

The role of culture, education, media and sport in the fight against racism

Background Analysis



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Abstract

The study concludes that the EU Anti-racism Action Plan 2020-2025 reflects the diversity of remedy measures identified in the specialist literature. Despite of the limited steering and monitoring within EU programmes of their contribution to the fight against racism, except for the CERV programme, there is a significant share of projects that are addressing racism related topics, also reflecting a diversity of remedy measures. There is a need for further building on existing good practices / incentives developed by programmes and implementing institutions.

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CONTENTS

LIST OF ABBREVIATIONS	3
LIST OF TABLES	5
EXECUTIVE SUMMARY	7
1. INTRODUCTION	9
1.1. Policy context	9
1.2. Aims and goals	10
1.3. Method	10
2. THE ROLE OF EDUCATION IN THE FIGHT AGAINST RACISM	11
2.1. Existing specialist literature on the role of education fighting racism	11
2.1.1. Opportunities	11
2.1.2. Challenges	12
2.1.3. Remedy measures	12
2.2. The role of the EU Anti-racism Action Plan in the field of education	14
2.3. The role of the funding programmes in the field of education	15
2.3.1. Regulatory framework	15
2.3.2. Programming	17
2.3.3. Project implementation	19
2.3.4. Monitoring and evaluation	20
3. THE ROLE OF SPORT IN THE FIGHT AGAINST RACISM	22
3.1. Existing specialist literature on the role of sport fighting racism	22
3.1.1. Opportunities	22
3.1.2. Challenges	23
3.1.3. Remedy measures	23
3.2. The role of the EU Anti-racism Action plan in the field of sport	24
3.3. The role of funding programmes in the field of sport	25
3.3.1. Regulatory framework	25
3.3.2. Programming	26
3.3.3. Project implementation	28
3.3.4. Monitoring and evaluation	29
4. THE ROLE OF CULTURE IN THE FIGHT AGAINST RACISM	31
4.1. Existing specialist literature on the role of culture fighting racism	31
4.1.1. Opportunities	31
4.1.2. Challenges	32

4.1.3. Remedy measures	33
4.2. The EU Anti-racism Action Plan and the role of culture	34
4.3. The role of funding programmes in the field of culture	34
4.3.1. Regulatory framework	35
4.3.2. Programming	38
4.3.3. Implementation	41
4.3.4. Monitoring and evaluation	43
5. THE ROLE OF MEDIA IN THE FIGHT AGAINST RACISM	45
5.1. Existing specialist literature on the role of media fighting racism	45
5.1.1. Opportunities	45
5.1.2. Challenges	46
5.1.3. Remedy measures	47
5.2. The EU Anti-racism Action Plan and the role of media	49
5.3. The role of funding programmes in the field of media	49
5.3.1. Regulatory Framework	50
5.3.2. Programming	50
5.3.3. Implementation	54
5.3.4. Monitoring and Evaluation	55
6. CONCLUSIONS	56
6.1. EU Anti-racism Action Plan reflects the diversity of remedy measures in specialist literature	56
6.2. Limited steering by EU programmes on their contribution to the fight against racism, except for the CERV	56
6.3. Significant share of projects addresses the fight against racism, reflecting a diversity of remedy measures	57
6.4. Lack of measuring programmes' contribution to the fight against racism	58
6.5. There is a need for further building on existing good practices and incentives developed by programmes and implementing institutions	59
REFERENCES	60

LIST OF ABBREVIATIONS

ARDI	European Parliament Anti-Racism and Diversity Intergroup
CERV	Citizenship, Equality, Rights and Values programme
CSO	Civil Society Organisations
DSA	Digital Services Act
EACEA	European Education and Culture Executive Agency
ECRI	European Commission against Racism and Intolerance
EDAP	European Democracy Action Plan
EP	European Parliament
EPRS	European Parliamentary Research Service
EPSR	European Pillar of Social Rights
ESC	European Solidarity Corps Programme
EU	European Union
FIFA	Fédération Internationale de Football Association
FRA	European Union Agency for Fundamental Rights
INI	Own-initiative report
LGBTI	Lesbian, Gay, Bisexual, Transgender and Intersex
MPM	Media Pluralism Monitor
NA	National Agencies
NGO	Non Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PISA	OECD's Programme for International Student Assessment
REC	Rights, Equality and Citizenship programme
UEFA	Union of European Football Associations

VET Vocational Education and Training

LIST OF TABLES

Table 1 – Regulatory framework Erasmus+ 2021-2027 in the field of education and racism	16
Table 2 – Programming Erasmus+ 2021-2027 in the field of education and racism	17
Table 3 – Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy	18
Table 4 – Erasmus+ projects in the field of education that address the fight against racism	19
Table 5 – Monitoring and evaluating Erasmus+ in the field of education and racism	20
Table 6 – Regulatory framework Erasmus+ 2021-2027 in the field of sport and racism	26
Table 7 – Programming Erasmus+ 2021-2027 in the field of sport and racism	27
Table 8 – Erasmus+ projects in the field of sport that address the fight against racism	28
Table 9 – Monitoring and evaluating Erasmus+ in the field of sport and racism	29
Table 10 – Regulatory framework EU programmes in the field of culture and racism	36
Table 11 – Programming EU programmes in the field of culture and racism	39
Table 12 – Implementation of EU programmes in the field of culture and racism	41
Table 13 – Creative Europe projects that address the fight against racism	42
Table 14 – Monitoring and evaluating EU programmes in the field of culture and racism	44
Table 15 – Regulatory Framework Creative Europe in the field of media and racism	50
Table 16 – Programming EU programmes in the field of media and racism	52
Table 17 – Implementation of EU programmes in the field of media and racism	54
Table 18 – Monitoring and evaluating Creative Europe in the field of media and racism	55

EXECUTIVE SUMMARY

KEY FINDINGS

- The EU Anti-racism Action Plan 2020-2025 generally reflects the diversity of remedy measures proposed in the specialist literature in the field of anti-racism.
- There is limited steering within EU programmes on their contribution to the fight against racism, except for the Citizenship, Equality, Rights and Values programme (CERV).
- There is a significant share of projects that address racism related topics, reflecting a diversity of remedy measures as identified in the specialist literature.
- There is a lack of measuring of the programmes' contribution to the fight against racism.
- There is a need for further building on existing good practices / incentives developed by programmes and implementing institutions.

Aims and goals

The overall goal of the study is to provide the Members of the European Parliament's Committee on Culture and Education (CULT) with expertise for an own-initiative report (INI) on 'The role of culture, education, media and sport in the fight against racism' (concomitant expertise¹).

The study assesses whether the EU Anti-racism Action Plan 2020-2025 is a suitable tool within the policy competences of the EU to combat racism in the fields of culture, education, media, and sports. Moreover, it assesses to what extent funding programmes under the remit of the CULT committee are aligned with the objectives laid down in the Anti-racism Action Plan 2020-2025 as regards the role of culture, education, media, and sport in the fight against racism.

Conclusions

Conclusion 1: The EU Anti-racism Action Plan 2020-2025 generally reflects the diversity of remedy measures proposed in the specialist literature in the field of anti-racism.

The EU Anti-racism Action Plan 2020-2025 is a suitable tool within the policy competences of the EU to combat racism in the fields of culture, education, media, and sports. Virtually all remedy measures identified in the specialist literature in the field of anti-racism are embedded in the Action plan.

Conclusion 2: There is limited steering within EU programmes on their contribution to the fight against racism, except for the Citizens, Equality, Rights & Values (CERV) programme

The Erasmus+, Creative Europe, and European Solidarity Corps programmes generally lack specific objectives related to the fight against racism and discrimination, and mostly cover these priorities as

¹ This Background Analysis is completed by the Recommendations Briefing on 'The role of culture, education, media and sport in the fight against racism'. These two research papers were commissioned by the Policy Department as a part of concomitant expertise aiming to support the work of the CULT Committee on the own initiative report on [The role of culture, education, media and sport in the fight against racism](#)

horizontal principles. The CERV programme takes a different approach and includes clear references to the EU Anti-racism Action Plan at all stages of the policy cycle. More specifically, the Creative Europe programme has little to no direct references to racism per se, but aims to foster diversity, intercultural dialogue, cultural heritage, inclusion, and community development under its remit. In addition, positive action to ensure representation of minorities is explicitly recalled in the Creative Europe programme's objectives. No specific steering on discrimination and racism is foreseen in Erasmus+, except for actions related to sport where specific interventions exist that address racism as a priority. The implementation guidelines on the 'Inclusion and Diversity Strategy', which apply to the Erasmus+ and the European Solidarity Corps, provide mechanisms to support inclusion and diversity within the programmes. Yet, they mostly consider discrimination as one of the barriers hampering accessibility and outreach, but they do not outline specific arrangements or incentives for actions that explicitly aim to combat discrimination.

Conclusion 3: There is a significant share of projects that address racism related topics, reflecting a diversity of remedy measures

The study shows that a substantial share of projects explicitly addressing racism-related topics have been implemented over the period 2014-2020 - except for the Creative Europe programme reporting lower figures - despite the limited steering on this specific topic at the programming level. Yet, if higher ambition in this field is needed, this can only go through more direct and explicit references to combatting racism in the regulatory frameworks and work programmes.

Conclusion 4: There is a lack of measuring of the programmes' contribution to the fights against racism

Baseline information on how the EU programmes under review contribute to the fight against racism is missing. In the monitoring framework of Erasmus+ no specific indicators are defined to measure the programme's contribution to the fight against racism, except for actions in the field of sport that had a dedicated specific objective related to intolerance, discrimination, and equal access to sport for all. Similar conclusions can be drawn for the European Solidarity Corps and Creative Europe programmes. Even where specific evaluation arrangements exist (i.e., the CERV programme and its Rights, Equality and Citizenship predecessor), information on results and effects seems limited. This is due to inherent difficulties in measuring and demonstrating effects in this area, but also to insufficient emphasis being placed on the monitoring and evaluation of the specific theme of racism.

Conclusion 5: There is a need for further building on existing good practices / incentives developed by programmes and implementing institutions

The actions carried out by implementing institutions that aim to fight racism are not systematically recorded and evaluated. In addition, the contribution of EU programmes and their related projects to the fight against racism is not systematically analysed within thematic and impact studies/ evaluations. This hampers the identification of good practices that could be further disseminated.

1. INTRODUCTION

1.1. Policy context

The principles of equality and the prohibition of discrimination on the basis of racial and ethnic origin have an extensive legal basis in the EU Treaties (e.g. Articles 2 and 3 of the Treaty on European Union (TEU)², and 10, 19 and 67(3) of the Treaty on the Functioning of the European Union (TFEU)³). These Treaty provisions are complemented by the Charter of Fundamental Rights of the EU⁴, which – under the Lisbon Treaty – has the same legal value as the Treaties. The Charter states explicitly in Article 20 that everyone is equal before the law and in Article 21(1) that 'any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited'.

Although since 2000 the European Union (EU) has introduced legislation to combat racial and xenophobic discrimination such as the Racial Equality Directive, Framework Decision on combating racism and xenophobia, the Victims' Rights Directive, and Audiovisual Media Services Directive, the problem persists⁵. In 2019, an EU-wide Eurobarometer survey found that over half of Europeans believe racial or ethnic discrimination to be widespread in their country, but with considerable variations between Member States⁶. To address racial discrimination and its underlying inequalities, the European Commission has put forward several equality strategies and actions. In 2020, the Commission brought forward an EU anti-racism Action Plan 2020-2025⁷, setting a range of legislative and non-legislative measures, including:

- Reassessing the existing EU legal framework. The Commission will report on the implementation of the Racial Equality Directive and follow up with any necessary legislation in 2022. The Commission encourages the Member States that EU law is fully transposed and properly applied in Member States. Also, the legislative framework on AI will specifically address the risk of bias and discrimination built into AI systems.
- Action to bring together stakeholders at all levels to fight racism more effectively, including the appointment of an EU anti-racism coordinator and supporting Member States to issue national action plans against racism and racial discrimination by the end of 2022.
- Mobilising budget of EU funding programmes to combat racism and discrimination.
- Encouraging Member States to actively address racial and ethnic stereotypes through the media, education, culture, and sport.
- Improving the collection of data disaggregated by ethnic or racial origin.
- Improving diversity within the European Commission and other EU institutions.

The EU anti-racism Action Plan was welcomed by civil society organisations and by the European Parliament Anti-Racism and Diversity Intergroup (ARDI)⁸. It is considered to provide a more comprehensive

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12016M002>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12016E010>

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12016P%2FTXT>

⁵ EPRS (2018), *The Cost of Non-Europe in the area of Equality and the Fight against Racism and Xenophobia*

⁶ European Commission (2019), *Eurobarometer Discrimination in the EU, September 2019*.

