



### **Facing Facts Network Submission for the 2026-2030 EU anti-racism strategy**

The Facing Facts Network is a European multi-stakeholder community of practice that connects civil society organisations, public authorities, and other key actors committed to improving responses to hate crime and hate speech. Coordinated by CEJI – A Jewish Contribution to an Inclusive Europe, the Network has been a framework partner of the European Commission since 2022.

While we do not speak on behalf of our members, we act as a connector and facilitator, bringing practitioners' experience to EU institutions, and vice versa. The content of this document reflects inputs gathered from our members, combined with the Secretariat knowledge of existing EU policies and instruments. Due to word limits in the consultation system, we submitted multiple entries; we are now sharing this consolidated version to allow for a comprehensive reading in one document.

This response is based on 8 responses from our members (see list below).

To prepare our contribution, we offered Facing Facts Network members multiple opportunities to share their inputs, including via email, phone calls, and a dedicated questionnaire. All written feedback was collected and synthesised into an initial draft submission. Where relevant, the Secretariat further elaborated on some members' feedback to integrate references to recent EU-level developments, tools, and decisions. We then convened an online meeting with members to present the draft, gather additional suggestions, and discuss possible revisions. Following this collaborative process, the document was updated to reflect members' contributions and circulated for final approval among those who participated in the consultation.

Our members' input shows that there is still work to do to integrate the strategic objectives of EU action on racism—and racist hate crime and hate speech in particular—with national efforts. Since 2014, Facing Facts has contributed to efforts by the High Level Group on Hate Crime and Hate speech to develop a comprehensive framework of principles that aim to strengthen responses to hate crime and hate speech encompassing training, data collection, reporting and victim support. We welcome the strategic shift towards

implementation in 2025, including through the establishment of a network of law enforcement investigators on hate crime and hate speech and a parallel prosecutor network, alongside the range of efforts and resources to support the effective implementation of the Digital Service Act and the Framework Decision. Our role is to bring Network member perspectives and experiences to these efforts, with the aim of strengthening EU and national hate response systems. Our recommendations below aim to bolster and guide efforts of EU and national anti-racism coordinators to play their part in ensuring that victims of racist crime are recognised and have access to support, safety and justice.

Training and Capacity Building on Hate Crime and Hate Speech (including institutional racism in the context of HC and HS)	
Issues/Gaps	Recommendations
Scarcity, inconsistency and low/poor quality of <b>specialised training on HC for law enforcement (LE)</b> .	<ul style="list-style-type: none"> <li>- Establish an EU-wide framework to harmonise specialized training programs for all police officers and prosecutors across Member States, with a focus on effectively recognising and responding to bias-motivated crimes</li> <li>- The framework should build on existing EU guiding principles and tools, provide practical checklists, and quality standards for the development and implementation of HC and HS training for LE and CJ, including online learning, particularly when such training is funded by the European Commission.</li> <li>- Support the development of competency frameworks and standards for hate crime and hate speech response systems especially in the area of hate crime monitoring/reporting/victim support/investigation and prosecution in cooperation with CSOs and PAs.</li> <li>- 'Promote and support cross-EU training exchange programmes to allow law enforcement and justice professionals to learn from the best practices of other Member States in tackling racism, hate crimes, and bias</li> </ul>

	in policing, including those offered by Facing Facts Online, CEPOL and ODIHR's TAHCLE programme.
<p><b>Lack of effective training for LE, CJ and other relevant public authorities to address institutional racism and police discrimination.</b></p> <p>Ethnic profiling, particularly against Roma, migrants, and refugees, remains a reported concern that undermines trust in law enforcement and contributes to underreporting.</p>	<ul style="list-style-type: none"> <li>- Make anti-discrimination and bias-awareness training a mandatory, well-resourced part of basic and continuous training for all relevant sectors.</li> <li>- Promote multi-stakeholder learning and exchange to increase understanding of/improve responses to cases of police discrimination in the context of hate crime.</li> <li>- Draw on <u>research produced by Facing Facts</u>, which demonstrates the benefits of multi-stakeholder learning.</li> <li>- The EU is encouraged to develop a common framework for anti-racism training in law enforcement and justice sectors, with a strong focus on preventing and addressing racial profiling. Other areas such as health care could be included in the framework.</li> </ul>
<p><b>Lack of involvement of NGOs in training development/delivery processes</b> (Hatter Society, FF)</p>	<ul style="list-style-type: none"> <li>- Make involvement of specialised CSOs representing affected communities in the development of national training programmes for LE and other relevant PAs on HC, HS, Discrimination and bias mandatory, and ensure access needs are considered in the development of the training and are met.</li> </ul>
<p>Bias motivations related to racism and xenophobia are not fully recognised in <b>criminal codes</b>, ableism too, is normalised</p>	<ul style="list-style-type: none"> <li>- Push Member States Work with the Commission to encourage Member States to support the Council in the inclusion of hate crime in the list of EU crimes in order to fully recognise intersectional elements of hate crime and criminalised hate speech.</li> </ul>



