

REVIEW OF CURRENT PRACTICES IN MULTI-LEVEL GOVERNANCE IN FINLAND



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REVIEW OF CURRENT PRACTICES IN MULTI-LEVEL GOVERNANCE IN FINLAND

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Executive Summary

This report gives an overall picture of multilevel-governance in the field of integration, good relations and interculturality in Finland, and discusses also the needs to develop it.

The first two chapters of the report present the key concepts and definitions, the historic origins of the approach of multi-level governance, and the Council of Europe and European Union standards and recommendations on it.

The third chapter presents the current state of things and the existing mechanisms of multilevel governance in Finland. It presents the Finnish governance model, which has three layers (state, region and municipality), and analyses how the elements of multilevel-governance are treated within Finnish legislation and existing cooperative structures. In addition the chapter

describes the concepts used in the field of integration, mainly the approach of a policy for 'good relations' in the Finnish context.

The fourth chapter presents models and good practices of multilevel governance from other European, mainly Nordic countries and also the Nordic co-operation in the field of integration policy. In the final analytic chapter, the report focuses on a policy case by analysing the Finnish government's recently published statement to Parliament on promoting equality, gender equality and non-discrimination, through the lens of the eight crucial elements of multilevel governance. The report draws a list of both general and policy-specific recommendations on how to build multilevel-governance structures during the implementation phase of the Finnish government's statement.

Introduction

The purpose of this report is to review the current good practices in multi-level governance in Finland. The report includes key concepts and definitions, the historic origins of the approach of multi-level governance and a review of the existing multi-level coordination mechanisms on the topic of integration (and linked topics such as good relations and equality) in Finland. It also analyses the benefits and weaknesses of the current mechanisms, discusses the applicability of various similar models from Europe and proposes recommendations for a new multilevel and multi-stakeholder mechanism to be implemented in future national policies on non-discrimination and promotion of intercultural practices.

Writing of this report was carried out in the framework of the joint project 'Building an Inclusive Integration

Approach in Finland' co-funded by the European Union and the Council of Europe and implemented by the Council of Europe in cooperation with the European Commission and the Ministry of Justice of Finland. This report was commissioned as part of the project and has been prepared by Panu Artemjeff, Miriam Attias and Robin Wilson. Panu Artemjeff and Miriam Attias are independent experts from the think tank MAP Finland, specialising in population relations policy in Finland, and Robin Wilson is an expert adviser to the Council of Europe on intercultural integration from Northern Ireland. The analyses of this report are based on both desk research and stakeholder interviews conducted in October 2023.

Multilevel governance (definitions, key points)

The term 'multi-level governance' (MLG) arose towards the close of the 20th century as a way to capture the Europe which had evolved over the preceding decades. This was no longer merely an intergovernmental Europe, because of transfers of competences to the European Union, yet nor was the EU a supranational entity which had supplanted its member states. Within the latter, meanwhile, regionalisation had seen power devolved to subnational levels. In this evolving political architecture, governance should now be conceived, it was argued by experts on European integration (Hooghe and Marks, 2001), as operating simultaneously at the local, regional, national and European levels.

The concept of MLG also reflected the globalisation and individualisation of contemporary societies. These trends were nowhere more evident, in tandem, than in the population movements, of migration and asylum-seeking, which have raised the challenge of intercultural integration high on the political agenda across Europe in this century. And they had major implications for domestic governance.

As was starkly evident after the collapse of the Soviet dictatorship in 1991, modern societies had become much too diverse and volatile to be governed by a 'sovereign' state alone: it simply could not be sufficiently omniscient and omni-competent to monopolise power (Hirst, 1997). This did not only entail central government sharing responsibility with other levels, closer to the ground. It also implied partnership arrangements with non-governmental organisations, capable of bringing stakeholder voices and good practices to bear.

MLG should thus be conceived as having not one but two dimensions. It is not only about the vertical relationships between levels of government but also the horizontal relationships which those different levels establish to traverse their own structures and collaborate with their external partners. Indeed, speaking specifically of 'migrant integration', the Organisation for Economic Co-operation (2022: 340) recognises the importance of 'vertical and horizontal coordination' across central government and with regional and local levels.

For example, members of the Council of Europe [Intercultural Cities](#) programme (see below) often benefit from integration councils (of whatever precise name) which bring together local public officials and representatives of the relevant non-governmental

organisations. These structures provide voice for those from migrant and refugee backgrounds and allow practical problems to be tackled through dialogue with those 'in the know' on the ground before they become polarising 'identity' concerns. Another valuable 'horizontal' relationship has proved to be via national networks of participating municipalities, as in Spain and Italy among others.

So MLG will have something of a 'fractal' character. At whatever scale one looks, 'macro' or 'micro' so to speak, one will see this same pattern—of relationships above and/or below and out into networks.

This connotes something like a game of three-dimensional chess. And the potential for weak co-ordination between levels or poor network connections at each level is evident (OECD, 2022). In each such policy arena—as with intercultural integration—a well-developed national plan is thus essential, driven by a clear overarching aim to which everyone in this fractal structure sees themselves as contributing, with clearly differentiated responsibilities so that everyone is also aware of their specific role.

Portugal represents a particularly good approach here. It has a public agency outside government, the *Alto Comissariado para as Migrações*, which provides a repository for expertise and engages with all levels of administration. There are local integration plans within the context of the national plan and there are 'one-stop shops' in major cities—so that newcomers can avoid being sent 'from pillar to post', with different issues they face enclosed in separate official silos.

It is critical too in this context that the many actors involved are able to cope with the challenges presented to them, rather than engaging in perfunctory, 'box-ticking' compliance or finding ways to marginalise this aspect of their role. It is a task no level of government can shirk, in the expectation that somehow, somewhere, someone else will deal with it.

Political leadership from the highest level is thus at a premium, to send the right signals throughout public service that this is a priority for everyone. But if all levels of government are steering in the same direction, the potential for synergies is great and effective pooling of effort can be achieved.

That is why an effective mechanism for co-ordination, on which this study is focused, is so important in this arena.