⁷ European Commission (2020), *A Union of Equality: EU anti-racism Action Plan 2020-2025 Communication, Communication, 18 September 2020*

⁸ EPRS (2021), *EU legislation and policies to fight racial and ethnic discrimination. Briefing*.

approach to all forms of racism in Europe and could help to improve the way structural and intersectional forms of discrimination are addressed.

The European Parliament, meanwhile, has long been demanding an end to racial discrimination. In recent resolutions, Parliament has called for an end to structural racism and discrimination, racial profiling, and police brutality, and for the right to protest peacefully⁹.

1.2. Aims and goals

The overall goal of the project is to provide the Members of the CULT Committee with expertise for an own-initiative report (INI) on 'The role of culture, education, media and sport in the fight against racism' (concomitant expertise). The following questions are addressed by this study:

- Is the EU Anti-racism Action Plan 2020-2025 a suitable tool within the policy competences of the EU to combat racism in the fields of culture, education, media, and sports?
- To what extent are funding programmes under the remits of the CULT committee aligned with the objectives laid down in the Anti-racism Action Plan 2020-2025 as regards the role of culture, education, media, and sport in the fight against racism?

1.3. Method

In this report we will look at the fight against racism through an intersectional lens. This means that when looking at racism and discrimination based on skin colour, language, religion, or ethnic or national background, one cannot disregard other areas of exclusion such as gender, ageism, ableism or heteronormativity. Because people are not confined to analytical boundaries there is an intersectional overlap that needs to be on the forefront of the fight against racism (rightly mentioned in the EU Anti-racism Action Plan). So, there is not always a way to pinpoint how exclusion happens and on what basis. Fighting racism can therefore only be successful if other areas and causes of discrimination are addressed at the same time.

The methodology used for this study principally consists of desk research of programme documentation relating to the funding programmes falling within the remits of the CULT Committee (Erasmus+, Creative Europe, European Solidarity Corps and Citizens, Equality, Rights & Values), monitoring data, academic literature within the fields of culture, education, media, and sports, as well as a limited number of interviews with stakeholders - such as the European Commission and National Agencies (NA).

The report subsequently analyses each thematic area per chapter (education, sport, culture, and media), first discussing the opportunities, challenges, and solutions identified in the specialist literature, framing the assessment of the EU Anti-racism Action Plan 2020-2025 and related EU programmes.

⁹ Ibid.

2. THE ROLE OF EDUCATION IN THE FIGHT AGAINST RACISM

KEY FINDINGS

- Education & training is considered as an important tool for tackling racism and discrimination and building inclusive societies.
- Remedy measures identified in the specialist literature include:
 - supporting schools to implement education policies that support racially integrated schools;
 - training and recruiting teachers that reflect the diversity of students;
 - reviewing the curriculum from multiple vantage points avoiding bias and giving history, social memory, and human rights – as well as indigenous forms of knowledge – a place at the core of teaching;
 - all actors in education institutions should receive training to become aware of their implicit bias.
- These remedy measures are generally recalled in the EU Anti-racism Action Plan.
- Although Erasmus+ should promote citizenship and the common values of freedom, tolerance and non-discrimination through education, no formal steering mechanisms are in place to assure that Erasmus+ sufficiently contributes to these goals.
- Despite limited steering, good mainstreaming with projects implemented on the ground enacting virtually all remedy measures proposed by the specialist literature.
- In the monitoring framework of Erasmus+ no specific indicators are defined to measure programmes' contribution in the fight against racism.

2.1. Existing specialist literature on the role of education fighting racism

2.1.1. Opportunities

The academic literature highlights the important role of education in fighting racism. Education is considered as an important tool for tackling racism and discrimination and building inclusive societies¹⁰. Education has the powerful potential to address deep-rooted discrimination and the legacy of historical injustices, as well as to enable individuals and groups to lift themselves out of poverty¹¹. Education could only prevent and combat racism and xenophobia if its access and quality are also guided by the principles of non-discrimination and equality. The role of education is not limited to initial formal education, but also expands to non-formal education and adult learning, historically much linked to social justice and the civil rights movement¹².

¹⁰ <https://rm.coe.int/ecri-general-policy-recommendation-no-10-key-topics-combating-racism-a/16808b75f7>

¹¹ Mutuma Ruteere (2013), *Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia, and related intolerance*. Human Rights Council

¹² Ibid.

2.1.2. Challenges

Studies and findings by international and national bodies show that school segregation is still an unfortunate reality of Europe today¹³. A report from the European Union Agency for Fundamental Rights (FRA) found evidence of school segregation in national-level reports and studies in at least half of the EU Member States¹⁴. It points out that school segregation and residential overconcentration can lead to marginalisation and the creation of parallel social spaces. This is also reflected in the Global education monitoring report of UNESCO in 2019¹⁵, concluding that there are negative consequences of segregation that affect Roma children, children with disabilities, children with a migrant background and other children due to their social or personal circumstances. A recent study of the OECD on inclusion of Roma students in Europe highlights low enrolments rate at different levels of education, including early dropouts and low enrolment in secondary education, also affecting the participation of Roma at higher education levels¹⁶. Studies also point to the negative effects of the share of immigrants on performance of immigrants in education in terms of learning outcomes, while there is a small effect on the other group¹⁷.

The specialist literature also points that institutional racism is present in organisational structures and teaching strategies. There is evidence that schools' disciplinary policies disproportionately impact certain groups of coloured students¹⁸, as well as that teachers' expectations differ by students' race, economic status, and national origin¹⁹. For instance, Eastern European students have experienced various forms of racism and low expectations in the UK school system.²⁰ Literature also provide evidence on racial discrimination that is taking place among students²¹. Furthermore, there is evidence that minority ethnic learners find it more difficult to get work experience placements²². People of colour also remains underrepresented as educators, which has an impact on people to connect with mentors who understand and share their experiences of racism and culture²³.

2.1.3. Remedy measures

The specialist literature suggests a variety of different remedy measures for overcoming racism, of which several are mentioned below²⁴:

- Education systems and educational institutions have an important role and responsibility in addressing and eliminating racism through supporting schools to implement education policies

¹³ Council of Europe (2017), *Fighting school segregation in Europe through inclusive education: a position paper*. September 2017, 34 p.

¹⁴ European Union Agency for Fundamental Rights (2017), *Together in the EU – Promoting the participation of migrants and their descendants*.

¹⁵ UNESCO (2019), *Global education monitoring report, 2019: Migration, displacement, and education: building bridges, not walls*.

¹⁶ OECD (2020), *Inclusion of Roma Students in Europe: A literature review and examples of policy initiatives*. OECD Education Working Paper No. 228

¹⁷ Brunello, G and De Paola, M (2017), *School Segregation of Immigrants and its Effects on Educational Outcomes in Europe*. EENEE Analytical Report No. 30. Prepared for the Europeans Commission

¹⁸ US Department Office for Civil Rights (2016), *2013-2014 civil rights data collection. A first look. Key data highlights on equity and opportunity gaps in our nation public schools*; Fabello, T., Thompson, M.D., Plotkin, M., Carmichael, M. D., Miner, P., and Booth, E.A. (2011), *Breaking Schools' Rules: A Statewide Study of How School Discipline Relates to Students' Success and Juvenile Justice Involvement*

¹⁹ Boser e.a. (2014), *The Power of the Pygmalion Effect. Teachers Expectations Strongly Predict College Completion*

²⁰ Antonina Tereshchenko, Alice Bradbury and Louise Archer (2019), *Eastern European migrants' experiences of racism in English schools: positions of marginal whiteness and linguistic otherness*, *Whiteness and Education*, 4:1, 53-71, DOI: 10.1080/23793406.2019.1584048

²¹ Priest, N., King, T., Bécares, L., and Kavanagh, A. M. (2016), *Bullying Victimization and Racial Discrimination Among Australian Children*. *American journal of public health*, 106(10), 1882–1884. <https://doi.org/10.2105/AJPH.2016.303328>

²² Andriessen, I e.a. (2021), *Ervaren discriminatie in Nederland II*. Sociaal en Cultureel Planbureau; Andriessen, I. e.a. (2021), *Ongelijke kansen op de stagemarkt. Onderzoek naar objectief vastgestelde en ervaren stagediscriminatie in het mbo in Utrecht*.

²³ Donlevy, V., Meierkord, A. and Rajania, A. (2016), *Study on the Diversity within the Teaching Profession with Particular Focus on Migrant and/or Minority Background*. Final Report to DG Education and Culture of the European Commission.

²⁴ Barbieri, C. and Ferede, M.K. (29 June 2020) *A future we can all live with: How education can address and eradicate racism*. UNESCO Futures of Education Ideas LAB. Retrieved from <https://en.unesco.org/futuresofeducation/ideas-lab/barbieri-ferede-education-eradicate-racism>

that support racially integrated schools. Such schools have been found to promote greater social cohesion and cross-race relationships²⁵.

- The need to train and recruit teachers that reflect the diversity of students. Studies shows higher learning outcomes, higher expectations, and fewer disciplinary actions when the teacher composition reflects the student population²⁶.
- Review the contents of the curriculum from various perspectives. First, schools should give history, social memory, and human rights – as well as indigenous forms of knowledge – a place at the core of teaching. This helps to fully understand the past and its relation to the present and to break the perpetuation of stereotypes²⁷. At the same time there is anecdotal evidence that budget cuts in education programmes leave less room for discussions on cross-cultural awareness and anti-racism²⁸. Moreover, vocational programmes that are heavily focused on gaining qualifications for the labour market may leave less time to focus on the personal and social transformation necessary to encourage anti-racist mentalities and practices²⁹.
- Educators should re-examine and revise curricula, and textbooks, to eliminate racist depictions, misrepresentation, and historical exclusions and to reflect a commitment to anti-racism³⁰.
- And finally, all actors in education institutions from policymakers, leaders, teachers, staff, and students should receive training to become aware of their implicit bias – their unconscious bias and beliefs. Reflective teaching, fair discipline policies based on data and use of external feedback are some strategies schools can use to reduce implicit bias³¹.

Most of these points are already reflected in the General Policy Recommendation on Combating racism and racial discrimination in and through school education, formulated by the European Commission against Racism and Intolerance (ECRI) of the Council of Europe. It recommends that (1) schools should be safe havens, free from racism and discrimination; (2) children from all backgrounds should have equal access to education (3) teachers should be trained for working with all children and be sensitive to the need of students from different backgrounds, including issues relating to human rights and racial discrimination; (4) and that governments must provide appropriate financial resources for schools to be able to promote equality and non-discrimination and regularly monitor the situation³².

Various European Member States have adopted measures to build more inclusive education systems and to guarantee the right of all children to education without discrimination. In practice, however, authorities at national and local level do not always abide by their obligations and often yield to pressure from different sources, including from school administrations, teachers, and other professionals and from families³³.

²⁵ Eaton, S. and Chririchigno, G. (2011), *Research brief. The Impact of Racially Diverse Schools in a Democratic Society. The National Coalition on School Diversity*. Brief No. 3.

²⁶ Egalite, A. J., Kisida, B., and Winters, M. A. (2015), *Representation in the classroom: The effect of own-race teachers on student achievement*. *Economics of Education Review*, 45, 44–52. <https://doi.org/10.1016/j.econedurev.2015.01.007>

²⁷ Barbieri, C. and Ferede, M.K. (29 June 2020) *A future we can all live with: How education can address and eradicate racism*. UNESCO Futures of Education Ideas LAB. Retrieved from <https://en.unesco.org/futuresofeducation/ideas-lab/barbieri-ferede-education-eradicate-racism>.

²⁸ <https://epale.ec.europa.eu/hr/node/157411>

²⁹ Ibid.

³⁰ Barbieri, C. and Ferede, M.K. (2020), *A future we can all live with: How education can address and eradicate racism*. UNESCO Futures of Education Ideas LAB. Retrieved from <https://en.unesco.org/futuresofeducation/ideas-lab/barbieri-ferede-education-eradicate-racism>

³¹ Staats, C. (2015), *Understanding implicit bias: what educators should know*. *American Educator*, 39(4), 29.

³² CRI (2007), *ECRI general policy recommendation No. 10. on combating racism and racial discrimination in and through school*. Adopted on 15 December 2006.

³³ Council of Europe, Commissioner for Human Rights (2017), *Fighting school segregation in Europe through inclusive education: a position paper*.

