAP has partly allowed for this development to get started

-A lack of binding objectives in the EU ARAP limits its effectiveness. The EU ARAP has a clear intention, but without measurable objectives and without a binding nature, it is unclear what is expected of Member States, meaning action on this develops only slowly or not at all

-Much work remains to be done connecting the different strategies, communities, individuals and groups. The EU ARAP and its tools has provided a platform for engagement, but these engagement also highlighted strong disagreements; this is challenge but also shows the strength in the platform for engagement the EU ARAP can provide

- * 2. What **best practices** would you like to highlight for shaping the future EU Anti-Racism Action Plan?

2000 character(s) maximum

-Partly made possible through the EU Health Policy Platform and further developed thanks to cooperation in the context of the EU Anti-racism Action Plan, EPHA's 'DisQo Stakeholder Network: anti-discrimination and health equity' has allowed a very strong platform to be created to bring together and collect expertise on health, racism and discrimination. The welcoming way in which the Coordinator on Combatting Racism has

engaged with this is something that should continue into the post-2025 action plan.

Further good practices collected through the work of the DisQo Network:

-The OHCHR Human Rights Indicators can be used for equality data collection in the context of the EU ARAP and on the national level. An example of this is how this is being implemented in Mexico, showing that this is possible

-The Afrozensus research project in Germany is an excellent example of community-led data collection, these kinds of initiatives should be further explored and provided with funding

-The real-time dashboard of incidents of discrimination provided by the Dutch G4 municipalities (Amsterdam, Rotterdam, the Hague, Utrecht) is an example of digital tools that can be used to collect data on the municipal level to inform anti-racism and anti-discrimination policy

Further recommendations and points for consideration are included in the attachment

If you wish to upload a **position paper** concerning the report of implementation of the EU anti-racism action plan 2020-2025, you can do so here.

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