European Network Against Racism




# AT THE MERCY OF POLITICAL WILL:

## NAPARs and structural racism in the EU

REPORT

European
Network Against
Racism

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European Network Against Racism

# ABOUT ENAR

The European Network Against Racism (ENAR) is a pan-European network of more than 140 member organisations across 31 countries in Europe. ENAR aims to build a resilient anti-racist movement to lead the struggle for racial equality by:

- Challenging structural racism and mobilising to counter its many manifestations.
- Creating spaces for anti-racist civil society organisations (CSOs) and activists to engage in democratic policymaking at local, national, and European levels.
- Advocating directly with EU institutions, in collaboration with its members, to advance anti-racism and equality policies.
- Strengthening alliances with other movements for social, economic, digital, and climate justice – recognising how these issues disproportionately impact racialised people.

ENAR's member organisations address diverse manifestations of racism affecting racialised communities, making ENAR a multi-issue organisation. Our strength lies in this diversity and in members' intersectional approaches, which drive systemic change and tackle structural racism.

ENAR plays a key role as a convener, providing spaces for dialogue, solidarity, and collective action. These spaces foster societal cohesion and protect the rights and diversity of our communities. Central to this approach is centering the voices and lived experiences of racialised people in policymaking processes.

We believe that solutions must be co-created with those most affected by racism – by working with grassroots organisations, amplifying marginalised voices, and building alliances with social justice movements.

European Network Against Racism

# ABOUT THE PROJECT

This report forms part of the second edition of ENAR's research portfolio assessing the state of National Plans Against Racism (NAPARs) across the European Union. Drawing on 13 country reports produced by national researchers embedded in their respective political, legal, and civil society contexts, it does not rank Member States or measure relative performance. Instead, it synthesises the recurring trends, common institutional patterns, and shared obstacles that emerge across the countries studied, offering an accessible analytical overview for advocates, policymakers, researchers, and civil society organisations. Grounded in critical race theory, decolonial thought, and intersectionality, the research treats racism as systemic, structural and historically constituted, and asks not simply whether Member States have adopted anti-racism plans, but whether those plans are capable of confronting racism as a phenomenon embedded institutions and structured rather than a collection of isolated incidents.

This report's central finding is that the current generation of NAPARs, and the EU architecture that frames them, are failing the communities they claim to serve in ways that are structural rather than incidental. While some Member States have made notable progress, racism is too often reduced to individual prejudice and hate crime, dedicated funding is frequently absent, and anti-racism commitments coexist with racialised policies in migration, policing, and welfare that actively reproduce the very harms these plans claim to address. Combined with the non-binding character of the EU framework – which allows plans to be adopted by one government and quietly dismantled by the next – these patterns reveal a two-tier Europe of anti-racism, where formal commitments and substantive change remain far apart.

# FUNDERS DISCLAIMER

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THE SIGRID RAUSING TRUST

# METHODOLOGICAL NOTE

This report forms part of the second edition of ENAR's ongoing research portfolio led by ENAR Policy Advisor Nourhene Mahmoudi, examining the state of National Plans Against Racism (NAPARs) across the European Union. The project brought together 13 national researchers who are country experts embedded within their respective political, legal, and civil society contexts, who each produced a country report documenting the designation, adoption, implementation or equivalent integrated anti-racism measures in their Member State, including cases where such frameworks were absent at the beginning of the research period.

The research was conducted between October 2025 – July 2026 and consolidated in the months that follow. As national policy developments continued throughout this period, the analysis reflects the information and policy situation available at the beginning of the research period. Therefore, plans adopted or developed subsequently are mentioned but were not incorporated into the assessment.

This publication does not constitute a comparative report. Rather than ranking Member States or measuring relative performance, its purpose is to identify and synthesise recurring trends, common institutional patterns, and shared obstacles emerging across the countries studied. It is designed as an accessible analytical overview for advocates, policymakers, researchers, and civil society seeking to understand the broader European landscape of anti-racism policymaking. Readers seeking detailed national analysis are encouraged to consult the individual country reports which provide the necessary contextual depth and country-specific evidence.

The report's scope is deliberately focused and limited: it examines whether these plans are capable of addressing racism as a systemic phenomenon embedded in institutional and societal structures, rather than merely treating it as a collection of isolated incidents or discriminatory attitudes. It does not comprehensively assess all national laws, policies and public-sector practices that may reproduce racial inequalities in contradiction to the NAPARs, nor does it systematically evaluate the mainstreaming of anti-racism across every policy area. Nevertheless, the report considers relevant policy contradictions and wider institutional contexts where these

are documented in the country research, recognising the effectiveness of a NAPAR cannot be understood entirely in isolation from the policies surrounding it.

Lastly, the analysis is grounded in the recognition that understanding and addressing structural racism requires more than examining formal commitments and institutional arrangements. The lived experiences and situated knowledge of racialised people are central to understanding how racism operates, how institutional practices affect communities, and where official frameworks fall short. Those most directly affected by racial inequality possess essential expertise that may be overlooked by institutional perspectives or claims of administrative neutrality. Their knowledge is therefore indispensable to assessing anti-racism plans respond to the realities racialised communities and whether the measures adopted are capable of contributing to structural change.

# ASSESSMENT TOOL: INDICATORS AND SCORING

Each National Action Plan Against Racism (NAPAR) was assessed against seven indicators developed by ENAR. The seven indicators that are listed and explained in the coming sections, were built based on ENAR's longstanding expertise in anti-racism policy and monitoring, while also drawing on relevant European standards and guidance, including the European Commission's Common Guiding Principles for National Action Plans Against Racism[1], to which ENAR contributed through its participation in the EU Anti-racism Forum.

Together, the indicators assess the core components of a meaningful anti-racism plan, including its recognition of structural and institutional racism, the participation of racialised communities in its design and implementation, the adequacy of resources allocated to its delivery, and the robustness of its monitoring, evaluation, and accountability mechanisms. Each indicator is organised into five levels, representing a progression from the absence of meaningful commitment, through symbolic or

[1] European Commission, *Common Guiding Principles for National Action Plans against Racism and Racial Discrimination* (2022).

rhetorical measures, to the substantive implementation of anti-racism in policy and practice. Researchers assigned the level that best reflected the national context based on triangulated evidence from desk research, stakeholder interviews, and their broader knowledge of the country's anti-discrimination framework, institutional landscape, and political context.

# DATA SOURCES AND RESEARCH METHODS

The research combined quantitative and qualitative methods, triangulating evidence across a range of sources to ensure analytical rigour. The desk research drew on coalition agreements, national strategies and action plans, legislation, evaluation reports, parliamentary materials, official communications, and relevant academic and grey literature. This was complemented by semi-structured interviews with key stakeholders, including state representatives and public administration officials, civil society and community-based organisations, and academics and subject-matter experts. These interviews explored how NAPARs come into being, how they are designed and implemented, and where they fall short, while also surfacing the experiences of those tasked with delivering anti-racism policy and those most directly affected by its presence or absence.

# ATTENTION TO CIVIC SPACE AND THE RULE OF LAW

The research gave particular attention to the shrinking of civic space and to pressures on the rule of law as defining features of the environment in which anti-racism policy is, or is not, developed. This focus has become increasingly necessary in light of the growing criminalisation and restriction on non-governmental organisations that advocate for human rights and against racism, including those campaigning for the

adoption of NAPARs themselves. Rather than treating the conditions under which civil society operates as mere background, the research understands them as a material factor that shapes the very possibility of meaningful anti-racism policy.

# CONCEPTUAL FRAMEWORK

This research is grounded in three mutually reinforcing analytical elements: critical race theory[2], decolonial thought[3], and intersectionality.[4] These frameworks serve as the theoretical foundation of this fact sheet, shaping both its methodological orientation and the interpretation of its findings. Rather than providing a single understanding of racism, they offer an analytical lens through which racism is examined, drawing attention to the institutional dynamics, historical continuities, and relations of political power that structure racial inequality.

At the centre of this approach is an understanding of racism as systemic, structural and historically constituted. This report departs from the viewpoint that systemic racism is embedded within institutions, legal systems, structures, public discourse, and material distributions of power. This understanding requires moving beyond questions of individual intent to examine how states and institutions may reproduce racial inequality through ostensibly neutral laws, administrative practices, policy priorities, and omissions.

Critical race theory (CRT) provides an analytical framework for understanding how racism becomes normalised and institutionally reproduced, including through formal equality mechanisms that may appear race-neutral but do not challenge underlying racial hierarchies and unequal power structures. The research, therefore, not only challenges whether anti-racism measures exist, but whether they meaningfully

[2] Derrick Bell, *Faces at the Bottom of the Well: The Permanence of Racism* (New York: Basic Books, 1998); Arun Kundnani, "Racism Is a Structure," in *What Is Antiracism? And Why It Means Anticapitalism* (London: Verso, 2023), 74-91.
[3] Walter D. Mignolo, "The Conceptual Triad: Modernity/Coloniality/Decoloniality," in *On Decoloniality: Concepts, Analytics, Praxis*, by Walter D. Mignolo and Catherine E. Walsh (Durham, NC: Duke University Press, 2018), 135-152.
[4] Kimberlé Crenshaw, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics," University of Chicago Legal Forum 1989, no. 1 (1989): 139–67.

challenge institutional arrangements that sustain racial inequalities or merely manage their effects.

Decolonial thought further situates contemporary racism within the enduring structures of European coloniality and racial capitalism[5]. In Europe, racism is often approached as detached from colonial history or as a contemporary problem linked to migration. Yet racism is deeply intertwined with the historical formation of modern European states, border regimes, citizenship, legal systems and social hierarchies. Through this framework, coloniality is understood not simply as a historical legacy but as an enduring structure of power that continues to shape whose knowledge is recognised as legitimate and how racialised identities, social relations, and hierarchies are organised[6].

Particular attention is therefore paid to the role of whiteness in shaping policy. Whiteness is a socio-political construct that is historically produced and institutionally embedded position of normative power that structures access to legitimacy, credibility, safety, resources, and political representation[7]. In many contexts, anti-racism efforts continue to operate within institutional settings where whiteness remains unchallenged and the standard against which difference is measured, governed, and often problematised.

Consequently, the national reports conducted as part of this research project which inspire the fact sheet, examine the extent to which NAPARs confront or avoid confronting the racial hierarchies embedded within institutions and public policy. This includes whether action plans recognise explicitly structural racism, address power asymmetries, redistribute institutional responsibility, and create mechanisms capable of challenging entrenched forms of racial exclusion rather than merely responding to isolated discriminatory incidents after they occur.

In this research, intersectionality is employed as a necessary analytical principle for understanding how racism constitutes and interacts with other systems of oppression and domination, including patriarchy, class inequality, ableism, religious discrimination, migration governance and heteronormativity. Anti-racism policy that treats racialised

[5] Mignolo, "The Conceptual Triad", 135.

[6] Aníbal Quijano, "Coloniality of Power, Eurocentrism, and Latin America," *Nepantla: Views from South* 1, no. 3 (2000): 534–42, 549–50, 564–65.

[7] Cheryl Harris, "Whiteness as Property", *Harvard Law Review* 106, no. 8 (1993): 1713–15.

communities as homogeneous risks rendering invisible different experiences and reproducing exclusion within the very frameworks designed to combat racism.

Lastly, this research has begun from the premise that structural racism requires meaningful structural responses. The question is therefore not whether ambitious anti-racist standards are justified, but whether governments are doing enough to meet them. NAPARs are assessed according to their capacity to produce institutional accountability and material change; symbolic or inadequate responses are treated as failures to address the problem at the scale required.

# SCOPE AND LIMITATIONS

Several limitations should be borne in mind when reading this factsheet. The country reports are not comprehensive audits of every anti-racism provision within a given Member State. Rather, they provide an overview of the context in which National Action Plans against Racism (NAPARs), or integrated anti-racism measures where no standalone NAPAR exists, were developed, adopted, and implemented. Similarly, the scores presented reflect the evidence available at the time of assessment and should therefore be interpreted with appropriate caution. They do not constitute definitive judgements on the overall quality or effectiveness of a Member State's anti-racism efforts but instead assess the extent to which commitments are articulated, evidenced, and substantiated through available information.

The assessment draws primarily on publicly available NAPARs and related policy documents, implementation reports where available, stakeholder interviews, and other accessible sources. While every effort was made to triangulate findings across these sources, the availability, quality, and accessibility of evidence varied considerably between Member States and was also limited by the resources available for this project.

The sample is limited to 13 Member States and does not claim to be representative of the European Union as a whole. As noted above, the scoring framework is not

designed to facilitate direct comparisons between countries or to produce aggregated national scores. Instead, it provides a structured means of assessing progress against a common set of indicators while recognising that national legal, institutional, and political contexts differ substantially. Aggregating scores will lead to wrongful conclusions on Member States' attitudes and actions to combat structural racism.

Finally, the qualitative evidence necessarily reflects the perspectives of the stakeholders who were interviewed. These perspectives were triangulated with documentary evidence and other available sources wherever possible to enhance accuracy, transparency, and balance. Nevertheless, differences in transparency, documentation, and data availability across Member States inevitably influence the evidence base upon which assessments are made. This should not be understood as diminishing the value of the findings; rather, it highlights the importance of transparent documentation, publicly accessible information, and research funding as essential components of accountability and effective anti-racism governance.

# HOW TO READ THE SCORING

The scoring carries an important interpretive caveat. Each score must be read singularly, as a reflection of the state of play on one specific dimension within one national context, and not as part of a cumulative total. The levels are not designed to be added together into an overall national score, nor to generate a ranking or league table of Member States. Comparability across countries cannot be ensured through this research, because its scope is deliberately not wide enough to examine the full range of policies that would be needed to assess the mainstreaming of anti-racism across all areas of government. The scoring is therefore best understood as a diagnostic snapshot that signals strengths and gaps within each national context, rather than as a comparative metric to be measured against other countries.

# PROJECT OUTPUTS

The research produced three interconnected outputs. The first is a set of 13 national reports, each providing a detailed account of the state of play of NAPARs in a participating Member State. The second is this report, which synthesises the cross-cutting trends emerging from those reports and offers an overview of the sample analysed. The third is the Anti-Racism Map, an accessible online map on ENAR's website that illustrates the state of play of NAPARs across EU Member States.

# GLOSSARY

## COLONIALITY

Coloniality, also referred to as modernity, is a political-epistemological project born of the power struggles of Western European kingdoms around the 15th century, which was then exported as a universal ideology through centuries of imperial colonisation and globalisation. It refers to the enduring patterns of power, knowledge, and being that persist beyond the formal end of colonisation. It describes how colonial logics and structures continue to shape societies, identities, and knowledge systems long af ter the physical presence of colonial rule has ended. Crucially, coloniality is more subtle, systemic, and internalised than colonisation. For more see: “Coloniality of power and Eurocentrism in Latin America.” (Quijano 2000); “On the Coloniality of Be ing” (Maldonado-Torres 2007).

## DECOLONIALITY

While decolonisation refers to the historical process of achieving political independence from colonial powers, the term has in some contemporary contexts been misappropriated by neoliberal institutions to signal inclusivity and diversity without addressing underlying structural inequalities. In contrast, decoloniality goes beyond the political and addresses the deeper, ongoing influence of colonial structures in knowledge, culture, and societal norms. It seeks to transform power relations, knowledge systems, and cultural dynamics that have been shaped by coloniality. Decoloniality is not only for those who directly experience the colonial difference but also for all those who struggle from and within modernity/coloniality and seek to build a radically different world. It advocates for an intersectional approach, recognising that struggles against coloniality inter sect with other forms of oppression, such as racism, sexism, and classism. For more see: “Necropolitics Public Culture” (Mbembe 2003); “The Coloniality of Gender” (Lugones 2016); “On Decoloniality” (Mignolo and Walsh 2018)

## GLOBAL MAJORITY

Global Majority is used deliberately in this report to reflect the demographic fact that populations shaped by colonialism and racialisation constitute most of the world's population, and to avoid the hierarchical and Eurocentric assumptions often embedded in the term Global South. Similarly, Global Minority is used to refer to populations historically situated in Europe and settler-colonial states, whose political, economic, and cultural dominance has shaped global systems. For more see: "Connected Sociologies" (Bhambra 2014); "On Decoloniality" (Mignolo and Walsh 2018)

## INTERSECTIONALITY

Intersectionality examines how multiple systems of power and oppression – such as sexism, racism, classism, ableism, and heteronormativity – interconnect on multiple and simultaneous levels. The resulting discrimination produces systemic injustice and social inequality. The concept builds on decades of African-American feminist activism in the 20th century, which challenged overlapping forms of oppression, particularly racism and sexism. For more see: "Demarginalising the Intersection of Race and Sex" (Crenshaw 1989); "Captive Revolution: Palestinian Women's Anti-Colonial Struggle within the Israeli Prison System" (Nahla 2014); "Intersectionality Report" (ENAR 2020); "Black Feminist Thought: Knowledge, Consciousness, and the Politics of Empowerment" (Collins 2022).

## RACIALISATION

Racialisation is the very complex and adaptable process through which groups come to be designated as being of a particular race and on that basis subjected to differential and/or unequal treatment. Put simply, racialisation is the process of manufacturing and utilising the notion of race in any capacity to produce inequalities. While white people are also racialised, this process is often rendered invisible or normative to those designated as white. As a result, people racialised as white may not recognise themselves as part of a race, even as they may implicitly or explicitly imagine themselves as a superior white category and retain the

authority to name and racialise others. For more, see: “Ain’t I a Woman? Black Women and Feminism” (Hooks 1981); “Rethinking Multiculturalism: Cultural Diversity and Political Theory” (Parekh 2001); “Race, Colour and the Pro cesses of Racialisation” (Farhad 2013)

## STRUCTURAL RACISM

Structural racism is a product of a system in which public policies, institutional practices, cultural representations, and other norms work in various ways to perpetuate racial inequity. It is a feature of the social, economic, and political systems in which we all live I today. Structural racism is embedded in institutions and society that reproduce poor opportunities for advancement in life and can describe the statistical representation of racial inequalities in all areas. Structural racism encompasses the entire system of domination based on race, diffused and infused in all aspects of society including its history, culture, laws, politics, economics and entire social fab ric. For more see: “The Spectacle of the Other” (Hall 1997); “Golden Gulag: Prisons, Surplus, Crisis, and Opposition in Globalising California” (Gilmore 2007); “Coloniality of Power in Development Studies and the Impact of Global Imperial Designs on Afri ca” (Ndlovu-Gatsheni 2012).

## WHITENESS

Whiteness is a structural position of power sustained through racialisation. It is socially, historically, and politically produced. Whiteness works by installing itself as the unmarked ground of the human, the default from which all others deviate, so that its particular claims, aesthetics, and interests are experienced as neutral, universal an beyond question. It is entrenched across institutions, knowledge systems, and everyday practice, reproducing hierarchy while presenting that hierarchy as the ordinary shape of the world. Naming whiteness is a political act that strips away the pretence of neutrality and exposes a durable regime of domination for what it is.

# EXECUTIVE SUMMARY

## What is a commitment worth if those it claims to protect continue to die?

In April 2025, Aboubakar Cisse was killed while praying in a mosque in La Grand-Combe, France[8]. Sixteen years earlier, Marwa El-Sherbini was stabbed to death in a Dresden courtroom after enduring repeated anti-Muslim harassment for wearing a headscarf[9]. Their killings are separated by time and circumstance, yet they expose a deeper contradiction at the heart of the European project: communities formally protected by equality frameworks continue to experience systemic racism, including racialised violence, exclusion, surveillance, racial discrimination as an ordinary condition of life, revealing the gaps and the limits, the uneven implementation and structural blind spots of the projections meant to safeguard them. Their names sit alongside others across Europe: Roma families targeted in violent attacks such as the killings in Hurbanovo, Slovakia[10]; Black and Brown migrants dying at Europe's borders in tragedies from Melilla[11] to Pylos[12], and Muslim communities being extraordinarily surveilled[13]. Different histories, different mechanisms, yet a shared reality: racialised and minoritised groups continue to encounter violence, exclusion and insecurity within a supposed 'Union of diversity' championing its self-image as a beacon of fundamental human rights and democracy.

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[8] Emmanuel Achiri, "Murder inside a French mosque: not an outlier, the inevitable result of Islamophobia," *EUobserver*, May 9, 2025.
[9] Kate Connolly and Jack Shenker, "The Headscarf Martyr: Murder in German Court Sparks Egyptian Fury," *The Guardian*, July 7, 2009.
[10] European Roma Rights Centre, "Attacks against Roma in Hungary, the Czech Republic and the Slovak Republic," July 15, 2012.
[11] BBC News, "How Spain Looked on as Dozens Were Crushed to Death at Its Border," BBC News, June 2022.
[12] UNHCR Europe, "Two Years since the Tragic Shipwreck off the Coast of Pylos, UNHCR and IOM Call for Accountability and Remembrance," June 14, 2025.
[13] European Network Against Racism (ENAR), Suspicion, Discrimination, and Surveillance: The Impact of Counter-Terrorism Law and Policy on Racialised Groups at Risk of Racism in Europe, 2021, 53-56.

This contradiction extends beyond individual acts of racism and violence. Across Europe, communities experience differentiated forms of racism shaped by distinct historical and political logics. Afrophobia/Afriphobia manifests through disproportionate exposure to discrimination, policing and violence, including deadly attacks such as the killing of Alika Ogorchukwu in Italy[14]. Roma communities continue to face segregation, forced evictions and violent assaults, remaining among the most socio-economically excluded groups in the Union[15]. Jewish communities live with heightened insecurity, with antisemitic incidents, online hate and attacks on synagogues, schools, with many Jews hiding visible signs of their identity out of fear. Muslim communities experience intensifying anti-Muslim racism and Islamophobia shaped by securitisation and civilisational narratives and discursive conspiration theories of 'Grand replacement'[16].

The EU's Fundamental Rights Agency's reports, including *Being Black in the EU*[17]*, Being Muslim in the EU*[18]*, Addressing Racism in Policing, Jewish People's Experiences and perception of antisemitism – EU Survey of Jewish People*[19] *and Rights of Roma and Travellers in 13 European countries*[20] document what these deaths name: racism in Europe is not residual, not exceptional, not interpersonal. It is structural, ordinary, lethal. Nearly one in two Black respondents report racial discrimination; nearly one in two Muslim respondents

[14] Judith Sunderland, "What Lay Behind the Brutal Killing of a Nigerian in Italy?," Human Rights Watch, August 2, 2022.
[15] European Union Agency for Fundamental Rights, *Rights of Roma and Travellers in 13 European Countries: Perspectives from the Roma Survey 2024* (Publications Office of the European Union, 2025), 27-30.
[16] European Union Agency for Fundamental Rights, *Being Muslim in the EU: Experiences of Muslims* (Publications Office of the European Union, 2024),
[17] European Union Agency for Fundamental Rights, *Being Black in the EU: Experiences of People of African Descent* (Publications Office of the European Union, 2023)
[18] European Union Agency for Fundamental Rights, *Being Muslim in the EU.*
[19] European Union Agency for Fundamental Rights, *Jewish People's Experiences and Perceptions of Antisemitism* (Publications Office of the European Union, 2024).
[20] European Union Agency for Fundamental Rights, *Rights of Roma and Travellers in 13 European Countries: Perspectives from the Roma Survey 2024* (Publications Office of the European Union, 2025).

the same including 58% of young Muslim women wearing religious clothing who reported discrimination when looking for work; Roma communities report exclusion across every domain measured: 31% experience discrimination because of their ethnic origin and 70% live in poverty, four times the rate of the general population. Jewish respondents likewise report widespread experiences of antisemitism, including harassment, discrimination and concerns about safety: 96% of Jewish respondents encountered antisemitism in the year before the survey. These are not the symptoms of a Europe yet to arrive at its values. They are the conditions under which the Union's anti-racism commitments are being made.