2.2. The role of the EU Anti-racism Action Plan in the field of education

The EU Anti-Racism Plan clearly addresses the challenges in access to education, as well as those affecting employment, health, and housing³⁴. In this case legislation needs to be backed up by policy measures. The EU Anti-racism Action Plan says where legal protection is not enough, the Commission will combat racism also through policy and funding programmes. The EU Anti-racism Action Plan is referring to that inclusion and fairness in education will be among the priority dimensions of the European Education Area and forms an integral part of the updated Digital Education Action Plan (2021-2027)³⁵. It also refers to the EU strategy on the rights of the child, that include actions tackling racism and discrimination, in which schools have an instrumental role to play in helping to reduce racial stereotyping and prejudice among children. The EU Anti-racism Action Plan also refers to the European Pillar of Social Rights (EPSR) and its related Action Plan, which supports equality in the labour market, including for people with a minority racial or ethnic background. Moreover, it mentions the Commission initiative on a Child Guarantee, which aims at ensuring a better social inclusion of all children in need and ensure their access to key services. The Action Plan also refers to the European Skills Agenda with social fairness as a cornerstone, including a Council recommendation on vocational education and training (VET) which calls on VET programmes to be inclusive for vulnerable groups, including people with a minority racial or ethnic background³⁶. It also refers to the reinforced Youth Guarantee that recommends that Member States step up outreach to the most vulnerable young people and pay due attention to all forms of discrimination³⁷.

Next to these policies, the EU Anti-racism Action Plan addresses the important role of EU funds in the 2021-2027 programming period, supporting Member States' efforts to promote social inclusion by ensuring equal opportunities for all and tackling discrimination, and more specifically Erasmus+ in the integration of people with a minority, racial or ethnic background. The EU Anti-Racism Action Plan also refers to Next Generation EU, as well as the technical support instrument for structural reforms as additional means that can support equality initiatives in areas such as the labour market, education and training, social protection, healthcare, and housing.

The EU Anti-racism Action Plan, however, does not present a comprehensive assessment and baseline how current EU policies and programmes are addressing the topic of anti-racism and what can be strengthened compared to the baseline situation in the field of education. It limits itself to describing current policies and programmes and initiatives and the objective to better use these to combat racism and discrimination in access to education. Nevertheless, reference is made in the EU Anti-Racism Plan to remedy measures identified in the specialist literature (see Section 3.1.3). It points, for example, on the important role of teachers to 'be sensitive to the need of pupils from different backgrounds, including on issues relating to racial discrimination'. It also says that schools should be 'safe havens, free from bullying, racism and discrimination and address the importance of promoting values of equality, respect, and inclusion in the curriculum'. It also points on the role of education 'acknowledging the historical roots of racism, such a related to colonialism, slavery, and the holocaust, ensuring remembrance', being an important focus of Council of Europe's education³⁸. The EU Anti-racism Action Plan also points to the importance of diversity charters signed by private sector organisations but does not specifically refer to the role of schools. Furthermore, it addresses the need to promote positive actions by public authorities in Member States, integrating equality considerations into their day-to-day business, as well as for the EU itself, for instance in its human resource policies. Schools are not specifically mentioned in this respect. Altogether, the EU

³⁴ European Commission (2020), *A Union of Equality: EU anti-racism Action Plan 2020-2025 Communication*, Communication, 18 September 2020.

³⁵ European Commission (2021), *Digital Education Action Plan (2021-2027). Resetting education and training for the digital age*.

³⁶ COM(2020) 275 final.

³⁷ European Commission (2020), *Proposal for a Council Recommendation on a Bridge to Jobs – Reinforcing the Youth Guarantee* (COM(2020)277 final).

³⁸ See <https://www.coe.int/en/web/history-teaching>

Anti-racism Action Plan is addressing the full set of remedy measures as proposed in the specialist literature for combating racism in education and training.

The EU Anti-racism Action Plan does not refer to targets for EU programmes, other than that programmes play an important role contributing to equality objectives. It says that Member States play a key role in designing targeted policies and maximising the use of funding programmes to support those affected by racism and discrimination, but it does not provide clear reference points how, beyond a broad reference to the enabling conditions³⁹ applicable to specific EU funds in 2021-2027. These conditions aim to ensure respect for fundamental rights, including non-discrimination as well as Roma equality, inclusion, and participation in the EU funds.

2.3. The role of the funding programmes in the field of education

Erasmus+ is the EU Programme in the fields of education, training, youth, and sport for the period 2021-2027. For exploring how Erasmus+ programme is supporting the fight against racism in the field of education an assessment is made of its regulatory framework, as well programming, project implementation, monitoring and evaluation.

2.3.1. Regulatory framework

While the regulation of Erasmus+ 2014-2020 already includes horizontal principles that ‘the programme promotes inter alia equality between men and women and measures to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation’, this was not further operationalised in clear objectives and monitoring. Also, the updated Regulation for 2021-2027 (see table below) further builds on the previous Regulation, describing these principles in the preamble, referring to programme support to Paris Declaration on promoting citizenship and the common values of freedom, tolerance, and non-discrimination through education’, as well as the Charter of Fundamental Rights of the European Union. These principles are not directly translated in concrete specific objectives in the fight against racism, but in more general terms promoting the inclusion and equity of the programme. The Regulation includes a dedicated chapter on inclusion, requesting the European Commission to establish a dedicated framework for inclusion measures outlining the main areas of work for the next seven years in this regard, as well as including action plans at the national level.

³⁹ Through the introduction of a horizontal enabling condition on effective application and implementation of the EU Charter of Fundamental Rights.

Table 1 – Regulatory framework Erasmus+ 2021-2027 in the field of education and racism

Erasmus+ regulation 2021-2027⁴⁰	
Preamble	<p>‘(12) The Programme should also support Member States in reaching the goals of the Paris Declaration of 17 March 2015 on promoting citizenship and the common values of freedom, tolerance and non-discrimination through education’.</p> <p>‘(43) The principles of transparency, equal treatment and non-discrimination set out in the Financial Regulation should be respected in the implementation of the Programme’.</p> <p>‘(64) This Regulation respects the fundamental rights and observes the principles recognised in particular by the Charter of Fundamental Rights of the European Union (the ‘Charter’). In particular, this Regulation seeks to ensure full respect for the right to equality between women and men and the right to non-discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation, and to promote the application of Articles 21 and 23 of the Charter’.</p>
General and specific objectives	<p>‘The programme has the specific objectives to promote [...] inclusion and equity at the level of organisations and policies in the field of education and training’.</p> <p>No specific reference is made to the fight against racism in the general and specific objectives.</p>
Specific articles	<p>As an impetus for inclusion and diversity in the new programme generation of Erasmus+, the regulation includes a dedicated chapter on inclusion.</p> <p>Article 15 states that ‘the Commission shall, by 29 November 2021, develop a framework of inclusion measures to increase participation rates among people with fewer opportunities, as well as guidance for the implementation of such measures’ and ‘inclusion action plans shall be developed and shall form an integral part of the national agencies’ work programmes’ that will be monitored by the Commission on a regular basis.</p> <p>Article 16 states that financial support measures shall be in place to ‘facilitate the participation of people with fewer opportunities, in particular of those whose participation is impeded for financial reasons. The level of support shall be based on objective criteria’.</p>

The impact assessment of the current Erasmus+ Regulation for 2021-2027⁴¹ does not directly refer to programmes’ contribution to the topic of racism and discrimination, neither does it include a reference to concrete interventions that address such topics (see overview of remedy measures in Section 3.1.3). Instead, the topic is wider embedded in the context of making Erasmus+ more inclusive. It states that ‘in general terms, ‘social exclusion - is driven by family, social, and physical environment that can be conducive of discrimination and vulnerabilities - hinders access to quality education and the chances to successfully complete education and training’. So, discrimination is considered as one of the barriers causing social exclusion. It also remarks that ‘social exclusion is at the same time the result and the cause for education poverty, a vicious circle perpetuated from one generation to the next’. The impact assessment concludes

⁴⁰ Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013

⁴¹ European Commission (2018), *Commission Staff Working Document Impact Assessment Accompanying the document Proposal for a Regulation of the European Parliament and of the Council establishing ‘Erasmus’: the Union programme for education, training, youth and sport and repealing Regulation (EU) 1288/2013*. SWD/2018/277 final - 2018/0191 (COD)

that 'learners with fewer opportunities and institutions from underperforming EU regions remain over-represented among the low achievers on basic skills (PISA results show that the risk of becoming a low-achiever is four times higher for pupils from a weak socio-economic background than from a strong one), show high rates of early school leaving and insufficient higher education attainment and in general score low on other social indicators'⁴². It also concludes that 'first and second-generation migrant children in schools are under-performing, partly because of inadequate support in the language of schooling'. It does not further explain the root causes behind social exclusion from the perspective of discrimination or refer to remedy measures.

2.3.2. Programming

The implementation of Erasmus+ is guided by programme implementation guidelines, annual work programmes, programme guides, and annual reports. The table below summarise how these documents refer to programme contribution to education in relation to racism and discrimination.

Table 2 – Programming Erasmus+ 2021-2027 in the field of education and racism

Erasmus+ work programme, programme guides	
Programme implementation guidelines ⁴³	The implementation guidelines for Erasmus+ (and European Solidarity Corps) Inclusion and Diversity Strategy, provides mechanisms to support inclusion and diversity, the role of applicant organisations, and the role of National Agencies, Resource Centres, and the European Education and Culture Executive Agency (EACEA). It refers to discrimination as one of the barriers in accessibility and outreach, but does not provide specific measures for steering on combating discrimination.
References in annual work programme 2021 ⁴⁴	Emphasis is placed on activities of the programme which promote and foster social inclusion, equity and active citizenship in formal and non-formal education, training, youth, and sport, as well as integrated and innovative approaches aimed at fostering inclusion, diversity, equality, gender-balance and non-discrimination in education, training, youth, and sport activities. In 2019 this cross-cutting priority was introduced, also having a specific call under Erasmus+ on 'social inclusion through education and training'.
Reference in programme guides ⁴⁵	Inclusion and diversity is one of the priorities for all Erasmus+ sectors. For Key Action 2 (strategic partnerships), it is mentioned that these are expected to trigger modernisation and reinforce the response of education and training systems and youth policies to the main challenges of today's world, amongst else non-discrimination. No specific reference is made to remedy measures for tackling racism and discrimination in the field of education.
'National' priorities	Open to National Agencies (Key Action 1 and 2) based on fixed list of annual priorities at European level. National Agencies cannot decide on own priorities,

⁴² Ibid.

⁴³ European Commission (2021), *Implementation guidelines - Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy*.

⁴⁴ European Commission (2021), *2021 annual work programme - "Erasmus+": the Union Programme for Education, Training, Youth and Sport - C(2021) 1939 of 25 March 2021*.

⁴⁵ European Commission (2021), *Erasmus+ programme guide 2021*.

Erasmus+ work programme, programme guides	
	but can decide to put more emphasize on one or more of the EU priorities, given the needs of their country.
Annual reports ⁴⁶	No specific reporting on programme contribution to fight against racism

The guidelines for programme implementation do not directly refer to the contribution of programmes to the fight against racism, nor to the specific measures identified in the specialist literature. Nevertheless, the topic is addressed as one of the root causes for social exclusion, and programme actions allow applicants to design projects that tackle racism within education or by means of the education sector. It does not define specific types of interventions to tackle racism, nor does it allocate dedicated budgets to the theme or require reporting on the programme's contribution to the fight against racism in annual reports. National agencies have the autonomy to define national priorities in the decentralised action of the programmes.

An important document to steer on inclusion and diversity are implementation guidelines for Erasmus+ (and European Solidarity Corps) Inclusion and Diversity Strategy. These guidelines, as indicated in the table above, provide mechanisms to support inclusion and diversity of the programme and refer to the role of applicant organisations and National Agencies, Resource Centres, and the European Education and Culture Executive Agency (EACEA). The main aim of these guidelines is to make the programme accessible for all and especially for people with fewer opportunities, by addressing barriers for participation. Discrimination linked to gender (gender identity, gender expression, etc.), age, ethnicity, religion, beliefs, sexual orientation, disability, or intersectional factors (a combination of one or several of the mentioned types) is mentioned as one of the barriers linked to accessibility (next to disabilities, health problems, barriers linked to education and training systems, cultural differences, social barriers, economic barriers, and geographical barriers). This should ultimately lead to better projects either directly involving people with fewer opportunities or focussing on inclusion and diversity issues. The measures proposed are included in the table below.

Table 3 – Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy⁴⁷

Programme	The role of applicant organisation	Role of national Agencies, Resource Centre, European Education and Culture Executive Agency
<ul style="list-style-type: none"> Inclusion and diversity as priorities in the assessment process Accessibility and user-friendliness of the programmes Preparatory Visits Reinforced mentorship Dedicated financial support Smaller, easier-to-access actions Step-by-step capacity building pathways Project format and mobility duration European activities at the local level Online exchanges 	<ul style="list-style-type: none"> Networking and capacity building for inclusion and diversity Equitable and transparent selection of participants Awareness-raising and outreach Preparation and support of participants in all project stages 	<ul style="list-style-type: none"> Information and awareness raising Supportive approach Strategic action Inclusion Officers Training and networking for organisations, National Agency staff and expert evaluators Monitoring and reporting Synergies with other programmes

⁴⁶ European Commission (2020), *Erasmus+ Annual Report 2019*.