EU / CoE standards and recommendations on multilevel governance

In line with the foregoing, in its 2022 [recommendation](#) on intercultural integration and MLG, the Committee of Ministers of the Council of Europe said:

‘Multilevel governance’ is a model of governance which embraces central, regional and local governments, as well as civil society organisations. The ways in which it is organised may vary greatly from one country to another. Ideally, it includes a bottom-up element and implies the setting up of participatory processes for policy co-creation, co-operation and co-ordination among all relevant public authorities, at all levels of governance, and with all relevant stakeholders, in areas of shared competence or common interest.

The recommendation recognised that the nature of the challenge of intercultural integration placed MLG at a premium:

The ‘intercultural integration’ model requires a holistic approach which can guide co-ordinated and long-term policies in all fields and levels of governance in order to promote and ensure equality for all members of society, to foster a common pluralistic sense of belonging through valuing diversity and building social trust, community cohesion and meaningful interaction between people across their different socio-cultural backgrounds, and to facilitate their equal participation in and contribution to society.

Hence to the recommendation was appended a [model framework](#), providing the 46 member states with a template to follow, so that they could secure the co-ordination among multiple actors this ‘holistic approach’ necessitated.

So what is it about the intercultural-integration paradigm which requires such an approach? In the last century, there were two models for dealing with cultural diversity: assimilationism and multiculturalism. They can best be understood by how they related the self and (diverse) others (Wilson, 2018).

Assimilation, as classically in ‘republican’ France, presumed that the others should come to resemble the taken-for-granted national self, a process which alienated *maghrébin* youth in the socially marginalised *banlieue*, leading to the riots against the police in 2005. Multiculturalism, as exemplified by the United

Kingdom and the Netherlands with their former colonies, assumed the self and others would lead what a report after the 2001 interethnic riots in deindustrialised English mill towns called ‘parallel lives’, producing ghettoisation and mutual incomprehension.

These trends forced a rethink across Europe and both the European Union and the Council of Europe came to the same conclusion. Integration had to be understood as what the EU called, in its 2004 [Common Basic Principles](#) for Immigrant Integration Policy in the EU, ‘a dynamic, two-way process of mutual accommodation by all immigrants and residents’. Similarly, in the Council of Europe’s 2008 [White Paper](#) on Intercultural Dialogue demanded by its member states—aware that the old models were no longer working—integration was defined as ‘a two-sided process and as the capacity of people to live together with full respect for the dignity of each individual’.

The common thread was the abandonment of what European [culture ministers](#) meeting in Opatia in 2003 dismissed as the ‘majority-minority’ approach to cultural diversity. In this perspective, the ‘minority’ is either allocated the burden of integration (assimilationism) or is subjected to a communal stereotype (multiculturalism). The productive alternative is bilateral dialogue among equal individuals, through which the self can include the other, and *vice versa*, with both enriched in the process.

This underlines the significance of MLG in this domain. The Regions for Migrants and Refugee Integration (REGIN) project led by the Conference of Peripheral Maritime Regions affirmed (CPMR, 2022: 7, emphasis in original):

It is important to consider that migrant and refugee populations are composed of different gender, age, ethnic, social and economic backgrounds, and encounter different obstacles regarding access to fundamental rights/services. Regional and local authorities enjoy the advantage of *being close to their population and have first-hand knowledge of the challenges and needs of their residents* ... Although European Member States often set national integration policy frameworks, in many contexts, regional and local authorities are able to be flexible in how they apply national policy and develop their own integration approaches.

This is a step beyond the approach taken in Finland, imported from the (once) multiculturalist UK, of ‘good relations’, with its aggregation of individuals into groups stereotyped from an imperial past and the associated difficulty of translation into concrete activities on the ground. In the UK—including in Northern Ireland with its sectarian divide and a British imperial dimension, the original focus of this euphemistic terminology—the usage has correspondingly fallen into desuetude.

Hence the Ministry of Justice’s evaluation of the 2021-23 Action Programme to combat racism and build people-to-people links found the measures arising ‘not as pervasive as one might hope’, with ‘hardly any activities to promote interaction or reconcile inter-ethnic conflicts’. Hence too the experience in Finland of patchy implementation by local authorities of their integration obligations and the weak monitoring of those. The Council of Europe model framework ties monitoring and evaluation to realisation of the specific aim and objectives of the strategy, rather than what can only ever be oblique indicators of ‘good relations’.

Having said that, ‘good relations’ has become embedded in official discourse in Finland, taking on a domestic life of its own (see below), and there is no need to erase it from the lexicon. Its very vagueness means it is an ‘empty signifier’ which can be given more meaning by incorporating it within the new intercultural paradigm. ‘Good’ relations, specifically, are then relations which encourage the inclusion of the other within the self (Wilson, 2018). This can never be more than partial and limited—and we would not want all to be clones of one another—but that is sufficient to engender experiences of mutual enrichment, to capture what the Council of Europe has come to call the ‘diversity advantage’ and to allow of enhanced social solidarity in today’s fractious societies.

Within the intercultural paradigm, it is thus the task of government at all levels to optimise the interactions among the diverse denizens of their societies, thereby capturing the diversity advantage while minimising the frictions which can be turned into social tensions and antagonism by those who would seek to profit from division and conflict. This will lack credibility on the street unless local (and regional) authorities, and relevant non-governmental organisations, are fully engaged.

That was why in 2007 the Council of Europe established the [Intercultural Cities \(ICCs\)](#) programme, initially in partnership with the European Commission, to promote and share good practice in intercultural integration at municipal level. The member states positively endorsed this work in a [recommendation of 2015](#).

In 2017, however, a ‘policy lab’ at a tenth-anniversary ICCs conference in Lisbon highlighted tensions

between some participating cities, particularly the highly diverse capitals, and their national governments, to which academics have also attested (Scholten and Penninx, 2016: 92). This led to the work on a model national framework for the MLG of intercultural integration, which came to fruition in 2022.

