

INAR Note on National Action Plans Against Racism and EU Action Plan.

We share here some thoughts on what might constitute an effective National Action Plan Against Racism (NAPAR)- that is a *Clear Action Plan*, in the words of the ARC Terms of Reference. These thoughts are based on our reading of a number of NAPARs (see references at bottom), our work with civil society groups in Ireland on a NAPAR, and our collaboration with European civil society colleagues in the ENAR NAPAR working group (WG), as well as discussions with ENAR colleagues relating to the recently announced EU Action Plan Against Racism (EU APAR).



We will first share a useful framework and use that to discuss some aspects of some NAPARs and the EU APAR, as this has been the practice with ENAR colleagues. We hope that this can be a helpful tool that can stimulate interest in further exploration, and consideration as to whether it might be one useful lens for looking at our discussions, enquiries and explorations.

Framework:

We use here the framework (set out in her *'checklist'*) of Sarah Isal's 2019 ENAR Document ["National Action Plans Against Racism: Lessons for effective national anti-racism policies"](#): The elements of this checklist strengthen one-another, and so can be viewed as a cohesive whole:

A: CONTENT : i) Sophisticated and comprehensive definition of racism ii) Recognises structural discrimination iii) Mentions intersectionality iv) Recognises specific forms of racism - *Afrophobia, Islamophobia, Antisemitism, Antigypsyism, Anti-migrant racism* v) Data collection: *Comprehensive equality data collection, Attitude and experience surveys, Hate crime statistics* vi) Comprehensive scope and diverse strategies.

B: PROCESS : vii) Political leadership viii) Link with other government agendas ix) Local dimension x) Consultation with civil society xi) Adequate financial resources xii) Strong implementing mechanism.

Let us take "B: Process" first, and then "A: Content", and then develop a little.

B: Process

The process of a NAPAR is crucial both to the quality of its content and outcomes. It's vital that a process for implementing and achieving the goals of a NAPAR is both bottom-up and top-down. This means proper stewardship and resourcing - political leadership at the highest level of government, driving implementation and engagement across departments, bodies and state functions; to be matched with active buy-in and engagement from affected communities and civil society, as well as local authorities. Leadership is also required from the highest level to ensure joined-up thinking and coordinating the necessary transversal actions across public functions, Government Departments, National Authorities and local authorities, as well as linkage with other policy initiatives, including major ones such as the rebuilding of a post-covid

economy and any future zero carbon sustainable infrastructure plan. Leadership means resourcing the work, both in the sense that the Plan must be ambitiously financially resourced for the specific programmes it requires state departments, national authorities and non state organisations undertake, it also means persuading departments, national authorities and bodies to reallocate resources in line with the Plan. There is also a crucial dimension requiring the resourcing of racialised communities and civil society actors to engage, both in a leadership role with the public, and in oversight. Adequate resourcing is also required for publicity and for the vitally important dimension of local government and local development initiatives. For a Plan to work also requires a strong implementation mechanism. This includes having a clear timeline for execution with concrete objectives across its areas, and measurable outcomes and a clear procedure for implementation, monitoring and review. An important dimension of this is oversight - again requiring leadership to guarantee it, and resourcing for developing the capacity of affected communities, civil society and the public to engage critically.

A: Content:

National Action Plans should lead-out with what are described as “sophisticated and comprehensive definitions of racism”. This includes a dynamic description of racism as a system with interrelated structural, institutional and historical dimensions, as well as the more commonly recognised individual racism seen in acts of discrimination, hate crime and hate speech. Good NAPARs place a focus on *structural* racism, precisely because it is particularly enduring, in part because it has historically been hardest to define, identify and tackle. This dynamic understanding of racism must also incorporate its intersectionality with other systems of oppression. The dynamic evolving nature of racism means that different forms arise in different contexts, so clearly naming the specific forms of racism which are pervasive in each national context is also important for a variety of reasons. Data collection on various aspects of racism and discrimination is crucial for monitoring and targeting policies and practices relating to hate crime and the policing of minorities, vital for monitoring institutional practices and key to capturing patterns of structural discrimination. NAPARs must be comprehensive in their scope, mobilising the full spectrum of societal actors across all functions, and employ a diversity of strategies.

A; vi) Scope:

With these “high level” criteria in mind, we now share a bullet-pointed outline of the Belgian NAPAR, which is considered to be well thought-out by the ENAR working group on NAPARs. This is in addition to the examples examined in the above-cited “Lessons for effective ...” resource, and provide sketched outlines of how NAPARs are fleshed out in their scope. We have linked below to the Belgian NAPAR (to date unfortunately only written in French and Flemish, and not at the time of publication adopted), as well as the Norwegian and one or two other Plans which are worth considering. After this, we will share notes on ENAR’s assessment of the EU APAR, using the same framework. One or two relevant resources to the EU APAR are also shared at the bottom.