⁴⁷ European Commission (2021), *Implementation guidelines - Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy*.

• Language learning support	• Encourage and support community participation	
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One important element through which the programme can steer towards the fight against racism is through the selection criteria that call for inclusion and diversity. These criteria are applied when deciding on the allocation of financial support, and determine that projects involving participants with fewer opportunities, newcomer and grassroots organisations should be given priority in the grant awarding process. However, no specific steering interventions are mentioned to steer on specific types of discrimination or projects on combating discrimination. Each national agency should further develop national Erasmus+ and European Solidarity Corps Inclusion and Diversity action plans based on the local reality in the country, but always consistent with the strategy at a European level. These action plans are still being drawn up at the time of writing this report. Each National Agency needs to appoint at least one Inclusion and Diversity Officer who coordinates inclusion and diversity related actions in the National Agency.

2.3.3. Project implementation

As discussed above, the European Commission does not systematically monitor the number and type of projects, nor the share of budget allocated to the fight against racism in Erasmus+. However, this does not mean that no project had been implemented in relation to anti-racism. To provide insights into how much is being done within this context, a preliminary exercise was performed to determine the share of Erasmus+, projects related to racism and discrimination that have been implemented in the previous programme period (between 2014 and 2020). For this exercise, an analysis was performed on the full project overviews (published on their respective project results platforms⁴⁸) for the period 2014 to 2020. This database represents a combined total of 151 853 projects. The total budget awarded to these projects, between 2014 and 2020, amounted to slightly over EUR 15.9 billion. After performing an estimation of *which* projects can be related to racism⁴⁹, a total of 9 281 projects were identified (6.1 % of the total number of projects). This corresponded to an awarded budget of slightly over EUR 578 million (3.6% of the total budget awarded). When observing the results for the separate actions, some additional insights can be drawn. A larger share of projects within KA2 (cooperation) and KA3 (policy reform) are addressing racism in their project summary, compared to KA1 (mobility). Overall, the results of this exercise show that a substantial share of racism-related projects have been implemented over the period 2014-2020, despite limited steering in programming.

Table 4 – Erasmus+ projects in the field of education that address the fight against racism

Programme area	Number of racism-related projects	Share of total number of projects	Sum of EU grant awarded (EUR)	Share of budget (of respective programme area's budget)
Erasmus -KA1	7290	5.9%	282 523 192	2.7%
Erasmus -KA2	1835	7.4%	275 927 501	5.4%
Erasmus -KA3	156	6.3%	19 836 622	6.5%
Total	9281	6.1%	578 287 315	3.6%

⁴⁸ Available at: https://ec.europa.eu/programmes/erasmus-plus/projects/eplu-projects-compendium_en

⁴⁹ To determine which projects can be considered 'related to racism', six terms / keywords were selected - to allow mapping of the projects through rule-based filtering and manual post-coding ('tagging / matching'). More specifically, a project was tagged if the project summary contained: (1) 'racism'; (2) 'discrimination'; (3) 'xenophobia'; and (4) 'hate speech'. Finally, a project was considered relevant in case at least one of these topics was detected in their project summaries.

Source: based on data from the annual project overviews for Erasmus+ (KA1), and the full project overviews for Erasmus+ (KA2 and KA3)⁵⁰.

Lastly, some insights were gathered on the range of activities performed within the Erasmus+, related to the fight against racism⁵¹. Overall, the activities implemented through anti-racism projects generally address the remedy measures proposed in specialist literature (see Section 2.1.3), for instance through addressing the role of education institutions, curricula, as well as the professional development of all actors in education institutions from policymakers, leaders, teachers, staff, and students that should receive training to become aware of their implicit bias – their unconscious bias and beliefs. In several projects, its contribution to fight against racism and discrimination is mentioned as side effect. To counter exclusion, discrimination, anti-migration, anti-European racism and a general hostility to Europe, projects indicate that an important building block is “getting to know and appreciate each other”. Through visiting each other and working together, the participants get to know other European countries and young people.

2.3.4. Monitoring and evaluation

Table 5 – Monitoring and evaluating Erasmus+ in the field of education and racism

Monitoring framework	
Monitoring framework	No specific indicator related to the topic racism and discrimination related activities in the field of education and training. Annex II of the Regulation include indicator on inclusion, being the number of people with fewer opportunities taking part in activities under Key Action 1; and the number of newcomer organisations and institutions taking part in the Programme under Key Actions 1 and 2;
Studies and Evaluations	No specific reference to programme contribution to the topic racism or discrimination in the mid-term evaluation in the field of education. No dedicated studies and evaluations on the topic racism.

The monitoring framework of Erasmus+, as included in Annex 2 of the Erasmus+ Regulation, does not define specific indicators to measure the programme’s contribution to the fight against racism. Instead, it measures the number of people with fewer opportunities taking part in activities, as well as the newcomer organisation and institutions taking part in the Programme. With regards to the first indicator, this also includes the groups of people that face discrimination, next to obstacles related to economic, social, cultural, geographical or health reasons, due to their migrant background, or for reasons such as disability or educational difficulties or for any other reason.

The mid-term evaluation of the previous Erasmus+ programme also does not include a comprehensive analysis on programmes contribution to the fight against racism. The only information provided in the mid-term evaluation is based on a pre/post analysis for pupils that confirms the positive contribution of Erasmus+ in five similar result areas, the order of which appears nevertheless specific to the school sector. There are statistically significant differences in results across pre- and post-survey of school pupils in EU citizenship (+7 score points), digital competence (+4), racism and xenophobia (+3), self-confidence in education (+4), civic participation and volunteering (negative difference)⁵². The mid-term evaluation of

⁵⁰ Retrieved from: https://ec.europa.eu/programmes/erasmus-plus/projects/eplu-projects-compendium_en

⁵¹ The range of activities was assessed through qualitative interpretation of the project summaries (quick scan), after identifying and flagging racism-related projects (filtering out the unrelated projects).

⁵² European Commission (2018). *Commission Staff Working Document. Mid-term evaluation of Erasmus+ programme 2014-2020*.

Erasmus+ concluded that Erasmus+ has proven to be flexible in adjusting to new emerging EU-level challenges (e.g. refugee crisis, intolerance or violent radicalisation were often mentioned), particularly through its annual work programming. Several National Reports value as well the flexibility of Erasmus+ objectives to address emerging challenges. Nevertheless, some ad hoc studies have shown the impact of different actions on the fight against racism. In 2019, an Impact study on Erasmus+ Higher Education Strategic Partnerships and Knowledge Alliances found that two out of three participating higher education institutions stated that their project contributed to increasing social inclusion and non-discrimination in higher education⁵³.

⁵³ European Commission (2019), *Study on the impact of Erasmus+ Higher Education Partnerships and Knowledge Alliances at local, national and European levels on key Higher Education policy priorities*. Luxembourg: Publications Office of the European Union, 2019

3. THE ROLE OF SPORT IN THE FIGHT AGAINST RACISM

KEY FINDINGS

- Sports offer many opportunities to prevent discrimination and racism, providing bonding and bridging social capital for its participants.
- Remedy measures identified in the literature include:
 - banning hate speech from all sports arenas and training facilities (awareness and sanctioning);
 - fostering social interaction and team building between different social groups from the youth level on;
 - eliminating obstacles for mobility towards more professional levels for minorities;
 - striving for more diversity and inclusion in key positions in the whole of the sports sector;
 - including and enforcing non-discrimination clauses in managerial and coaching contracts.
- These remedy measures are generally recalled in the EU Anti-racism Action Plan. Question remains if enough is done to deal with more subtle or unconscious forms of structural racism.
- The Erasmus+ regulation addresses its contribution to inclusion in sport and specific priorities on the fight against racism are defined for concrete actions.
- There is a significant share of projects that are addressing racism and discrimination related topics enacting virtually all remedy measures proposed in literature.
- No specific indicators are defined for sport to measure programmes' contribution to the fight against racism.

3.1. Existing specialist literature on the role of sport fighting racism

3.1.1. Opportunities

Sports offer many opportunities to prevent discrimination and racism. Various studies have shown recreational sports provide bonding and bridging social capital for its participants.⁵⁴ Bonding social capital is within a group or community whereas bridging social capital is between social groups, social class, race, religion or other important sociodemographic or socioeconomic characteristics.⁵⁵ Within sports teams' participants can form bonds with team members with widely different cultural, ethnic, and religious backgrounds. Role models such as coaches or professional athletes from these backgrounds can also strengthen social cohesion and counter prejudice against minorities.

⁵⁴ Kristin Walseth (2008), *Bridging and bonding social capital in sport—experiences of young women with an immigrant background*, *Sport, Education and Society*. 13:1, 1-17.

⁵⁵ Putnam RD. (2000), *Bowling alone : the collapse and revival of American community*. New York: Simon and Schuster; 2000.

A recent study from the EPRS also points out that the same applies for competitive sports. Although they “[...] can be viewed as a form of differentiation, dividing and ranking participants according to their level of performance, age and gender. [...] It is generally accepted that sport provides a level playing field for participants, by bringing together athletes from different (geographical, cultural, religious, and social) backgrounds to compete against one another, obeying the same rules, and in the same institutional and ethical framework, all coming together in a single 'sporting community'. What is more, 64 % of EU citizens regard sport as a means of combating discrimination.”⁵⁶

3.1.2. Challenges

Sports can also be a cause for great concern regarding discriminations and racism.⁵⁷ Sports arenas (recreational and professional) are frequently hosted to acts of overt racism, misogyny and homophobia by spectators and players. It has been well documented that players with different skin colour or ethnicity are confronted regularly by racial slurs and other forms of racism and discrimination.⁵⁸ Furthermore, the governing bodies of sporting organisations consist mostly of white heterosexual men and are thus failing to represent women, members of the LGBTI+ community and people of colour.⁵⁹ The same applies to trainers and sports journalists. These phenomena are the more subtle forms of discrimination and exclusion sometimes known as structural or institutional racism. A German study on football for the EU Agency for Fundamental Rights (FRA) showed the connection between right-wing extremism and racism by hooligans and voiced at least three forms of structural discrimination based on empiric evidence:⁶⁰

- Sport tribunals tend to impose stiffer sanctions against migrant players than against non-migrant players – for the same type of offence.
- Migrant football clubs sometimes face obstacle and difficulties in finding adequate training facilities.
- Young migrant players in amateur football sometimes encounter barriers of (structural) discrimination within the football club (e.g. coaches’ nomination of players) hampering their football career.

3.1.3. Remedy measures

The specialist literature shows that numerous initiatives and projects have been launched on a national, regional, and local level that aim at combating racism, xenophobia, and related intolerance in sports although there is a lack of legally binding regulations. This means condemnation of racism is usually done in the form of a general anti-discrimination act or through non-binding declarations and position papers. In athletics however, there is an interesting enforceable development where all coaches of the German Athletics Organisation “[...] are obliged to comply with principles of non-discrimination and neutrality according to a “code of honour” which is a binding element of their work contracts.”⁶¹

⁵⁶ Ivana Katsarova (2021), *Fighting discrimination in sport*. European Parliamentary Research Service

⁵⁷ Salomé Marivoet (2014), *ISCTE-Instituto Universitário de Lisboa: Challenge of Sport Towards Social Inclusion and Awareness-Raising Against Any Discrimination*. November 2014

⁵⁸ Hate speech, racism, and other discriminatory behaviour in sport. Report of the topical tour de table of the 48th T-RV meeting (Strasbourg, 5-6 June 2019)

⁵⁹ FRA (2010), *Racism, ethnic discrimination and exclusion of migrants and minorities in sport: a comparative overview of the situation in the European Union*.

⁶⁰ Peucker, M. (2010), *Racism, xenophobia, and structural discrimination in sports: Country report Germany*.

⁶¹ Ibid.

Existing sources seem to point towards the following (non-exhaustible) possible remedy measures on fighting racism in sport:

- Banning hate speech from all sports arenas and training facilities (awareness and sanctioning).⁶²
- Fostering social interaction and team building between different social groups from the youth level on (implementation).⁶³
- External communication about non-discrimination (awareness).⁶⁴
- Eliminating obstacles for mobility towards more professional levels for minorities (monitoring).⁶⁵
- Striving for more diversity and inclusion in key positions in the whole of the sports sector (implementation and monitoring).⁶⁶
- Including and enforcing non-discrimination clauses in managerial and coaching contracts (implementation and sanctioning).⁶⁷

3.2. The role of the EU Anti-racism Action plan in the field of sport

The EU Anti-racism Action plan addresses the important role of sport to actively address racial and ethnic stereotypes, just like the role of media, education, and culture. Furthermore, the EU Anti-racism Action Plan points that “EU action on sport also prioritises projects that counter stereotypes and promote social inclusion through sport, including in cooperation with key organisations such as the Union of European Football Associations (UEFA) and the International Federation of Association Football (FIFA). It refers to joint initiatives such as the UEFA Respect, #EqualGame and #WePlayStrong campaigns and the FIFA #stopracism and #stopviolence campaigns. It also indicates that under the 2021-2027 Erasmus+ programme, the specific focus on grassroots [recreational] sports, i.e. organised sport practised at local level by amateur sports people, and ‘sport for all’, will make it easier for people from all backgrounds, including those with a minority racial or ethnic background, to participate. The Commission will also promote awareness-raising through targeted communication activities. This will include reaching out to high-level figures of the sport, but also political, business, or cultural world and inviting organisations with a large outreach to lend their support.