In the recommendation of that year, specifically, the Committee of Ministers said under the heading of ‘Multilevel governance of intercultural integration’:

- ▶ Member States should adopt coherent, co-ordinated, efficient and effective multilevel governance at all stages of the policy-making process, from the needs assessment to conception, implementation and evaluation of the impact of relevant policies, having in mind the principles of local self-governance as enshrined in, *inter alia*, the European Charter of Local Self-Government.
- ▶ Multilevel governance should aim to align strategic needs and goals, and ensure policy consistency, knowledge and resource sharing, good practice exchange and mutual learning across all levels of government, building on their specific competence and responsibilities, and involving all policy areas.
- ▶ Governance structures should be developed to facilitate political dialogue and the creation of a shared long-term strategy between different levels of administration in intercultural integration matters.
- ▶ Policy co-ordination and consultation instruments and frameworks should be developed to facilitate coherence, collaboration, communication of objectives and co-operation in specific areas of intercultural integration, and guarantee that the intercultural integration approach is embedded in all public policies.
- ▶ Horizontal networks among States, regions and local authorities should be supported as tools for good practice sharing and policy innovation. Wherever possible, good practice sharing should also involve the private sector and civil society.
- ▶ Representatives of migrants and of persons with a migrant background,¹ from various socio-cultural origins, should be systematically involved as active agents at all levels, including—where appropriate—as part of joint structures to co-design national, regional and local intercultural strategies.
- ▶ Consultation and exchange spaces in which those from civil society can meet to discuss

1. The recommendation specifically allows of the intercultural approach being applied where self and other embrace people from non-migrant backgrounds, as in Finland with members of the Sami community and the self-government arrangements.

and identify challenges, successes and needs in relation to the implementation of the intercultural integration model should be promoted.

- ▶ The Model framework for an intercultural integration strategy at the national level may inform practitioners working on intercultural integration strategies, including within regional and

local authorities. To this end, it would be useful to encourage the development of a policy of continuous training and targeted support for these practitioners, in order to facilitate the appropriation of the fundamental principles and methodologies inherent in intercultural integration.

Current situation / mechanisms of multilevel governance in Finland

From integration to promotion of good relations and interculturality

This section reviews the existing multi-level coordination mechanisms on the topic of integration, good relations and non-discrimination in Finland.

In Finland, there has been an Integration Act since 1999. In recent years, alongside integration, the concept of 'good relations' has been embedded in official discourse and it is also included in the new Integration Act, which comes into effect in 2025.

The approach of good relations has been promoted since 2012 in different international projects in relation to policies for equality and integration and it has replaced the concept of 'two-way integration'. The model was inspired by the ideas developed in the UK but has been redefined and developed further in the Finnish context by various co-creations projects.

The term 'good relations' or 'community/inter-group relations' refer to how different communities or groups feel about and interact with each other. A relation is 'good' if people respect each other, if they manage to interact and communicate, if each one feels safe to express their identity as they wish, and if they have equal chances for participation. The theoretical framework that has served as a basis for the policy for good relations recognises four dimensions through which a state of a relationship can be measured: interaction, safety, participation and attitudes.

The new Integration Act, which will be effective from 2025, defines the concept of 'good relations', according to this theoretical framework, as relations that are based on positive attitudes, interaction, sense of security and participation in the society. The act states a duty for municipalities to promote good relations locally and have a plan for it as part of their Integration Programme.

Good relations does not only refer to the process of integration. It is a broader perspective, which can relate to any dimensions of diversity (in addition to integration, also language, religion, ability/disability, age, sexual orientation/gender etc). The concept has been introduced and compared with the approach of interculturality in the Council of Europe publication 'The intercultural city: Step by Step Guide to the Finnish context' (to be published).

The concept of a policy for good relations was presented in the [inception report](#) mapping the existing integration and good relations policies in Finland,

written for the EU / CoE joint project on 'Building an inclusive integration approach in Finland'. It can be identified as having three levels:

- ▶ - assessing the impact of mainstream policies on different population groups (for example urban planning, housing, education—do they enable mixing and interaction?),
- ▶ non-discrimination and minority rights policies (that can be group-specific and aim at equal rights and opportunities to participate and by so doing, enable good grounds for symmetric interaction)
- ▶ focusing on policies that specially aim at building good and symmetrical interaction and communication between different groups of society and at handling tensions and mediating conflicts.

The approach of good relations is content- and value-wise similar to the intercultural approach. The similarities and differences have been discussed in the Council of Europe publication *Step-by-Step: A practical guide to apply the urban model of intercultural inclusion*—which was translated and contextualised into Finnish. In both approaches, the focus is on recognising differences and diversity, non-discrimination and interaction. There is a slight difference in the discourse: whereas in the intercultural approach the discussion is centred on diversity and the diversity advantage, in the approach of good relations the focus is always on the relations—whether that concerns individuals with different backgrounds or inter-group relations. The choice of using the concept and the approach of good relations in Finnish might arise from the semantics: the direct translation of 'interculturality' (*kulttuurienvälisyys*) implies fixed or integral 'cultures', and thus does not get rid of the essentialising effect of multiculturalism.

Finnish governance model—three layers

The Finnish model of governance is of a locally decentralised state. Vertically, there are three levels of governance: the state, the region and the municipality. The region, as a concept, refers to two different administrative entities: the state's regional administration; 15 business, transport and environmental centres (ELY-keskus) and six regional administrative agencies (AVI); and the new 21 welfare areas, which started in the beginning of 2023. The welfare areas and the

municipalities have their own elected councils and parliaments so to a certain extent, there is regional and local autonomy in service provision.

The legislative basis for a multilevel governance that promotes participation is strong. According to the constitution Finnish democracy entails the right of the individual to participate in and influence the development of society and his or her living conditions. The constitution also states that the public authorities shall promote opportunities for the individual to participate in societal activity and to influence the decisions that concern him or her.

The participatory rights of the constitution are further defined within the legislation on municipalities and regions. The purpose of the local government act is to establish the conditions in which, in municipal activities, the self-government of the residents in a municipality can take place and opportunities can occur for the residents to participate and exert an influence. Besides the electoral rights in local elections, the act states that a municipality's residents and service users have the right to participate in and influence the activities of the municipality. Local councils must ensure that there are diverse and effective opportunities for participation. The residents of a municipality and the corporate entities and foundations operating in the municipality have the right to submit initiatives on matters concerning the municipality's activities. Similar participatory rights are guaranteed by the act on wellbeing counties. The legal framework also defines the structures for vertical cooperation between the state, regions and municipalities, which is an important element of multilevel governance.