It is against this reality that the European Union's and the Member States' anti-racism architecture must be read. On 18 September 2020, in the wake of George Floyd's killing and the Black Lives Matter mobilisations that moved millions through the streets of Europe in the middle of a pandemic, the European Commission adopted its first ever EU Anti-Racism Action Plan 2020-2025[21]. For the first time, the Union named *structural racism* – a discursive shift from racism understood as interpersonal prejudice to racism understood as a relation that shapes institutions, laws, economies, and the racialised hierarchies on which European modernity was built. A Coordinator on combating racism was appointed[22]. Member States were called on to adopt National Plans Against Racism (NAPARs) or integrated measures against racism. In January 2026, following sustained advocacy by civil society organisations and anti-racist movements who refused to let the commitment lapse after the formal end, the Commission launched the EU Anti-Racism

[21] European Commission, *A Union of Equality: EU Anti-Racism Action Plan 2020–2025*, COM(2020) 565 final (Brussels, September 18, 2020).
[22] European Commission, "The Commission's Coordinator on Combating Racism," accessed August 17th, 2026. The Commission's Coordinator on combating racism - European Commission.

Strategy[23] as successor to the Action Plan. Both instruments place NAPARs as the centre of national delivery, supported by common guiding principles and a self-check tool developed during cycle of the Action Plan.

**Anti-racist gains in Europe have been won, not given –** secured through decades of organising by racialised communities against institutions that have conceded ground slowly and unevenly. That this shift was won at all, in a political environment increasing defined by the far righting of the mainstream[24] and the fascisisation of Europe, the criminalisation of solidarity, the shrinking of civic space, and the hardening of Europe's borders, is itself a measure of decades of organising by the anti-racism movement, racialised communities, and their allies. **What is won on these terms is real, but it also partial and reversible: dependent on political will, vulnerable to backlash, and constrained by what states have been prepared to concede**. This research project takes the progress seriously, and asks what it has, and has not, delivered.

As one of the key advocacy actors for the Racial Equality Directive, the EU ARAP and the EU Anti-Racism Strategy, ENAR developed an online map and researches the state of anti-racism commitments across EU Member States. The first edition of the project was published in 2023 where 7 countries were assessed[25]. This year we are publishing 13 country reports assessed by national experts based on ENAR's criteria and frameworks.

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[23] European Commission, *Union of Equality: Anti-Racism Strategy 2026–2030*, COM(2026) 12 final (Strasbourg, January 20, 2026).

[24] **"Far-righting the mainstream"** shifts attention from the conventional notion of "mainstreaming of the far right" to the agency of mainstream actors themselves: Rather than treating far-right ideas as exogenous imports, we foreground the endogenous ideological, institutional, and state-centred dynamics through which mainstream parties actively shape, legitimize, and implement reactionary agendas". Juan Roch and Alvaro Oleart, "Far-righting the Mainstream: Endogenous Drivers of Reactionary Shifts in Western Party Politics," *Comparative European Politics* 24, no. 51 (2026).

[25] European Network Against Racism (ENAR), "Anti-Racism Map: Mapping National Anti-Racism Plans Across the EU," February 6, 2024, https://www.enar-eu.org/napar/.

Drawing on these national reports, the central argument of the factsheet is that the current generation of NAPARs, and the EU architecture that frames them, are failing communities they claim to serve in ways that are structural rather than incidental. Some Member States have made notable progress, yet across the sample, racism is still too often confined to the register of individual prejudice and hate crime, while in several Member States the very existence of systemic racism is denied outright. Where NAPARs have been adopted, formal compliance frequently coexists with the absence of dedicated funding, with the marginalisation of anti-racism across ministries and policy areas – and most tellingly – with the parallel implementation of racialised policies in migration, asylum, policing, new technologies, **welfare, and child protection that actively reproduce the harms the plans claim to address. A NAPAR launched in one ministry while another deports, profiles, surveys, and excludes is not a contradiction the state struggles to resolve; it is the operation of a system that produces anti-racism discourse while leaving racist structures intact and, in many cases, reproducing them**. This is what Sara Ahmed has named non-performative commitment: the public statement whose institutional life consists precisely in not being implemented, in which the document does the policy work the policy was meant to do[26].

The patterns the research documents are consistent across very different national contexts. NAPARs systematically reframe racism through the depolitised vocabularies of '*integration, social cohesion, and hate crime'*, leaving the institutions that produce racialised violence outside their scope. Roma exclusion is addressed as social policy rather than anti-Roma racism; Islamophobia or Anti-Muslim Racism, Afrophobia, Antisemitism, anti-Asian racism, Antigypsyism are unevenly named or not named at all; coloniality and,

[26] Sara Ahmed, "Commitment as a Non-performative," in *On Being Included: Racism and Diversity in Institutional Life* (Durham, NC: Duke University Press, 2012), 117, https://doi.org/10.1215/9780822395324.

colonial continuities and its afterlives are rarely acknowledged at all. Intersectionality, where it appears, is reduced to a list of identity categories that do not explain how systems of oppression interact to produce compounded forms of discrimination, nor is it employed as an analytical framework for understanding co-constituted systems of power – leaving racialised people without a framework adequate to their lived experiences. Decolonial analysis, which would situate European racism within the longer histories of empire, trading in Africans as slaves, and extraction that produced it, is almost entirely absent. The abstention of EU member states at the UN General Assembly to **recognise slavery as the gravest crime against humanity** including calls for reparations reflects a continued reluctance to confront Europe's historical and ongoing role in structural racism[27]. Similarly, the refusal of several Member States to collect harmonised, disaggregated equality data by race and ethnicity is not a technical oversight to be corrected; it is a political choice, defended in the language of protecting identities but function to protect whiteness as the unmarked norm of citizenship and belonging, and to foreclose the evidence base on which structural claims could for redress and accountability be made. International human rights bodies – including ECRI[28], CERD[29], and the UN Working Group of Experts on People of

[27] European Network Against Racism (ENAR), *"The United Nations General Assembly Recognises Slavery as the Gravest Crime against Humanity and Calls for Reparations. But the European Union Abstains,"* press release, March 26, 2026.
[28] European Commission against Racism and Intolerance (ECRI), *General Policy Recommendation No. 14 on Combating Racism and Racial Discrimination in Employment* (Strasbourg: Council of Europe, 2012), para. 10(a).
[29] UN Committee on the Elimination of Racial Discrimination (CERD), *Concluding Observations on the Twenty-Second and Twenty-Third Periodic Reports of France*, CERD/C/FRA/CO/22-23, 2024, paras. 5–6.

African Descent[30] – have called repeatedly for such data collection with appropriate safeguards[31]. The refusal persists because the refusal is the point.

Compounding all of this is the non-binding character of the EU framework itself. NAPARs are encouraged, not required. Adoption depends on political will, **which means that plans can be adopted by one government and quietly discontinued,** defunded, or dismantled by the next – as is already occurring in several Member States as far-right and far-right adjacent parties enter or shape governing coalitions. What emerges is not a coherent or effective European framework for anti-racism but a patchwork of commitments whose implementation remains uneven across the Union. Where protection against racism is not backed by enforceable rights, effective monitoring, and mechanisms of accountability, the EU's anti-racism commitments remain contingent in practice, producing significant gaps between formal commitments and the protection (or lack thereof) experienced by racialised people

Europe is witnessing a rise in racial violence, far-right parties are entering or shaping governments across Europe, and exclusionary migration and security policies are increasingly normalised. These structural limitations require an honest assessment of whether the Union's anti-racism framework is capable of addressing structural racism or whether, by relying on political will rather than binding obligations, it remains largely performative. This raises a fundamental question about the gap between the Union's anti-racism commitments and the value and objectives enshrined in the EU Treaties[32],

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[30] UN Working Group of Experts on People of African Descent, *Disaggregated Data to Advance the Human Rights of People of African Descent* (Geneva: Office of the United Nations High Commissioner for Human Rights, 2023), 14.
[31] European Network Against Racism (ENAR), *Equality Data Collection: Facts and Principles* (Brussels: European Network Against Racism, 2015), PDF.
[32] Consolidated Version of the Treaty on European Union, arts. 2, 3(1), and 6(1), OJ C 202, June 7, 2016, 13–14; Consolidated Version of the Treaty on the Functioning of the European Union, arts. 10 and 19(1), OJ C 202, June 7, 2016, 47, 56.

including equality, human rights, and non-discrimination, and their implementation in practice.

# RECOMMENDATIONS

The following recommendations emerge from the assessment of National Action Plans Against Racism (NAPARs) across the 13 Member States studied. They are addressed to the European institutions and to Member States, recognising the distinct but complementary roles each holds in advancing non-discrimination across the Union.

A single thread runs through the recommendations. The central lesson from the implementation of the 2020-2025 EU Anti-Racism Action Plan, confirmed by this assessment, is that voluntary commitments do not deliver meaningful anti-racism action that is centred in recognising the systemic nature of racism and its impact on affected communities. The reliance on non-binding measures, specifically the call to adopt NAPARs, produced patchy implementation, uneven ambition, and weak accountability across Member States. As it was noted in ENAR's recently published policy brief on the EU Anti-Racism Strategy 2026-2030[33], the strategy risks being a missed opportunity to confront the structural violence experienced by racialised communities unless it moves, alongside the NAPARs, from an acknowledgment to binding obligations. The recommendations below therefore prioritise legal traction, independent oversight, and the meaningful empowerment of racialised communities over the good will of governments.

[33] European Network Against Racism (ENAR), *The New Anti-Racism Strategy: A Defining Moment for Europe's Future* (Brussels: European Network Against Racism, September 18, 2025).

# RECOMMENDATIONS FOR THE EUROPEAN COMMISSION AND THE COUNCIL OF THE EU

## Secure binding traction through a Council Recommendation on structural racism and NAPARs

To date, the Council has addressed anti-racism principally through its adopted Council Conclusion under the French Presidency in 2022[34], and more recently, under the Irish Presidency in 2026. The 2022 Conclusions represented an important political commitment, calling on Member States to develop national plans against racism (NAPARs) and encouraging greater coordination and reporting. However, they were widely criticised because racism was not framed as a structural phenomenon. The 2026 conclusions mark a significant development. They explicitly recognise structural racism, acknowledge its cumulative and intergenerational effects, and call on Member States to develop, adopt, implement or renew national action plans, programmes or strategies that address structural racism, adopt an intersectional approach, and are subject to continuous monitoring and periodic evaluation. They also invite the Commission to support Member States through technical assistance, mutual learning, guidelines and handbooks.

Yet recognition and political commitment cannot be the endpoint. The persistence of racism, from microaggressions at the workplace to state-produced racial violence, is the very reason for the need for impermeable anti-racism measure capable of enduring beyond changes in political priorities and governments. As long as these commitments remain primarily dependent on political will, they remain vulnerable to reversal, dilution or abandonment when political circumstances change. Council conclusions can establish direction, but they cannot by themselves ensure that anti-racism becomes an enduring component of the legal, institutional and administrative structures through which Member States govern. The danger is therefore cyclical: political

[34] Council of the European Union, *Council Conclusions on Combating Racism and Antisemitism*, ST 6406/1/22 REV 1 (Brussels, March 2, 2022).

commitment produces action, changes in political priorities weaken or discontinue that action, implementation becomes uneven, and the absence of durable institutional safeguards leaves space for the same forms of exclusion and inequality to persist. **Breaking this cycle requires anti-racism to be embedded more robustly within the Union and Member States' legal and policy architecture, rather than treated as a policy priority that can be strengthened or weakened with each change of government.**

The next step should therefore be to consolidate the acknowledgement of structural racism achieved through the 2026 conclusions into a more durable Union-level framework.

Member States and the Council of the EU should therefore move from political statement to actionable guidance by adopting a Council Recommendation on structural racism and NAPARs. Unlike Conclusions, a Council Recommendation, formally listed as an EU legal act under Article 288 TFEU[35] , it could strengthen continuity and convergence and, importantly, begin to shift anti-racism from a matter of discretionary political commitment towards an established component of national and Union governance.

The objective should not be simply to produce stronger statements, but to make anti-racism commitments sufficiently institutionalised that they cannot be readily discarded when political circumstances change. Without such durability, the EU risks remaining caught in a recurring cycle in which racism is repeatedly recognised as a serious structural problem, commitments are made in response, and yet the institutional conditions necessary to prevent its persistence remain insufficiently protected.

[35] European Union, *Consolidated Version of the Treaty on the Functioning of the European Union*, art. 288, 2016 O.J. (C 202) 47.

## Review and strengthen the Race Equality Directive and the Employment Equality Directive

The Race Equality Directive (2000/43/EC)[36] and the Employment Equality Directive (2000/78/EC)[37] remain the backbone of EU anti-discrimination law, yet they were drafted more than two decades ago and no longer effectively reflect the realities of racism as structural, institutional and historical. The Commission's own studies confirm the case for revision: the study on possible gaps in legal protection against racial or ethnic discrimination identifies areas inadequately covered by the RED[38], including discriminatory ethnic profiling by law enforcement, discriminatory evictions, the absence of mechanisms to tackle the root causes of structural racism, and the lack of proactive equality duties. The study on sanctions[39] further shows that the RED's requirement of 'effective, proportionate and dissuasive' sanctions is left almost entirely undefined, producing wide and inconsistent variation across Member States. Yet the new EU Anti-Racism Strategy does not commit to revising the RED at all, proposing only a study on its implementation and a narrower focus on algorithmic discrimination. This falls well short of what the evidence demands.

Therefore, the European Commission should commit to a substantive revision of both directives. Revision should introduce positive duties to promote equality and proactive, preventive obligations, moving away from the foundational negative model which allows individuals to seek redress only after

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[36] Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, 2000 O.J. (L 180) 22
[37] Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation, 2000 O.J. (L 303) 16.
[38] European Commission, Directorate-General for Justice and Consumers, and Milieu, *Study to Support the Preparation of an EU Initiative to Address Possible Gaps in the Legal Protection against Discrimination on Grounds of Racial or Ethnic Origin: Final Report* (Luxembourg: Publications Office of the European Union, 2022)
[39] European Commission, Directorate-General for Justice and Consumers, and Milieu Consulting, *Study on Sanctions for Discrimination on Racial/Ethnic/Religious Grounds* (Luxembourg: Publications Office of the European Union, 2025), 19–25, 263–68.

the harm has occurred. Moreover, the revision should also include racial equality impact assessments and the mainstreaming of anti-racism; specific minimum standards for sanctions and remedies.

This work on the substance of the directives should be matched by the timely transposition of two directives on minimum standards for equality bodies. Member States must now ensure they translate these standards into genuine independent, adequate and sustained funding with effective powers, so that equality bodies can support victims, collect equality data, and address the structural issues that the directives are intended to reach.

## Unblock and adopt the Horizontal Equal Treatment Directive

The 2008 proposal for a Horizontal Equal Treatment Directive would close a long-standing gap in EU law by extending protection against discrimination on grounds of religion or belief, disability, age and gender beyond employment to social protection, education, and access to goods and services. The proposal, although outdated, has been blocked in the Council for 17 years, requiring a unanimous vote from EU Member States. The Commission's move to withdraw it in February 2025 was reversed in July 2025 after strong opposition from the European Parliament, civil society organisations and most member states[40], but adoption remains unlikely while Germany, Italy and Czechia maintain their reservations[41]. Yet the proposal, blocked in the Council for 17 years, should not be treated as beyond improvement. As civil society stressed, its current text reflects a narrow, single-axis vision of equality that would struggle to support claims of intersectional discrimination, excludes third-country

[40] European Commission, Directorate-General for Justice and Consumers, "Reply to Petitioners Concerning the Proposed Withdrawal of the 2008 Equal Treatment Directive," July 2025.
[41] European Parliamentary Research Service, *Proposal for a Horizontal Equal Treatment Directive: Complementary Impact Assessment*, PE 774.698 (2025), 24–25.

nationals, permits continued restrictions on religious symbols, and offers weak orientations for persons with disabilities. Adoption should therefore go hand in hand with efforts to embed intersectionality, close these exclusions, and address forms of discrimination such as AI-driven bias, rather than settling for the least controversial compromise.

## Mainstream anti-racism and make racial equality impact assessment mandatory across all EU policy

Anti-racism cannot be confined to a dedicated strategy while racism continues to be reproduced across other areas of EU policy, including migration[42]. The European Commission should introduce mandatory anti-racism and equality impact assessments, in the form of structural racism audits with robust accountability mechanisms, into the design and review of EU legislation, budgets and programmes.

## Advance intersectional, disaggregated equality data collection

Monitoring and data collection remain weak, with a clear need for harmonisation and standardisation of date by race or ethnicity. The recently adopted directives on minimum binding standards for equality bodies is certainly a step forward according to which, under article 16, data collected by equality bodies must be disaggregated by the grounds covered by the Racial Equality Directive. However, harmonisation provisioned by the directive is still partial: the indicators will cover how equality bodies function, not the

[42] European Network Against Racism (ENAR), *Raceless in Name Only: Whiteness and the Racial Governance of Mobility in the European Union* (Brussels: ENAR, 2026).

substance of discrimination data, and the level of granularity is left to national law, which means that variation across Member States will still persist.

Moreover, the EU should mandate Member States and the FRA to collect data disaggregated by race/ethnicity, religion, gender, migration status and socio-economic status, in cooperation with civil society, to support evidence-based policy making and monitor structural change. The EU should also commission FRA to research the intersectional dimensions of racism and how systems of oppression interact and produce intersecting discrimination. These mandates should complement the indicators foreseen in the two directives for minimum standards for equality bodies.

## Protect anti-racism and racial justice defenders from criminalisation and surveillance as an integral part of the EU Civil Society Strategy and NAPARs

The European Civic Forum's *Civic Space Watch 2026*[43] documents how civil society organisations advocating for racial justice are directly targeted either through strategic lawsuit against public participation (SLAPPs), funding disruption, or through 'foreign agent' smear campaigns, and the expansion of interoperable EU surveillance infrastructure via Europol, Frontex and ProtectEU agenda, which increasingly treat human rights defenders working on racial justice including migration as suspects and criminals. The chilling effect undermines the very actors on whom the effective design and implementation of NAPARs depend.

[43] European Civic Forum, *Civic Space Report 2026* (2026).

The European Commission should therefore ensure that the Civil Society Strategy operates as a concrete safeguard, not merely as a statement of principle. In particular, it should:

- **Explicitly recognise anti-racism and racial justice defenders as a group at heightened risk of criminalisation, surveillance and stigmatisation,** in line with the Strategy's acknowledgement that governments must act to reverse shrinking civic space, especially in cases of state repression.
- **Embed concrete safeguards against disproportionate surveillance**, abusive investigations, intimidation and funding insecurity into the structured, permanent dialogue mechanisms and framework foreseen under the Strategy. These safeguards should include effective access to remedies and independent oversight where civil society organisations or human rights defenders are subject to measures that may interfere with their legitimate advocacy and participation.
- **Strengthen and implement the EU's anti-SLAPP framework as a specific safeguard for anti-racism and racial-justice defenders.** Directive (EU) 2024/1069 provides procedural safeguards against manifestly unfounded or abusive court proceedings with cross-border implications, while Commission Recommendation (EU) 2022/758 calls for broader measures to protect journalists and human rights defenders from SLAPPs, including in purely domestic cases.[2] The Commission should ensure that the implementation and monitoring of this framework adequately account for the particular risks faced by organisations engaged in anti-racism, migration and racial-justice advocacy.
- **Making the meaningful, protected participation of racialised communities and anti-racism CSOs a precondition for the**

**credible implementation of NAPARs at national level**. Safeguarding these defenders is not peripherical to anti-racism, it is a prerequisite for it.

## Address colonial continuities and advance redress and reparatory justice by aligning with UN mechanisms

Reparatory justice is not separate from fighting racism in Europe: the racial ordering of humanity and the wealth accumulated through enslavement and colonisation continue to structure racialised inequality today, as documented in ENAR's *Europe's Original Sin* (2024)[44]. Yet the EU's commitment in the Anti-Racism Strategy to confronting 'the legacies of colonialism and slavery' and aligning with ICERD and the Durban Declaration remains rhetorical. On 25 March 2026, the UN General Assembly adopted Ghana's resolution recognising the transatlantic trade and enslavement of Africans as 'the gravest crime against humanity'[45], urging apologies, reparatory justice and return of looted property. It passed 123 to 3, yet all EU Member States abstained, retreating into arguments about 'hierarchies of atrocities' and the legality of slavery 'at the time'[46].

The Commission should therefore ensure that the implementation of the EU Anti-racism Strategy:

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[44] European Network Against Racism (ENAR), *Europe's Original Sin: White Supremacy, Colonialism, and the Contemporary Racial Wealth Gap* (Brussels: ENAR, 2024).
[45] United Nations General Assembly, "Declaration of the Trafficking of Enslaved Africans and Racialized Chattel Enslavement of Africans as the Gravest Crime against Humanity," A/RES/80/250, March 25, 2026.
[46] European External Action Service (EEAS), "EU Explanation of Vote – UN General Assembly: Action on A/80/L.48 – Declaration of the Trafficking of Enslaved Africans and Racialized Chattel Enslavement of Africans as the Gravest Crime Against Humanity," March 25, 2026.

- Explicitly acknowledges European states' historical and ongoing responsibility for enslavement and colonialism as foundational to contemporary racism and affirm reparatory justice as a legitimate route to remedy.
- Actively support, rather than abstain from UN reparatory justice mechanisms, aligning the EU with the Un resolution, the CARICOM Ten-Point Plan[47] and the UN Permanent Forum on People of African Descent recommendations[48];
- Translate recognition into policy through formal apologies, restitution, and reparatory justice to ensure that the EU's internal and external anti-racism agenda are coherent and have meaningful impact.

[47] Caribbean Community (CARICOM), *The CARICOM (Caribbean Community) Ten Point Plan for Reparations: A Manifesto for the Coming Enlightenment* (Georgetown, Guyana: CARICOM Secretariat, 2026).
[48] United Nations Permanent Forum on People of African Descent, *Preliminary Conclusions and Recommendations*, 1st session, 2022,

# RECOMMENDATIONS FOR MEMBER STATES

## Adopt a dedicated National Plan Against Racism where none exists, and strengthen those already adopted.

Some Member States[49] have taken the important step of adopting a dedicated NAPAR or integrated measures of anti-racism, reflecting a growing recognition, supported by the European Commission's guiding principles, that racism is a distinct structural problem requiring dedicated and sustained action. However, several Member States still have no plan in place, and the absence of a framework leaves racialised communities in those countries without any structured basis for protection and redress.

Member States without a NAPAR should therefore adopt a comprehensive, standalone plan, rather than folding anti-racism into generic equality, diversity or 'integration' frameworks, which risk obscuring racism as a distinct phenomenon and diluting both focus and accountability. Those that have already adopted a plan should build on this foundation and address the shortcomings addressed in this assessment to ensure their NAPARs deliver structural change and move beyond statements of intent.

## Adopt a definition of racism that captures its systemic nature

The credibility of a NAPAR resets how it defines the problem it claims to solve. Member States should therefore build their plans on a definition recognising racism as structural, institutional, historical and ongoing, embedded in laws, policies, institutional practices and the distribution of power and resources,

[49] 14 Member States have adopted a NAPAR or regional plans, according to the European Commission's EU Anti-Racism Strategy 2026-2030.

rather than reducing it to individual prejudice, 'intolerance' or isolated acts of hatred. Plans should explicitly name the specific manifestations of racism and apply an intersectional approach, since generic language allows the most affected groups to be rendered invisible and vulnerable. Definitions must reject notions of 'reverse racism' or 'anti-white racism' that frame racism as a symmetrical phenomenon affecting all groups equally, thereby erasing the structural organisation of racial power, the historical production of whiteness, and the unequal distribution of racial privilege and disadvantage.