The EU Anti-racism Action Plan addresses several remedy measures mentioned in the specialist literature. The EU’s cooperation with UEFA and FIFA for instance, is a particularly powerful alliance to address the issue of racism, specifically concerning racist incidents during professional football matches. Also, the focus on grassroots sports will include all forms of sports and will provide many opportunities for combating racism and discrimination if properly executed, prioritized, and monitored.

The question is to what extent project beneficiaries limit themselves to only addressing overtly racist acts within football, and whether enough is done to deal with more subtle or unconscious forms of structural racism such as (unconsciously) excluding women or people with a migrant background for key positions within the sports. Of course, football is just one of the many sports practised in the EU, and it is therefore necessary that also other initiatives are taken in other professional (non-recreational or grassroots) sports. Because of the sheer number of football participants and the known racist incidents in and near football

⁶² CoE (2020), *Hate speech, racism and other discriminatory behaviour in sport*. 14 September 2020

⁶³ ECRI (2008), *ECRI Recommendation n.12 on combating racism and racial discrimination in the field of sport*

⁶⁴ Ibid.

⁶⁵ Peucker, M. (2010), *Racism, xenophobia and structural discrimination in sports: Country report Germany*.

⁶⁶ Ibid.

⁶⁷ Ibid.

itches the sector could take the lead and inspire other professional sports sectors as well. As of now, the EU Anti-racism Action Plan does not mention any other specific sports.

Considering the vast potential of sports in preventing racism and discrimination, the limited attention awarded to it in the EU Anti-racism Action Plan seems too little. Furthermore, there is no mention at all on the representation of marginalised communities in key positions in sports. Laying the basis for more diversity and inclusion in the sporting sector as a whole could be one of the most promising strategies on tackling racism and discrimination in the long run. This means more work needs to be done concerning more subtle forms of inclusion by addressing (unconscious) bias, stereotypes, prejudices, inequalities and microaggressions in sports.

3.3. The role of funding programmes in the field of sport

Erasmus+ also promotes the European dimension of Sport (2% of the total Erasmus+ budget), aimed to increase the level of participation and to develop innovative practices in sport and physical activity. Sport is recognised as an economic driver for jobs and growth and an important source of non-formal learning, including for disadvantaged groups. To explore how the Erasmus+ programme supports the fight against racism in this area, an assessment is made of its regulatory framework, as well programming, project implementation, monitoring and evaluation.

3.3.1. Regulatory framework

The previous chapter on the role of education in the fight against racism already discussed in detail the regulatory framework of Erasmus+. This section therefore focuses specifically on how the relationship between sport and the fight against racism is referred to in the Erasmus+ Regulation. In the preamble, the Erasmus+ Regulation 2021-2027 already refers to the role of sport in relation to social inclusion and equality and promoting European values, including that of the right to be free from discrimination. Its specific objective related to sport addresses the contribution to inclusion in sport (article 3.2.C). The Erasmus+ Regulation for the programme period 2014-2020, however, is more prominently referring to the contribution of sport in the fight against racism. In its specific objectives (article 16) the Regulation specifies that the programme tackles 'cross-border threats to the integrity of sport, such as doping, match-fixing and violence, as well as all kinds of intolerance and discrimination (article 16.1.a)'. The Regulation of the previous programme period also specifies that Erasmus+ 'promotes voluntary activities in sport, together with social inclusion, equal opportunities and awareness of the importance of health-enhancing physical activity through increased participation in, and equal access to, sport for all' (article 16.1.c).

Table 6 – Regulatory framework Erasmus+ 2021-2027 in the field of sport and racism

Erasmus+ regulation 2021-2027⁶⁸	
Preamble	(14) There is a need to focus, in particular, on grassroots sport, taking into account the important role that sports play in promoting physical activity and a healthy lifestyle, interpersonal relations, social inclusion, and equality. [...]The Programme should contribute to promoting common European values through sport, good governance and integrity in sport, sustainable development, and education, training, and skills in and through sport. Not-for-profit sport events supported by the Programme should achieve a European dimension and impact.
General and specific objectives	(Article 3.2.1) Promote learning mobility of sport coaches and staff, as well as cooperation, inclusion, creativity, and innovation at the level of sport organisations and sport policies. No specific reference to the role of sport combating racism and discrimination.
Specific articles	No specific reference to the role of sport combating racism and discrimination.

The impact assessment of the current Erasmus+ Regulation for 2021-2027 does not directly refer to the role of sport in relation to the topic of racism and discrimination, neither did it refer to concrete interventions addressing these topics (see overview of remedy measures in Section 4.1.3). The topic is wider embedded in the context of making Erasmus+ more inclusive, addressing the inclusion gap (see also Section 3.3.1).

3.3.2. Programming

The implementation of Erasmus+ is guided by programme implementation guidelines, annual work programmes, programme guides, and annual reports. The table below summarise how these documents refer to programme contribution to sport in relation to racism and discrimination.

⁶⁸ Regulation (EU) 2021/817 of the European Parliament and of the Council of 20 May 2021 establishing Erasmus+: the Union Programme for education and training, youth and sport and repealing Regulation (EU) No 1288/2013

Table 7 – Programming Erasmus+ 2021-2027 in the field of sport and racism

Erasmus+ work programme, programme guides	
Programme implementation guidelines ⁶⁹	<p>See Section 3.3.2</p> <p>Indicates specifically that ‘sport is a framework for personal, social and learning skills and promoting tolerance, solidarity, inclusiveness as well as other sport values and EU values. One of the goals of the new EU Workplan for Sport⁷⁰ is to increase participation in sport and health-enhancing physical activity in order to promote an active and environment-friendly lifestyle, social cohesion and active citizenship’.</p>
References in annual work programme ⁷¹	<p>See Section 3.3.2</p> <p>Indicates that ‘sport actions will continue to support initiatives that tackle cross-border threats to the integrity of sport, such as doping, match fixing and violence, as well as all kinds of intolerance, harassment and discrimination and activities leading to or related to violent extremism. It will also promote and support good governance in sport and dual careers of athletes and voluntary activities in sport, together with social inclusion, including of refugees and migrants’.</p> <p>Referring to ‘The #Beinclusive EU sport awards will once again recognise sport organisations working with ethnic minorities, refugees, people with disabilities, youth groups at risk, or other groups that face challenging social circumstances’.</p> <p>It also indicated that ‘a group of experts on Gender Equality in Sport will be convened with the aim of submitting proposals for future actions to the Commission’.</p> <p>Specific priorities on combating violence, racism, discrimination, and intolerance in sport and tackling violent radicalisation is defined for partnerships for cooperation in the sport field and small-scale cooperation partnerships for projects in the field of sport. Erasmus also supports not-for-profit European sport events in the field of non-discrimination.</p>
Reference in programme guides ⁷²	<p>See section 3.3.2</p> <p>In the field of sport priority will be given to partnerships which contribute to the implementation of key policy documents such as the EU Work Plan for Sport (2021-2024) or the Council recommendation of health-enhancing physical activity. Amongst else, specific priority in the sport field is given to combating violence and tackling racism, discrimination and intolerance in sport and tackling violent Radicalisation. Projects under this priority will focus mainly on combating those behaviours that may have a negative influence over the practice of sport and society more in general. Projects will contribute to the fight of any form of discrimination and promote equality in sport, including gender equality.</p>
National priorities	Open to National Agencies
Annual report	Indicates that 52% of all small collaborative partnerships and 27% of larger collaborative partnerships are devoted to promoting social inclusion and equal opportunities in sport. In addition, the third edition of the #Beinclusive EU sport awards recognised organisations using the power of sport to increase social inclusion for disadvantaged groups.

⁶⁹ European Commission (2021), *Implementation guidelines - Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy*.

⁷⁰ Resolution of the Council and of the Representatives of the Governments of the Member States meeting within the Council on the European Union Work Plan for Sport (1 January 2021-30 June 2024) 2020/C 419/01

⁷¹ European Commission (2021), *2021 annual work programme - "Erasmus+": the Union Programme for Education, Training, Youth and Sport - C(2021) 1939 of 25 March 2021*.

⁷² European Commission (2021), *Erasmus+ programme guide 2021*.

The documents guiding the implementation of the programme make specific reference to its contribution to the fight against racism and discrimination in sports. This is most visible in the annual work programme, which refers to the importance of sport to address all kinds of intolerance, harassment, and discrimination. Specific priorities on combating violence, racism, discrimination, and intolerance in sport and tackling violent radicalisation is defined for partnerships for cooperation and small-scale cooperation partnerships for projects in the field of sport. Erasmus also supports not-for-profit European sport events in the field of non-discrimination. These guiding documents do not refer to specific type of intervention that are tackling racism, nor are specific budgets allocated to the theme.

The annual report does not specifically refer to its contribution to the fight against racism and discrimination, but remains limited to social inclusion and equal opportunities in general.

3.3.3. Project implementation

The Commission does not systematically monitor the number and type of projects in the field of sport, nor the share of budget allocated to the fight against racism. To provide insights into how much is being done within this context, a preliminary exercise was performed to determine the share of Erasmus+ sport projects related to racism and discrimination that have been implemented in the previous programme period (between 2014 and 2020)⁷³. For this exercise, an analysis was performed on the full project overview of Erasmus sport projects (published on the respective project results platform⁷⁴) for the period 2014 to 2020. This database represents a combined total of 1 174 sport projects. The total budget awarded to these projects, between 2014 and 2020, amounted to slightly over EUR 250.4 million. After performing an estimation of *which* projects can be related to racism⁷⁵, a total of 94 projects were identified (8.0 % of the total number of projects). This corresponded to an awarded budget of slightly over EUR 20 million (8.0% of the total budget awarded). When observing the results for the separate actions, some additional insights can be drawn. Only a small number of non-for-profit European sport events are organised that address the topic racism and discrimination (in total 2 out of 80), while a larger share of collaborative partnerships address racism in their project summary. Overall, the results of this exercise show that a substantial share of racism-related projects have been implemented over the period 2014-2020.

Table 8 – Erasmus+ projects in the field of sport that address the fight against racism

Programme area	Number of racism-related projects	Share of total number of projects	Sum of EU grant awarded (EUR)	Share of budget (of respective programme area's budget)
Collaborative Partnership	92	8.4%	19 263 299	9.1%
Not-for-profit European sport event	2	2.5%	887 672	2.3%
Total	94	8.0%	20 150 971	8.0%

⁷³ We followed a similar analysis as for the education and training projects as presented in Section 2.3.4.

⁷⁴ Available at: https://ec.europa.eu/programmes/erasmus-plus/projects/eplu-projects-compendium_en

⁷⁵ To determine which projects can be considered 'related to racism', six terms / keywords were selected - to allow mapping of the projects through rule-based filtering and manual post-coding ('tagging / matching'). More specifically, a project was tagged if the project summary contained: (1) 'racism'; (2) 'discrimination'; (3) 'xenophobia'; and (4) 'hate speech'. Finally, a project was considered relevant in case at least one of these topics was detected in their project summaries.

Source: based on data from the annual project overviews for Erasmus sport projects ⁷⁶.

Lastly, some insights were gathered on the range of activities performed within the Erasmus+, related to the fight against racism⁷⁷. Overall, the activities implemented through anti-racism projects generally address the remedy measures proposed in the specialist literature (see Section 3.1.3). Nevertheless, for a lot of funded activities, anti-racism is just one of the supposed benefits deriving from the activity. Many projects include anti-racism amongst other topics like match-fixing, doping, integrity (sexual) harassment and abuse. This usually materialises in products such as manuals or declarations on Sports Values or Fair Play. Nonetheless, a few projects specifically target racism. They develop, for instance, theatre play for youth, a handbook on racism, capacity building for teachers, surveying athletes on racism, specific meetings on the subject or using sport psychology to tackle racism and discrimination together with research tools, the use of change agents, manuals etc. Subtle forms of racism are addressed by some projects for that focus on specific groups such Queering Football, Gender Inequity, Bullying of migrant and refugee children, Disability in Football and Empowering Women Athletes.