Multi-level governance is also required in sector based legislation, for example in the field of integration and good relations. The new Integration Act requires multidisciplinary cooperation at different levels. At the national level, since the 2010 Promotion of Immigrant Integration Act, it is required that the Ministry of Employment and the Economy elaborate a national programme, with objectives over four years, and relevant departments set their own objectives and measures within that. It is also stated that this has to be done within and with the support of a cooperative body of all relevant ministries.

At the regional level, the regional business, transport and environment centres can set up regional committees for immigration and integration to support the integration measures. They can invite municipalities of the region, welfare areas, police, reception centres for asylum seekers, other authorities, representatives of business life and organisations, non-governmental organisations, associations and communities, as well as service providers of integration services.

At the local level, in (45 §) it is stated that the municipality has general and coordination responsibility

for the planning, development and monitoring of the promotion of integration at the local level. The 2010 act requires each Finnish municipality, alone or in combination, to produce an "integration programme", to be renewed at least once every four years. This has to be done in a multidisciplinary cooperation. The new act requires also that the municipality must take care of the coordination of the planning and development of integration with the welfare area.

In the integration programme, according to the new act of 2025, the municipality must record goals, supporting measures, responsible parties, cooperation, and the monitoring (with indicators) of the areas of immigrants' employment, education, well-being and health, housing, inclusion, equality and opportunities to maintain one's own language and culture, and the promotion of good relations. The municipality must report at least every two years on the achievement of the integration goals and the implementation of the measures to the regional business, transport and environment centre. The report must also contain information on equal access to services, the adequacy of the level of funding and the effectiveness of implementation.

Article 48 § of the Integration Act states that the municipality has to set up a multi-disciplinary local cooperating group on immigration and integration to promote integration and good relations "if the need for services of immigrants require it". The act lists the entities that can be part of the group: In addition to the municipality, also the welfare area, the regional business, transport and environment centre, other municipalities in the area, the police, the reception centre for asylum seekers, other authorities, organisations, non-governmental organisations, associations and communities, representatives of the business life, and the service providers of integration services. This group supports the planning, development and implementation of integration at the local level; supports the coordination of integration with other planning by different authorities; must coordinate the reception of certain immigrants; promotes equality and good relations at the local level and may have other tasks related to immigration and the promotion of integration.

Policy-specific committees and networks

There are policy-specific committees and networks that aim to promote and reinforce political programmes and policies. The Integration Act requires them at different levels, but there are also some others.

As examples of them, in the fields of integration, good relations and equality there are:

Required by the Integration Act:

- ▶ KYHRY (the horizontal inter-ministerial cooperation group for integration), coordinated by the Ministry of Labour and Economy (required by the new Integration Act)

This group brings together eight ministries (Ministry of Labour and Economy, Education, Justice, Foreign Affairs, Interior, Social and Health, and Treasury), that prepare the national integration plan and deal with issues related to integration. It aims to improve cooperation and communication related to integration and to coordinate measures.

- ▶ Municipal networks and multi-disciplinary local cooperating group on immigration and integration

In the new Integration Act (45 & 48 S) these groups are mandatory, if the service needs of immigrants require it. The tasks of such groups are to promote integration and good relations. It is common that municipal working groups or networks exist already at least in bigger municipalities that receive immigrants.

Others:

- ▶ The integration partnership programme, coordinated by the Ministry of Economic Affairs and Employment

The idea is to build a national, open network of operators involved in the work related to the integration and social inclusion. Also regional partnership networks have been established since 2021. Any organisation working in the field of integration can sign up to the programme. The partnership programme is leading us towards an inclusive society | Integration (kotoutuminen.fi)

- ▶ Equality and equality issues information list, coordinated by the National Institute of Health and Welfare and the Municipalities Association

Equality and equality issues information list for municipalities and regions (YHTA list) is an e-mail list for equality and equality workers in municipalities and regions, as well as employees who have work tasks related to the promotion of equality and equality. Employees of organizations and projects doing regional equality work can also join the list. Meetings (YHTA dates) are organized for those who subscribe to the list, where the flow of information on good practices for the promotion of equality and equality is strengthened and equality and equality work is supported in municipalities and regions. Joining the list requires the e-mail address of a municipality, region or regional equality work organization.

- ▶ The network for the working life diversity programme

The working life diversity programme was part of Sanna Marin's governmental action plan against racism and for good relations. The goals were to prevent discrimination in recruitment, and to support the skills and interests of employers to recruit people with immigrant origin, for instance by using anonymous recruitment. Also one goal was to bring employers insights on how the expertise, the language skills and the knowledge of international context could reinforce the success of organisations. To prepare the programme, a multidisciplinary steering committee was set up. It was chaired by the Ministry of Employment and Economy, and other participants were the Ministry of Justice, the Institute for Health and Welfare, central trade unions, the confederation of business, the association of Finnish entrepreneurs, the regional centres for the employment offices, Business Finland, Helsinki Region Chamber of Commerce, the cities of Helsinki, Espoo, Turku and Oulu and StartUpRefugees.

- ▶ National cooperation model for internal security (and good relations)

The cooperation for internal security and the steering of the work for internal security is carried out by a "national cooperation model for internal security". The model was set up in December 2019, with the goal to promote the everyday safety and strengthen the sense of security of the population living in Finland by promoting the cooperation, joint planning and parallel action of different national-level actors, such as ministries, agencies, organizations and the business world, in responding to various internal security phenomena and problems. An online platform, Tuovi, was established. It is a platform for information sharing and cooperation for all who operate in the field of internal security. It is run by the Ministry of Interior and the actors are other ministries, regional and local agencies, municipalities, non-governmental organisations and service-providers. The national level has no mandate to force local actors to anything; it can only recommend good practices. At the local and regional level, safety problems are prevented by means of safety planning, for which the national cooperation model has made recommendations. At the core of all action, multilevel governance and cooperation is the key. Promoting good relations is one part of the implementation of the strategy for internal security; and in the recommen-

dations for safety planning there is a chapter on how to build good relations on a local level. The measures include for example the collection of data on the social climate and tensions, and the use of mediation and restorative justice practices in cases of conflicts.