## Mainstream anti-racism and apply racial impact assessment across all national policy

Anti-racism cannot be quarantined within a standalone plan while other areas of government actively produce racial violence and violence. Member States should systematically mainstream racial equality across all portfolios and apply racial equality impact assessment, both ex-ante before measures are adopted, and ex post, to evaluate effects. This is especially urgent for the implementation of the Migration and Asylum Pact and associated national plans, which risk entrenching racialised violence and profiling, detention, and rights restrictions; for policing and criminal legal systems; for the deployment of AI and automated decision-making under the AI Act which can erode and scale discrimination; and for access to adequate housing, healthcare, employment, social protection and education. Assessments should be conducted transparently, with the involvement of affected communities and civil society, and their findings should be capable of halting or amending harmful measures.

## Resource plans adequately and assign clear responsibility

A NAPAR without a budget is a statement of intent, not an action plan. Member States should back their plans with dedicated, ring-fenced funding, realistic timelines and measurable, time-bound targets against which progress can be judged. Responsibility for delivery must be explicitly assigned to named authorities, with coordination anchored at the highest level of government to ensure cross-departmental buy-in and to prevent anti-racism from being sidelined and siloed to one ministry or political entity. Clear lines of accountability, including who is answerable when targets are missed, are critical to move plans from aspirational language to concrete change.

## Decolonise education and ensure historical accountability

Education systems both transmit and can dismantle racism. National governments and their ministries of education should move beyond Eurocentric perspectives and decolonise educational curricula ensuring that histories of colonialism, enslavement, empire and their continuities are taught comprehensively and across all levels of schooling, rather than the current strategy of omitting, minimising or sanitising them. This requires revising textbooks and teaching materials to remove racial stereotypes and Eurocentric framings, reflecting the full diversity of societies in what and who is taught, and investing in teacher training so educators can address these histories factually and with rigour. Decolonising education also means confronting discrimination, segregation and disproportionate disciplinary and streaming practices affecting racialised pupils, so that the education system itself ceases to reproduce racial inequality.

## Centre, protect and resource the participation of racialised communities

Racialised communities and the CSOs that represent them are not stakeholders to be consulted at the margins but rights-holders whose expertise is indispensable to the design, implementation, monitoring and revision of NAPARs. Member States should establish structured, permanent participation mechanisms that are not tokenistic but meaningful. This participation must be adequately and sustainably resourced, as expecting underfunded organisations to contribute without compensation only serves to perpetuate existing inequalities. Member States must also protect racial justice defenders and anti-racism organisations from SLAPPs, surveillance, smear campaigns, abusive investigations, criminalisation and politically motivated withdrawal of funding, and recognising that civic space for anti-racism advocacy is inseparable from democracy, the rule of law, and the effective protection of fundamental rights

## Adopt and operationalise an intersectional approach

Racism is rarely experienced in isolation from other forms of structural discrimination. Member States should ensure that NAPARs adopt an intersectional approach that recognises how systems of oppression interact to produce distinct and compounded forms of discrimination, ensuring these experiences are addressed rather than falling between fragmented and disconnected policy silos. Operationalising intersectionality means more than recognising it rhetorically: it requires intersectional data, targeted measures, and coordination across equality frameworks so that no group's specific experience is rendered invisible by single-axis approaches.

## Establish independent monitoring through a common, EU supported mechanism

The value of a NAPAR depends on rigorous, credible evaluation of whether it is working, yet accountability mechanisms are not in place. The European

Commission has developed a self-assessment checklist tool, but there is no common monitoring system across Member States, and the anticipated progress report promised in the EU ARAP 2020-2026 is yet to be released. Relying on Member States to monitor their own plans is inherently contradictory: it allows governments to mark their own homework and provides no independent verification of whether commitments translate into change on the ground. Instead, monitoring should be built on an independent structured and comparable mechanism modelled on the Roma Civil Monitoring initiative, whereby national civil society organisations, primarily those led by racialised people, are commissioned and resourced by the EU to produce regular shadow reports assessing implementation of national framework. This approach would ensure comparability, transparency and provide consistent and periodic data across Member States, centre the expertise of affected communities in defining indicators and interpreting findings, and generate the independent evidence base needed to hold both national governments and the EU accountable for delivery.

## Anti-racism focal points

Appoint national contact points to ensure effective NAPAR coordination and accountability. The appointment of National Contact Points (NCPs) for NAPARs is essential to ensure effective coordination, implementation, and accountability at the national level. These focal points should be designated within relevant government ministries or independent equality bodies and entrusted with clear mandates and sufficient authority to coordinate across sectors and levels of governance. As national-level coordinators, NCPs would serve as the central liaison between Member States and the European Commission, ensuring timely reporting, monitoring progress, and facilitating the exchange of good practices within the EU NAPAR Subgroup. Crucially, they should also be responsible for institutionalising structured engagement with

civil society organisations, racialised communities, and local and regional authorities throughout the design, implementation, and evaluation phases of NAPARs.

# EXPLANATION OF INDICATORS

SEVEN INDICATORS, SCORED 0 TO 4

# INDICATOR 1

## Existence of a comprehensive, identifiable, and legally anchored NAPAR

### What it measures

This indicator evaluates whether a Member State has a formally adopted, publicly accessible, and legally anchored National Plan Against Racism (NAPAR), supported by clear implementation structures, accountability mechanisms, and independent monitoring. It assesses the plan's legitimacy (government/parliamentary adoption), its centring of racialised people (CSO consultation, especially with racialised communities), content robustness (timelines, measurable targets, budget, intersectional scope), implementation structures (designated bodies, resources, training), and its legal status (constitutional/statutory anchoring vs political declaration).

### Why it matters

A NAPAR is not an end in itself, it is a vehicle for confronting structural racism. Its value lies not in its existence on paper, but in whether it builds the legal, institutional, and political infrastructure capable of dismantling racial inequality over time. For ENAR, this means a NAPAR legally anchored, enforceable, and resourced to outlive the government that adopts it – because structural racism itself is structural, intergenerational, and embedded in the state's own architecture. Plans that exist only as executive declarations or ministerial strategies reduce anti-racism to a matter of political goodwill, leaving racialised communities to negotiate their rights with every election. Worse, the mere adoption of a NAPAR can become a shield against accountability – allowing governments to claim progress while leaving the systems that produce racial harm untouched. The real test of a NAPAR is therefore not whether it exists, but whether it shifts power, redistributes resources, and binds the state to measurable, enforceable obligations toward the protection of racialised communities' rights. Anything less risks turning anti-racism into a bureaucratic performance that legitimises the status quo.

#### Note on the interpretation of the scores

The scoring carries an important interpretive caveat. Each score must be read singularly, as a reflection of the state of play on one specific dimension within one national context, and not as part of a cumulative total. The levels are not designed to be added together into an overall national score, nor to generate a ranking or league table of Member States. Comparability across countries cannot be ensured through this research, because its scope is deliberately not wide enough to examine the full range of policies that would be needed to assess the mainstreaming of anti-racism across all areas of government. The scoring is therefore best understood as a diagnostic snapshot that signals strengths and gaps within each national context, rather than as a comparative metric to be measured against other countries.

## Scoring scale

4
/4

### Comprehensive, legally anchored and delivering

A comprehensive and standalone plan, publicly accessible and adopted by government, with parliamentary endorsement or a basis in equality or constitutional law. It includes most of these conditions:

- Developed through broad and genuine consultation with civil society, including racialised-led, intersectional and grassroots organisations, whose input is visibly reflected.
- Equipped with a clear timeline, measurable targets and data tracked against them.
- Backed by a dedicated, traceable budget with evidence of execution.
- Led by a designated implementing body with cross-government coordination authority.
- Mainstreamed across government, through mechanisms such as equality or racial impact assessments of laws and policies, anti-racism objectives in sectoral strategies, and focal points in relevant ministries.
- Subject to an independent monitoring mechanism, with public progress reporting.
- Independently evaluated, with documented government action on the findings, including corrective measures and renewal, demonstrating that the commitment is lasting and not disposable.

The plan functions as a full policy cycle of design, delivery, evaluation and correction.

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3
/4

### Anti-racism plan in place with partial delivery and incomplete accountability

A standalone, government-wide plan is publicly accessible, formally adopted and operation. It includes most of these conditions:

- A dedicated or identifiable budget, with some evidence of execution.
- Named responsible bodies with the authority and staffing to act.
- A defined timeline, measurable targets and indicators.
- A functioning monitoring or reporting mechanism, with some progress reporting.
- Evidence of action under the plan since adoption.
- Consultation with civil society.

However, accountability remains incomplete: the plan lacks one or more of independent evaluation, documented corrective follow-up, dedicated and traceable funding, or legal anchoring.

COUNTRIES Ireland

2
/4

### Anti-racism plan in place, with significant gaps

A government-wide plan, strategy or policy framework on anti-racism exists and is adopted, but important weaknesses limit its effectiveness. It includes most of these conditions:

- No dedicated or identifiable budget, or funding not tied to specific actions.
- No named responsible bodies, or responsibilities assigned without the authority, staffing or coordination to carry them out.
- No timelines, milestones or measurable indicators.
- No operational monitoring, reporting or accountability mechanism.
- Consultation with civil society, including racialised-led organisations, that was absent, selective or tokenistic.
- Fundamental weaknesses in the plan's conceptualisation of racism.
- No evidence of action under the plan since adoption, or the plan has lapsed without renewal.

COUNTRIES **Denmark** **Finland** **France** **Germany** **Greece** **Italy** **Portugal** **Spain** **Sweden**

1
/4

### Minimal, fragmented or indirect commitment

Anti-racism is addressed only in a narrow, partial or indirect way and the structural dimension of racism. This includes one or more of the following conditions:

- One or several group-specific strategies addressing specific forms of discrimination, lacking however a general framework, central coordination or common accountability.
- Policies that reduce anti-racism to diversity and inclusion or to general non-discrimination, without naming racism or addressing its structural and institutional forms.
- Anti-racism measures that appear only as minor components of other policies (for example equality, integration, hate crime or security strategies), without dedicated objectives, resources or accountability.
- Anti-racism measures exist only in isolation: confined to one ministry or sector, or scattered across several (for example policing, education, employment) without a shared framework, central coordination or mainstreaming.

COUNTRIES **Austria** **Croatia** **Slovenia**

*Score note: Group-specific strategies and integrated frameworks remain essential and should be described in the country report. They score level 1 because they cannot substitute for a plan addressing racism comprehensively across groups, sectors and institutions, in line with CERD and Durban standards. Standalone plans command dedicated political attention and resist dilution into broader agendas.*

0
/4

### No plan

There is no identifiable plan, strategy or policy that addresses racism, or existing measures contain no anti-racism content. This includes one or more of the following conditions:

- No adopted plan or policy on anti-racism exists. Drafts, announcements, declarations of intent and expired plans do not count.
- Policies are framed only as inclusion, integration, participation or socio-economic support for a group, with no recognition of structural racism as the problem, and no attention to institutional causes.
- Government actions, public statements or legislation actively contradict or undermine anti-racism principles or reinforce racial inequities or discriminatory outcomes.

# INDICATOR 2

## Addressing structural racism, adopting an intersectional approach and mainstreaming across key-policy areas

### What it measures

This indicator assess the level and depth of state recognition of racism – from outright denial, to narrow framings of racism as individual prejudice, to substantive acknowledgment of structural, institutional and historical racism, including colonial legacies and continuities, whiteness, and the racialised dimensions of migration, policing, welfare, education, housing, health, and digital governance. It evaluates whether NAPARs move beyond rhetorical recognition to operationalise intersectionality (if mentioned at all), mainstream anti-racism across all policy domains, and commit the Member State to repair and redress – not only acknowledgement. Crucially, it asks whether governments are willing to name racism as it operates within their own institutions, or whether they instead locate it in individual attitudes or external actors.

### Why it matters

Recognition is the threshold condition for any meaningful anti-racist action, yet across the EU, it remains one of the most politically contested terrains. Several member states still refuse to acknowledge structural racism, framing it as a problem of individual attitudes rather than systemic, institutional and cultural, or denying its existence entirely. This refusal is not neutral: it actively protects the systems that produce racial harm and silences the communities most affected. Where racism is named only in its most visible forms – hate crime, far-right extremism – the everyday, bureaucratic and institutional racism embedded in policing, borders, welfare, child protection, education, and algorithmic decision-making is rendered invisible and therefore ungovernable. For ENAR, the depth of recognition is therefore a political diagnostic: it reveals whether the state is willing to confront its own role in producing racial inequality, or whether it treats anti-racism as something done for racialised communities rather than with them, as equal partners, despite the Union's legal obligation to combat discrimination and promote equality across all its policies and activities. Without honest recognition, every subsequent measure – from data collection and mainstreaming to redress – rests on a flawed foundation and on denial.

## Scoring scale

4
/4

### Transformative recognition, coherence and redress

- Racism is comprehensively recognised as structural, institutional and historical, including whiteness and racial hierarchy, colonial legacies and continuities, and racialised dimensions of migration, policing, security, welfare, education, housing, health, and digital governance.
- Racial mainstreaming is applied across all key policy areas, including migration, borders, counterterrorism and algorithmic decision-making, with concrete changes to law and practice where racialised harm is identified.
- Intersectionality is operationalised through analysis, measures, targets and data.
- The state commits to repair and redress, with concrete reparatory programmes and remedies for those affected by institutional racism.
- Racialised communities shape how racism is defined and analysed in the plan.
- Government policy and official discourse are consistent with the plan. No contradiction, material or severe, is documented, and the state reviews or repeals measures found to produce racialised outcomes.

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3
/4

### Structural recognition applied, with gaps

- Institutional racism is explicitly recognised in named state institutions, for example police, border authorities, welfare or child protection services, with concrete measures to address it. These go beyond training to include changes in practice, independent complaints, oversight or accountability.
- The structural analysis is applied across several key policy areas, including at least one contested area such as policing, migration or security.
- Intersectionality is operationalised in some areas, for example through measures targeting racialised women, LGBTQI+ people, disabled people, children or people with insecure residence status, and through disaggregated targets.
- Colonial legacies and historical continuities are acknowledged, with at least some concrete commitments, for example in education, archives, public memory, restitution or official acknowledgement.

COUNTRIES Ireland

2
/4

## Structural recognition on paper

The plan or official framework recognises structural and institutional racism, but the recognition is not applied:

- Structural and institutional racism are defined, but the analysis does not translate into measures addressing the state's own institutions.
- The analysis avoids contested areas, especially migration, borders, policing, counterterrorism and security. Alternatively, these areas are covered only through training and awareness-raising rather than changes to law, practice or accountability.
- Intersectionality is mentioned in principle but not operationalised. There are no targeted measures, disaggregated targets or group-specific analysis.
- Historical and colonial racism is acknowledged in general terms, without concrete commitments to memory, education, repair or redress.

NAPAR includes a basic definition of racism that references structures and history, but lacks detail or sophistication (including by focusing mostly on hate crime); intersectionality is mentioned but not operationalised; sectoral mainstreaming is minimal; historical racism is vaguely acknowledged without redress measures.

COUNTRIES Finland Germany Portugal Spain

1
/4

## Individualised or externalised recognition

Racism is acknowledged but framed narrowly and located outside the state:

- Racism is understood as individual prejudice, hate speech, hate crime or extremism.
- Institutional responsibility is ignored or denied. State actors appear only as protectors, never as producers of racism.
- Intersectionality is absent, or reduced to a list of grounds.
- Colonial and historical structures are not addressed.
- Key areas such as migration, policing, security and digital governance are excluded from the analysis.

COUNTRIES Croatia France Greece Italy Sweden

0
/4

## Denial or hostility

The state does not recognise racism as structural problem and, in its policy or discourse, actively reproduces it. This includes any of the following:

- Official denial that structural or institutional racism exists, or rejection of the concept as ideologically imported.
- No recognition of racism in any national framework, combined with policy that produces racialised outcomes.
- Policy or official discourse that racism and hierarchies between groups.
- Legislation or measures that explicitly or disproportionately target, surveil or exclude racialised communities, for example through ethnic, religious or origin-based criteria in housing, citizenship, policing or welfare, without the state acknowledging or addressing their racialised effects.

COUNTRIES **Denmark** **Austria** **Slovenia**

*Note: A plan's existence does not lift a country out of level 0 where denial or hostility is the dominant and documented position of the government.*

# INDICATOR 3

## Equality Data collection

### What it measures

This indicator assesses whether Member States collect, analyse, and publish equality data disaggregated by race or ethnicity – and whether such data is harmonised across policy domains and comparable across the EU. It evaluates whether data collection is intersectional by design – capturing how race or ethnicity interacts with different grounds of discrimination rather than treating the categories as separate or competing. It further examines whether data is governed by rights-based safeguards (including voluntariness, self-identification, anonymity, informed consent, and community co-design) – and whether racialised communities and their organisations are involved in defining categories, shaping methodologies, interpreting findings, and governing the use of data. Critically, it also measures whether states refuse or evade disaggregation by relying on proxies (nationality, country of birth, language, religion), citing legal or constitutional barriers that international and EU bodies have repeatedly shown to be surmountable.

### Why it matters

Equality data is the evidentiary backbone of anti-racist policy: without it, structural racism remains statistically invisible, politically deniable, and legally unchallengeable. Yet across the EU, many member states still refuse to collect data disaggregated by racial or ethnic origin, often invoking data protection law, constitutional principles of equality, or historical sensitivities as justifications. These objections have been systematically rebutted by ECRI, FRA, the UN CERD, and many CSOs including ENAR, as well as racialised-led civil society, all of whom affirm that disaggregated data collection is not only legally permissible but legally required to give effect to equal treatment obligations – provided in voluntariness, self-identification, anonymity, and robust safeguards against misuse. The refusal to disaggregate is therefore not a technical limitation but a political choice – one that protects institutions from scrutiny and shields racism from measurement. Proxies such as nationality or country of birth erase racialised citizens, obscure patterns of racial inequality, and render the experiences of descendants of immigrants statistically invisible, limiting the ability of policymakers to identify and address racial discrimination.

Equally critical is the need to capture intersectional experiences. Racism is never lived in isolation: racialised people at the intersection of different identities experience harm at the convergence of multiple structures of power and these harms cannot be understood, measured, or remedied through single-axis data. When equality data treats race, class, gender, disability, sexuality, religion and migration status as separate silos, it renders those at the intersections statistically invisible, even as they are disproportionately exposed to violence, exclusion and institutional harm. Intersectional data collection is therefore not a methodological luxury, but a prerequisite for justice – the only way to ensure that anti-racist policy responds to racism as it is actually lived, rather than to an abstracted, singular, and often unmarked subject.

For ENAR, equality data is about making structural and intersectional racism visible, holding institutions accountable, and equipping racialised communities with the evidence needed to claim their rights. Without it, NAPARs operate in the dark – and governments retain the power to deny what cannot be counted.

## Scoring scale

**4 /4**

### Comprehensive, rights-based and intersectional equality data

- Equality data disaggregated by self-identified racial or ethnic origin is collected periodically across multiple sectors and on intersectional grounds (e.g. gender, disability, religion, migration status, class).
- Data collection is governed by rights-based safeguards (voluntariness, self-identification, anonymity, informed consent), and racialised communities and organisations are involved in defining categories, shaping methodologies and interpreting findings.
- Quantitative data is complemented by qualitative evidence of lived experience.
- Data is publicly available in accessible formats and languages, directly informs NAPAR baselines, targets and progress reports, and is aligned with European and international frameworks.

**3 /4**

### Regular and partially disaggregated data, with gaps in categories, intersectionality or participation

- Equality data regularly collected across several sectors and at least partly disaggregated by racial or ethnic origin, using self-identification, but categories are incomplete, inconsistent across sectors, or lack intersectional breakdowns.
- Data is publicly available with limited accessibility and is used in policymaking, though not systematically. Involvement of racialised communities in design or governance is limited or ad hoc.

**2 /4**

### Proxy-based or limited disaggregation

- Data collection relies mainly on proxies (nationality, country of birth, parental origin, language, religion, perceived origin) rather than recognising racial or ethnic categories, or disaggregated collection exists only as plans, pilots, or in narrow sectors (e.g. law enforcement).
- Data may be extensive but does not allow racial inequality to be measured directly, is irregular or poorly accessible, and is weakly integrated into policy. The state may cite legal or constitutional barriers to explain why it does not disaggregate.

COUNTRIES: Finland | France | Germany | Ireland | Slovenia

**1 /4**

### Fragmented or incident-based data

Equality data exist but is outdated, fragmented, or not disaggregated by race or ethnicity. It focuses on isolated incidents (e.g. recorded hate crime) or narrow sectors; not linked to policymaking or monitoring the NAPAR.

COUNTRIES: Austria | Croatia | Denmark | Greece | Italy | Portugal | Spain | Sweden

0
/4

### Refusal, denial or obstruction

No meaningful data on racial or ethnic inequalities is collected, including through proxies such as country of birth, nationality, language, religion, perceived origin or migration background. The state refuses, denies the need for, or actively obstructs disaggregated data collection. This may include denying that racial discrimination or structural racism exists in the national context, blocking or defunding independent or community-led initiatives, or suppressing or withholding existing data. Racism remains statistically invisible and legally unchallengeable.

# INDICATOR 4

## Enabling Environment for Racialised-led Civil Society

### What it measures

This indicator assesses whether the state creates the institutional, legal and material conditions for racialised-led organisations to organise, advocate, monitor and shape anti-racism policy. It covers two connected dimensions:

1. **Participatory mechanisms**: whether a permanent, resourced and transparent mechanism exists within NAPAR governance, with co-decision powers (not merely consultation), clear terms of reference and protection from political reshuffling, and whether racialised-led, intersectional and grassroots organisations are meaningfully included and supported (e.g. stipends, translations, accessibility).

2. **Enabling environment**: whether civil society can operate independently and safely, with long-term and accessible funding, and with legal and institutional safeguards against harassment, criminalisation, surveillance, administrative obstruction and political delegitimisation.

### Why it matters

The Commission's guiding principle 6[50] frames participation as a core principle of NAPARs. In practice, many Member States reduce it to consultative theatre: invitations issued late, agendas pre-written, recommendations ignored and funding that is unstable or conditional. For ENAR, this is not a procedural failure but a continuation of the colonial logic that treats racialised communities as objects of policy rather than authors of it. Participation cannot be meaningful in a hostile or precarious civic space. A well-designed forum is hollow if its members face defunding, smear campaigns or surveillance outside it, and a free civil society sector has limited impact without a seat at the table where decisions are made. Genuine participation requires shifting power, not sharing space. Mechanisms that lack co-design authority, that exclude grassroots and racialised-led groups in favour of 'safe'[51] interlocutors, or that collapse when governments change, reproduce the very exclusions NAPARs claim to address. "Nothing about us without us" is not a slogan, it is a structural condition for legitimacy.

**[50]** European Commission, Subgroup on the National Implementation of the EU Anti-Racism Action Plan 2020–2025, *Common Guiding Principles for National Action Plans against Racism and Racial Discrimination* (Brussels: European Commission, 2022), 5.

**[51]** 'Safe' interlocutors refers here to civil society organisations or representatives perceived by public authorities as institutionally acceptable, non-confrontational, or less likely to challenge existing policy frameworks and power relations. See Stefan Rother and Elias Steinhilper, "Tokens or Stakeholders in Global Migration Governance? The Role of Affected Communities and Civil Society in the Global Compacts on Migration and Refugees," *International Migration 57,* no. 6 (2019): 243-57.