The Belgian coalition for a NAPAR document (the notes here are not exhaustive):**What is good:**

- · Has a clear timeline for execution with;
- · concrete objectives and measurable outcomes.
- · Has a clear procedure - mechanism -for implementation.
- · Envisages being adequately resourced.
- *Explicitly* aimed to address institutional and structural racism and to combat the structural and institutional conditions within which racist acts occur.
- Leads with transnational actions - across Government functions, Government Departments, Public Authorities, local authorities.
- · Clear role for corporations and SMEs.
- · Ensure buy in from all stakeholders and public – by resourcing publicity.
- · Goes some way to incorporating intersectional dimensions.
- · Seeks to improve the efficacy of anti discrimination legislation and practice.
- · Seeks to improve measures for tackling Hate Speech
- · Improve the efficacy of Hate Crime and Incitement to legislation and practice.
 - With surrounds in Policing and Criminal Justice System
- · Explicit measures to tackle racism in the Policing and Criminal Justice System
 - Ban racial profiling
 - Tackle ‘police culture’
- · provides for the resourcing of anti racism organisations
- · Education:
 - ○ Curriculum and interculturalism
 - ○ History of colonialism
 - ○ Public education
- Employment: resources and targeted measures to combat discrimination against identified disadvantaged groups ; People of African Descent, Roma.
- · Accommodation: measures to tackle institutional and structural discrimination.
- · Health and Wellbeing: measures to tackle institutional and structural discrimination

Could be more explicit about:

- Being driven by leadership at the highest level.
- Being adequately resourced in itself.
- Resourced measures to combat structural inequality.
- Establishing an agreed resourcing strategy (each department & sector must contribute)
- Incorporating intersectional dimensions across all areas.
- Providing resources to anti racism organisations to monitor progress.
- The role of TUs and other civil society actors.
- Disaggregated ethnic data across all functions to monitor impact of measures.
- Broadcast and Print media: reporting standards, diversity in staff, intercultural content, history of colonialism & racism, histories of different peoples.

From ENAR meetings - notes of our assessment in discussing the EU APAR :**What's good:**

- Leadership in the form of EU Coordinator on Anti Racism - could ensure EU level priority
- Has clear timeline and some resourcing
- An equality taskforce across the Directorates General of the European Commission
- An EU Summit on Racism in March - international day against racism
- A robust definition of structural and institutional racism, including definitions of specific forms of racism
- A comprehensive framework for action
- Racial equality mainstreaming (a key recommendation from ENAR, see link below)
- Considered a useful tool to push EU institutions and member states to prioritise anti racism, including through the provision of frameworks for NAPARS.
- Has capacity to take into account local needs
- Good scope: Housing, Healthcare, Education etc.

Within this, ENAR prioritises to ensure implementation of:

- Assessing and identifying gaps in Equality and Hate crime legislation
- New legislation on law enforcement and equality bodies
- A framework for national delivery of NAPARS
- Equality data collection, disaggregated by race
- Racial equality mainstreaming measures in social rights, migration, digital services, post-covid and postcarbon reconstruction of an inclusive 'green economy'.
- Racial diversity in institutions and companies
- Protection of human rights defenders
- Combat demonisation of anti racist bodies and people
- How is civil society consultation going to be conducted?

ENAR priority concerns:

- IMPLEMENTATION IS KEY
- Ensure good Coordinator is in place

What EU APAR currently says about NAPARS:

- Promises the adoption of common principles for National NAPARS by end 2021- but already has strong guiding principles in “A Union of equality : EU anti-racism action plan 2020-2025” (p17) - these are consistent with the above Framework of good practice.
-

Sources, useful resources - links:

Indicators for a good NAPAR - Sara Isal's document:

<https://www.enar-eu.org/National-Action-Plans-Against-Racism-Lessons-for-effective-national-anti-racism>

ENAR roadmap on EU institutions' racial diversity

<https://www.enar-eu.org/A-roadmap-to-racial-diversity-in-EU-institutions>

ENAR Report on intersectionality in anti racism policy

<https://www.enar-eu.org/intersectionalityreport>

ENAR's recommendations for EU APAR

<https://www.enar-eu.org/Key-recommendations-for-the-EU-Action-Plan-Against-Racism>

Roadmap for EU institutions to address structural racism (pre EU APAR)

<https://www.enar-eu.org/A-roadmap-for-EU-institutions-to-address-structural-racism>

A Union of equality : EU anti-racism action plan (EU APAR)

https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/eu-anti-racism-action-plan-2020-2025_en_2020-2025

Belgian Civil Society call for a NAPAR - 11 elements: - "exemplary"- but not adopted yet

<https://www.bepax.org/files/files/coalition-plan-d-action-interfederal-contre-le-racisme-dossier-propositions-d-actions-220518.pdf>

Norway's NAPAR - also - "Exemplary"

<https://www.regjeringen.no/en/dokumenter/the-norwegian-governments-action-plan-against-racism-and-discrimination-on-the-grounds-of-ethnicity-and-religion-2020-2023-extracted-version/id2681929/>

Barcelona's Municipal plan to combat Islamophobia:

<https://www.eccar.info/sites/default/files/document/Measure%20Plan%20against%20islamophobia%20%28eng%29.pdf>

Swedish NAPAR:

<https://www.government.se/492382/contentassets/e6047ff54c00452895005f07e2e2ba39/a-comprehensive-approach-to-combat-racism-and-hate-crime>

Scotland's Race Equality Framework

<https://www.gov.scot/publications/race-equality-framework-scotland-2016-2030/>

Also of Interest: **Barcelona - City of Rights Programme:**

<https://www.eccar.info/sites/default/files/document/Measure%20Barcelona%20city%20of%20rights%20%28eng%29.pdf>

UN - OHCHR Guide on NAPARs

<https://www.ohchr.org/Documents/Issues/Racism/NAPARD.pdf>