Multilevel governance organs related to good relations

There are several multilevel governance organs that are directly or indirectly linked to the promotion of good relations. On the national level, they are coordinated by different ministries, and regionally by regional authorities and locally by municipalities. These organs bring together representatives of different communities and minorities.

The Sami, as the indigenous group, have their own self-governing body, the Sami Parliament, for language and cultural affairs. Its task is to deal with affairs related to their language and culture and status as the indigenous population.

The Roma, the disabled, the different language groups and deaf/sign language have group-specific permanent organs/structures for dialogue and for bringing the points of view of these minorities into political processes. They do not have inter-group collaboration on a regular basis. Only the Advisory Board for Ethnic relations brings together different groups. In addition to the national advisory board there are seven regional boards. Altogether these involve some 300 participants, representing associations, parties, labour market organisations, and government at all levels.

The organs are presented in the table below:

Multilevel governance organs related to integration and good relations			
	National	Regional	Local
The indigenous Sami	Sami Parliament	Sami Cultural Centre Sajos	
Roma Affairs	Advisory Boards for Roma Affairs (Coordinated by Ministry for Social Affairs and Health)	Regional advisory boards (coordinated by regional administrative agencies AVI)	Local Roma working groups
Disabled	The advisory Board for the Rights of Disabled (VANE)	Disability Councils of the Welfare areas	Municipal Disability Councils
Language groups	Advisory Board for languages		
Deaf/ Sign language	Advisory Board for Sign language affaires		
Ethnic relations	Advisory board for Ethnic Relations (coordinated by Ministry of Justice)	Regional advisory boards (coordinated by Business, transport and environmental centres (ELY-keskus)	Migrant or multicultural boards

As we see, there is a legislative basis and existing structures for multilevel governance. The challenge is that the responsibilities to apply policies and actions, which have been defined in multi-level governance structures, are vague. Also, it is not always clear to know what is the impact of these structures and networks and how the different parties perceive the meaningfulness of participation.

Models from European states / country comparisons

Finland's own work in promoting 'good relations' and the best mechanism for the MLG of intercultural integration in the country can be usefully informed by looking at other Nordic countries—not only for potential lessons but also with an eye to sharing good practices and developing mutual learning through existing arrangements for co-operation such as the Nordic Council.

The Nordics as a whole tend to exhibit well-functioning MLG arrangements. MLG is all about relationships—vertical and horizontal—and so trust is at a premium. The [European Social Survey](#) regularly tests the opinions of respondents across the 28 (currently) participant countries on what has now become the standard barometer of trust. Those surveyed are invited to express where they stand on a range from 'you can't be too careful' (0) to 'most people can be trusted' (10). The Nordic countries always evince the most trusting responses of all. This has been linked in a classic study (Rothstein, 2005) to their still distinctive (Hay and Wincott, 2012: 183) universal welfare states, the mechanism being that these are guarantees of impartial public authority.

Moreover, in the [white paper](#), on the platform of the universal norms espoused by the Council of Europe, impartial authority was identified as one of three defining features of a democratic architecture conducive to intercultural integration, drawing on the work of David Held (2003: 169) on cosmopolitanism. Impartial authority, it was argued there, was essential to ensure that, where intercultural dialogue did not succeed, contending cultural claims would be addressed in a manner seen as legitimate by all. (The other features were respect for every individual as a human being and reciprocal recognition of this equality of worth.)

The welfare state has in turn been seen as key to integration across the Scandinavian countries. In particular, in the context of the associated high post-war employment, there has been a strong belief across the Nordics that integration should follow the 'workline', identifying employment as a privileged route (Brochmann and Hagelund, 2012). This has had the side-effect of enrolling the 'social partners' in the MLG arrangements via their involvement in labour-market regulation.

In Denmark, for instance, the social partners agreed a deal in 2016, supported by government, to facilitate the integration of refugees and reunified family members into the labour market. This streamlined and accelerated the assessment and recognition of

skills, acquisition of vocational Danish and job placement, including via new requirements placed on local authorities. And it established a training programme for entrants not yet able to command a trade-union reservation wage, while incentivising placements with a bonus for participating companies.

Similarly, Sweden developed a series of 'fast tracks' to promote the early employment of refugees through agreements with the sectoral social partners. In Norway too social partnership has facilitated the integration of migrants into the labour market while preventing 'social dumping' (Søholt and Tronstad, 2021: 42).

The arrangements for MLG in Finland have thus been unsurprisingly topped (since 2011) by the Ministry of Employment and the Economy (although they did previously come under the Ministry of the Interior). The trend in Finland has though been towards devolution to the regional level and the 2010 Promotion of Immigrant Integration Act tasked the 15 regional centres for economic development, transport and the environment with monitoring the adoption and implementation of the municipal integration plans it mandated. They are required to co-operate with regional administrative agencies and may appoint a regional committee.

The '[At Home in Finland](#)' project which ran between 2015 and 2020 thus involved a figure in each of the seven regions as well as national co-ordination and local co-ordinators in municipalities. This worked better than where the intervening regional level was absent, since the regions understood the municipalities better than in the view from Helsinki; trust-based relationships were again important.

These legal obligations in Finland favour MLG having the ideal 'fractal' character discussed earlier—in that wherever one looks, at whatever level, one sees (reassuringly) broadly the same picture. There have however been tensions between the municipalities and national government over the level of support and variation in performance. Some have been more willing to invest resources than others in the context of local autonomy (Koikkalainen, 2021).

Similarly, in Sweden the Public Employment Service of the Ministry of Employment is responsible for the co-ordination and introduction to the country of newly arrived migrants. At the regional level, 21 county administrative boards are responsible for regional co-ordination and early measures for

asylum-seekers. And at the local level 290 municipalities are responsible for providing Swedish-for-immigrants and civic-orientation courses, housing, pre-schooling and schools.

The 'workline' approach had been intensified after a change of government in Sweden in 2010. This *reduced* integration to entering employment and transferred responsibility for the two-year introduction programme for refugees from municipalities to the Public Employment Service—partly again because of patchy involvement by the former (Hudson *et al*, 2021).