## Scoring scale

4
/4

### Rights-based and enabling environment

A fully institutionalised participatory body exists, meeting regularly with public agendas and minutes. Membership is representative and transparent; civil society (incl. racialised groups) is meaningfully empowered to co-design and monitor NAPAR implementation. Participants are resourced (stipends, translation, accessibility) and organisations have long-term, accessible funding while retaining full independence. Legal and institutional safeguards effectively protect civic space against harassment, criminalisation, surveillance and political delegitimisation. Particular attention is given to supporting grassroots, intersectional and smaller racialised-led organisations that might be otherwise excluded.

3
/4

### Supportive environment

A formal participatory structure exists that meets somewhat regularly (e.g. 2– 3 times a year) with defined but limited terms of reference. Participation is structured and meaningful though not central to decision-making, and some support is provided to participants. Membership includes racialised-led civil society but may have gaps in diversity. Funding mechanisms exist, civic freedoms are protected, and organisations can advocate independently without significant political or administrative interference. Partial institutional protection ensures continuity across government terms.

COUNTRIES Finland

2
/4

### Partial enabling environment

Some mechanisms for engagement exist, but they are weak: meetings are infrequent, terms of reference unclear, membership opaque or unbalanced, and civil society has limited influence. Participation relies on occasional consultations or project-based funding, resource support is minimal and unstable, and protections for independent advocacy are uneven. The mechanism can be easily reshuffled or ignored.

COUNTRIES Greece Ireland Portugal Spain

1
/4

### Limited environment:

Basic civic freedoms formally exist, but there is no stable or formal participatory body. Ad hoc consultations or workshops are irregular, sporadic or symbolic, with little institutional weight. Very few racialised people are represented. Funding is scarce or inaccessible, and organisations face significant structural barriers to sustained advocacy.

COUNTRIES Croatia Denmark France Germany Italy Sweden

0
/4

### Restrictive or hostile environment

No participatory mechanism exists, and the state actively constrains racialised-led civil society through restrictive laws, surveillance, criminalisation, political attacks, administrative barriers, exclusion from policymaking or systematic defunding. Civil society is harassed, delegitimised or retaliated against for seeking involvement, and dissent is silenced. Organisations operate in a climate of intimidation, insecurity or shrinking civic space.

COUNTRIES Austria Slovenia

# INDICATOR 5

## Allocation of human and financial resources

### What it measures

This indicator measures the level of commitment of Member States to the NAPAR, as shown by the human and financial resources attached to it, and whether that commitment is permanent for disposable. It looks at whether resources are dedicated, published, and earmarked for specific objectives; whether staff are assigned with defined roles; whether funding is provided for independent monitoring, data collection, trainings, awareness-raising and the participation of civil society, including grassroots racialised-led organisations; whether resources are directed towards the empowerment of racialised communities themselves, for example through funding community-led initiatives and organisations, rather than solely toward state-run activities; and whether these commitments are embedded across political cycles or depend on the will of the current government and on short-term project funding.

The indicator does not assess whether a budget is adequate or feasible in absolute terms, and it is not a comparison of spending between Member States. Budget size is shaped by factors outside the scope of this research, such as national fiscal capacity, administrative structures, the scope of the plan, and how anti-racism work is funded across ministries. Instead, it reads resources as evidence of commitment: whether the NAPAR is backed by identifiable, accountable and durable resources, or remains a declaratory document without the means to be implemented.

### Why it matters

A NAPAR without resources cannot be implemented, monitored or held to account, however strong its commitments on paper. Budget and staffing are among the clearest indications of whether a government treats the plan as a priority or as a symbolic gesture. Transparency of the budget allows also civil society, equality bodies and the public to scrutinise whether commitments are being met.

Permanence matters as much as size. Anti-racism work that depends on short-term projects, donor support, or the political preferences of the current government is vulnerable to being scaled back or abandoned when priorities shift, and racialised communities, who are already affected by discontinuity in public policy, bear the cost of that instability. Funding that is embedded in law or institutional budgets signals that the commitment is structural rather than disposable.

Where funding reaches racialised communities and the organisations they lead, it also supports their empowerment and agency, rather than positioning them only as beneficiaries of state action. Resourcing community-led work is part of what makes a NAPAR accountable to those it is meant to serve.

## Scoring scale

4
/4

### Dedicated, transparent and institutionally embedded resources

A dedicated budget for the NAPAR is published and accessible, with resources earmarked for specific objectives. Staff are assigned across relevant ministries with clearly defined roles (e.g. policy development, coordination, monitoring), including equality officers or focal points. Funding is provided for independent monitoring, data collection and evaluation, training and capacity-building, awareness-raising, and the participation of civil society (e.g. translation, travel, stipends). Funding is also directed toward the empowerment of racialised communities, including support for grassroots racialised-led organisations and community-led initiatives. Financial and staffing commitments are secured across political cycles, embedded in law or institutional budgets rather than dependent on short-term projects.

3
/4

### Clear and public resources, dependent on current political will

Clear budget exists, publicly available, with staff assigned though unevenly across ministries. Resources are partly available for monitoring, data collection, training or awareness-raising. Civil society and community-led work are supported, but not systematically. Commitments are not secured beyond the current political cycle and depend largely on the will of the current government.

2
/4

### Limited and fragile resources

A limited budget and small staff team exist, (<5 people); resources insufficient compared to plan's scope; monitoring and civil society are engagement underfunded; awareness activities are minimal; funding project-based and fragile, with little or no protection against being reduced or withdrawn.

COUNTRIES Denmark Finland France Ireland Spain Sweden

1
/4

### Symbolic or ad hoc resources

Very small or symbolic budget; only one or two staff dedicated. Funds are not public or not earmarked, and monitoring and civil society participation are not funded. Activities rely on ad hoc, donor or external support, with no indication of continuity.

COUNTRIES Croatia Germany Greece Italy Portugal

0
/4

### No resources or active withdrawal of resources

No budget is allocated or none is made public, no staff assigned; no resources for monitoring, awareness, or civil society. Where evidence shows that funding for anti-racism work has been actively reduced or withdrawn, this is also scored at this level.

COUNTRIES Austria Slovenia

# INDICATOR 6

## Racialised-led Civil Society Mobilisation and Participation

### What it measures

This indicator measures how far civil society and specifically racialised-led is organised and active around NAPARs on its own terms. It looks at civil society-led coalitions or networks, participation in NAPAR development, independent monitoring (e.g. shadow reports), grassroots mobilisation, intersectional organising, and advocacy beyond government-led consultation. It captures what civil society does, not what the state provides, and it recognises informal, grassroots, digital and transnational forms of organising where formal coalitions are unsafe or impossible.

Mobilisation is read in light of the conditions under which it takes place. Civic space, funding, repression and delegitimisation do not act in one direction: they can suppress or fragment organising, but they can also push it into adaptive forms or intensify it as resistance. Low mobilisation may therefore reflect limited coordination, historical or demographic factors, suppression, or activity that cannot be safely documented, and it is not treated as civil society failure or as a finding about state conduct. Strong mobilisation, including under hostile conditions, is not treated as evidence of an enabling environment. State responsibility for civic space, funding, repression, surveillance and criminalisation is assessed separately under indicator 4.

### Why it matters

NAPARs are only credible as the communities they are meant to serve are able to shape, monitor and contest them. Racialised-led civil society brings lived experience and structural analysis that state actors often lack, and independent monitoring and advocacy hold NAPARs accountable beyond government-led consultation. Without organised, independent civil society engagement, NAPARs risk becoming top-down documents that reflect state priorities rather than the realities of racialised communities.

Tracking mobilisation separately from state action matters for three reasons: First, it keeps the assessment accurate: it avoids crediting states for civil society's achievements and avoids penalising civil society for conditions outside its control. Second, it makes visible how the two interact. Mobilisation can flourish under hostile conditions or remain limited under enabling ones, and reading the two together would hide both patterns. Third, at a time of shrinking of civic space and growing repression of racial justice organising, understanding where racialised communities are able to organise, where they are resisting under pressure, and where activity cannot be safely documented helps identify where support and protection are most needed.

## Scoring scale

4
/4

### Sustained, independent and influential mobilisation

Civil society is highly organised and active around the NAPAR, through a coalition or network and/or other sustained forms of organising. It is independent, with transparent governance and a diverse, intersectional membership, and it engages in NAPAR development and carries out independent monitoring (e.g. shadow reports). It sustains grassroots mobilisation and advocacy beyond government-led consultation, nationally and EU level, and its terms of reference or positions recognise systemic and structural racism.

3
/4

### Organised and active, with partial reach

Civil society is organised and active, through a coalition or network that is independent and meets regularly. It includes several but not all racialised and intersectional groups, with coordination arrangements in place, though governance is only partly transparent. It engages in NAPAR development and some independent monitoring or advocacy, but this is partial, with limited reach or continuity.

COUNTRIES Finland Ireland Spain

2
/4

### Loosely organised and intermittent

Civil society organising exists but is loosely coordinated. A coalition or network may exist but with limited representation, no clear governance or regular coordination, and activity that is intermittent or project dependent. Engagement with the NAPAR is limited, with little independent monitoring and no sustained advocacy beyond consultation.

COUNTRIES Denmark France Germany Portugal Slovenia Sweden

1
/4

### Fragmented or individual engagement

No coalition or network, but individual organisations or grassroots groups engage with the NAPAR independently, formally or informally, with limited coordination or visibility.

COUNTRIES Austria Croatia Greece Italy

0
/4

### No identifiable organised engagement

No identifiable organised racialised-led civil society engagement with the NAPAR. A score of 0 reflects the absence of observable activity and does not by itself indicate its cause (absence of interest, suppression, or activity that cannot be documented).

# INDICATOR 7

## Narrative change, education and media

### What it measures

This indicator assesses whether Member States are investing in and enabling genuine narrative change - that is, the transformation of the dominant frames, assumptions, and knowledge structures through which publics understand race, racism, migration, and racialised communities. It distinguishes narrative from adjacent but insufficient activities: awareness-raising (informing publics that racism exists), hate speech monitoring (detecting explicit harms), and counter-messaging (responding to racist content). While these may be necessary, they often address surface manifestations while leaving intact – or even reinforcing – the deeper narrative structures that determine who belongs, who is treated as threatening and whose knowledge counts. The indicator therefore determines whether state and state-funded interventions move beyond awareness and dialogue toward transforming the frameworks themselves, and whether racialised communities are recognised as knowledge-producers and authors of narrative.

### Why it matters

The European Commission's guiding principles 1 and 3 ask Member States to recognise diversity and combat stereotypes. ENAR's critique is sharper: public narratives are site of structural power. Narrative change is fundamentally a question of epistemic transformation. Colonial and structural racism operate not only through material domination but through establishing Eurocentric knowledge, history, perspectives as universal, while marginalising racialised community knowledge as partial, or irrelevant. Initiatives that 'raise awareness' assume the problem is ignorance - Yet racism is often produced through conscious choices, or through institutional arrangements that generate racist outcomes regardless of individual attitudes or intentions. Likewise, framings of 'intercultural dialogue' or 'mutual understanding' risk depoliticising racism, recasting structured domination as cultural misunderstanding and producing false symmetries between racialised communities and majority populations. This is particularly evident in migration debates, where racialised narratives routinely construct migrants as security threats, economic burdens, culturally incompatible, or inherently suspect. Such framings do not merely reflect public attitudes; they actively shape policy, legitimising surveillance, border violence, detention, deportation, and other exclusionary practices while rendering these responses both necessary and commonsensical.

Campaigns build around bystander passivity ('don't look the other way') can similarly allow majority publics to position themselves as concerned observers of racism happening elsewhere, rather than as actors implicated in the structures that produce it. Genuine narrative change therefore requires more than messaging: it requires shifting who frames the story, whose analysis is treated as authoritative, and whose priorities shape public discourse. It requires distinguishing community engagement from community leadership. Without this shift, narrative work risks reproducing the very hierarchies it claims to challenge, leaving structural racism intact beneath a more inclusive surface.

## Scoring scale

4
/4

### Transformative narrative change and epistemic shift

- A long-term, resourced narrative change is embedded in the NAPAR. It aims to transform dominant frames on race, racism, migration and belonging, not only to inform the public.
- Racialised communities are recognised as knowledge producers and authors. Racialised-led organisations, media, scholars and cultural actors lead framing and analysis, with secure, multi-year funding and full editorial independence, including the freedom to criticise government policy.
- Compulsory curricula at all levels address structural racism, colonialism and its continuities, whiteness and racial hierarchy, and racialised communities' histories and contributions. They are supported by systematic teacher training and measures against racism in education systems.
- Public service media and regulators apply enforceable accountability on reporting about race, migration and religion, with representation of racialised people across workforce, editorial and leadership roles.
- The state addresses online narratives, including platform accountability for amplification of racist content, in line with EU digital regulation, without reducing change to content moderation.
- Government communication is consistent with the strategy. Officials do not produce or legitimise racist narratives, and the state publicly corrects them when they occur.

3
/4

### Structured narrative work, partially embedded

The state funds and enables work that addresses structural racism, with racialised communities playing a leading role in parts of it:

- Interventions explicitly address structural racism, including in at least one contested area such as migration, policing, security and name the role of state institutions.
- Curricula and education transformation are underway, including colonial history and its continuities, and structural racism. They include teacher training, textbook review, or measures addressing racism within schools.
- Media accountability measures exist with some enforcement, for example through public service broadcaster mandates, regulator action, or representation targets covering workforce and editorial roles.
- Racialised-led organisations, scholars, artists and media led some initiatives, with resources and editorial independence. Funding is multi-year for at least part of this work.
- Some evaluation assesses changes in framing, not only reach.
- No material contradiction in official narratives is documented.

2
/4

### Structured awareness without narrative transformation

Activity is regular and planned, but focused on awareness rather than transforming the frames through which racism is understood. It fulfils most of these conditions:

- Campaigns and programmes are recurring and linked to a plan or strategy, but mostly describe racism as attitudes, hate speech or discrimination by individuals, rather than as structural and institutional.
- Contested areas, especially migration, policing, security and Islamophobia, are avoided, or addressed only through 'social cohesion' or 'integration' framing.
- Education reforms are limited to optional or extracurricular material, isolated modules or one-off teacher training. Colonial history is absent or presented without continuities.
- Media measures are limited to guidelines, voluntary codes or monitoring, without enforcement, follow-up or attention to workforce representation.
- Racialised-led organisations are consulted or funded for delivery, but not for framing, analysis or leadership. Funding is short-term and project based.
- Reach and participation are reported, but there is no evaluation of whether narratives shift.

COUNTRIES **Finland** **Ireland** **Portugal** **Spain**

1
/4

### Reactive or depoliticised activity

Some activity exists, but it is reactive, sporadic or framed in ways that leave dominant narratives intact:

- Campaigns are occasional, often launched in response to high-profile incidents, and are not part of a strategy.
- Racism is framed as ignorance, individual prejudice, intolerance.
- Education includes little or no content on racism, colonial history or racialised communities, beyond general valued of diversity and intolerance.
- No media accountability measures exist on racialised representation or reporting on race and migration.
- Racialised communities are absent from design, or included only as audience, testimonials or campaign faces.

Minimal public campaigns, often reactive (e.g. after racist incidents); limited or no educational/structural measures; narratives fail to address systemic racism.

COUNTRIES **Croatia** **France** **Greece** **Italy** **Slovenia** **Sweden**

0
/4

## Hostile narrative environment

The state actively produces or legitimises racist narratives, and no meaningful counter-narrative work exists. This includes any of the following:

- Government officials or official communications routinely frame racialised communities, migrants, Muslims, Roma or Black people as threats, burdens, culturally incompatible or inherently suspect.
- Official denial or ridicule of structural racism, or delegitimisation of anti-racism as *ideological, imported, divisive.*
- Restrictions on teaching or discussing racism, colonialism or related topics in education, culture or public institutions.
- Defunding, exclusion, or public targeting of racialised-led organisations or media working on narrative change.

Note: isolated awareness activities do not lift a country out of level 0 where hostile official narratives are dominant and documented.

COUNTRIES **Austria** **Denmark** **Germany**

# AUSTRIA



As exclusionary nationalism becomes increasingly mainstream within Austria's political landscape, with the far-right FPO (Freedom Party of Austria) at historic strength and a new austerity government taking power, there is no NAPAR to anchor anti-racism commitments made by the government in 2020. Instead, in Austria there are fragmented efforts, including one ministerial action plan and local efforts which cannot withstand the institutional and political forces normalising fascist rhetoric, criminalising Palestinian solidarity, and intensifying of migrants and other racialised groups. The UN Special Rapporteur [52]found 'widespread attitude of refusal to fully acknowledge racism and its consequences on racially and ethnically marginalised groups.'

## Indicator scores

1 /4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Minimal, fragmented or indirect commitment**

Austria has not adopted a National Action Plan Against Racism; the 2025 coalition programme contains no such commitment, and anti-racism efforts remain fragmented across sectoral strategies

0 /4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Individualised or externalised recognition**

the 2025 coalition programme contains no such commitment, and anti-racism efforts remain fragmented across sectoral strategies

1 /4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

Austria does not systematically collect equality data disaggregated by race, ethnicity, skin colour or religion; available data are fragmented and concentrated in policing, asylum and 'integration' statistics, are not harmonised across sectors

**[52]** United Nations Office of the High Commissioner for Human Rights, *"End-of-Mission Statement by the Special Rapporteur on Contemporary Forms of Racism, Racial Discrimination, Xenophobia and Related Intolerance on Her Visit to Austria,"* December 9, 2025, https://www.ohchr.org/sites/default/files/statements/20251209-eom-stm-austria-sr-contemporary-forms-racism-en.pdf.

0
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Restrictive or hostile environment**

No permanent, institutionalised participatory body for anti-racism exists at federal level; consultations around sectoral strategies (e.g. the Federal Ministry of Arts, Culture, Civil Service and Sport, BMKÖS' diversity strategy) have been ad hoc, opaque in selection, dominated by ministerial and academic actors, and presented final documents to CSOs rather than enabling co-design, while the dedicated Competence Centre for Diversity, Anti-Racism and Anti-Discrimination proved institutionally vulnerable and was dismantled following government change.

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INDICATOR 5

### Allocation of human and financial resources

**No resources or active withdrawal of resources**

No dedicated, published federal budget is earmarked for anti-racism; staff capacity is dispersed and unprotected against political shifts (as shown by the dismantling of the Competence Centre), monitoring and CSO engagement are underfunded, and anti-racism work depends overwhelmingly on short-term, project-based funding that produces precarity and prevents sustained strategic planning.

1
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Fragmented or individual engagement**

A diverse and active anti-racism civil society exists and is engaged in advocacy, documentation and shadow reporting, though sustained coordination around a unified NAPAR demand is constrained by state repression (e.g. Operation Luxor[53], restrictions on Palestine solidarity), fragmented funding, and the parallel emergence of community-based mechanisms that compensate for institutional gaps.

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INDICATOR 7

### Narrative change, media and education

**Hostile narrative environment**

Awareness and educational initiatives remain fragmented and largely reactive, and concentrated mainly on online hate speech, while mainstream political discourse normalises racist and ethno-nationalist narratives

**[53]** Esther Feeken, "Assemblages of (In)Security: Political Islam, Operation Luxor, and the Rise of Soft Authoritarian Security Governance in Austria," PoLAR: Political and Legal Anthropology Review 48, no. 2 (2025): e70025, https://anthrosource.onlinelibrary.wiley.com/doi/10.1111/plar.70025; Farid Hafez, "*The Austrian State's Attack on Muslims Shows No Sign of Easing,*" Middle East Eye, March 10, 2024, republished by Georgetown University's Bridge Initiative, March 11, 2024, https://bridge.georgetown.edu/external_article/the-austrian-states-attack-on-muslims-shows-no-sign-of-easing/.

# EXISTING EFFORTS

## Vienna[54]/Graz[55] Action Plans

- Achievement: city-level employment programs, housing initiatives, education curricula changes, formal council commitments.
- Limitation: Time-limited. City-level only. Federal institutions not bound. Additive, not transformative. No systematic outcome data.

## BMKOS Diversity Strategy (2023-2024)[56]

- Achievement: staff training on anti-racism, colonial histories displayed in museums, arts funding criteria revised, some racialised artists gained access.
- Limitation: Scope: arts/culture only; ignores police, housing, employment, health, justice.

  **Decolonisation risk:** Museums display colonial histories without addressing looted objects or systemic racism.

  **Consultation tokenistic:** Final strategy presented as finished, not co-design.

  **No accountability:** Internal evaluation only; no outcome targets.

# WARNING SIGNS

### 1 Performative anti-racism as obstruction

Austria has created the appearance of action while avoiding addressing structural racism. The Federal Ministry for Arts, Culture, the Civil Service and Sport's strategy against racism focuses on knowledge and funding criteria, however it doesn't merely address systemic racism a core problem in Austrian institutions and structures.

### 2 Rightward political drift with no policy counterweight

Far-right FPO is at historic strength (29.2%, 2024). New government focused on austerity, not anti-racism. Without a NAPAR, fragmented local efforts cannot resist headscarf ban criminalises Muslim families (800 euros fines); Syrian families reunifications suspended; botched Somali deportation without documentation (ECHR intervention required). UN special rapporteur[57] documented 'acceptability of ethno-nationalistic notions that fundamentally link being Austrian with being white.'

**[54]** City of Vienna, Wiener Aktionsplan gegen Rassismus 2025 [Vienna Anti-Racism Action Plan 2025] (Vienna: City of Vienna, 2025), https://www.wien.gv.at/spezial/aktionsplan-gegen-rassismus/.

**[55]** City of Graz, Zehn-Punkte-Aktionsprogramm der Stadt Graz zur konkreten Bekämpfung von Rassismus, Fremdenfeindlichkeit und Diskriminierung in unserer Stadt: 2025–2027 [Ten-Point Action Programme of the City of Graz to Combat Racism, Xenophobia and Discrimination in Our City: 2025–2027] (Graz: City of Graz, 2025), https://www.graz.at/cms/beitrag/10358509/7771447/Zehn_Punkte_Aktionsprogramm_der_Stadt_Graz.html.

**[56]** Federal Ministry for Arts, Culture, the Civil Service and Sport (BMKÖS), *Anti-Racism Strategy* (Vienna: BMKÖS, 2024), https://www.bmwkms.gv.at/dam/jcr:ec8e92ef-f349-44d1-8700-94b5f5293030/ars.pdf.

**[57]** Office of the High Commissioner for Human Rights, *"End-of-Mission Statement on Austria."*

# CROATIA



Croatia has no National Action Plan Against Racism. Instead, anti-racism appears as one chapter within a broader Human Rights and Anti-Discrimination Plan (2022-2027)[58] where racism is framed as isolated hate incidents rather than a structural phenomenon. Dominant political and institutional narratives frame Croatia as ethnically homogeneous and largely unaffected by racism, attributing discriminatory incidents to individual prejudice rather than systemic patterns. Meanwhile, Roma, migrants, refugees, Muslims, Black communities and racialised communities by large report documented discrimination in housing, employment, policing and access to services. The human rights portfolio sits under the Minister of the Interior, the same entity responsible for policing and border control.

## Indicator scores

1 /4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Minimal, fragmented or indirect commitment**

Croatia has a formally adopted, publicly available National Plan for the Protection and Promotion of Human Rights and Combating Discrimination (2022– 2027), with a dedicated chapter on racism and xenophobia, implementation action plans and annual reporting. However, it is not a dedicated NAPAR, lacks measurable race-specific targets and independent monitoring, and was developed without consultation with racialised communities.