3.3.4. Monitoring and evaluation

Table 9 – Monitoring and evaluating Erasmus+ in the field of sport and racism

Monitoring framework	No specific indicator related to the topic racism and discrimination related activities in the field sport. Annex II of the regulation include indicator on inclusion, being the number of people with fewer opportunities taking part in activities under Key Action 1; and the number of newcomer organisations and institutions taking part in the Programme under Key Actions 1 and 2.
Studies and Evaluations	No specific reference to programme contribution to the topic racism or discrimination in the mid-term evaluation in the field of education. No dedicated studies and evaluations on the topic racism.

The Erasmus + monitoring framework does not include specific indicators to measure programmes contribution in the fight against racism in the field of sport. The programme only measures the number of people with fewer opportunities taking part in activities and the newcomer organisation and institutions taking part in the Programme. With regards the first indicator, this also includes the individuals who face discrimination, amongst other groups, but this is not monitored specifically.

Erasmus+ reported in the previous programming period 2014-2020 on a specific indicator on the percentage of participants in sport-related projects that used the results of cross-border projects to enhance social inclusion, equal opportunities, and participation rates. However, no specific reference is made to racism and discrimination.

The mid-term evaluation of the previous Erasmus+ programme 2014-2020⁷⁸ provided information on programmes' contributions to combating racism and violence, also since a specific objective was focused to intolerance and discrimination (article 16.1.a) and equal access to sport for all (article 16.1.c). The mid-term evaluation showed that around one third (32%) of Erasmus sport organisations that participated in

⁷⁶ Retrieved from: https://ec.europa.eu/programmes/erasmus-plus/projects/eplu-projects-compendium_en

⁷⁷ The range of activities was assessed through qualitative interpretation of the project summaries (quick scan), after identifying and flagging racism-related projects (filtering out the unrelated projects).

⁷⁸ European Commission (2018). *Commission Staff Working Document. Mid-term evaluation of Erasmus+ programme 2014-2020*

Erasmus+ reported positive results in relation to the contribution to combatting racism and violence,. Moreover, the mid-term evaluation shows that almost half (48%) of sport organisations participating in the programme consider themselves to have strong measures in place to combat discrimination, while one third (33%) consider themselves to have medium measures in place, and one-fifth (19%) consider them to have low measures. One needs to be careful with using these results because these are based on self-assessment⁷⁹.

⁷⁹ Ibid.

4. THE ROLE OF CULTURE IN THE FIGHT AGAINST RACISM

KEY FINDINGS

- To effectively improve cohesion, foster creativity and promote diversity, EU action in the field of culture must tackle its own biases and stereotypes.
- Remedy measures identified in the literature include:
 - reducing barriers to participation, fruition, and management of cultural activities;
 - supporting grassroots initiatives, training and awareness raising on diversity;
 - supporting heritage interpretation activities, intercultural dialogue and prizes,
 - monitoring, evaluating and exchanging of good practices.
- These remedy measures are generally recalled in the EU anti-racism Action Plan.
- However, steering on anti-racism is generally limited in the relevant EU programmes.
- Despite limited steering, good mainstreaming with projects implemented on the ground enacting virtually all remedy measures proposed by the literature.
- Limited evidence of the effects of the activity supported despite the emphasis on this point in the literature.

4.1. Existing specialist literature on the role of culture fighting racism

4.1.1. Opportunities

Racism is inherently a matter of culture, heritage, and norms. This is fully acknowledged in the scientific and grey literature alike. Thus, cultural activities are expected to play a key role in redressing discrimination and racism. Although measuring impacts of cultural action to tackle the root causes of racism remains complex,^{80,81} there is broad consensus in the specialist literature on a range of possible direct and indirect benefits.

Direct benefits concern those involved in cultural activities and include, i.e., humanitarian benefits, empowerment, improvement of human capital and sense of belonging for minorities involved in arts and cultural activities.⁸² They can also represent working opportunities⁸³ and '*make visible and give voice to what often remains invisible or silent*'.⁸⁴

⁸⁰ Pasikowska-Schnass, M. (2017), *Integration of refugees and migrants: Participation in cultural activities*. EPRS

⁸¹ De Bock, J., Deufel, N., Di Federico, E., Lewis, R., Siung, L., Walling, M. (2017), *The role of culture in promoting inclusion in the context of migration, Voices of culture*.

⁸² Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*, Brainstorming Report

⁸³ Pasikowska-Schnass, M. (2017), *Integration of refugees and migrants: Participation in cultural activities*, EPRS

⁸⁴ Vlachou, M (2017), *The Inclusion of Migrants and Refugees: The Role of Cultural Organisations*, Acesso Cultura

Even more importantly, cultural activities are valued for the indirect benefits they can bring about and are considered key to tackling the structural causes of racism and discrimination, by enhancing mutual understanding and strengthening cohesion within communities. Heritage interpretation and arts, if properly used, can be thought-provoking experiences of cultural diversity that can question rooted beliefs and stereotypes.⁸⁵ Culture is thus considered as a formidable means of conflict resolution and prevention,⁸⁶ which can ‘connect different value systems and challenging established aesthetic criteria’⁸⁷ thus helping build a more cohesive and open society.⁸⁸

Promoting diversity and intercultural dialogue through arts is also a means of spurring creativity⁸⁹ and hybridisation.⁹⁰ It generates demonstrated economic benefits via spill overs.⁹¹ The resulting increase in diversity can also be a driver of productivity.⁹²

4.1.2. Challenges

As indicated above, there is broad consensus that culture has a key role to play in fostering diverse and cohesive societies thus tackling the root causes of racism and discrimination. However, structural issues exist that impede intercultural dialogue and mutual understanding, including non-verbal barriers, stereotypes, prejudices,⁹³ leading to ghettoization, closure, hatred, and discrimination of marginalised communities. This is all the more relevant at a time where migrations are increasingly re-shaping our societies, including cities, towns, and public spaces.⁹⁴

In addition, if the EU cultural offer is to produce its intended benefits in terms of improving cohesion, it must tackle its own biases and stereotypes.

First and foremost, there are strong barriers to the participation of minorities in culture.⁹⁵ Studies have shown that minorities are underrepresented in culture fruition,^{96,97} production,⁹⁸ and management.⁹⁹ There is also geographical divide (e.g. urban vs rural) and segregation by income levels.¹⁰⁰ This impedes the development of truly diverse and fully inclusive narratives in art and culture.¹⁰¹ Furthermore, such gaps

⁸⁵ Voices of culture (2018), *Social inclusion: partnering with other sectors*

⁸⁶ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*, Brainstorming Report

⁸⁷ ERIcarts (2008), *Sharing diversity national approaches to intercultural dialogue in Europe : study for the European Commission : report*, European Institute for Comparative Cultural Research

⁸⁸ European Commission (2014), *The role of public arts and cultural institutions in the promotion of cultural diversity and intercultural dialogue*

⁸⁹ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*, Brainstorming Report

⁹⁰ Yingling, M. (2020), *The Possibility Spectrum: Increasing Diversity & Inclusion in Arts Organizations*. European Journal of Cultural Management and Policy.

⁹¹ De Bock, J., Deufel, N., Di Federico, E., Lewis, R., Siung, L., Walling, M. (2017), *The role of culture in promoting inclusion in the context of migration*, Voices of culture

⁹² Wiesand, A. (2013), *Turning Intercultural Action into Policies*, ERIcarts - European Institute for Comparative Cultural Research

⁹³ Baires, N. A and Catrone, R. (2021), *On the Importance of Listening and Intercultural Communication for Actions Against Racism*, Preprint

⁹⁴ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*. Brainstorming Report

⁹⁵ De Bock, J., Deufel, N., Di Federico, E., Lewis, R., Siung, L., Walling, M. (2017), *The role of culture in promoting inclusion in the context of migration*, Voices of culture

⁹⁶ Inc Arts (2020), *Diversity and Managing in the Arts*

⁹⁷ Sabatini, F. and Trimarchi, M. (2020), *Challenging spaces and formats of culture in the city: highlights on the future of cultural heritage management*. European Journal of Cultural Management and Policy, 10 (1), pp. 19-31.

⁹⁸ Moser, A. (2020), *Cultural Management and Policy in the “Migration Society”: Inequalities and Starting Points for a Critical Reorientation*. European Journal of Cultural Management and Policy, 10 (1), pp. 4-18

⁹⁹ Castellini, M.; Marzano, M. and Valentini, N. (2020), *Searching for diversity. An overview on boards of Italian Cultural Institutes*. European Journal of Cultural Management and Policy. 10 (1), pp. 32-46

¹⁰⁰ Inc Arts (2020), *Diversity and Managing in the Arts*

¹⁰¹ Moser, A. (2020), *Cultural Management and Policy in the “Migration Society”: Inequalities and Starting Points for a Critical Reorientation*. European Journal of Cultural Management and Policy, 10 (1), pp. 4-18

seem to remain stable or even widen of late¹⁰². Where minorities are represented, their stories are sometimes instrumentalised for “aesthetical purposes” rather than in a quest for substantial equality.¹⁰³

Furthermore, to justify further efforts and investments in culture and improve their effectiveness, there is a need for monitoring and evaluation tools which can demonstrate the positive impacts generated and inform on what works.^{104,105}

4.1.3. Remedy measures

Against this framework, several recommendations can be identified in the specialist literature that aim to improve the effectiveness of EU action in this field. The most recurrent are summarised as follows:

- reduce barriers to participation in culture, including by creating and supporting networks¹⁰⁶ and reaching out to non-users¹⁰⁷ through new channels;¹⁰⁸
- foster real diversity in cultural institutions at the employee as well as management level,¹⁰⁹ also by imposing eligibility and award criteria on organisations benefitting from public funds, and ensuring that their workforce is always paid from the beginning of the career (i.e. including internships, to avoid barriers to entrance);¹¹⁰
- support grassroots initiatives which can substantially enrich diversity and renovate arts;¹¹¹
- train, to equip staff with tools and knowledge to deal with diversity;¹¹²
- support mutual learning, also for cultural organisations;¹¹³
- support NGOs in the cultural and social inclusion sector;¹¹⁴
- support heritage interpretation activities, to experience both the historical roots and the contemporary relevance of the values of inclusiveness;¹¹⁵
- promote collaboration between small and large organisations active in the field;¹¹⁶
- identify and recognise roles and responsibilities for different actors in different competent services;¹¹⁷

¹⁰² Parkinson, A., Buttrick, J. Wallis, A. (2014), *Equality and diversity within the arts and cultural sector in England. Evidence and literature review final report. Arts of council of the UK*

¹⁰³ Montserrat, J., Wee, C., and Williams Gamaker, M. (2020), “We need collectivity against structural and institutional racism in the cultural sector”, Arts professionals

¹⁰⁴ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces. Brainstorming Report*

¹⁰⁵ De Bock, J., Deufel, N., Di Federico, E., Lewis, R., Siung, L., Walling, M. (2017), *The role of culture in promoting inclusion in the context of migration. Voices of culture.*

¹⁰⁶ Voices of culture (2018), *Social inclusion: partnering with other sectors*

¹⁰⁷ European Commission (2014), *The role of public arts and cultural institutions in the promotion of cultural diversity and intercultural dialogue.*

¹⁰⁸ Vlachou, M (2017), *The Inclusion of Migrants and Refugees: The Role of Cultural Organisations.* Acesso Cultura

¹⁰⁹ Moser, A. (2020), *Cultural Management and Policy in the “Migration Society”: Inequalities and Starting Points for a Critical Reorientation.* European Journal of Cultural Management and Policy, 10 (1), pp. 4-18

¹¹⁰ Inc Arts (2020), *Diversity and Managing in the Arts*

¹¹¹ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces. Brainstorming Report*

¹¹² European Commission (2014), *The role of public arts and cultural institutions in the promotion of cultural diversity and intercultural dialogue*

¹¹³ Ibid.

¹¹⁴ ERICarts (2008), *Sharing diversity national approaches to intercultural dialogue in Europe : study for the European Commission : report.* European Institute for Comparative Cultural Research

¹¹⁵ Inc Arts (2020), *Diversity and Managing in the Arts*

¹¹⁶ European Commission (2014), *The role of public arts and cultural institutions in the promotion of cultural diversity and intercultural dialogue*

¹¹⁷ Ibid.

- promote open, accessible, and welcoming public spaces¹¹⁸ and exchanges to unleash creativity; and
- improve monitoring and evaluation also by testing and sharing participatory tools which can demonstrate the effects of promoting inclusion, non-discrimination and combatting racism through culture and help create better policies.^{119,120} Improve benchmarks for cultural institutions.

4.2. The EU Anti-racism Action Plan and the role of culture

The role of culture is highlighted in the EU Anti-racism Action Plan 2020-2025 as a means to tackle the structural causes of racism, often in conjunction with action in the field of media and to ensure balanced narratives and representations of minorities in the society.