In Norway, the association of local authorities has a bilateral partnership with government on integration, periodically reviewed. This allows, for instance, for discussions of responsibility-sharing *vis-à-vis* refugee quotas, which are associated with *per capita* assistance from central government. Everyone knows roughly how much it costs local authorities per refugee. It doesn't really matter who is in government nationally and there is cross-party consensus locally.

At least twice a year, there is a meeting of the Association of Norwegian Local and Regional Authorities and the government, chaired by the chair of the association and attended by the directors of integration and diversity and of immigration on the government's behalf. It has formed the backdrop to the handling of the Ukraine refugee influx.

The integration law passed in Norway in 2021 places most duties on municipalities, so they can offer individually tailored services. Indeed, more central funding has been distributed to the municipal level in recent years, in recognition that local authorities spend it better and more innovatively in this arena.

Multilevel governance between countries: Nordic co-operation in the field of integration policy

Since 2016, the Nordic Council of Ministers has implemented a cooperation programme for the promotion of immigrant integration. The countries involved in

the Nordic Council of Ministers are Norway, Denmark, Iceland, Finland and Sweden. Even though there is no such thing as one distinct and unified Nordic model of migration, Nordic states have developed cooperative structures for sharing and learning from each other. The aim of the programme is to support integration promotion in the Nordic countries by strengthening cooperation between them, supporting the development of exchange and development of good practices and new knowledge. A new integration cooperation programme has been drawn up for 2022–24, emphasising the importance of education and training and the role of labour market integration in the integration of newly arrived refugees and migrants. The programme has several elements including a website: www.integrationnorden.org, managed by the Nordic Welfare Centre, serving as a hub for knowledge exchange, capacity building and networking between key actors working hands on with the inclusion of newcomers into Nordic labour markets and communities. Activities of the programme also include thematic seminars for relevant actors as well as the forming of two expert groups, one targeting labour market integration, and one targeting social integration in a broader sense.

The Nordic Migrant Expert Forum is a good example of a multilevel governance structure that gathers expertise on migration policy issues from all Nordic countries and presents recommendations concerning integration issues for Nordic Integration Ministers in the context of the Nordic Council of Ministers. The members of the Forum have been tasked with sharing their insights into the challenges faced by public authorities and other stakeholders, as well as the solutions available to them when it comes to integration in the Nordic region. The most recent recommendation by the Nordic Migrant Expert Forum was published in the Nordic Council of Ministers meeting in Reykjavik in October 2023. It consists of thirteen recommendations for further developing integration policies in the Nordic states (see: <https://pub.norden.org/nord2023-033/index.html>)

Policy case analysis: action plan against racism and promotion of good relations

As we have tried to describe, the elements of multilevel governance are very much present in the legal framework and practices to enhance participatory democracy in Finland. This is probably most prevalent in the field of equality and non-discrimination where the basic approach since adoption of the nondiscrimination act in 2004 has been developed around the idea of involvement of minority groups in policy making. One of the obstacles in this field has however been the vagueness of responsibilities and lack of a single sector consisting of a vertical and horizontal implementation mechanism that would enforce the legal and political goals in an efficient manner. Issues related to nondiscrimination have been tackled under many different sectors including integration policy, human rights, disability, antiracism and group based policies. According to Finnish non-discrimination legislation every public authority and bigger employers are responsible for tackling discrimination in all forms and all actions. Unfortunately, if something is everyone's concern, it might end up being nobody's concern.

The problem of insufficient coordination was one of the main reasons for establishing a national action plan against racism and promotion of good relations during the previous governmental term in Finland. One goal of the action plan was to establish multilevel governance structures that would lead to more efficient and engaging methods of work for designing, promoting and evaluating policies against racism and promotion of good relations. The key elements of these new structures and policies were analysed in the Council of Europe evaluation report and it consists of recommendations for further developing the measures. According to the evaluation report, future governments should take into account for example the following recommendations in order to enhance multi level governance in the field of equality and nondiscrimination:

- ▶ Strengthening community-based and participatory preparation in the different languages would increase the equality of different groups in future policy preparation processes.
- ▶ Identifying concrete objectives and measures may require delving into a more limited number of areas of life, where channels of influence and measures can be designed as a whole, cutting across all levels of government and civil society.

- ▶ The preparation of action programmes against racism would be strengthened if as many sectors as possible developed data collection on racism and its manifestations in the area of life concerned.
- ▶ The activities of the good relations pilot project were very important for the implementation of the action programme at regional and local level and should also be included in this type of activity; future anti-racism action programmes to ensure their effectiveness at regional and local level.
- ▶ In addition to the monitoring of the government programme and the internal monitoring of the action programme, the implementation of measures in future action programmes should be monitored through an independent monitoring mechanism.

All of these recommendations are focusing on further developing critical elements of multi level governance. The evaluation report was handed over to the contemporary government's working group which was responsible for drafting the government's statement to Parliament on promoting equality, gender equality and non-discrimination in Finnish society during the summer 2023. The statement consists of the goals and activities the Finnish state will come up with to tackle racism and promote good relations in the forthcoming four years. About 100 representatives of civil society organisations, researchers and other parties were consulted as part of the process of drafting the statement. The statement also deals with the governing structures and consists of elements for strengthening multilevel governance.

Next we will analyse the contents of the statement from the perspective of key elements of multilevel governance [developed](#) by the Council of Europe in 2022. These were derived from research linked to a project, in conjunction with the EU, on intercultural integration in Cyprus. The research paper explored how the MLG of intercultural integration, addressed in the recommendation agreed by the Council of Europe Committee of Ministers in April 2022, could be operationalised in different constitutional contexts before concluding with elements of general application. These should be taken into account in the forthcoming policy processes.

Element 1: national leadership from the top.

One of the main structural changes after declaring a government anti-racism statement is that the Prime Minister's Office will take the lead in preparing a national action plan against racism and promotion of good relations. The prime minister is the leader of the government and this decision emphasizes the level of priority given to the statement. The leadership is given to the highest political actor of Finnish society. This change in the overall coordination structure opens new possibilities for strengthening the coordination between different stakeholders and incorporation of multilevel governance mechanisms in practical implementation of coming policies.