1 /4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Individualised or externalised recognition**

The National Plan frames racism primarily as individual discrimination, hate crime and hate speech, without recognising structural or institutional racism. It lacks an operational intersectional approach, does not mainstream anti-racism across policy areas, and omits historical and systemic drivers of racism.

**[58]** Government of the Republic of Croatia. *National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the Period to 2027*. Zagreb, March 2023. National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027.pdf

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based**

Croatia lacks systematic, disaggregated equality data capable of identifying racialised inequalities across sectors, with available information largely fragmented and concentrated on hate crime and hate speech. Data collection is poorly harmonised and is not meaningfully used to establish race-specific baselines, targets or outcome-based monitoring.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment**

Croatia has no stable, functioning participatory mechanism dedicated to anti-racism or NAPAR monitoring: the Human Rights Council has been inactive, while working groups are temporary and lack continuity. Civil-society participation is irregular and insufficiently representative, with racialised communities excluded and no effective means to ensure accountability for their participation.

1
/4

INDICATOR 5

### Allocation of human and financial resources

**Symbolic or ad hoc resources**

Funding for anti-racism and anti-discrimination commitments is fragmented, often symbolic or unspent, and not separately identifiable for racism-related activities. Implementation also relies on a small, overstretched government office, with no dedicated anti-racism staff or budget for independent evaluation and sustained monitoring.

1
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Fragmented or individual engagement**

Croatia has no formal or informal independent civil-society coalition specifically focused on anti-racism policy or NAPAR monitoring. Existing cooperation among human-rights organisations is reactive, ad hoc and largely confined to government-selected consultation processes, without shared governance or sustained collective advocacy

1
/4

INDICATOR 7

### Narrative change, media and education

**No identifiable organised engagement**

Croatia's awareness-raising efforts remain sporadic, generic and insufficiently focused on racism, racialisation or xenophobia. The existing communication strategy has not been updated, while planned activities are inconsistently implemented and lack measurable reach or a sustained approach to addressing structural racism and representation.

# EXISTING EFFORTS

## 1 Office of the Ombudsperson as Croatia's equality body

The Ombudsperson functions as credible, independent equality body, producing detailed annual reports documenting discrimination, hate crime and institutional gaps. Its work is widely cited by ECRI, FRA and UN CERD, and provides one of the few reliable sources on equality data in the country. However, while the institution is generally regarded as compliant to European and International standards in formal design and legal powers, it remains constrained in practice at home, with limited parliamentary follow-up, modest political influence and uneven uptake on its recommendations. The Ombudsperson has repeatedly called out the country's government and Ministry of Interior for the unlawful and often violent pushbacks of migrants at its borders.

## 2 City of Zagreb: Coordination for the Integration of Foreigners

This municipal mechanism brings together city departments, civil society organisations, and migrant communities to co-design support measures, demonstrating the potential of inclusive, participatory governance at the local level and offering a scalable model for national institutionalisation of participatory mechanisms. While such services are genuinely important for newcomers, the 'foreigners/integration' terminology should be critically revisited from a decolonial and intersectional lens: *integration* must be understood as a two-way, structural process, not assimilation into an unmarked majority norm and racialised communities should be recognised as rights-holders and co-producers of policy.

## 3 Civil society leadership on Anti-Racism and Historical

Organisations such as the Centre for Peace Studies (CPS), Documenta and Roma-led associations as well as other anti-racism and racialised-led organisations sustain critical work on anti-racism, refugee rights, minority protection and wartime legacies. Despite shrinking civic space and administrative exclusion, they provide the evidence base, advocacy and community-led monitoring that any meaningful NAPAR process would need to build upon.

# WARNING SIGNS

## 1 Institutional conflict of interest at the top

The human rights and anti-discrimination portfolio are held by the Minister of the Interior, who simultaneously oversees policing, border management and migration control which are the institutions most frequently implicated in reports of racial profiling and discriminatory enforcement. The Human Rights Council, the body meant to provide cross-sectoral oversight, has not convened in more than a year.

## 2 Systemic exclusion of racialised communities

Migrant-led, Black, Muslim and refugee organisations are absent from national policymaking structures and receive no dedicated state support to participate. The City of Zagreb's coordination for the Integration of Foreigners

is a rare positive practice but remains municipal in scope and disconnected from national governance.

## 3 Civic space eroded through administrative means:

Civic space narrows through cumulative restrictions rather than through overt repression: discontinued funding, delayed consultations and selective cooperation with state-aligned actors. The Centre for Peace Studies has been excluded from the Porin asylum reception since 2018[59], which is a centre for applications for international protection in Zagreb operated by the Ministry of the Interior. It provides accommodation and basic reception services while asylum applicants are processed. CPS, by contrast, argued that the decision was politically motivated and linked to its public criticism of alleged police misconduct at the borders. The Ministry denied that the decision was politically motivated.

**[59]** Centre for Peace Studies, *"MoI Denies CPS the Access to Reception Centres for Asylum Seekers!"* November 12, 2018, MoI denies CPS the access to Reception Centres for asylum seekers! - Centar za mirovne studije.

# DENMARK



Denmark's National Action Plan Against Racism, launched in February 2025[60] after a three-year delay and a significant transfer from the Ministry of Justice to the Ministry of Immigration and Integration, represents a limited response to the structural dimensions of racism. Although the plan establishes a formal framework for anti-racism initiatives, it does not adequately address the legal, political and institutional structures that can reproduce racialised inequalities. Its failure to explicitly recognise structural, institutional and historical racism, alongside the omission of Islamophobia/anti-Muslim racism, Afrophobia and Antigypsyism as distinct forms of racism, narrows the scope of the state's response and limits its capacity to address the experiences of affected communities. Defining the problem in relatively restrictive terms while leaving broader policy contradictions insufficiently addressed, the plan risks functioning primarily as a demonstration of state commitment of anti-racism, rather than as an effective instrument of structural change and accountability to protect racialised communities.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

Denmark's 2025 plan is formally adopted, publicly accessible and supported by identifiable funding, but is lacks legal anchoring, robust and independent monitoring and a demonstrated mechanism for corrective action. It's narrow treatment of structural racism, selective recognition of affected groups and limited influence for civil society constrain its credibility as a comprehensive, accountable national framework.

0
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

The plan does not define racism or provide an operational framework for addressing structural, institutional, historical and intersectional racism, while omitting explicit recognition of several racialised communities. In combination with government's documented rejection of structural-racism framing and policies criticised for producing racialised outcomes, this meets the indicator's 0 safeguard despite the existence of the plan.

**[60]**6 The Danish Government, Handlingsplan mod racisme [Action Plan Against Racism], Ministry of Immigration and Integration, February 2025, https://uim.dk/media/vjrf3czp/handlingsplan-mod-racisme.pdf .

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

Denmark has surveys, research and hate-crime statistics, but the report identifies fragmented evidence, limited direct measurement of racial inequalities and insufficient integration of data into the plan's targets and monitoring. The UN Committee on the Elimination of Racial Discrimination (UN CERD) has called for improved equality-data collection, and the plan does not demonstrate a comprehensive, right-based and intersectional data framework.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment**

Although civil-society organisations we consulted, the national report describes a process with limited transparency and influence over the final plan, without a permanent, resources mechanism for sharing decision-making or implementation oversight. Reported barriers to policymaking access and concerns about political and funding pressures further weaken the environment for independent advocacy, even though the evidence does not establish a uniformly hostile environment for all organisations.

2
/4

INDICATOR 5

### Allocation of human and financial resources

Denmark has allocated DKK 18.2 million for the 2025-2026 plan and a separate DKK 35 million framework for addressing discrimination against Greenlandinc Inuit over 2025-2028. However, funding is time-limited and drawn from multiple sources, and the report does not establish comprehensive, durable resourcing for independent monitoring, cross-governmental implementation and racialised-led organisations.

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

Civil society demonstrated meaningful mobilisation through an alliance of organisations that submitted joint recommendations and challenged the plan's limited approach to structural racism. However, the evidence presented establishes coordinated advocacy around the plan's development more clearly than sustained coalition governance, regular independent monitoring or continued action after adoption.

0
/4

INDICATOR 7

### Narrative change, media and education

The plan includes research, education and awareness initiatives, but these do not amount to a sustained strategy for transforming dominant narratives or addressing the institutional and historical production of racial stereotypes. The report also documents official political narratives problematising migrant communities and Muslims.

# EXISTING EFFORTS

## 1 Institutional infrastructure: The Board of Equal Treatment and DIHR

Denmark maintains formal equality infrastructure, including the Board of Equal Treatment, which handles individual discrimination complaints, and the Danish Institute for Human Rights (DIHR), the national human rights institution mandated to monitor and report on equality and non-discrimination. DIHR has consistently produced critical analysis of Danish anti-discrimination gaps, including on ethnic profiling, hate crime and the limits of the current legal framework. However, these bodies operate with restricted mandates, limited resources, and no enforcement power over structural or state-driven racism (such as the '*parallel society*' housing legislation, called also *ghetto* legislation, and racial profiling), meaning their work documents harms the NAPAR refuses to name but cannot compel the government to act.

## 2 Civil society documentation and advocacy

Several Danish CSOs, including ENAR member organisations, have built significant expertise in documenting racism, producing community-based data, and advocating at national and EU level. Their work has been essential in surfacing Islamophobia, Afrophobia, Antigypsyism, and the racialised impact of the 'ghetto laws', which are precisely absent from the NAPAR. These organisations often fill the gap left by the state, providing the analysis, victim support, and international reporting (to CERD, ECRI, FRA) that the NAPAR does not. However, they operate in an increasingly hostile political climate, with limited core funding and little structural access to the policy processes that shape antiracism in Denmark.

## 3 Inuit-led truth, Memory and Justice work on Greenland

One significant antiracism and decolonial efforts connected to the Danish state has emerged from Inuit communities in Greenland and Greenlandic Danes, who have driven public reckoning on the harms of Danish colonial rule. This includes mobilisation around the forced contraception scandal, the 'experiment children' of the 1950s, the ongoing impact of forced relocations and assimilation policies, and broader demands for historical accountability, apology and reparative justice. These efforts have pushed the Danish state into establishing bilateral reconciliation and historical investigation processes with Greenland and have made visible the colonial foundations of contemporary Danish racism, including the racialised treatment of Greenlandic people living in Denmark, who face documented discrimination in housing, child welfare interventions, and policing. However, despite the NAPAR's 12 targeted measures for Greenlandic Inuit covering housing, education and labour market inclusion, the plan fails to address colonial foundations of Danish racism. While these initiatives mark a rare acknowledgment, they remain siloed as a "Greenland issue" rather than central to Danish antiracism, and Greenlandic voices continue to be marginalised in policymaking, with reparative justice measures included.

# WARNING SIGNS

## 1 'Reverse racism' and definitional immunity

The Danish NAPAR's most alarming move is its redefinition of racism itself through introducing the notion of 'reverse racism', the idea that white Danes can be victims of racism in the same way as racialised minorities. This erases any analysis of whiteness, racial hierarchy and structural power. Racism is reframed as a symmetrical interpersonal phenomenon rather than a system of domination,[61] contracting international standards (UN CERD, ECRI[62] and EU Anti-racism framework[63]) .Equally critical is what the NAPAR defines as *not* racism: criticism of religion and restrictive immigration policy. This grants the Danish state definitional immunity: by its own framework, state policy cannot be racist because it is reframed as 'legitimate political opinion.' An action plan ostensibly designed to protect racialised minorities is instead structured to protect the state, whiteness and dominant populations from accusations of racism.

## 2 The 'Ghetto Laws'[64] and the Legal Codification of Racial Hierarchy

The NAPAR contradicts the 'Parallel Societies' legislation (formerly 'Ghetto Laws') - which is a body of law that explicitly uses 'non-Western' origin as a legal criterion to designate neighbourhoods for forced demographic restructuring, including the demolition of social housing, forced relocations, mandatory daycare for 'ghetto children' [65]from age one, and doubled criminal penalties in designated zones. This is one of the most overt examples of legally codified racial hierarchy in contemporary Europe, yet the NAPAR doesn't mention it, critique it or even acknowledge the impact on racialised communities affected by this law. The plan thus operates alongside, and tacitly legitimises, the institutionalisation of the very racial categories a NAPAR should dismantle.

## 3 The Migration governance paradox illustrating how Denmark is an exporter of racialised border regimes

The deepest paradox of the NAPAR is that it is authored and administered by the Ministry of Immigration and Integration, the very ministry responsible for Denmark's 'paradigm shift' from 'integration' to deportation, the revocation of Syrian residence permits, the pursuit of externalisation of asylum, and one of Europe's harshest migration regimes. Denmark has actively positioned itself as a model and exporter of restrictive migration governance, influencing European and other member states' migration policy. The institutional location of the NAPAR is therefore not neutral: antiracism has been placed under the authority of the state apparatus most directly responsible

**[61]** Kimberlé W. Crenshaw, "Race, Reform, and Retrenchment: Transformation and Legitimation in Antidiscrimination Law," Harvard Law Review 101, no. 7 (1988): 1331–87; David Theo Goldberg, The Racial State (Malden, MA: Blackwell Publishers, 2002).

**[62]** European Commission against Racism and Intolerance, ECRI General Policy Recommendation No. 7 (Revised) on National Legislation to Combat Racism and Racial Discrimination, CRI(2003)8 REV. (Strasbourg: Council of Europe, December 13, 2002; revised December 7, 2017).

**[63]** The European Commission adopted the strategy on January 20, 2026. Its full title is Union of Equality: Anti-Racism Strategy 2026–2030.

**[64]**. Government of Denmark, "Obligatorisk dagtilbud skal sikre bedre danskkundskaber inden skolestart" [Mandatory daycare to ensure better Danish language skills before school starts], May 28, 2018,https://regeringen.dk/aktuelt/nyheder/2018/ghettoudspil/obligatorisk-dagtilbud-skal-sikre-bedre-danskkundskaber-inden-skolestart/

**[65]** The term 'ghetto children' is a label referring to children living in Danish residential areas designated under the country's former 'ghetto' legislation (changed to *parallel society housing legislation).* Under legislation introduced in 2018, children from the age of one living in designated vulnerable housing areas who were not already enrolled in daycare could be required to attend a minimum of 25 hours of weekly early-childhood provision focused on Danish language and values; non-compliance could result in the suspension of child benefits. The policy attracted criticism because it imposed specific integration requirements on children based on their place of residence, in areas identified partly by the proportion of residents classified as immigrants or descendants from "non-Western" countries.

for producing racialised violence. The result is a plan that cannot name migration governance as a site of racism while also exporting the Danish model which normalises the dismantling of asylum rights across Europe.

# FINLAND



Finland's second National Action Plan Against Racism (2024-2027) projects an image of institutional continuity and a continued political commitment to addressing racism within an egalitarian policy framework. Its development took place amid political tensions following repeated racist statements by governing Finns Party figures[66], with the plan emerging as part of the governing coalition's efforts to manage the resulting crisis. While this context shaped the political compromise underpinning the plan, its adoption represents a further step in formalising national anti-racism efforts. Nevertheless, the plan remains a non-binding political programme that frames racism predominantly as individual prejudice and overlooking the structural dimension. Procedural progress is evident and should be acknowledged, but important and implementation gaps: the plan does not provide racialised communities with enforceable rights, clearly traceable budgets linked to individual actions, and the weak conceptualisation of racism in the plan. As a result, the plan's impact will depend substantially on sustained political commitment, effective coordination and affected communities throughout implementation.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

Finland's second NAPAR, *A New Boost for Equality in Finland (2024),* was adopted as a government decision. Responsible ministries are named more clearly than the first plan, but timelines and indicators are often vague, and there's no independent monitoring body, enforcement mechanism or process for when measures aren't implemented.

2
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition on paper**

The plan describes racism in structural terms but doesn't clearly define institutional racism, and it focuses mainly on prejudice and discriminatory behaviour. Intersectionality is introduced in the pan however it is not operationalised: Black, Roma, Sámi and undocumented communities get little attention, and colonialism and historical racism are largely absent apart from support for the Sámi and Sign Language Truth and Reconciliation Commissions.

**[66]** David Mac Dougall, *"Racism and Rape Fantasies: The PR Headache Facing Finland's New Right-Wing Government,"* Euronews, June 20, 2023, https://www.euronews.com/2023/06/20/racism-and-rape-fantasies-the-pr-headache-facing-finlands-new-right-wing-government.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Proxy-based or limited disaggregation**

Some sectoral data exists, mainly on employment and law enforcement, but it relies on proxies such as country of birth, nationality and first language which hide racism against racialised Finnish citizens. A 2023 Ministry of Justice study confirmed that human-rights-based data collection is legally possible, but the planned 2026 statistics project with Statistics Finland has no secured funding, and existing data remains fragmented.

3
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Partial enabling environment or Supportive environment**

Finland has set up a dedicated mechanism for the NAPAR, the National Anti-racism Cooperation Network. It's led by a 10-member Working Group of civil society representatives, researchers, anti-racism experts and people with lived experience of racism, is mandated to monitor implementation and intends to meet regularly, and the Statutory Advisory Board for Ethnic Relations (ETNO) provides another channel for communication. However, the Network is time-limited (2025-2027), advisory only, not legally embedded and convened, run and funded by the Prime Minister's Office, with an unclear selection process and civil society's influence remains limited.

2
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

The government has publicly committed €6 million to the plan, almost about three times the €2.13 million for the first NAPAR. It has also earmarked €400,000 a year for the security of Jewish congregation, kept a dedicated NAPAR team at the Prime Minister's Office and funded civil society projects (€240,000 across ten projects in 2025). However, the yearly budget falls from €2 million to €500,000, NAPAR staff drop from 3 to 2.5 posts in 2026, most funding has no clearly earmarked line, civil society support is small-scale and short-term, and none of it is legally secured beyond the current government.

3
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

Several Finnish civil society organisations, anti-racism experts and groups led by people with lived experience of racism actively advocate for stronger anti-racism policy. Through the National Anti-Racism Cooperation Network, they also help monitor the NAPAR and prepare the shadow report. However, advocacy remains fragmented and depends on individual organisations, with limited coordination and visibility at national level.

2
/4

INDICATOR 7

**Narrative change, media and education**

Awareness work is episodic and tied mostly to the annual Week Against Racism. The main campaign, *Me puhumme teoin* ("Action, Not Words"), drew 87 organisations and more than 470 commitments, however, most were symbolic and about individual behaviour rather than institutional power. Education focuses on general equality and gender equality with little on colonial legacies or racialised communities, and Finns Party publicly rejected the government campaign.

# EXISTING EFFORTS

## 1 Statutory Equality Bodies and international monitoring engagement

Finland maintains two statutory equality bodies: the non-Discrimination Ombudsman and the Ombudsman for Equality and their role is to supervise compliance with the non-Discrimination Act and the Equality Act. These institutions, alongside Finland's engagement with ECRI, CERD and FRA, provide a baseline infrastructure for documenting discrimination and pushing for legislation to develop equality data. Civil society organisations and academic researchers also draw on this infrastructure to surface evidence on ethnic profiling, Afrophobia, Antigypsyism and Islamophobia that the NAPAR itself does not adequately name.

## 2 Sami Truth and Reconciliation Process and Indigenous-Led Justice Work

The NAPAR includes activities supporting the Sami and sign language Truth and Reconciliation Commissions, allotted to the Prime Minister's Office and Ministry of Justice. The Sami Commission's final report (December) documents long-standing assimilation policies and constraints on Sami self-determination over land, language and livelihoods. This indigenous-led work is the strongest structural and reparative element connected to the NAPAR, though follow-up has so far been limited and Finland's participation in colonisation and coloniality is not widely recognised in the action plan.

# WARNING SIGNS

## 1 Ethnic profiling and policing not addressed in the NAPAR

Research[67] on ethnic profiling demonstrates that civic space in Finland is not equally accessible from the outset: Black people and Roma are disproportionately subjected to police stops, identity checks, and differential treatment by private security in streets, transport hubs, shops and while driving. This produces 'conditioned citizenship', formal rights that are unevenly realised in practice. The NAPAR contains no measures to address ethnic profiling, no independent police oversight mechanism, and no recognition of policing as a site of structural racism, leaving one of the most documented forms of racialised state violence outside the scope of the plan. Recent

**[67]** [1] Suvi Keskinen et al., *The Stopped: Ethnic Profiling in Finland*, SSKH Notat 1/2018 (Helsinki: Swedish School of Social Science, University of Helsinki, 2018).

police conduct during pro-Palestinian demonstrations (2023-2024) further illustrates the differential treatment of racialised civic actors[68].

Borders as the unspoken limit of anti-racism

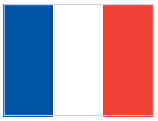
## 2 The NAPAR addresses racism as interpersonal prejudice and service-level discrimination

while placing the state's own racialising practices outside the anti-racism frame including border closures, asylum suspensions, deportations, conditional citizenship, and the destitution of undocumented people. The 2024 Border Security Act[69] is treated as a security measure rather than a racial one, despite applying to populations racialised as non-European. This scoping reproduces the colonial logic by which European nation-states have long distinguished those who count as subjects of rights from those who count as threats to be managed. A NAPAR that individualises racism while the state continues to produce racialised violence, risks functioning as performative anti-racism and as an institutional activity that leaves the architecture of racialised state power intact.

**[68]** Amnesty International Finland, "Barriers to Participation: Racism and the Unequal Right to Protest," accessed October 22, 2026, https://www.amnesty.fi/en/barriers-to-participation-racism-and-the-unequal-right-to-protest/.

**[69]** Laki väliaikaisista toimenpiteistä välineellistetyn maahantulon torjumiseksi [Act on Temporary Measures to Combat Instrumentalised Migration], 482/2024, Finlex, Laki väliaikaisista toimenpiteistä välineellistetyn maahantulon torjumiseksi | 482/2024 | Suomen säädöskokoelma | Finlex.

# FRANCE



France's *Plan national de lutte contre le racisme, l'antisemitisme et les discriminations liées à l'origine (PRADO 2023-2026)*[70] was launched against a state architecture that continues to resist explicitly naming the racial structures it claims to combat. Although racialised communities constitute a significant part of the population across metropolitan France and the overseas territories, the plan remains grounded in a universalist framework that largely avoids naming structural and institutional racism as such. As a former colonial power that still administers overseas territories inhabited predominately by racialised populations, France continues to deny the structural and institutional dimensions of racism in its founding plan, omits any meaningful reference to coloniality, racialised migration governance or intersectionality, and entrenches Islamophobia through laws cloaked in republican neutrality, from the 2004 headscarf ban to the 2021[71] 'anti-separatism' law.[72] Despite racial discrimination documented by local and international monitoring bodies, PRADO mobilises a universalist framework that renders systemic racism unspeakable, offers neither recognition, redress nor reparation to the communities most impacted and it does not address the parallel criminalisation and dissolution organisations working on issues related to racism.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

France has an identifiable, government-endorsed plan, now in its second iteration (adopted July 2026), which shows institutional continuity. However, it remains a political document without legal anchoring or binding force, and its coverage of structural racism is absent and coverage of specific forms of racism is uneven, as the independent monitoring body CNCDH has noted.

1
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Individualised or externalised recognition**

The plan is grounded in a universalist framing that treats racism as individual prejudice, with no recognition of its systemic or institutional dimensions. It also lacks an intersectional approach, does not explicitly name Islamophobia, and makes no reference to the colonial roots of contemporary racism.