	<ul style="list-style-type: none"> <li>- Outline process and clarify interaction between the new strategy and the updating of the Framework Decision 2008/913/JHA into a full Directive</li> </ul>
<b>Victim centered responses and support</b>	
<b>Issue</b>	<b>Recommendation</b>
<p>Current national systems for reporting, investigating, and prosecuting hate-related incidents are often fragmented and slow, as well as inaccessible, leaving victims without timely access to justice.</p> <p><b>lack of harmonised data collection frameworks</b>, indicators, and comparative monitoring prevents a clear understanding of the scale and nature of hate crimes in the EU.</p>	<ul style="list-style-type: none"> <li>- The new AR strategy refers to existing international standards in the area and consult with relevant stakeholders about how to provide forum/mechanism/plan to progress on existing guidance and obligations.</li> <li>- The European Coordinator makes use of existing guidance and Key Principles from the HLG on hate crime and hate speech and data from FRA, OSCE/ODIHR etc. to meaningfully guide national coordinators to advocate for better (disaggregated) data and responses.</li> </ul>
<p><b>Intersectionality not sufficiently considered in research and support services.</b></p> <p>Existing surveys do not adequately capture the intersectional and diverse experiences of discrimination among affected communities.</p> <p>Victims support services are not always informed by intersectional approaches.</p>	<ul style="list-style-type: none"> <li>- The new strategy can provide guidance and set financial support for FRA and other EU institutes to run comprehensive and periodic EU-wide surveys that encompass an intersectional approach to racism. Disaggregated data should reveal how various communities experience discrimination differently, and ensure no group is left behind. These surveys should be available in accessible formats for those with various access needs and must inform both EU and national anti-racism action plans.</li> <li>- Victim support services must be responsive to the specific</li> </ul>



	<p>needs of diverse victims, including those facing intersecting forms of discrimination.</p> <ul style="list-style-type: none"> <li>- The new Anti-Racism Strategy emphasises the importance of an intersectional-informed approach and identifies practical steps to be implemented by Member States (e.g. continuous training with CSOs and affected communities) also considering the impact of environmental racism" and how it affects particular communities, such as Roma community.</li> </ul>
<p><b>Sport and Football:</b> Racism and homophobia remain pervasive in football and other sports (<a href="#">FRA Report</a>), with young people of immigrant origin, Black players, and Roma individuals particularly targeted. Disabled people are also heavily targeted, but little research is carried out on the extent and impact. Despite this, institutional responses from sports authorities and public bodies have been insufficient, and there is a lack of EU-level guidance on how to address the issue.</p>	<ul style="list-style-type: none"> <li>- The EU Strategy needs to clarify the role of sport in addressing racism. Awareness campaigns, fan education, and accountability mechanisms in cooperation with football associations and leagues, need to be encouraged and funded. It is important to fund anti-discrimination programs in grassroots and amatorial sports.</li> <li>- Training on unconscious bias and hate speech for relevant staff, including coaches, athletes, relevant staff including support liaison officers and fans must be available. Training needs to be developed in collaboration with Football association, leagues and CSOs and in collaboration with relevant European Football stakeholders.</li> </ul>
<p><b>Public Campaigning:</b> lack of funding and guidance on how to run effective public campaigns</p>	<ul style="list-style-type: none"> <li>- Based on best practices examples (see MOI Austria public campaigning guidelines) provide guidance and make funding available to MSs to create awareness campaigns on hate crime and hate speech also to</li> </ul>



	highlight the role and work of police authorities in hate incidents.
Lack of specific guidelines for <b>media outlets</b>	<ul style="list-style-type: none"> <li>- The EU Strategy needs to build on the AVMSD and Code of Conducts to ensure the media sector reports news in an unbiased way that does not promote polarisation and further propose racist narratives. The Strategy needs to encourage diversity in reporting, avoid stereotypical narratives, and ensure fact-checking of stories with potentially racist or xenophobic undertones. Moreover, funding is necessary to amplify diverse voices and challenge dominant narratives.</li> </ul>
Improving/increasing access to justice and support for victims	<ul style="list-style-type: none"> <li>- Provide multilingual and low-threshold information tools (websites, apps) to help victims find appropriate support. The Anti-Racism Strategy needs to set out guidelines that give guidance to citizens on trustworthy and accessible reporting systems that clearly explains how complaints will be processed.</li> </ul>
Insufficient funding and lack of recognition of the work of specialised NGOs in the area of victim support	<ul style="list-style-type: none"> <li>- Provide targeted funding for specialised victim support services (legal aid, psychosocial help, translation, strategic litigation pursuant to Article 10 of the Equality Bodies Directives), ensuring accessibility across all regions and communities, including rural areas and among minority and migrant populations.</li> <li>- The Anti-Racism Strategy needs to coordinate efforts and raise awareness of possible EU Funding available specifically on anti-racism and provide support to help and facilitate the process for organisations that want to apply.</li> </ul>