The idea is also to bring together anti-discrimination expertise under the prime minister and to improve the effectiveness of cooperation between public authorities and other parties promoting non-discrimination. The knowledge base on non-discrimination and racism will be improved. The government will also launch an annual round-table discussion led by the prime minister on promoting equality and nondiscrimination. The roundtable aims at involving stakeholders from both horizontal and vertical levels: different levels of administration, civil society and the private sector. The composition of the roundtable has not been declared yet and it might either be thematically chosen or based on a stakeholder perspective. Whatever the outcome is, **it would be beneficial to include elements of multilevel governance as a guiding principle in setting up of the new consultative structures on tackling racism and promoting good relations.**

One important structure, as described above, for involving ethnic and religious minorities in decision making is the advisory board of ethnic relations (ETNO). ETNO operates in both national and regional levels and is aiming at bringing in multilevel expertise on the issues concerning ethnic relations. According to the anti-racism statement the government will support the work done by the Advisory Board for Ethnic Relations (ETNO) and regional ETNOs to promote good relations between population groups and new resources have been allocated to them from the state's budget. The role of regional ETNOs was strengthened by a pilot project on good relations during the years of 2021-23. The pilot project served as a catalyst in developing regional strategies to tackle racism in different parts of the country and got loads of positive feedback. **The activities of the good relations pilot project were very important for the implementation of the nation action plan at regional and local level and activities like that should also be included in future anti-racism action programmes to ensure their effectiveness at regional and local level.**

Element 2: an expert agency.

The anti-racism statement promises to bring together anti-discrimination expertise under the Prime Minister's Office. The aim is to improve the effectiveness of cooperation between public authorities and other parties promoting non-discrimination. The knowledge base on non-discrimination and racism will also be improved. There is an existing structure for aggregating expertise in Finnish non-discrimination policy. A discrimination monitoring group has worked since 2008 and it consists of research institutes, NGOs and public officials who have expertise on non-discrimination data collection or analyses. The monitoring group had an evaluative role in the previous government's action programme against racism in its different phases. **The role of the discrimination monitoring group could be further developed when the next national action programme against racism is prepared.** The key functions of the group should be providing relevant evidence-based knowledge for decision making, making analyses and policy recommendations and consulting different levels of governance in their efforts to develop discrimination data collection.

Element 3: horizontal co-production, coordination and consultation.

Horizontal co-production and coordination are taken into account in the activities of the government's statement to parliament on promoting equality. The government will support the work done by the Advisory Board for Ethnic Relations (ETNO) and regional ETNOs which gather expertise and knowledge of different ethnic and religious groups around the country. Multiple levels of governance may benefit from the knowledge produced within ETNOs. The government will also improve dialogue with non-governmental organizations by preparing a strategy on civil society organizations and an implementation plan for it. **The priorities and aims of the NGO strategy have not been published yet but the elements of co-production, coordination and consultation should be fostered by the strategy. In addition the mechanisms of recognition and procedural justice should be taken into account in the targets of the strategy.**

The government will also cooperate with labour market organizations to promote non-discrimination, diversity and equal opportunities at work. The role of the business sector in tackling discrimination has not been emphasised enough in the Finnish context and policies are needed for reducing recruitment discrimination and promoting diversity management. **New channels of cooperation and learning should be established between the public, private and third sectors. This could be enforced by public funding instruments which require cross sectoral cooperation.**

Element 4: a national intercultural-integration plan.

There is no national intercultural integration plan in Finland but the government's plan to continue the Equal Finland action plan against racism and promotion of good relations contains elements equivalent to the intercultural approach. The Finnish concept of good relations is described in detail in a chapter on the current situation of Finland in this report. According to the government's statement document, the EU Anti-racism Action Plan 2020–2025 will be taken into account when drawing up the renewed action plan against racism. In addition to the specific action plan against racism, the government will launch an equality and gender equality programme covering the entire education system in 2024–25. The programme will support educational institutions in the practical implementation of their current equality and gender equality plans in the day-to-day activities of early childhood education and care and educational institutions. The continuing work under the plan will be carried out in a way that encourages broad participation and will make use of the consultations carried out in the preparation of the statement. **Synergies among these strategies should be identified and strengthened by setting up the vertical and horizontal governing structures that play key roles in achieving the goals of different action plans.**

Element 5: local leadership and planning.

The element of local leadership and planning is not very well defined in the government's statement. The statement declares that the government is aware that different cities and regions have different circumstances and discussions on the promotion of non-discrimination, including the prevention of segregation, will be continued in the network of major cities. The Prime Minister's Office will also launch an anti-racism campaign which is planned to be carried out in cooperation with labour market, sports, cultural and non-governmental organizations. **The pilot project on good relations has established regional networks on promoting good relations and drafted regional action plans with region-specific goals and activities. These networks and plans could serve as a starting point for further developing local and regional perspectives and activities when the government's statement is to be implemented at the local and regional level.** The role of local leadership should be enhanced in both horizontal and vertical levels. Local horizontal leadership should include political, administrative, private sector and civil society leaders committed to the work for good relations and the intercultural approach. The vertical element should drive for synergies between state, regional and local level activities

and seek partnerships with grassroots civil society organizations, which have first hand knowledge of the situation in neighbourhoods and communities.

Element 6: regular meetings.

The element of regular meetings has to be defined in a more precise manner while analysing the upcoming policies of the Finnish government while it implements its statement on promoting equality, gender equality and non-discrimination in Finnish society. The new coordination mechanism will be founded in the prime minister's office and it will have several participatory channels for multilevel governance. The key questions to be considered are how the new structure involves both vertical and horizontal elements of multilevel governance and what are the main avenues of engagement at national, regional and local level. **The regularity of meetings should be tailored to needs in a specific way, taking into account the synchronization and synergies of targets and activities at different levels of policy implementation.** This will require a plan of actions identifying key structures, activities, timetables and responsibilities and mechanisms of evaluation. Meetings should strengthen the overall implementation and evaluation of the process in vertical and horizontal levels.

Element 7: fair and sustainable funding.

The statement declares that the funding for the forthcoming activities will be covered from the state's budget and the government will allocate sufficient resources to the measures. The annual budget for the activities turned out to be 6 million euros. In addition to the state budget, the project funding from different EU funding and national funding programmes will be used for achieving the goals of the statement. The fairness of the funding is a question that multi-level governance instruments should discuss while analysing the impact of the measures. In the case of non-discrimination, funding for civil society initiatives is part of the empowerment and should be included in the evaluation criteria. **The fairness of the funding could be part of the topics covered within the external evaluation procedures.**

Element 8: evaluation.