**[70]** Interministerial Delegation for the Fight against Racism, Antisemitism and Anti-LGBT Hate (DILCRAH), *National Plan to Combat Racism, Antisemitism and Discrimination Based on Origin (PRADO) 2026–2029* (Paris: DILCRAH, 2026).

**[71]** France, *Law No. 2004-228 of 15 March 2004 Regulating, pursuant to the Principle of Secularism, the Wearing of Signs or Clothing Manifesting Religious Affiliation in Public Primary and Secondary Schools*, *Official Journal of the French Republic*, no. 65, 17 March 2004.

**[72]** France, *Law No. 2021-1109 of 24 August 2021 Strengthening Respect for the Principles of the Republic*, *Official Journal of the French Republic*, no. 0197, 25 August 2021.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Proxy-based or limited disaggregation**

France's restrictive approach and racial data leaves the state structurally unable to measure racial discrimination, the plan cannot be grounded in evidence or its impact assessed. Existing sources, such as the Défenseur des droits' testing studies documents widespread discrimination, but they are ad hoc and not integrated into policy design. The state's refusal to act on this evidence, in the absence of a systematic, disaggregated framework, keeps racism largely invisible in official statistics.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Partial enabling environment**

35 associations were consulted in developing the plan and DILCRAH funds civil society through calls for projects, but there is no permanent, resourced body with co-decision powers. Participation is largely ad hoc and grant based. This is compounded by shrinking civic space documented by the European Civic Forum, police violence, the criminalisation of protest and restrictions on those speaking out on Gaza, while the universalist framework leaves little room to recognise and fund communities organising around their own experience of racism.

2
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

The plan is backed by an institutional structure (DILCRAH) and some dedicated funding, which sets France apart from member states with no resourcing at all. Even so, the budget is limited, not clearly earmarked and not matched to the plan's ambitions, and little is known about how resources are actually allocated and tracked. Moreover, organisations are constrained by the Republican Commitment Contract and covert prefectural vetting via FDVA.

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organisation and intermittent**

Racialised-led and anti-racist civil society in France is active and mobilised, documenting discrimination, litigating and campaigning on police violence, racial profiling and Islamophobia, but coordination is uneven: strong within specific issues and networks, yet fragmented between grassroots racialised-led groups and larger established associations, with no single cross-cutting coalition engaging collectively on the plan. This mobilisation also operates under shrinking civic space, including the criminalisation of protest and restrictions on Gaza solidarity, and limited recognition and funding for racialised-led organising.

1
/4

INDICATOR 7

### Narrative change, media and education

**Reactive or depoliticised activity**

Public narratives in France are dominated by stigmatising political and media discourse on Muslims and migrants, framed through securitisation, "separatism" and 'Great Replacement' narratives, which treats racialised communities as threats to national identity. Planned awareness-raising and counter-messaging measures are tokenistic and do not address these underlying frames or the need for epistemic change, such as recognition of colonial history and racialised communities' own voices.

## EXISTING EFFORTS

### 1 Research funding earmarked for the health and psychological impacts of racism

The NAPAR commits to commission a study on racism's health and psychological effects, including the refusal of care and unequal access to healthcare as well as emergency treatment. However, this remains within the health sector and is not generalised across the plan; it acknowledges effects without naming systemic racism.

### 2 Abrogation of the Code Noir

In May 2026, the French Parliament voted unanimously to abrogate the Code Noir[73], the 1685 royal decrees classifying enslaved human beings as *moveable property,* a text that had survived unrepealed for 170 years after the abolition of slavery in 1848. That this abrogation is hailed as historic progress while France's NAPAR doesn't address the state colonial past and continuities, nor references Afrophobia and doesn't name systemic racism, is itself evidentiary of the distance that remains between this symbolic gesture and actual redress, accountability and reparatory justice. The 170-year silence reflects the same political logic that kept the crimes of the Algerian war outside official recognition for decades, and that continues to resist naming colonial continuity as a live driver of contemporary racism. The Code Noir's abrogation is a necessary step, but doesn't constitute reparation which remains, in the current French policy architecture, officially uncharted.

## WARNING SIGNS

### 1 The equality data gap

France's constitutional tradition of republican universalism prohibits the collection of ethnic or racial statistics in most public datasets, meaning there is no official baseline capturing intersectional discrimination or experiences of data disaggregated by race or ethnicity. This political choice places France, alongside other EU member states who resist collecting equality data, at odds with international recommendations, including from the UN Committee on the Elimination of Racial Discrimination (UN CERD) and the European Commission against Racism and Intolerance (ECRI).

**[73]** Assemblée nationale, *Bill on the Repeal of the Code Noir*, no. 1817, 17th Legislature, introduced September 16, 2025, adopted by the National Assembly May 28, 2026.

## 2 Shrinking civic space and the systematic defunding of anti-racist civil society

The 2021 'Anti-Separatism law' operates on two reinforcing levels. Discursively, it institutionalises Islamophobia: as Amnesty International documented[74], the government's own explanatory statement frames the law around 'radical Islam' and 'separatism' without defining either term, embedding the conflation of Muslim identity with security threat directly into legislation. Materially, its Contract of Republican Commitment conditions public funding on vaguely defined republican compliance, a mechanism Amnesty warned would be implemented discriminatorily, with no meaningful oversight. The result is a legal architecture that simultaneously stigmatises Muslim and racialised communities, making the state both source of structural racism and the arbiter of which organisations are permitted to challenge it.

[74]

# GERMANY



Germany has an established federal anti-racism architecture, including a National Action Plan Against Racism (NAPAR), an independent Anti-Discrimination Commissioner answerable to Parliament, a working definition of structural racism, and headline funding through *Demokratie leben!*. The introduction of a working definition of racism by the Expert Council on Anti-Racism in 2025 represents a further step towards recognising racism as a historically rooted and structural phenomenon. However, these developments coexist with significant gaps in legal protection, implementation and accountability, as well as political and policy developments that raise questions about the coherence of Germany's anti-racism commitments. During 2023-2025, increasingly restrictive migration and citizenship policies, political rhetoric linking migration to problems in urban spaces, and restrictions on Palestine solidarity protests (ruled unlawful by the Berlin Administrative Court[75]), drew criticism from civil society and human rights observers. These developments highlight tensions between the institutional recognition of racism and the practical exercise of state power.

The NAPAR's limited engagement with migration enforcement, deportation practices, policing and restrictions on dissent further raises questions about the scope of Germany's anti-racism framework. While the state has expanded its capacity to recognise and address certain forms of racism, the extent to which this recognition informs policy across government remains uneven. In particular, the relationship between Germany's historical responsibility, its approach to colonial legacies, and contemporary forms of racial inequality requires more sustained attention. The central question is therefore not whether Germany has an anti-racism architecture, but whether that architecture is sufficiently comprehensive, adequately resourced and institutionally empowered to address racism as a structural feature of public institutions and society.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

The NAPAR is formally adopted with named implementing bodies, yet its status as policy rather than statute leaves anti-racism vulnerable to the political cycle and shields the state from binding accountability which constitutes a vulnerability that the current coalition has actively exploited.

**[75]** Verwaltungsgericht Berlin [Berlin Administrative Court], "Palästina-Kongress 2024: Auflösung und Verbot rechtswidrig" ["Palestine Congress 2024: Dissolution and Ban Unlawful"], press release no. 51/2025, November 26, 2025, https://www.berlin.de/gerichte/verwaltungsgericht/presse/pressemitteilungen/2025/pressemitteilung.1620365.php.

2
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition on paper**

Germany has made meaningful progress in recognising racism as a structural and historically rooted power relation. However, this recognition has not yet translated into a consistent, cross-government approach to identifying and addressing institutional racism. Intersectionality remains unevenly integrated into policy design, budgeting and implementation, while major areas of state practice receive insufficient scrutiny.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Proxy-based or limited disaggregation**

Germany does not collect disaggregated data on race, ethnicity or religion. Official statistics rely on proxies such as migration background, citizenship and country of birth, which miss racialised German citizens and do not capture intersectional experiences of discrimination. Some monitoring exists, including the NaDiRa monitor, but the absence of a systematic equality data framework limits evidence-based policymaking and makes it hard to assess whether policy changes outcomes.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment**

Germany has established civil society funding and consultation structures, and racialised-led organisations contribute to advocacy, research and monitoring. However, these mechanisms do not consistently provide affected communities with meaningful influence over policy design or implementation. Project-based funding and limited decision-making authority constrain their ability to hold institutions accountable. The wider environment also constrains them: counter-extremism instruments and restrictions on protest and association have been applied to Muslim, Palestinian and migrant-led groups. This is a state-side finding about the conditions provided, not a judgement on civil society's own capacity.

1
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

Headline funding figures conceal a fragile, project-based model now eroding further as integration courses, development aid, and the *Demokratiefördergesetz*[76] itself have been cut or abandoned, while security and military budgets expand.

**[76]** Andrea Pürckhauer, "What Happens Next with Integration Courses?" *Mediendienst Integration*, February 4, 2025, https://mediendienst-integration.de/news/wie-geht-es-mit-den-integrationskursen-weiter/; ; Marcel Fürstenau, "Germany Slashes Aid and Development Budget," *Deutsche Welle*, September 21, 2025, https://amp.dw.com/en/germany-slashes-aid-development-budget/a-74066633.

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

Germany has an established civil society ecosystem that mobilises around racism, discrimination and minority rights. However, the national report provides limited evidence of a sustained, coordinated coalition with formal influence over NAPAR implementation and monitoring. The extent to which racialised-led organisations can shape shared priorities and exercise influence over decision-making therefore remains insufficiently established.

0
/4

INDICATOR 7

### Narrative change, media and education

**Hostile narrative environment**

Public vocabulary is starting to shift on paper, yet dominant narratives on migration, security and national belonging have moved sharply rightward, with senior government figures contributing to the racialisation of urban space and migrant presence, and with Muslims and migrants routinely targeted in public and media discourse. Far-right and neo-Nazi actors, including the AfD and openly neo-Nazi groups, have normalised racist and antisemitic rhetoric, and antisemitic hatred has risen alongside anti-Muslim and anti-migrant hostility. Education and memory work remain strong on the Holocaust but are not consistently linked to colonial history, anti-Black racism or Islamophobia.

## EXISTING EFFORTS

### 1 A structural definition of racism, anchored in independent institutions with significant caveats

The Federal Anti-Racism Commissioner's working definition[77] of racism as a 'structural, historically grown power relation,' together with the 2022 elevation of the Federal Anti-Discrimination Commissioner[78] to an independent office elected by the Bundestag, provides a conceptual and institutional baseline that several EU Member States still lack. The framing opens space, in principle, to name racism as a property of institutions rather than of individual attitudes. Its translation into binding practice remains thin, and the same federal government that hosts these institutions has simultaneously advanced policies on citizenship, deportation, and protest that the definition's own logic would identify as structurally racist.

### 2 Community-led knowledge production as counter-archive

Afrozensus (Each One Teach One) and the NaDiRa Monitor (DeZIM) have built one of Europe's stronger infrastructures for documenting racialised experience on terms partly defined by affected communities themselves. In a context where the state continues to refuse disaggregated data and to fold racial inequality

**[77]** Federal Government Commissioner for Migration, Refugees and Integration and Federal Government Commissioner for Anti-Racism, *Working Definition of Racism by the Expert Council on Anti-Racism* (Berlin: Federal Government of Germany, 2025), https://www.integrationsbeauftragte.de/antirassismus/arbeitsdefinition-rassismus.

**[78]** German Bundestag, "Ferda Ataman Elected Federal Commissioner for Anti-Discrimination," July 7, 2022, https://www.bundestag.de/dokumente/textarchiv/2022/kw27-de-wahl-bundesbeauftragte-antidiskrimierung-900522; Federal Republic of Germany, *General Act on Equal Treatment* (AGG), 26–26a, https://www.gesetze-im-internet.de/englisch_agg/englisch_agg.html. .

into the category of 'migration background'. This work functions as a counter-archive, producing the evidence base those official statistics are structured not to see, and asserting epistemic authority for Black, Muslim, Roma, and migrantised communities over the conditions of their own lives.

# WARNING SIGNS

## 1 The state's adoption of far-right demographic logics

The AfD's framing of *Remigration*[79] as the project focused on the removal of migrants and racialised citizens as a demographic project, has moved from the far-right margin into the operating logic of government. Chancellor Merz's October 2025 description of migrants as a visible 'problem in the cityscape[80]', the 2025 rollback of fast-track naturalisation[81], the expansion of deportation infrastructure[82], and proposals for indefinite detention[83] together signal a state actively reproducing the racial boundary between those who belong to the nation and those marked for removal. This is a racialised distinction between citizen and the disposable other, reactivated in contemporary form. An anti-racism plan that does not name the relation between racialisation and contemporary migration governance, citizenship, and deportation as core sites of racialised state violence accepts the racial order it claims to dismantle, and functions as institutional cover for its continuation.

## 2 The racialised policing of dissent and the shrinking of civic space

Sweeping bans on Palestine solidarity assembly in German cities, the detention of protesters including minors and the elderly, the pre-emptive closure of Palestine Congress[84], and the use of immigration powers to bar speakers which was partially ruled unlawful by the Berlin Administrative Court in 2025[85] and condemned by Amnesty International[86] as well as UN expert[87]s, have fallen most heavily on Palestinian, Arab, Muslim, and Jewish anti-zionist communities. Alongside the collapse of the *Demokratiefördergesetz,* the revocation of anti-discrimination clauses in Berlin arts funding, and the operational deployment of categories such as *Clankriminalität* and "political Islam," show how counter-extremism and memory-political frameworks racialise certain communities as threats while placing the violence they experience outside the scope of recognisable racism. Civic space for racialised dissent is contracting, the NAPAR's silence on this terrain is itself a political position.

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**[79]** Alternative für Deutschland, "Remigration," AfD, accessed October 17, 2026, https://www.afd.de/remigration/. The party defines remigration as "all measures and incentives for a lawful, rule-of-law-compliant return of foreigners obliged to leave the country to their homeland"

**[80]** Belinda Grasnick, "Was hinter Merz' Satz zum 'Stadtbild' steckt" ["What Lies Behind Merz's 'Cityscape' Remark"], *tagesschau*, October 17, 2025, https://www.tagesschau.de/inland/innenpolitik/merz-stadtbild-migration-100.html.

**[81]** Deutscher Bundestag [German Bundestag], "Gesetz zur Änderung des Staatsangehörigkeitsgesetzes sowie weiterer Vorschriften" ["Act Amending the Nationality Act and Other Provisions"], legislative record, enacted October 27, 2025, effective October 30, 2025, https://dip.bundestag.de/vorgang/gesetz-zur-%C3%A4nderung-des-staatsangeh%C3%B6rigkeitsgesetzes-sowie-zur-%C3%A4nderung-weiterer-vorschriften/322125.

**[82]** Marcel Fürstenau, "How Germany Aims to Increase Deportations," *Deutsche Welle*, November 4, 2025 https://amp.dw.com/en/germany-migration-syria-deportations-repatriation/a-74610937.

**[83]** Deutscher Bundestag [German Bundestag], "Gesetzesregelungen zur Erhöhung der Zahl von Rückführungen" ["Legislative Measures to Increase Returns"], *Heute im Bundestag*, December 3, 2025, Gesetzesregelungen zur Erhöhung der Zahl von Rückführungen - Deutscher Bundestag.

**[84]** Reuters, "Police Shut Down Pro-Palestinian Gathering in Germany over Hate Speech Fears," April 12, 2024, https://www.reuters.com/world/europe/police-shut-down-pro-palestinian-gathering-germany-over-hate-speech-fears-2024-04-12/.

**[85]** Berlin Administrative Court, "Palestine Congress 2024: Dissolution and Ban Unlawful."

**[86]** Amnesty International, *Under Protected and Over Restricted: The State of the Right to Protest in 21 European Countries* (London: Amnesty International, 2024), 97, amnesty.org/en/wp-content/uploads/2024/07/EUR0181992024ENGLISH.pdf.

**[87]** Office of the United Nations High Commissioner for Human Rights, "UN Experts Urge Germany to Halt Criminalisation and Police Violence against Palestinian Solidarity Activism," October 16, 2025, https://www.ohchr.org/en/press-releases/2025/10/un-experts-urge-germany-halt-criminalisation-and-police-violence-against .

# GREECE



*Note: This assessment focuses on Greece's first National Action Plan against Racism and Intolerance (2020-2023), as the second NAPAR (2026-2029) was launched during the research period and therefore falls outside the assessment's original scope. The second plan is acknowledged as a subsequent policy development but is not included in the scoring.*

Greece's 2020-2023 NAPAR was the country's first formal anti-racism framework and represented an institutional acknowledgement that racism is a state concern. In practice, however, the plan functioned primarily as an administrative consolidation of existing ministry initiatives rather than a transformative strategy to address structural racism holistically with a dedicated budget, measurable targets, or enforcement mechanisms. The plan's limits are most sharply exposed by what it excluded. Throughout the NAPAR implementation period, Greece's border regime produced systematic pushbacks, deaths at sea, arbitrary detention, and documented violence against racialised migrant populations, most emblematically in the February 2023 Pylos shipwreck[88], in which over 600 people died. These practices were entirely outside the NAPAR's scope. Civic space shrunk simultaneously: NGO registration[89] rules introduced in 2020 burdened migrant-led organisations, human rights defenders faced criminalisation and smear campaigns, and 24 humanitarian activists, including Sarah Mardini and Sean Binder[90], were prosecuted on espionage and smuggling charges. Migrants themselves were also prosecuted: nine Egyptian survivors of the Pylos shipwreck faced charges including smuggling and causing a shipwreck before the case was dismissed in May 2024[91].

The anti-racism commitments enshrined in the first Greek NAPAR coexisted with the racialised governance of migration and the repression of those who challenged it.

**[88]** Amnesty International, *Greece: 6 Months On, No Justice for Pylos Shipwreck* (London: Amnesty International, December 19, 2023), Greece: 6 Months On, No Justice for Pylos Shipwreck - Amnesty International; European Ombudsman, "Decision on How the European Border and Coast Guard Agency (Frontex) Complies with Its Fundamental Rights Obligations with Regard to Search and Rescue in the Context of Its Maritime Surveillance Activities, in Particular the Adriana Shipwreck," decision OI/3/2023/MHZ, February 26, 2024, https://www.ombudsman.europa.eu/en/decision/en/182665.

**[89]** Amnesty International, *Greece: Regulation of NGOs Working on Migration and Asylum Threatens Civic Space* (London: Amnesty International, July 31, 2020), Greece: Regulation of NGOs working on migration and asylum threatens civic space - Amnesty International.

**[90]** Human Rights Watch and Amnesty International, "Greece: Respect Fair Trial Rights of Pylos Shipwreck Survivors," May 17, 2024, https://www.hrw.org/news/2024/05/17/greece-respect-fair-trial-rights-pylos-shipwreck-survivors.

**[91]** Human Rights Watch and Amnesty International, *"Greece: Respect Fair Trial Rights."*

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

Greece adopted a NAPAR for 2020-2023, coordinated through the National Council Against Racism and Intolerance (NCRI), established under Law 4359/2015. However the statutory basis of the coordinating body did not make the NAPAR itself a binding instrument. Adopted primarily through executive and administrative processes, the plan lacked parliamentary scrutiny, enforceable obligations on ministries, a central budget, measurable targets and an independent monitoring and evaluation framework. Implementation relied on fragmented ministerial action and voluntary reporting, while the NCRI lacked the authority to compel compliance.

1
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition on paper**

The NAPAR defines racism in terms of both prejudice and power relations, providing an important conceptual point. However, this recognition is not developed into a systematic analysis of institutional or state racism. Intersectionality is not established as a guiding analytical or policy approach; the reference to 'multiple discrimination' remained largely confined to overlapping protected grounds in a legal sense. Although the plan covers areas such as education, employment, housing and health, it does not adequately address structural racism in policing, racial profiling, migration governance, border enforcement or the exclusion of Roma communities. It also lacks a meaningful historical analysis of racism.

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

Greece lacks a comprehensive system of equality data disaggregated by race or ethnicity, and the NAPAR does not establish a clear roadmap, institutional responsibilities, timelines or indicators for developing one. Existing sources, including racist-violence records compiled by the Racist Violence Recording Network and data from public institutions, provided useful evidence but remain fragmented and do not capture intersectional discrimination across different sectors.

2
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

The NCRI provided a formal channel for consultation between public authorities, independent bodies and civil society, but its advisory role, limited transparency and lack of enforcement powers constrained its influence. Smaller grassroots, migrant-led and Roma organisations faced barriers to meaningful participation and were often represented indirectly. Restrictive NGO registration requirements and legal proceedings involving humanitarian actors further raised concerns about the space for independent advocacy and monitoring.

1
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

Although some actions had identified costs and funding sources, including ministry budgets and EU funding, the NAPAR had no clearly consolidated, dedicated overall budget. The lack of a comprehensive resource overview made it difficult to assess whether funding was sufficient for the plan's scope or sustained throughout implementation.

1
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Fragmented or individual engagement**

Established networks such as the Racist Violence Recording Network (RVRN) have contributed meaningfully to training, data, and advocacy. However, the evidence points to limited coordination among racialised-led organisations and insufficient evidence of sustained, independent monitoring of the NAPAR, such as shadow reporting. Civil society engagement appears to have relied largely on established organisations and issue-specific activities, rather than broad, coordinated mobilisation around the plan. This score reflects the documented limits of NAPAR-specific engagement, not a lack of broader civil society activity or a judgement on CSOs' effectiveness.

1
/4

INDICATOR 7

### Narrative change, media and education

**Reactive or depoliticised activity**

The NAPAR included awareness-raising, police and prosecutor training, and a multilingual victim guide. However, it lacked a sustained communications strategy, measurable targets and a coordinated approach to challenging racist stereotypes and structural inequalities in public discourse. Evidence of comprehensive curriculum transformation or action on racist media framing is also limited.

# WARNING SIGNS

## 1 Institutional depoliticisation

The 2024 move of the National Council Against Racism and Intolerance (NCRI) to the Ministry of Social Cohesion and Family reframes racism as a cohesion and integration problem. Within this logic, responsibility shifts onto racialised communities to adapt, while the state structures producing racial inequality remain unchallenged.

## 2 Criminalisation of solidarity and shrinking civic space

The prosecution of humanitarian activists, burdensome NGO registration rules, and documented harassment of humanitarian rights defenders have progressively narrowed the space for independent monitoring and racialised dissent, precisely the conditions under which NAPAR accountability depends.

# EXISTING EFFORTS

## 1 Racist Violence Recording Network (RVRN)

This joint initiative of the Greek National Commission for Human Rights (GNCHR), UNHCR, and 55 NGOs has produced some of the only systematic evidence on racist violence in Greece. Its inclusion in the National Council against Racism and Intolerance (NCRI) with a weighted vote represents a partial opening toward affected-community knowledge. Like Afrozensus in Germany, it functions partly as a counter-archive in the absence of state data.

## 2 ECOSYSTEM Initiative

The ECOSYSTEM initiative [92]represents an attempt to shift the logic of anti-racism policy design in Greece from isolated interventions toward a more coordinated, system-level approach. Developed to inform the recently launched NAPAR 2026-2029, it brings together civil society organisations, state bodies, and research institutions to map needs, gaps, and priorities across the field. Its consultative methodology which draws on interviews and surveys with key stakeholders, is more participatory than previous cycles have typically been. However, its designation as a good practice warrants caution. It remains a planning and consultation process, not an implemented programme, and there is yet no evidence of outcomes. The risk is that it reproduces a familiar pattern in Greek anti-racism policy: a structured consultation resulting in tokenisation and lack of translation of input in structural change. Its value will ultimately be determined by whether the implementation of the newly launched NAPAR reflects its findings.