	Working partnerships between civil society and public bodies should be prioritised because they will lead to more inclusive and impactful projects that strengthen national racism and hate response systems
The lack of standards addressing politicians' role in countering polarising rhetoric and hate speech weakens efforts to promote inclusive public discourse.	<ul style="list-style-type: none"> <li>- The strategy should emphasise the responsibility of politicians at EU and national levels to promote inclusive discourse and refrain from hate speech.</li> <li>- Grant NGOs legal standing in criminal proceedings concerning hate speech targeting entire groups.</li> </ul>
<b>Strengthening hate response systems through NAPARs development processes and Coordination/Integration among different hate strategies</b>	
<b>Issue/gap</b>	<b>Recommendation</b>
<b>EU level</b>	
<b>Absence of and/or poor coordination among various EU strategies</b> —including those on gender equality, LGBTIQ+ rights, disability, Roma inclusion, and migration, leading to fragmentation of policies and insufficient responses to affected communities.	<ul style="list-style-type: none"> <li>- The Anti-Racism Strategy should serve as a framework to identify and counter all forms of racism and mainstream intersectional-informed approach across all relevant EU policies and instruments. This is particularly the case where coordinators and/or strategies across all forms of racism are not in place at the national level</li> <li>- Coordination must be matched with accessible and sustained funding streams for civil society, education, and grassroots initiatives that address discrimination through intersectional lens.</li> </ul>
<b>Absence of harmonised approaches to tackling racism within public institutions across the EU.</b> Current efforts are often fragmented, project-based, or dependent on political will,	<ul style="list-style-type: none"> <li>- The EU should recommend concrete measures for the development of anti-racist strategies within public</li> </ul>

leaving institutions without the structural frameworks needed to prevent racism effectively.	institutions, which integrate racism prevention across all areas of organisational structures and ensure the establishment of a sustainable anti-racist stance.
The current <b>role of the EU Anti-Racism Coordinator</b> lacks sufficient authority, resources, and mechanisms to effectively put pressure, oversee progress, identify gaps, and support Member States in delivering on their commitments.	<ul style="list-style-type: none"> <li>- Strengthen the role of the Anti-Racism Coordinator within the Commission, and in general its capacity to monitor and follow up on national plans. In this renewed capacity the coordinator should meet more frequently with government representatives, decision makers and CSOs with the aim of progressing the development and implementation of effective national anti-racism action plans.</li> </ul>
<b>National Level</b>	
<b>Lack of cooperation:</b> weak or non existing connections across the national anti-racism response systems actors	<ul style="list-style-type: none"> <li>- In the context of a growing recognition that public authorities, civil society organisations are part of national and EU hate and discrimination response systems, the Commission/ coordinators should support national partners to identify key areas for connection across national systems, matching needs to resources including guidance, training programmes and sharing good practice, drawing on Facing Facts systems mapping methods.</li> <li>- The Anti-Racism Strategy needs to require involvement of CSOs at the European and National/Local level and recognise the crucial role of community perspectives given also the trust of citizens towards CSOs.</li> </ul>
<b>Lack of evaluation and assessment mechanisms:</b> development of NAPARs not sufficiently supported by commonly agreed/ EU set of evaluation and assessment mechanisms	<ul style="list-style-type: none"> <li>- EU to make available funding and research tools to consistently monitor government's policies in response to NAPAR and other hate strategies implementation where existent. CSOs should be involved in the</li> </ul>



	<p>monitoring/assessment. The process should be independent from the governments.</p> <ul style="list-style-type: none"> <li>- Evaluation mechanisms can draw upon existing tools such as the <u>NOA report cards methodology</u>, the <u>ILGA Rainbow map</u> and the <u>ENIL Independent Living survey</u>.</li> </ul>
<p><b>Absence of specialised units:</b> many Member States do not have dedicated police units or prosecutors with the expertise and resources to investigate, prosecute, and monitor hate crimes, leading to underreporting, inadequate responses, and limited victim support. (see also previous sections).</p>	<ul style="list-style-type: none"> <li>- The new EU plan can reinforce other EU guidance in the area and invite Member States to establish specialised police units and the appointment of prosecutors dedicated to hate-motivated crimes. Those specialised units should be in contact/exchange with the AR national coordinator.</li> </ul>
<p>Only few public authorities accessing EU funding to progress on anti-racism strategies</p>	<ul style="list-style-type: none"> <li>- Encourage participation of public bodies, in particular law enforcement agencies, in CERV funded projects, but not through compulsory participation (that might result in no projects at all from the most challenging contexts), but through financial motivation (make public staff salaries eligible).</li> </ul>
<p><b>Lack of financial resources</b> make it very difficult for national coordinators to implement NAPARs (where existent) or for governments to set up the necessary efforts towards the creation of one.</p>	<ul style="list-style-type: none"> <li>- Provide dedicated funding for the development/implementation/evaluation of NAPARs to enable higher quality, stronger accountability, and improved impact measurement.</li> </ul>



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