The EU Anti-racism Action Plan underlines the importance of common EU values and a strong understanding of the historical roots of racism. Hence the attention on ensuring remembrance, fighting stereotypes, and discussing the history of minorities in Europe and the historical legacy of colonialism.

The EU Anti-racism Action Plan also emphasises the need to improve diversity and tackle underrepresentation in the cultural and creative industries, and clarifies that through the Creative Europe and CERV programmes the EU will seek to remove obstacles to participation. One key notion that is deeply rooted in the agenda and specialist literature alike is that change can only be ensured using intersectional approaches which tackle holistically multiple and sometimes reinforcing types of discrimination.

The EU Anti-racism Action Plan proposes to reach out to profiles in the area of culture also as ambassadors. Finally, the EU Anti-racism Action Plan underlines the importance of improving data collection and knowledge of diversity in all sectors and confirms the need to ensure active cooperation with and financial support for non-governmental organisations and community-based organisations given the key role of civil society in the fight against discrimination and racism.

Overall, the lessons learned from the specialist literature appear to be duly embedded in the EU Anti-racism Action Plan.

4.3. The role of funding programmes in the field of culture

In order to assess the role of funding programmes in pursuing the aims of the EU Anti-racism Action Plan it might be helpful to define the scope of cultural action. In reading the EU Anti-racism Action Plan the main topics seem to include: (i) Art and Creativity; (ii) Heritage and remembrance; (iii) Values, Rights and Citizenship; (iv) Diversity and fighting stereotypes.

These elements define a rather broad field of intervention encompassing a variety of types of action and target groups. Given the cross-cutting nature of “culture”, its boundaries can sometimes overlap with other strands of remedy actions, especially within the field of education and media.

There are three main programmes under the remit of the CULT committee dealing with combatting discrimination and racism which can be mostly – though not solely – referred to the field of culture, notably:

- the Citizenship, Equality, Rights and Values programme (CERV);

¹¹⁸ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*. Brainstorming Report

¹¹⁹ Ibid.

¹²⁰ De Bock, J., Deufel, N., Di Federico, E., Lewis, R., Siung, L., Walling, M. (2017), *The role of culture in promoting inclusion in the context of migration*, [Voices of culture](#)

- the Creative Europe programme; and
- the European Solidarity Corps (ESC).

The sections below provide an overview of elements of programming, implementation and monitoring and evaluation in these funds which contribute to fighting racism. All the documents have been screened in search for references to combatting overt as well as more subtle forms of discrimination, primarily but not only on the grounds of racial or ethnic origin, religion, or belief.

4.3.1. Regulatory framework

The Table below provides an overview of the relevant references to combatting racism and discrimination in the regulatory framework of the three programmes under review. It shows that attention to racism and non-discrimination is particularly apparent in the regulatory framework of the CERV programme, with specific references in its preamble and objectives. Whilst the Equality, Rights and Gender Equality strand aims to prevent discrimination and improve policies combatting racism and discrimination, the other two strands take a more horizontal approach looking at the root causes of discrimination, promoting heritage, EU values and citizens' participation. Both the Creative Europe programme (Culture strand) and the European Solidarity Corps programme have little to no direct references to racism per se, but aim to foster diversity, intercultural dialogue, cultural heritage, inclusion, and community development under their remit. In particular, positive action to ensure representation of minorities is explicitly recalled in the Creative Europe programme's objectives.

Table 10 – Regulatory framework EU programmes in the field of culture and racism

	Citizenship, Equality, Rights and Values¹²¹	Creative Europe¹²² - focus on culture	European Solidarity Corps¹²³
Preamble	Full reference to all forms of discrimination and racism <i>'The Programme should support actions to prevent and combat all forms of discrimination, racism, xenophobia, afrophobia, anti-Semitism, anti-Gypsyism, anti-Muslim hatred, and all forms of intolerance'</i>	<ul style="list-style-type: none"> No reference to racism other than non-discrimination on all grounds as per the Charter of Fundamental Rights.¹²⁴ Non-discrimination, tolerance, human rights, and cultural heritage are recalled in several paragraphs of the preamble Diversity is particularly prominent in the preamble (> 10 paras) 	<ul style="list-style-type: none"> No reference to racism other than that to non-discrimination on all grounds as per the Charter of Fundamental Rights.¹²⁵
General Objectives	Equality, Rights and Gender Equality Strand: <ul style="list-style-type: none"> to prevent discrimination on all grounds; to improve policies which i.a.: <ul style="list-style-type: none"> promoting non-discrimination and the mainstreaming thereof; and combating racism, xenophobia and all forms of intolerance, including homophobia, biphobia, transphobia, interphobia and intolerance on the basis of gender identity, both online and offline; 	Art. 3(1) a) <ul style="list-style-type: none"> <i>'safeguard, develop and promote European cultural and linguistic diversity and heritage'</i> No references to racism and non-discrimination	Key concepts of solidarity, civic participation, and cultural development, as well as contribution to positive societal change.
Specific Objectives	Union Values Strand: <ul style="list-style-type: none"> the ultimate objective is to nurture and sustain a rights-based, equal, open, pluralist, inclusive and democratic society; and 	Emphasis on cross-border, transnational, and intercultural activities. Importantly, in art. 3(5), it is specified that <i>'The Programme objectives shall be pursued in a way that encourages inclusion, equality, diversity, and participation, which, where appropriate, shall be achieved through specific incentives that:</i> <p>(a) <i>ensure that people with disabilities, people belonging to minorities and people belonging to socially marginalised groups have access to the cultural and creative sectors and that encourage their</i></p>	Direct reference to social inclusion and equal opportunities, especially for participants. <p>However, no specific reference to racism, xenophobia, homophobia, hate and other overt forms of discrimination.¹²⁶</p>

¹²¹ Regulation (EU) 2021/692

¹²² Regulation (EU) 2021/818

¹²³ Regulation (EU) 2021/888

¹²⁴ *"In particular, this Regulation seeks to ensure full respect for the right to equality between men and women and the right to non-discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, socioeconomic background [...]"*
¹²⁵ Ibid.

¹²⁶ 0 occurrences of the word "racism", xenophobia, homophobia, 2 occurrences of the word "discrimination", but in the context of providing opportunities on equal grounds to all candidates, not in the sense of fighting discrimination

	Citizenship, Equality, Rights and Values ¹²¹	Creative Europe ¹²² - focus on culture	European Solidarity Corps ¹²³
	<ul style="list-style-type: none"> to contribute to implementing EU priorities, in particular in the area of fundamental rights, the rule of law and democracy. <p>Citizens' engagement and participation:</p> <ul style="list-style-type: none"> to promote citizens' engagement and participation in the democratic life of the Union and exchanges between citizens of different Member States, and to raise awareness of their common European history (citizens' engagement and participation strand): <ul style="list-style-type: none"> supporting projects aimed at remembering defining moments in modern European history; promoting citizens' and representative associations' participation in and contribution to the democratic and civic life; and promoting exchanges between citizens of different countries, in particular through town-twinning and networks of towns 	<p><i>active participation in those sectors, including in both the creative process and audience development; and</i></p> <p>(b) <i>foster gender equality, in particular as a driver of creativity, economic growth and innovation.'</i></p>	

4.3.2. Programming

Attention to combatting racism and non-discrimination is apparent also in the annual programming of the programmes (see table 11). The different nature of the programmes means that in some cases the steering is clear – in terms of stated objectives and in the extent to which the EU Anti-racism Action Plan is explicitly recalled in the official documentation – whilst in some other cases it only transpires through the actions supported and their expected results because of the mainstreaming of the principle of non-discrimination (especially in the case of Creative Europe and the European Solidarity Corps).

The CERV programme also fosters diversity through eligibility and award criteria that ensure that funding steers positive change within the beneficiary organisations, it supports grassroots initiatives to ensure greater diversity and helps create bridges between small and large organisations. This is confirmed in the mid-term evaluation of the predecessor Rights, Equality and Citizenship (REC) programme and by the fact that anti-racism is amongst the single largest call for proposal issued in 2021 and 2022. The EU Anti-racism Action Plan systematically informs call for proposals and other programming documentation of the CERV programme. Importantly, the types of action programmed appear to cover the whole spectrum of remedy actions indicated in the specialist literature.

In the Creative Europe programme great heed is paid to diversity, intercultural dialogue, and actions that through heritage interpretation can foster non-discrimination. However, the EU Anti-racism Action Plan is not mentioned in the main programming documents. It seems also important that awards, prizes, and heritage activities put emphasis not only on the EU identity and values but also on less “consumable” identities of minorities.

Despite somewhat light references to racism, the European Solidarity Corps programme seems to significantly contribute to combatting racism too, also thanks to the fact that non-discrimination is a key eligibility and award criteria for organisations participating as well as one key result of the activities programmed.

Table 11 – Programming EU programmes in the field of culture and racism

	Citizenship, Equality, Rights and Values	Creative Europe	European Solidarity Corps
References in work programmes and programme guides	The EU Anti-racism Action Plan is widely recalled in the work programme, informs several strands, and call for proposals.	The EU Anti-racism Action Plan is not mentioned in the policy framework As above, focus on Cultural Heritage.	Focus on European Cultural Heritage, social inclusion of people with fewer opportunities, tolerance, human rights and the value of differences and diversity <u>No specific reference to racism, xenophobia etc.</u> Non-discrimination, diversity, and inclusion recalled as principles for participants in line with EU strategies and quality standards for applicant organisations
Relevant Expected Results	<p>Union Values:</p> <ul style="list-style-type: none"> strengthened capacity of CSOs that aim to protect and promote EU rights and values; a better developed advocacy and watchdog role for CSOs; increased public awareness of EU rights and values; empowerment of vulnerable groups; and improved knowledge on the charter of Fundamental Rights and enforcement (also for Equality Bodies). <p>Equality, Rights and Gender Equality Strand:</p> <ul style="list-style-type: none"> increased knowledge of EU and national non-discrimination legislation, legislation on hate-speech, victims' empowerment; and increased diversity management and inclusion. 	<p>Heritage days:</p> <ul style="list-style-type: none"> higher awareness of EU citizens on richness and cultural diversity; appreciation of the rich mosaic of European cultures; and counter racism and xenophobia and encourage greater tolerance in Europe and beyond the national borders; etc. <p>Prizes:</p> <ul style="list-style-type: none"> promote intercultural dialogue, circulation of knowledge, contamination; and promote the diversity of cultures in Europe. 	<p>Participants:</p> <ul style="list-style-type: none"> enhanced intercultural awareness; and better awareness of the European project, its foundation, history, functioning and EU values. <p>Organisations:</p> <ul style="list-style-type: none"> greater understanding and responsiveness to social, linguistic and cultural diversity; <p>Society:</p> <ul style="list-style-type: none"> greater understanding and responsiveness to social, linguistic, and cultural diversity;

	Citizenship, Equality, Rights and Values	Creative Europe	European Solidarity Corps
Relevant types of action	<ul style="list-style-type: none"> • Awareness raising • Mutual learning • Analytical and monitoring activities, methodologies and tools, data collection, reports, and guides • Training • ICT tools • Supporting civil society and stakeholders • Increasing awareness about European Culture and values, respect, diversity, remembrance • Bringing together citizens of different nationalities • Developing EU networks 	<p>There are horizontal, sectoral, and special actions. In particular:</p> <ul style="list-style-type: none"> • Horizontal: (i) transnational operation and mobility of artists; (ii) Policy development and mutual learning, including on gender equality (iii) Pan-European platforms • Special actions: <ul style="list-style-type: none"> ○ European Capitals of Culture; ○ European Heritage Label and related networking activities; ○ Union cultural prizes; ○ European Heritage Days; ○ support to European cultural entities such as orchestras that aim to train and promote young, high-potential artists and have an inclusive approach with a large geographical coverage 	<p>Volunteering activities which aim, i.a. to:</p> <ul style="list-style-type: none"> • reach out to young people with fewer opportunities including refugees, asylum seekers and migrants; • promote diversity, intercultural and inter-religious dialogue, EU values of human dignity, freedom, equality and respect for human rights, including the rights of persons belonging to minorities, as well as on projects enhancing media literacy, critical thinking; and • raise participants' awareness and understanding of other cultures and countries, offering them the opportunity to build networks of international contacts, to actively participate in society and develop a sense of EU citizenship and identity.

4.3.3. Implementation

The trends described about the regulatory framework and annual programming of the programmes are clearly reflected in the implementation of the projects on the ground (see table 12). Substantial support is provided by the CERV programme through its call for proposal directly aiming at fighting racism and the many types of actions supported (from tools to embed diversity such as the diversity charts, to the provisions of skills to enforce anti-racism principles to e.g. regulatory bodies etc.). Amongst other, there is systematic support to improving awareness, equipping institutions and NGOs with the instruments and resources to fight racism, preventing discrimination and embed diversity across the board, develop new methodologies and tools to better understand racism and discrimination, European Remembrance activities and the likes. But clear attention to racism can be found also in the support to remembrance and heritage interpretation within the Creative Europe and European Solidarity Corps programmes. For the latter, it is interesting to notice how non-negligible shares of the volunteering and solidarity projects carried out through 2018-2020 explicitly aim to tackle overt forms of racism and discrimination, in addition to the substantial share of projects contributing to social inclusion, diversity and tolerance. This happened despite racism was not explicitly mentioned neither in the stated programme objectives nor in annual work programmes.