**[92]** Greek National Commission for Human Rights (GNCHR), "Ecosystem: Anti-discrimination Initiative of the Ministry of Social Cohesion and Family, GNCHR and KMOP," November 18, 2024, https://www.nchr.gr/.

# IRELAND



Ireland's NAPAR is among the more credibly designed plans in the European landscape due to its promising acknowledgment of structural racism, colonial legacies and intersectionality which are explicitly mentioned in comparison to other European plans which remain vague. Ireland has also appointment an independent and racialised Special Rapporteur with parliamentary reporting obligations. However, design quality and delivery are not equitable since the gap between them is widening. Ireland has seen anti-migrant violence escalate sharply in 2023 and 2024, as hate-speech provisions were removed from the Criminal Justice (Hate Offences) Bill in 2024 following political opposition[93] and criticism from lawmakers and public figures, and where the government's own public awareness campaign, which was due in 2023, has yet to be launched. Meanwhile, the plan's intersectional commitments remain largely aspirational: Traveller and Roma communities, who face some of the most severe and historically entrenched racism in Ireland, are inadequately resourced through the Ireland Against Racism Fund and underrepresented in implementation structures. The plan names intersectionality; it has not operationalised it. Ireland can be seen as a cautionary example of how rhetorical sophistication can coexist with structural inaction.

## Indicator scores

3
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place with partial delivery and incomplete accountability**

The plan was adopted at government level with broad cross-departmental scope and an independent development process, but its absence of parliamentary adoption and lack of statutory embedding leaves it vulnerable to political discontinuity, as the 2025 transfer of responsibility to the Department of Justice already demonstrates.

3
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition applied, with gaps**

The NAPAR explicitly names structural racism and colonial roots and mandates gender-disaggregated monitoring, but intersectional commitment for multiply marginalised groups remains underdeveloped in practice, with no reparatory justice framework and limited specific measures beyond general mainstreaming language.

**[93]** Marie O'Halloran, "Controversial Hate Speech Provisions Removed from Criminal Justice Legislation as Bill Passed in Seanad," The Irish Times, October 16, 2024, https://www.irishtimes.com/politics/oireachtas/2024/10/16/controversial-hate-speech-provisions-removed-from-criminal-justice-legislation-as-bill-passed-in-seanad/.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Proxy-based or limited disaggregation**

A National Equality Data Strategy exists and pilots are underway, but implementation remains partial and uneven, with key institutions including An Garda Síochána and the Courts Service actively refusing to collect data disaggregated by race or ethnicity, creating a structural blind spot in the sectors where racialised communities are most exposed to harm.

2
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Partial enabling environment**

The Special Rapporteur and Advisory Committee provide formally structured and independent oversight with defined terms of reference and Oireachtas reporting obligations, but the structures were only established in mid-2024, carry no legislative protection, and have yet to demonstrate tangible influence over policy decisions.

2
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

The Ireland Against Racism Fund has disbursed 2.4 million euros across 57 projects, providing a visible if modest funding stream, but no comprehensive implementation budget has been published; staffing levels are undisclosed, and project-based funding cycles make sustainability contingent on political will rather than institutional commitment.

3
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Organised and active, with partial reach**

CINAPAR operated as an independent coalition with a Shadow NAPAR providing structured critical accountability, but limited core funding constraints its reach, and not all racialised communities are adequately represented within its structures.

2
/4

INDICATOR 7

### Narrative change, media and education

**Structured awareness without narrative transformation**

The NAPAR acknowledges racism embedded in curricula and commits to media training pathways for minority ethnic professionals but neither is operationalised with dedicated resourcing or measurable targets. The awareness campaign missed its 2023 deadline. There is no commitment to decolonising curricula, no media monitoring mechanism, and no action requiring institutions to challenge dominant racial narratives.

# EXISTING EFFORTS

## 1 Special rapporteur on Racial Equality (Dr Ebun Joseph)

The appointment of an independent Special Rapporteur[94] with a four-year term and a mandate to report to an Oireachtas committee[95] is a structurally significant step. It creates a degree of institutional continuity beyond electoral cycles and gives civil society a named accountability mechanism. Whether the role translates into genuine policy influences will depend on how seriously government responds to the annual reports produced.

## 2 CINAPAR and the Shadow NAPAR:

The coalition for the implementation of NAPAR (CINAPAR) operated independently from government, producing a parallel Shadow NAPAR that critically assesses state progress against civil society priorities. This is a more structured form of civil society engagement than exists in many comparable countries, and the Shadow NAPAR model provides a legitimate and documented counternarrative to official reporting. Its effectiveness is constrained by limited core funding, but the model itself is worth recognising.

# WARNING SIGNS

## 1 The NAPAR opens doors to acknowledge colonial roots of racism, oppression and domination but doesn't extensively address Ireland's own complex relationship with colonial systems or the transatlantic slave trade

Ireland's own complex relationship with colonial narrative as a formerly colonised nation has historically been mobilised to deflect scrutiny of Irish participation in British imperial structures, missionary projects as well as contemporary complicity in global racial hierarchies. Not naming this reality leads to the foreclosure of reparatory justice and the treatment of racism as an imported phenomenon via migration rather than constitutive of Irish state formation while it also risks erasing the experiences of Black Irish, African-descent, and migrant communities whose presence is rooted in the very colonial histories the plan abstracts away from.

## 2 The persistent absence of ethnic equality data renders racism statistically invisible and undermines the accountability of the NAPAR.

While the NAPAR acknowledges the lack of equality data collection disaggregated by race or ethnicity, it sets no binding timelines, lead authority, or disaggregation standard aligned with the EU High Level Group or the UN human-rights based guidelines. Without such data, structural racism cannot be measured, disparities cannot

**[94]** The Special Rapporteur on Racial Equality and Racism, Dr Ebun Joseph, was appointed for a four-year term beginning in July 2024. The role includes monitoring implementation of Ireland's National Action Plan Against Racism and submitting an annual report to the responsible minister, which is also sent to the relevant Oireachtas committee. The Oireachtas is Ireland's national parliament, comprising Dáil Éireann (the lower house) and Seanad Éireann (the upper house); its committees scrutinise government policy and can examine the Rapporteur's findings and question the government on implementation.

**[95]** Department of Children, Equality, Disability, Integration and Youth, "Minister Joe O'Brien Announces the Appointment of the Special Rapporteur for the National Action Plan Against Racism," July 2, 2024, Government of Ireland, https://www.gov.ie/en/department-of-children-disability-and-equality/press-releases/minister-joe-obrien-announces-the-appointment-of-the-special-rapporteur-for-the-national-action-plan-against-racism/.

be evidenced and public bodies cannot be held accountable, leaving affected communities at the intersection of identities to carry the evidentiary burden themselves.

# ITALY



Italy's second NAPAR was adopted in August 2025 - after a six-year gap during which the previous Plan expired without evaluation Its adoption followed repeated calls from the European Commission and international human rights bodies yet attracted limited public and political visibility. This apparent commitment to anti-racism sits uneasily alongside the Meloni government's broader policy direction, characterised by increasingly restrictive migration controls, the externalisation of asylum procedures through the Italy–Albania Protocol, and continued cooperation with Libyan authorities despite documented human rights concerns. These policies place racialised migrants and asylum seekers at the centre of an increasingly security-driven approach to migration, while leaving the structural dimensions of racism largely unaddressed by the NAPAR. At the same time, the 2025 Security Decree introduced new offences and tougher penalties affecting protest activities, raising concerns about freedom of peaceful assembly and the ability of civil society to challenge government policy. The persistent absence of an independent national human rights institution further weakens the domestic accountability framework. Against this backdrop, the NAPAR rests on a weak legal foundation, frames racism predominantly as individual prejudice to be addressed through awareness-raising, and gives insufficient attention to structural drivers such as border and migration governance, citizenship, political participation and environmental racism. Vague monitoring arrangements, undefined financing and the filtering of civil society input through inter-ministerial revision risk reducing the Plan to a formal exercise in compliance rather than an effective instrument for dismantling structural racism.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

The NAPAR was approved through an internal departmental act of the Department for Equal Opportunities rather than through legislation or formal government decision, leaving it without binding legal force or clear obligations on implementing authorities.

1
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Individualised or externalised recognition**

Italy's NAPAR makes only peripheral reference to structural racism. Its approach remains centred on individual prejudice, discriminatory attitudes and awareness-raising, with little substantive analysis of the institutional structures and power relations that reproduce racial inequality. Anti-racism is not meaningfully mainstreamed across government policy, particularly in migration and asylum governance.

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

Italy continues to lack systematic, disaggregated equality data, a gap repeatedly highlighted by CERD and ECRI; the NAPAR does not establish a robust mechanism to address this shortfall.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment**

UNAR, Italy's equality body, organised thematic consultation groups involving CSOs and representatives of racialised communities, but contributions were filtered through inter-ministerial revision, and participating organisations were not invited to review or validate the final text.

1
/4

INDICATOR 5

### Allocation of human and financial resources

**Symbolic or ad hoc resources**

The NAPAR does not attach dedicated budget lines to its measures, making implementation dependent on the discretionary use of existing ministerial resources.

1
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Fragmented or individual engagement**

Despite the engagement of anti-racist organisations, no structured coalition advocating for the NAPAR exists, and public authorities do not foster a structural networking or coordinated engagement among civil society.

1
/4

INDICATOR 7

### Narrative change, media and education

**Reactive or depoliticised activity**

The Plan includes awareness campaigns and some educational content, with limited CSO involvement, but lacks a systemic approach to media accountability, does not meaningfully reframe colonial history and its legacies, and leaves racialised voices underrepresented in media production and public discourse. Activities remain limited in scale and frequency.

## EXISTING EFFORTS

### 1 Local and regional anti-discrimination strategies

Several cities, including Modena, Torino and Bologna, have adopted local plans against racism providing clear dedicated budgets, accountability through elected bodies and offering an instructive model that has inspired a national framework against racism. Many of these instruments predate the NAPAR itself, demonstrating that subnational authorities have historically been more proactive than the central government in formalising anti-discrimination commitments. The long-standing cooperation with CSOs and networks of racialised communities has also produced more participatory governance arrangements, which the NAPAR could draw on to overcome its top-down design.

### 2 Italian Network Against Hate Speech and CSO coalitions:

A broad coalition of CSOs including Lunaria, ASGI (Association for Juridical Studies on Immigration), Amnesty International Italy and Carta di Roma, has developed sustained monitoring of racist incidents, hate speech and media representation, producing annual reports (e.g. Lunaria's "Cronache di ordinario razzismo"[96]) that fill critical gaps left by official statistics and provide an evidence base for advocacy.

## WARNING SIGNS

### 1 Shrinking civic space:

the CIVICUS Monitor downgraded Italy from "narrowed" to "obstructed" in December 2025[97], and the 2026 Liberties Rule of Law Report classifies Italy among the "Dismantlers"[98], reflecting a deteriorating environment for human rights defenders and racial justice advocates. Concerns include restrictions on the right to peaceful assembly, notably through the 2025 Security Decree[99], which introduces new criminal offences targeting protest activities and expands police powers; alongside documented cases of surveillance of journalists, activists

[96] Lunaria, ed., Cronache di ordinario razzismo[Chronicles of Ordinary Racism] (Rome: Lunaria, 2024), https://www.cronachediordinariorazzismo.org/wp-content/uploads/Fourth-white-book-on-racism-in-Italy.pdf.

[97] CIVICUS Monitor, "Italy," accessed July 18, 2026, https://monitor.civicus.org/country/italy/

[98] Civil Liberties Union for Europe (Liberties), Liberties Rule of Law Report 2026 (Berlin: Civil Liberties Union for Europe, 2026), Italy chapter, https://www.liberties.eu/f/k1z8tk.

[99] Amnesty International, "Italy: Draconian New Law Criminalizing Peaceful Protest While Expanding Police Powers Must Be Rejected," May 31, 2025, https://www.amnesty.org/en/latest/news/2025/05/italy-draconian-new-law-criminalizing-peaceful-protest-while-expanding-police-powers-must-be-rejected/ .

and CSO representatives working on migration and minority rights (as exposed by the Paragon spyware case[100]).

## 2 Asymmetry in memory politics and structural blind spots

The continued absence of any public, institutional recognition of Italy's colonial past and continuities together with the NAPAR's omission of central issues such as migration governance, access to citizenship, Mediterranean border violence (i.e. Albania Protocol[101] and Memorandum with Libya[102]) and environmental racism, signals a persistent reluctance to address racism as a structural, historically rooted and intersectional phenomenon. This selective framing risks reducing anti-racism to a matter of individual prejudice or isolated incidents, rather than confronting the institutional arrangements, narratives and inequalities that reproduce racial discrimination over time.

**[100]** Amnesty International Security Lab, "Italy: New Case of Journalist Targeted with Graphite Spyware Confirms Widespread Use of Unlawful Surveillance," June 13, 2025, https://securitylab.amnesty.org/latest/2025/06/italy-new-case-of-journalist-targeted-with-graphite-spyware-confirms-widespread-use-of-unlawful-surveillance/

**[101]** Government of the Italian Republic and Council of Ministers of the Republic of Albania, Protocol for Strengthening Cooperation in the Field of Migration, signed November 6, 2023, https://www.esteri.it/en/sala_stampa/archivionotizie/comunicati/2023/11/protocollo-tra-il-governo-della-repubblica-italiana-e-il-consiglio-dei-ministri-della-repubblica-di-albania-per-il-rafforzamento-della-collaborazione-in-materia-migratoria/;

**[102]** Sergio Carrera, Giuseppe Campesi, and Davide Colombi, *The 2023 Italy-Albania Protocol on Extraterritorial Migration Management: A Worst Practice in Migration and Asylum Policies* (Brussels: Centre for European Policy Studies, December 7, 2023), https://www.ceps.eu/ceps-publications/the-2023-italy-albania-protocol-on-extraterritorial-migration-management/

# PORTUGAL



Portugal's National Plan to Combat Racism and Discrimination (PNCRD) 2021-2023 marked an important shift in official policy by explicitly recognising racism as structural and linking contemporary discrimination to the country's colonial and slavery legacies. But that recognition has not been consistently translated into government practice: the Plan is non-binding, lacks a dedicated budget and sustained participatory oversight, while implementation has stalled and policy developments, including tighter nationality rules and legislation restricting face covering in public spaces, raise concerns about coherence with its anti-racist and intersectional commitments. At the same time, the rise of Chega, a far-right anti-immigration party, has normalised racist discourse that now circulates well beyond the far right. Without legal anchoring, dedicated resources, or institutionalised participation, the plan's transformative potential has been subordinated to political convenience.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

The PNCRD is a standalone, publicly adopted plan with formal coordination structures and civil-society input. Adopted by Council of Ministers resolution without binding obligations or parliamentary approval, it remains vulnerable to political deprioritisation. It's non-binding status, lacks of dedicated funding and weak accountability leave delivery dependent on political will; limited progress and the absence of independent evaluation undermine its credibility.

2
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition on paper**

The Plan's recognition of structural racism and colonial legacies is significant but remains more developed in its framing than in its institutional measures. Intersectionality is not consistently operationalised, and the report documents major tensions between the Plan's commitments and policy or political discourse on policing, migration and Muslim women.

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

No systematic disaggregated equality data; monitoring relies on fragmented information preventing meaningful progress assessment. The 2023 Survey on the Living Conditions, Origins and Trajectories of the Resident Population (ICOT) is a meaningful advance, but it is a one-off statistical operation rather than a regular, cross-sectoral equality-data system. The continuing data gaps make it difficult to establish baselines, set measurable targets or assess the Plan's impact.

2
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment**

Racialised-led organisations had an important role in drafting the Plan, but that participation was not sustained in implementation or monitoring. With no permanent, resourced mechanisms for community oversight, and a worsening climate for anti-racist advocacy, the initial consultation has not translated into continuing influence.

1
/4

INDICATOR 5

### Allocation of human and financial resources

**Symbolic or ad hoc resources**

The PNCRD has no dedicated budget, and implementation relies on existing agency budgets or possible EU funding, with no transparent account of resources spent. The report provides little evidence of dedicated staffing or stable support for monitoring and community participation, leaving implementation financially fragile.

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

Anti-racist organisations contributed to the PNCRD's development, and groups such as SOS Racismo, Djass and Consciência Negra have taken part in wider joint mobilisation. However, this does not demonstrate sustained, PNCRD-focused coordination. Grassroots groups' role in monitoring implementation remains informal and constrained by unstable resources and a hostile advocacy climate.

2
/4

INDICATOR 7

**Narrative change, media and education**

**Reactive or depoliticised activity**

The report describes the persistence of colonial narratives and the growing visibility of securitarian, anti-migrant and anti-Muslim discourse in politics and media. Civil-society and academic counternarratives exist, but the evidence does not show a sustained state strategy to reshape education, media representation or dominant public narratives.

# EXISTING EFFORTS

## 1 Formal recognition of structural racism and colonial legacies

The PNCRD explicitly acknowledges racism as a structural phenomenon linked to Portugal's colonial and slave-trading past which is a significant normative shift in a context long characterised by lusotropicalist[103] denial, a colonial narrative which portrays Portuguese colonialism as comparatively tolerant and racially harmonious, obscuring its violence and enduring racial inequalities. This creates a formal reference point that can be mobilised by civil society and provides discursive ground for challenging celebratory colonial narratives, even where implementation remains weak.

## 2 Broad civil society consultation during drafting phase

The PNCRD drafting process involved consultation with a relatively wide range of civil society organisations representing racialised communities, contributing to the Plan's progressive framing. While participation has not been institutionalised beyond this phase, the consultation established precedent and relationships that grassroots movements, academics, and critical voices continue to leverage in pushing structural racism into public debate.

# WARNING SIGNS

## 1 Policy incoherence undermining anti-racism commitments

The PNCRD's recognition of structural racism coexists with restrictive, securitarian, and racialised policies, including changes to nationality and migration legislation prioritising control over inclusion, and proposals targeting visibly religious symbols, affecting Muslim women. When anti-racism commitments coexist with policies framing racialised groups as risks or problems, the Plan's authority is fundamentally undermined, sending contradictory signals to institutions and society.

**[103]** Cristiana Bastos and Cláudia Castelo, "Lusotropicalismo," *Oxford Research Encyclopedia of African History,* August 21, 2024, https://doi.org/10.1093/acrefore/9780190277734.013.1486.

## 2 Normalisation of racist discourse across the political spectrum

The rise of Chega has intensified racist narratives targeting South Asian migrants, Roma, and Black Portuguese communities, alongside Islamophobic rhetoric that particularly affects South Asian Muslim communities. Critically, these dynamics are not confined to the far right, actors within mainstream parties, and particularly the right wing, have contributed to normalising securitarian framings, while media platforms reproduce these frames without scrutiny. Even actors on the left wing adopt cautious or ambiguous stances, prioritising political containment over clear confrontation of racism.

# SLOVENIA



Slovenia presents a paradox familiar across Central and Eastern Europe: a constitutional and legislative architecture formally committed to equality sitting atop of institutional practices that systematically produce racialised exclusion. Roma communities are recognised as a national minority yet continue being in segregated settlements lacking basic infrastructure, with children routinely streamed into separate or lower-quality education. Irregularised migrants, asylum seekers and undocumented people face systematic pushbacks, violence and detention at Slovenia's southern border which is widely reported on by international bodies and human rights organisations[104]. The 1992 erasure case[105], in which 25,671 long-term residents (Croats, Muslim Bosniaks, and Serbs) were deleted from population registers overnight, losing access to employment, healthcare, and housing through an administrative procedure, remains the clearest illustration of how racism operates in Slovenia: embedded in bureaucratic logic, rarely named as such and rarely repaired. Three decades later, the same pattern persists: no National Action Plan Against Racism, no coordinating authority, no ring-fenced resources, and no mechanism through which racialised communities can shape the policies governing their lives.

## Indicator scores

1
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Minimal, fragmented or indirect commitment**

Slovenia has no NAPAR; anti-racism is addressed through uncoordinated group-specific strategies (Roma Programme 2021-2030, Antisemitism Strategy to 2033, migration and integration strategies) with no general framework, central coordination or common accountability. The Advocate of the Principle of Equality's 2022 recommendation for an action plan and focal point, and the Strategic Council's 57 hate speech recommendations (2023), remain unimplemented.

**[104]** Amnesty International, *Pushed to the Edge: Violence and Abuse against Refugees and Migrants along the Balkan Route* (London: Amnesty International, March 13, 2019), Pushed to the edge: Violence and abuse against refugees and migrants along Balkan Route - Amnesty International; European Council on Refugees and Exiles (ECRE), *"Access to the Territory and Push Backs: Slovenia,"* Asylum Information Database, updated July 30, 2026, https://asylumineurope.org/reports/country/slovenia/asylum-procedure/access-procedure-and-registration/access-territory-and-push-backs/.

**[105]** European Court of Human Rights, *Kurić and Others v. Slovenia*, App. No. 26828/06, judgment (Grand Chamber), June 26, 2012, https://hudoc.echr.coe.int/eng?i=001-111634&utm_; Amnesty International, Slovenia: Amnesty International's Position on Resolving the Issue of the Erased (London: Amnesty International, 2013), Slovenia: Amnesty International's position on resolving the issue of erased

0
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Denial or hostility**

Racism is framed as individual prejudice, hate speech or extremism, with no official recognition of structural, institutional or historical racism, and intersectionality is limited to the legal prohibition of multiple discrimination. The 1992 erasure of 25,671 people, a conditional EUR 50 monthly compensation scheme, and the differential treatment of Ukrainian versus Syrian and Afghan refugees show racialised outcomes left unaddressed.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

Data relies on proxies (nationality, citizenship, country of birth, Roma group membership) and on Ombudsman and Advocate case reporting. The 2023 Personal Data Protection Act permits ethnicity data in principle but has not been operationalised, and FRA and ECRI both flag the absence of systematic disaggregated data, so data is descriptive and not used to set targets.

0
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Restrictive or hostile environment**

Irregular consultation with civil society organisations exists but it is not periodic, it is invitation-dependent and agenda-controlled by the state, with no permanent anti-racism body. Migrant, African descent and Muslim communities have not comparable channel.

0
/4

INDICATOR 5

### Allocation of human and financial resources

**No resources or active withdrawal of resources**

There is no earmarked budget or dedicated staff for anti-racism, which is no one's primary job. The Advocate (25 staff, all grounds) and project-based EU funding provide a thin base that makes sustained strategic action structurally unviable.

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

Civil society engages actively on racism, migration and minority rights through informal networks, joint initiatives and ENAR shadow reporting, but is loosely organised, project-dependent and has no formal coalition advocating for a NAPAR. This reflects funding precarity and not a lack of capacity.

1
/4

INDICATOR 7

**Narrative change, media and education**

**Reactive or depoliticised activity**

Initiatives (e.g. the 2025 City for Everyone conference) are isolated and civil society-led, with no state-resourced strategy or campaigns. Migration discourse is securitised, racism is externalised as imported, and racialised communities remain underrepresented in shaping public discourse.

# EXISTING EFFORTS

## 1 Formal legal and institutional infrastructure: necessary but insufficient

Slovenia has constitutional equality guarantees, a Protection Against Discrimination Act (PADA), a 2023 Criminal Code amendment recognising motivation as an aggravating circumstance, and specialised bodies including the Advocate of the Principle of Equality as well as the Human Rights Ombudsman. The Ombudsman, Slovenia's nationally accredited human rights institutions, has also formally recommended adopting an anti-racism plan. However, the anti-discrimination architecture remains fragmented and anchored in an individualised, complaints-based model that frames racism as a deviation from legal norms rather than as a structural condition embedded in state institutions.