There are several elements of evaluation mentioned in the statement. The Prime Minister's Office will lead the monitoring of measures under the plan. The monitoring will be part of the government's monitoring cycle and the government will assess the situation and the need for further measures in its mid-term policy review session in 2025. The continuing work under the plan will be carried out in a way that encourages broad participation and will make use of the consultations carried out in the preparation of this

statement. The government will also annually review the decisions, conclusions and recommendations issued to Finland by international bodies monitoring human rights and decide on measures to be taken. The form of this annual review is still open.

The actual evaluation procedures are most probably more clearly defined in the forthcoming action plan which implements the statement. However several crucial elements should be taken into account in developing the evaluation procedures from a multilevel governance perspective. **The first thing to consider is how the evaluation procedures are combining and covering the knowledge on different levels of implementation (vertical element: national, regional and local). The second angle is to figure**

out how the horizontal evaluation is organised within different levels of governance. In addition to internal evaluation procedures, the element of external evaluation should also be taken into account. In the evaluation report on the Equal Finland action plan, we recommended that, **in addition to the monitoring of the government programme and the internal monitoring of the action programme, the implementation of measures in future action programmes should be monitored through an independent monitoring mechanism.** Independent monitoring mechanisms have been used in various policy fields, such as sustainable development policies, before and there are plenty of good practices available in the international context as well.

Conclusion: recommendations

Like any human being, any state is unique. But every human has a brain, a skeleton, muscle tissue and a blood system. And any MLG arrangement has itself to have four analogous features.

Its 'brain' is the national centre, where expertise is concentrated and executive decisions are taken. Its 'spine' is the stacked series of levels, from national to local, which must work bottom-up as effectively as top-down, with formal, robust relationships. Its connecting 'tissue' is the national policy framework which gives every element in the governance arrangement not only a clear place but also a sense of its relationships of interdependence with others. And it has a 'capillary' system of engagement with NGOs, penetrating to the neighbourhood scale, which fosters trust and commitment by all.

Effective MLG arrangements can not only ease tensions between levels of government but engender synergies—between a policy framework and funding provisions (top-down) fostering and learning from on-the-ground innovation (bottom-up), allied to horizontal co-ordination and dissemination of good practice. Such arrangements make the 'body politic' altogether healthier and greater than the sum of its parts.

As we see in this report, the legislative basis and existing structures for multilevel governance in Finland are quite strong. However the challenge is that the responsibilities to apply policies and actions, which have been defined in multi-level governance structures, are vague. Also, it is not always clear to know what is the impact of these structures and networks and how the different parties involved in the action perceive the meaningfulness of participation.

This report examines the current developments in Finland concerning planned national initiatives on promoting equality, good relations and intercultural activities. We paid special attention to the Finnish government's statement to Parliament on promoting equality, gender equality and non-discrimination in Finnish society and have drawn recommendations on how key elements of multilevel governance should be taken into account when the actual implementation of the government's statement starts. The statement itself declared structural changes in coordination mechanisms by transferring the coordination of equality and non-discrimination under the prime minister's office. This change in coordination structure opens new possibilities for strengthening the coordination between different stakeholders and for incorporating multilevel governance mechanisms in practical implementation of coming policies.

Our recommendations for further developing these policies are:

1. Finnish governments should consider the elements of multilevel governance as guiding principles in setting up the new consultative and implementation structures on tackling racism and promoting good relations.
2. The vertical and horizontal elements which include involvement of national, regional and local level actors and activities are a crucial part of policy design, which should be taken into account in the process of preparing a concrete action plan for implementation of the government's statement.
3. The role of the discrimination monitoring group could be further developed when the next national action programme against racism is prepared. The key functions of the group should be providing relevant evidence-based knowledge for decision making, making analyses and policy recommendations and consulting different levels of governance in their efforts to develop discrimination data collection.
4. Synergies among different policy programmes and strategies should be identified and strengthened by setting up the vertical and horizontal governing structures that play key roles in achieving the goals of different action plans.
5. The regularity of meetings should be tailored to needs by taking into account the synchronisation and synergies of targets and activities in different sectors and levels of policy implementation.
6. New channels of cooperation and learning should be established between the public, private and third sectors. This could be enforced by public funding instruments which require cross sectoral cooperation.
7. The participatory elements of the planned actions should take into account the elements of co-production, coordination and consultation with civil society actors. In addition the mechanisms of recognition and procedural justice should be taken into account in the targets of the action plan.
8. The pilot project on good relations has established regional networks on promoting good relations and drafted regional action plans with region specific goals and activities. These networks and plans could serve as a starting point for further developing local and regional perspectives and

activities when the government's statement is to be implemented at the local and regional level.

9. The evaluation procedures should combine the knowledge on both vertical and horizontal levels of implementation. In addition to the internal monitoring, the implementation of measures in future action programmes should be monitored through an independent external monitoring mechanism. The fairness of the funding could be part of the topics covered within the external evaluation procedures.

With any programme to improve individual fitness, one starts with where the individual is at, with their accumulated quirks and particularities. These recommendations similarly start from Finland's existing 'body politic', focusing on its complex policy *acquis* in this domain. Our report has shown that that is a little disjointed and has quite a bit of padding and our recommendations seek to 'tone up' its various components.

Any fitness programme becomes more demanding over time. And, in an ideal world, there would be a more strategic and rationalised national policy framework, with clearer objectives and well-defined consequent programmes, working together more coherently to greater effect. In that context, the MLG of integration should be 'fit for purpose': the arrangements, as these evolve, should be bespoke, in terms of structures, mechanisms and roles, for the achievement of the policy goals Finland's citizens democratically set in this key 21st-century policy arena.

The vision should be that, over time, Finland is able to learn the lessons of wider European experience, co-ordinate good practices particularly within the Nordic region and end up with a 'fitter' set of arrangements for managing its cultural diversity in a holistic fashion, combining combating racism and all forms of intolerance with the positive promotion of inclusion and integration.

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