## 2 Symbolic recognition of the 'Erased' and an active civil society ecosystem

Presidential apologies (2022)[106] and the recognition of the 'Erased for their human rights struggle[107]', alongside a diverse civil society sector including migrant-led organisations, demonstrate that both institutional acknowledgement of state-perpetrated racism and organised advocacy exist. Yet these gains remain partial: the compensation scheme departed significantly from the Constitutional Court's remedy framework. The erasure is still not officially named as racism, and civil society engagement remains constrained by funding precarity and exclusion from co-decisional spaces.

# WARNING SIGNS

## 1 Migration and border policy as a site of racial stratification

The 2024 and 2025 migration strategies frame people on the move as populations to be managed, processed, contained and deported, not as rights-holders. The contrast between Slovenia's welcoming response to Ukrainian refugees in 2022 and its treatment of people from the Global Majority is indicative of this racialised approach to migration governance. A NAPAR that leaves border and asylum policy untouched would address racism on one side of the state while the other side continues to produce it.

**[106]** Council of Europe, Commissioner for Human Rights, "Slovenia State Apology to the 'Erased' Is a Welcome and Meaningful Step," February 25, 2022, https://www.coe.int/sr-RS/web/commissioner/-/slovenia-state-apology-to-the-erased-is-a-welcome-and-meaningful-step.

**[107]** G. K., "Pirc Musar priznanje za delo na področju človekovih pravic podelila izbrisanim" [Pirc Musar Awards the Erased Recognition for Their Work in the Field of Human Rights], RTV Slovenija, December 10, 2024, https://www.rtvslo.si/slovenija/pirc-musar-priznanje-za-delo-na-podrocju-clovekovih-pravic-podelila-izbrisanim/730138.

## 2 The political choice not to name racism as structural

Despite the European Commission's call on all Member States to adopt a NAPAR, Slovenia hasn't adopted one yet and it relies instead on scattered strategies that never name racism as structural. Racism is continuously reframed as individual or isolated incident. This arrangement shields state actors from scrutiny and sustains a national self-image of Slovenia as a country without a colonial past, and therefore without a racism problem of its own.

# SPAIN



Spain's Strategic Framework on Citizenship and Inclusion against Racism and Xenophobia 2023-2027[108] illustrates a promising example of a shift from episodic measures toward a more systematic response to racism, introducing intersectionality as a methodological pillar and broadening recognition of Islamophobia and Antigypsyism. Yet its transformative potential is constrained by the absence of parliamentary approval, the lack of binding targets and protected funding, weak independent monitoring, and the insufficient centring of racialised and minority-led organisations, all of which is unfolding within a political climate in which far-right discourse, restrictions on civic space, and unaddressed colonial legacies continue to shape the lived realities of racialised communities.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

Spain's 2023-2027 Strategic Framework was adopted by the Council of Ministers, with an inter-ministerial design and an OBERAXE indicator dashboard. Without parliamentary approval or statutory embedding, it remains vulnerable to political discontinuity. More critically, it has no measurable targets tied to deadlines, no dedicated multi-year budget, and no confirmed evidence that its monitoring committee is functioning. Design is more advanced than delivery, so the plan sits below a "partial delivery" standard.

2
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Structural recognition on paper**

The framework recognises racism as structural and adopts intersectionality as one of four methodological pillars, but this recognition is not applied. It sets no binding mandates, indicators or inter-ministerial responsibilities, and it does not address the state's own institutions in policing, immigration enforcement or identity checks, which ECRI's sixth report documents as systemic. Intersectionality is not embedded in migration, housing, policing or labour policy. Colonial legacies, and the history of enslavement and of the genocide of Roma, remain largely absent from education and public memory.

**[108]** Ministry of Inclusion, Social Security and Migration, *Strategic Framework for Citizenship and Inclusion, against Racism and Xenophobia (2023–2027)* (Madrid: Government of Spain, 2023), https://www.inclusion.gob.es/documents/6602794/6870003/Strategic%2Bframework%2Bfor%2Bcitizenship%2Band%2Binclusion%2C%2Bagainst%2Bracism%2Band%2Bxenophobia%2B%282023-2027%29.pdf/6088296c-17f1-1226-5fa8-ba3b61152995.

2
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Proxy-based or limited disaggregation**

The OBERAXE and OPI indicator panel (six policy areas, 45 objectives) allows partial disaggregation by sex, age and nationality, but cross-tabulation is not always available. Official data relies on nationality or place of birth, which obscures racialised patterns affecting Black Spanish citizens and Roma. Intersectional discrimination cannot be measured systematically. Survey-based diagnostics have expanded (e.g. *The Impact of Racism in Spain* 2024–2025)[109], but harmonised administrative equality data is still missing and CSO records reveal significant under-reporting.

2
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Partial enabling environment**

The framework provides for civil society participation, and around 70 CSOs were consulted. It could not be established that the Monitoring and Evaluation Committee is constituted, meets regularly or includes civil society. Racialised-led and grassroots groups are under-represented compared with large professionalised NGOs. CSO input is not consistently reflected in decisions, and documentation is not systematically accessible. Participation is not supported by remuneration or accessibility measures.

2
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

Annex 3[110] publishes a budget and an activity list, meeting basic transparency expectations, but many actions remain unbudgeted and staffing levels and funding for CSO engagement, independent evaluation, awareness-raising and trainings are not specified. Coordination sits within a migration-focused structure, and CSOs warn that unprotected funding lines leave NAPAR exposed to political cycles.

**[109]** Consejo para la Eliminación de la Discriminación Racial o Étnica (CEDRE), *El impacto del racismo en España: Percepción de la discriminación por origen racial o étnico por parte de sus potenciales víctimas en 2024. Resumen ejecutivo* [The Impact of Racism in Spain: Perception of Discrimination on Grounds of Racial or Ethnic Origin by Potential Victims in 2024. Executive Summary] (Madrid: Ministerio de Igualdad, 2025), https://www.igualdad.gob.es/wp-content/uploads/2025/06/Resumen_ejecutivo_ImpactoRacismo_ESP_Accesible_2024.pdf.

**[110]** Ministerio de Inclusión, Seguridad Social y Migraciones. *Marco estratégico de ciudadanía e inclusión, contra el racismo y la xenofobia (2023–2027). Anexo 3: Actuaciones desarrolladas por la Administración General del Estado.* Madrid: Observatorio Español del Racismo y la Xenofobia, 2024. https://www.inclusion.gob.es/documents/3976301/4202317/OB02_Marco-Estrategico_Anexo_3.pdf/2343e49d-b72a-095e-9f7c-e83e1b4d0dac?t=1710169697657.

3
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

An independent coalition exists across racial justice, migrant rights, Roma, LGBTQ+ and social justice organisations. It holds periodic coordination meetings and provides a platform for joint advocacy. Public information is limited: few joint statements or monitoring outputs, no published governance rules or membership breakdown. It is therefore not possible to establish whether the coalition is racialised-led or whether smaller grassroots groups have a real voice, which in the report is an information gap and not a transparency failure. Smaller organisations face funding and capacity barriers.

2
/4

INDICATOR 7

### Narrative change, media and education

**Structured awareness without narrative transformation**

The state has launched Sistema FARO (March 2025, with LaLiga), a real-time hate speech monitor, and the 2024 "No mires hacia otro lado" campaign. Hate speech monitoring is not narrative change, and Annex 3 lists only small, one-year allocations (for example EUR 17,424 for audiovisual material), with no multi-year budget, evaluation or media accountability mechanism. There is little evidence that racialised-led groups designed the initiatives. Hate incidents are rising (856 racist or xenophobic incidents in 2023; anti-Roma incidents up about 68%), and ECRI documents stereotyped media portrayals of Roma and anti-Muslim and anti-migrant narratives.

## EXISTING EFFORTS

### 1 Sistema FARO and institutional monitoring of online hate speech

Launched in March 2025 by OBERAXE in partnership with LaLiga, Sistema FARO[111] provides real-time monitoring of racist, xenophobic, Islamophobic, antisemitic and anti-Roma content across major social media platforms, with quarterly public bulletins. It signals state recognition that media and online platforms are central battlegrounds against racism. Its impact, however, depends on whether monitoring translates into accountability for platforms and perpetrators, and on whether civil society, particularly racialised-led organisations, are resourced to engage with data produced.

### 2 Strengthened legal architecture against discrimination and Antigypsyism

Law 15/2022 on Equal Treatment and Non-Discrimination, together with Organic Law 6/2022 explicitly recognising Antigypsyism, has expanded the formal protection framework and marks important normative progress. Yet racism still lacks an explicit statutory definition, no independent body holds enforcement powers, and the evidentiary burden continues to fall on victims, meaning these advances remain vulnerable to political shifts and uneven in practice.

**[111]** Observatorio Español del Racismo y la Xenofobia. "El OBERAXE y LaLiga presentan la nueva metodología de monitorización del discurso de odio racista y xenófobo en tiempo real, Sistema FARO." *Ministerio de Inclusión, Seguridad Social y Migraciones,* March 11, 2025. https://www.inclusion.gob.es/web/oberaxe/w/el-oberaxe-y-laliga-presentan-la-nueva-metodologia-de-monitorizacion-del-discurso-de-odio-racista-y-xenofobo-en-tiempo-real-sistema-faro.

# WARNING SIGNS

## 1 Absence of parliamentary approval, binding targets, and protected funding undermines accountability

The NAPAR was adopted by government but not endorsed by parliament, weakening its democratic legitimacy and leaving its continuity exposed to political cycles which constitutes a particularly acute risk given the mainstreaming of far-right discourse. Without measurable targets, independent monitoring and ringfenced resources, the framework risks remaining a strategic vision without the structural foundations.

## 2 Shrinking of civic space erodes the conditions for meaningful participation and implementation

Between 2023 and 2025, racialised, migrant and Palestine-solidarity organisations have faced cumulative restrictions: fines and criminal charges under public order provisions, administrative friction around public events, surveillance, and digital harassment of racialised and feminist journalists. For migrants with precarious residency, sanctions can directly affect regularisation, making participation materially dangerous. This shrinking space directly undermines the NAPAR: when civil society cannot organise safely, consultation becomes performative, independent monitoring is weakened, and the racialised communities the plan is meant to serve are pushed further from the decision-making spaces that determine its implementation.

# SWEDEN



Sweden's Action Plan to Combat Racism and Hate Crime (adopted in December 2024)[112] sets out measures in four areas: schools, welfare and the public sector, and working life. It names five groups as particular priorities, which is a positive step in recognising specific forms of racism, however, it doesn't name structural and institutional racism nor how systems of oppression can interact producing racial inequalities. Its definition of racism focuses on prejudice and unequal access to rights and opportunities, rather than examining how institutions, laws and public policy produces racialised outcomes. Migration and policing, central arenas where state power shapes racialised people's lives, are outside of its policy areas.

That gap is especially consequential in the political context in which the plan was adopted: The national report describes the Tido Agreement[113] as shaping government policy and cites criticism from Civil Rights Defenders that it lacks a rights-based approach and includes measures that undermine human rights and the rule of law. The report also points to the repeal of state funding framework for civil-society organisations based on ethnic affiliation, proposals that could make citizenship revocable for some dual citizens, and the expansion of financial incentives for voluntary returns. Moreover, the plan names colonial history, but does not confront its continuity. It acknowledges Sweden's colonial violence against the Sámi and the colonial roots of anti-Black racism yet stops short of asking how those histories shaped, and continue to shape, the state's institutions, borders and definitions of belonging. Whiteness is not analysed as a structure of power; it appears only in reference to white-power extremism. The result is a fragmented account: colonial harms are recognised as past events affecting groups, while the racial order they helped build remains largely unnamed.

The plan assigns coordination and monitoring to the Living History Forum, but its commitments lack clear, measurable targets; resources are difficult to trace, and civil-society participation is not sufficiently transparent.

**[112]** Government Offices of Sweden, *Action Plan to Combat Racism and Hate Crime* (Stockholm: Government Offices of Sweden, 2024), https://www.government.se/contentassets/a18571ecb11b4934884a6612efeb2082/action-plan-to-combat-racism-and-hate-crime.pdf.

**[113]** Civil Rights Defenders, Analysis of the Tidö Agreement (October 2022), https://crd.org/wp-content/uploads/2022/12/Analysis-of-the-Tido-Agreement_Civil-Rights-Defenders_221024.pdf.

## Indicator scores

2
/4

INDICATOR 1

### Existence of a comprehensive, identifiable and legally anchored NAPAR

**Anti-racism plan in place, with significant gaps**

Sweden has a formally adopted, public plan signed by six ministers, with four defined action areas and a dedicated monitoring function at the Living History Forum, which goes beyond a general statement of intent. However, the plan lacks binding targets, any statutory or parliamentary anchoring, and its monitoring relies on government-led reporting rather than independent oversight. It therefore falls short of the standard for a score of 3, and its credibility is also weakened by its limited engagement with how wider migration and policing policies may relate to racism.

1
/4

INDICATOR 2

### Addressing structural racism, adopting an intersectional approach and mainstreaming anti-racism across key-policy areas

**Individualised or externalised recognition**

The plan names five forms of racism, but it frames racism mainly as long-standing societal prejudice. It uses "institutional racism" only once (regarding Antigypsyism), and it never mentions structural racism or racialisation. Migration, policing and colonial legacies are left out apart from a vague reference to slavery, and intersectionality appears only as a list of overlapping grounds with no targeted measures or disaggregated targets. Recognition is therefore present on paper but does not translate into measures that address the state's own institutions.

1
/4

INDICATOR 3

### Equality data collection and evidence-based policy making

**Fragmented or incident-based data**

Successive Swedish governments have maintained that data on ethno-racial categories should not be collected, and the plan restates the need to remain restrictive despite civil society concerns about the lack of equality data. The plan is not based on statistical evidence and sets no ambition to engage with disaggregated data. The Swedish/foreign-background distinction in official statistics is not a proxy for ethnicity and does not fill the gap.

1
/4

INDICATOR 4

### Enabling Environment for Racialised-led Civil Society

**Limited environment:**

The Living History Forum coordinates a network of about 100 public agencies and hosts a reference group for dialogue with civil society, so a participatory structure does exist. However, the group's composition is not published, meeting frequency and minutes are not specified, and decision-making stays largely with public authorities. The 2023 repeal of the funding scheme based on ethnic origin has also weakened organisations' capacity. The gap between how openly the agency network is run and how little is visible about the civil society dialogue keeps this at a partial enabling environment.

2
/4

INDICATOR 5

### Allocation of human and financial resources

**Limited and fragile resources**

The budget is public and sits within Expenditure area 13, with roughly 62 million SEK for 2025 and some earmarked posts for training and civil society funding. This is a considerable increase and is embedded in institutional budgets, which is normal in Sweden. However, the number of dedicated staff cannot be identified, and the budget is described as opaque and hard to trace. Resources go mainly to capacity-building and awareness-raising rather than accountability or transformative measures, and existing civil society funding is not coordinated under the plan

2
/4

INDICATOR 6

### Racialised-led Civil Society Mobilisation and Participation

**Loosely organised and intermittent**

Sweden has an established anti-racism civil-society sector, including SIOS, an umbrella organisation representing ethnic minority associations. The assessment also identifies coordination among independent civil-society organisations at local and national levels, while noting that the coalition's structure and transparency are limited. Civil-society organisations contributed to developing the government's 2024 Action Plan to Combat Racism and Hate Crime, and a reference group provides a channel for their participation in implementation and monitoring. However, the available evidence does not sufficiently establish the breadth and regularity of independent collective advocacy, the extent of coordination specifically around the plan, or the existence of independent civil-society monitoring. A government-supported initiative launched in September 2025 to improve collaboration with civil society further indicates that these participation structures were still being developed

1
/4

INDICATOR 7

### Narrative change, media and education

**Reactive or depoliticised activity**

The plan contains no real strategy on narratives about racism. Its relevant measures, a media and information literacy campaign and monitoring of racism and extremism online, deal with misinformation and harmful content in general. They do not challenge the underlying framings that portray racialised groups as problems or as outsiders. The plan also does not address the role of institutions, political discourse or the media in producing these narratives. Civil society has no defined role in shaping counternarratives, and the knowledge overview covers antisemitism but not the other main groups of racism. The plan leaves the dominant narratives unchanged, so its measures are best described as isolated awareness-raising actions, not narrative change.

## EXISTING EFFORTS

### 1 Targeted action programmes addressing specific forms of racism.

In 2022, Sweden introduced five action programmes addressing Afrophobia, Antigypsyism, Islamophobia and racism against the Sámi. These complemented the broader national plan by recognising that racism affects different communities in distinct ways and requires tailored approach. However, without a stronger framework for addressing structural and institutional racism and the intersecting systems of oppression that produce and perpetuate racial inequalities, such initiatives risk remaining fragmented. Their potential to generate systemic and lasting change therefore remains limited.

### 2 The Truth Commission for the Sami people.

Established following a request from the Sámi Parliament[114], the commission examines historical Swedish state policies towards the Sámi and their continuing consequences, with a mandate to propose measures supporting redress and reconciliation. Its work offers an important opportunity to recognise historical injustices and examine how past and present state policies contribute to structural inequalities. However, a truth commission cannot itself guarantee redress: its impact depends on whether the government and relevant institutions implement its recommendations, allocate sufficient resources and establish effective follow-up and accountability mechanisms.

## WARNING SIGNS

### 1 Wider government policy risks undermining anti-racism commitments.

Sweden's anti-racism commitments sit in tension with the restrictive migration and security agenda advanced through the Tidö Agreement, concluded in 2022 between the governing parties and the Sweden Democrats. Its measures include tighter family-reunification rules, a shift away from granting permanent residence permits, and proposals to deport foreign nationals on the basis of conduct deemed inappropriate. The

[114] United Nations Human Rights Council, Visit to Sweden: Report of the Special Rapporteur on the Promotion of Truth, Justice, Reparation and Guarantees of Non-Recurrence, A/HRC/55/xx (2024), https://documents.un.org/doc/undoc/gen/g24/117/08/pdf/g2411708.pdf

agreement has also underpinned the introduction of police security zones, where stop-and-search operations can take place without individualised suspicion. In its 2025 report, the European Commission against Racism and Intolerance (ECRI)[115] warned that these zones carry heightened risks of racial profiling, including of children, and that the wider policy direction could deepen the marginalisation of migrants and people from minority ethnic backgrounds. ECRI also cautioned that political discourse increasingly equating migration with criminality risks exposing these groups to further hate speech and hate crime.

**[115]** European Commission against Racism and Intolerance (ECRI), ECRI Report on Sweden (Sixth Monitoring Cycle), CRI(2025)15 (Strasbourg: Council of Europe, June 17, 2025), paras. 43, 61–62, 99–104, https://hudoc.ecri.coe.int/eng#{%22sort%22:[%22ecripublicationdate%20descending%22],%22ecriidentifier%22:[%22SWE-CbC-VI-2025-15-ENG%22]}.

# CONCLUSIONS

This report shows how National Action Plans Against Racism function as a key site through which the European Union and its Member States manage the demand for racial equality, even when the structures that produce racial hierarchies remain untouched. Starting from the understanding that contemporary European anti-racism policy is shaped by the same colonial continuities and racial logics that govern migration, policing and security, the analysis traces how commitment is enacted, diluted and withdrawn across multiple, interconnected practices rather than appearing as isolated failures or exceptional omissions. The plans exist because racialised communities and civil society demanded them for decades, and because a number of Member States chose to respond. Adopting a plan, publishing it and exposing it to scrutiny is a political decision, and the governments, officials and equality bodies who took it deserve recognition. Structural racism was barely admissible in official language a decade or two ago. Today Portugal acknowledges the legacies of colonialism and slavery, Ireland names structural racism, Germany has adopted a working definition and funds the Afrozensus and the NaDiRa monitor, Spain has recognised antigypsyism in law, and France's parliament has voted to abrogate the Code Noir. These steps matter, and they deserve to be protected.

Yet by examining the existence of plans, the report demonstrates how adoption is unevenly distributed and easily reversed, with Austria, Croatia and Slovenia without a standalone plan, Italy having gone six years without one, and Ireland alone scoring above 2 on the indicator, while no Member State reaches the top of the scale. It then shows how the absence of legal footing, earmarked multi-year budgets, independent monitoring and consequences for non-delivery institutionalises disposability, so that plans, institutions and funding lines can be rewritten, starved or dismantled with a change of government, as the closure of Austria's Competence Centre for

Diversity, Anti-Racism and Anti-Discrimination and the project-based funding behind Germany's headline budget illustrate.

The report further analyses how definitions centred on individual prejudice, hate speech and attitudes keep policing, ethnic profiling, asylum, border control, counterterrorism and security policy largely outside the scope of the plans, exposing racialised people to violence, surveillance and death in precisely the sites where the state exercises racism most directly. Practices such as equality data collected through proxies, consultation of civil society on pre-drafted texts, project-by-project funding and the placement of plans in single ministries have been examined as everyday mechanisms through which racialised communities are rendered statistically invisible, consulted without power and left without recourse. Finally, the report highlights how these patterns extend into a shrinking civic space, where racial-justice and Palestine-solidarity organisations face administrative vetting, conditional funding, protest bans, surveillance and prosecution, and where those with the most expertise on racism are made the most precarious.

The Pact on Migration and Asylum, the reforms of safe third country definitions and the Schengen Borders Code, and the proposed Deportation Regulation and Anti-Smuggling Package, together with national restrictions on asylum, family reunification and citizenship, are adopted by the same governments that adopt anti-racism plans. Rather than being reconciled with them, these instruments consolidate, legalise and normalise the racialised dynamics that the plans are meant to address. The result is a structural contradiction, in which anti-racism is declared in one policy domain while exclusion, profiling and deterrence are codified in another, further constraining already limited mechanisms of redress and deepening the existing accountability vacuum.

As this report has shown through a selected number of plans and indicators, National Action Plans Against Racism are not merely administrative documents but expressions of a political settlement in which racism is acknowledged as a problem to be managed rather than a system to be dismantled. They exhibit structural patterns across countries, institutions and practices that produce a hierarchy of whose experience of racism is recognised, funded and acted upon, and whose is not. Anti-Muslim racism, antigypsyism, anti-Black racism and anti-migrant racism receive uneven and often marginal treatment, while the racism enacted through policing, borders and security remains largely unnamed. These patterns are woven into the way the EU and its Member States understand citizenship, belonging and peoplehood, and they explain why plans can multiply while the statistics stay the same.

Therefore, any advocacy for plans that deliver must confront the structural racism and colonial logics that underpin European institutions and policymaking. It must also explicitly name whiteness as a system of power and coloniality as a living logic in migration governance, policing, citizenship, security and development policy, while embedding anti-racist, intersectional and decolonial approaches into legislation, budgeting and the organisation of government. Ultimately, the fragility of National Action Plans Against Racism reflects a deeper structural condition: anti-racism that depends on political will, rather than on law, resources and accountability, will always yield to the policies that surround it.

Unfortunately, yet again, the commitments made at EU level, including the 2020 EU Anti-racism Action Plan and the 2026-2030 Strategy, are not matched by an obligation on Member States to adopt, fund and implement plans that confront the structural violence experienced by racialised communities, including migrants and

refugees. Without a binding and structural basis, national plans risk reproducing a framework in which racism is acknowledged in principle and left intact in practice. Only by anchoring plans in law, guaranteeing independent monitoring and multi-year funding, extending their scope to policing, migration and security, and protecting the independent voices that hold them to account can policy change move beyond performative commitments to dismantle the hierarchies that produce exclusion and the precarity of racialised persons.

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