Table 12 – Implementation of EU programmes in the field of culture and racism

	CERV	Creative Europe	European Solidarity Corps
Relevant projects implemented ¹²⁷	<p>Relevant calls for proposals for 2021 include:</p> <ul style="list-style-type: none"> • Anti-racism call for proposal (EUR 10 million) • European Remembrance call for proposal (around EUR 12 million) • EU identity and values (EUR 50 million, including grass roots initiatives) 	<ul style="list-style-type: none"> • European Heritage Days (EUR 400 thousand) • Prizes in the area of Cultural heritage • European Capitals of Culture (ECOC) • European Heritage Label¹²⁸ 	<p>A total of 7073 projects in 2018-2020, with the following themes:</p> <ul style="list-style-type: none"> • Inclusion: 34.8% • Equality and non-discrimination: 20.4% • European identity and values: 13.9% • Human rights: 5.5% • Reception and integration of third-country nationals: 3.2% <p>Screening the project database for relevant keywords yields the following results: (i) overt forms of racism and discrimination: 2% to 4%¹²⁹, (ii) subtle forms of discrimination: 10% to 50%¹³⁰</p>

For the Creative Europe programme, the Commission does not systematically monitor neither the number and type of projects, nor the share of budget allocated to the fight against racism. To provide insights into how much is being done within this context a preliminary exercise was performed to determine the share of Creative Europe projects related to racism and discrimination that have been implemented in the previous programme period (between 2014 and 2020). Similar to Erasmus+, an

¹²⁷ This is done with reference to the most recent years for which info is available, or 2021 work programme

¹²⁸ "The European Heritage Label remains one of the most valuable EU initiatives to strengthen the European citizens' sense of belonging to the Union, the focus on the European dimension of cultural heritage sites and the common values they represent being a distinctive feature of the action" – Annual work programme 2021

¹²⁹ For example, the term "racism" is a keyword in around 4% of the projects funded in 2018-2020, xenophobia 2%, violence 4%

¹³⁰ For example, the term "inclusion" is a keyword in around 51% of projects funded in 2018-2020, discrimination 25.8%, diversity 21.5%, tolerance 20.9%, exclusion 11.2%, stereotypes 8.1%.

analysis was performed on the full project overviews (published on their respective project results platforms¹³¹) for the period 2014 to 2020. This database represents a combined total of 4 649 projects, of which 1 353 are related to culture, 3 276 to media, and 20 Cross-sectorial projects. The total budget awarded to these projects, between 2014 and 2020, amounted to EUR 894 million, with EUR 405 million for Culture projects, EUR 485 million for media, and EUR 4 million for cross sectorial projects. After performing an estimation of *which* projects can be related to racism¹³², a total of 41 projects were identified (0.9 % of the total number of projects). This corresponded to an awarded budget of slightly over EUR 8,6 million (1% of the total budget awarded). When observing the results for the separate actions, some additional insights can be drawn. A larger share of projects in the 'culture' strand are addressing racism in their project summary, compared to 'media'. Overall, the results of this exercise show that **a small share of racism-related projects have been implemented over the period 2014-2020**, compared to the Erasmus+ (see previous chapters). However, caution should be taken in interpreting this as low attention to racism as the fight against racism in the cultural sector might take the form of more indirect contribution to boosting diversity thus tackling the root causes of discrimination.

Table 13 – Creative Europe projects that address the fight against racism

Programme area	Number of racism-related projects	% of total number of projects	Sum of EU grant awarded (EUR)	% of budget (of respective programme area's budget)
Culture	24	1.8%	200 000	4.9%
Media	16	0.8%	5 545 039	1.4%
Cross-sectorial	1	5.0%	2 854 850	0.6%
Total	41	0.9%	8 599 889	1.0%

Source: based on data from the full project overviews for the Creative Europe Programme¹³³

Lastly, some insights were gathered on the range of activities performed within the Creative Europe projects related to the fight against racism.¹³⁴ The activities implemented through anti-racism projects generally address the remedy measures proposed in specialist literature (see section 4.1.3).

Supported projects that address the topic of discrimination and racism in the field of culture include literacy translation projects (total 6) and cooperation projects (total 18). Examples of such projects include book translations (such as the project 'Literary Conversations with the Future'), music (such as the project 'Radical Music and its Intercultural Nature'), theatre (such as the project 'Free man Walking – theatre as a tool for detainees' integration'), museums (such as the project 'From Complicated Past Towards Shared Future'), as well as training of artist form underrepresented groups or newcomers in European societies (such as the project 'Co-creating Europe through the arts'), or research on discrimination of specific groups in art (such as the project 'Not Yet Written Stories – Women Artists')

¹³¹ Available at <https://ec.europa.eu/programmes/creative-europe/projects/ce-projects-compendium/>

¹³² To determine which projects can be considered 'related to racism', six terms / keywords were selected - to allow mapping of the projects through rule-based filtering and manual post-coding ('tagging / matching'). More specifically, a project was tagged if the project summary contained: (1) 'racism'; (2) 'discrimination'; (3) 'xenophobia'; and (4) 'hate speech'. Finally, a project was considered relevant in case at least one of these topics was detected in their project summaries.

¹³³ Retrieved from <https://ec.europa.eu/programmes/creative-europe/projects/ce-projects-compendium/>

¹³⁴ The range of activities was assessed through qualitative interpretation of the project summaries (quick scan), after identifying and flagging racism-related projects (filtering out the unrelated projects).

Archives at Home'). Projects also relate to strengthen cultural institutions, public authorities and professionals applying participatory planning and the capacity of cultural institutions, public authorities, Civil Society Organisations (CSOs) working in the cultural sector, to create "contact spaces" and projects for intercultural dialogue, thus establishing multisectoral partnerships and alliances (such as the project 'Co-creating Intercultural Societies: a Focus on Racism and Discrimination'). The programme also supports projects creating awareness for the need of multiple, intercultural, interracial representation in culture (such as the project 'Women on women').

4.3.4. Monitoring and evaluation

In the area of monitoring and evaluation, the picture is less promising. All programmes include some indicators on the output generated with respect to combatting racism (CERV), supporting relevant actors, or including minorities. However, information on results and effects seems limited. This is due to inherent difficulties in measuring and demonstrating effects in this area given the size of the programmes, but also due to little emphasis being placed on the monitoring of the specific theme of racism. Failing to clearly demonstrate the effects of these programmes in the area of combatting discrimination and racism might be a deterrent for additional investments and should hence be considered an important aspect for review. However, this assessment is hampered pending the publication of the final evaluations of the 2014-2020 programmes.

Table 14 – Monitoring and evaluating EU programmes in the field of culture and racism

	CERV	Creative Europe	ESC
Monitoring (indicators)	Relevant indicators on (i) Number of people reached by training, awareness raising, mutual learning; (ii) Number of civil society organisations supported; (iii) Number of transnational networks and initiatives focusing on European memory and heritage	Two relevant indicators are identified, including: (i) Number of projects supported by addressed to socially marginalised groups; (ii) The number of projects supported involving organisations from third countries.	Of specific interest is the share of participants with fewer opportunities. A thematic indicator exists that deals with climate objectives, but not on anti-discrimination/racism.
Evaluation Requirements	The mid-term and final evaluations will inform on the effects by specific objective (thus including on racism and discrimination specific ones)	A mid-term and a final evaluation are foreseen. At the moment, no specific focus nor requirements in the regulation on anti-discrimination/racism.	
Relevant evaluation findings	The mid-term Evaluation ¹³⁵ carried out on the 2014-2020 REC programme indicated good operational progress and emphasised the continuing need for support in the area. However, a few key points (i) limited evidence on effects ¹³⁶ ; (ii) limited relevance of indicators ¹³⁷ ; (iii) key results in the area of training, support to NGOs and creation of tools and methods. ¹³⁸	<i>'(i) cultural diversity and intercultural dialogue - achieved through encouraging and promoting cross-border mobility, the promotion of mobility and digitisation in the field of cultural heritage, and intercultural dialogue'</i> ¹³⁹	Not available given the early stages of the programme.

¹³⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0358&from=EN>

¹³⁶ Ibid. '...impact is moderate, due both to the limited amount of Programme resources (especially in the areas of fighting and preventing violence, anti-discrimination and combating racism) as well as change being influenced by many other different factors and policies'

¹³⁷ Ibid. 'the system of indicators could be further enriched to capture the whole range of expected results of the Programme', including on non-discrimination'

¹³⁸ Ibid. 'this is also the key aim of the Programme: to build capacity of the key stakeholder groups to instigate change in the specific policy areas.'

¹³⁹ SWD(2018) 159 Final, Mid-Term evaluation of the Creative Europe programme (2014-2020)

5. THE ROLE OF MEDIA IN THE FIGHT AGAINST RACISM

KEY FINDINGS

- Media, and especially social media, represent both a threat and an opportunity to combat racism.
- Measures proposed to spur positive change through the media include:
 - media literacy and awareness raising for all individuals, especially youths and minorities who are most liable to misinformation; and
 - promotion of pluralism, diversity and multiculturalism in the industry to break stereotypical notions of minorities, working with regulatory bodies, social media platforms and civil society organisations on the one hand, but also journalists and artists on the other.
- The EU Anti-racism Action Plan is clearly informed by the literature and proposes a combination of tools, better law enforcement, and support to several stakeholders.
- Different approaches in both programming and implementation across EU programmes:
 - at the programming level, racism, hate speech and hatred online are tackled explicitly only through the CERV programme; but
 - at the implementation level, significant shares of projects across all programmes tackle racism indirectly, through the promotion of tolerance, diversity and non-discrimination.
- Monitoring arrangements and evaluation findings do not allow to review in detail the results and effects generated by combatting racism through media.

5.1. Existing specialist literature on the role of media fighting racism

5.1.1. Opportunities

Media can be powerful tools to combat racism in so far as they can '*foster a culture of understanding between different ethnic, cultural and religious groups in society*'.¹⁴⁰ They can create new representations, which circulate across different localities and produce new ideas of belonging.¹⁴¹ Public service broadcasters are increasingly making their offer more multicultural, both to support a culture of diversity but also as a market issue, e.g. to fulfil the needs of growing minorities.

¹⁴⁰ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*, Final Report

¹⁴¹ Horsti, K. (2010), *Celebrating Multiculturalism: European Multicultural Media Initiatives as Anti-Racist Practices, Anti-Racism & Multiculturalism*. Studies In International Communication

Journalism in particular can be a powerful part of social change, by breaking stereotypical notions of “culture”.¹⁴² Positive, counter-stereotypical portrayals of minorities can indeed improve connectedness between different cultures and promote experiences of shared identity.¹⁴³

In addition, media can also be echo chambers for activities contrasting hate-speech,¹⁴⁴ discrimination and racism and increase awareness,¹⁴⁵ including through the work of regulatory bodies of media and human rights bodies.¹⁴⁶

5.1.2. Challenges

Nevertheless, media might – and, in fact, often do – play a negative role in reinforcing stereotypes, racism, xenophobia and intolerance in public discourse, as vastly reported by the literature.^{147,148} Intersectionality with other dimensions of stereotypes (e.g. gender, sexual orientation, socio-economic status) might intensify discrimination and compound marginalisation.¹⁴⁹

First, there is an increasingly evident radicalisation in the cyberspace.¹⁵⁰ Hate speech and hate crime have been steadily on the rise during the past decade.¹⁵¹ The rapid spread of unverified information which can go viral can have corrosive effects on cohesion, especially due to its potential to encourage followers.¹⁵² Social media are not just platforms for entertainment, but “platforms for political discourse and identity making”.^{153,154} Thus, they play an increasingly important role in “shaping social relations, including those pertaining to race and racism.”¹⁵⁵ Phenomena such as the normalisation of overt racism discourse, “cumulative racism” due to unintentional dissemination of false or misleading anti-immigration information by oblivious users are increasingly evident.¹⁵⁶

Part of the difficulty in influencing messages channelled by the media and of combatting hate-speech is linked to freedom of press complexities,¹⁵⁷ the scarcity of code of conducts, lack of powers of regulators, few complaints filed and ineffective sanctioning mechanisms.^{158,159} The notion itself of cultural diversity varies markedly from country to country.¹⁶⁰ For instance, reports exist of several instances of anti-muslim hate on European media, including in publicly sponsored media outlets in

¹⁴² Horsti, K. (2007), *Managed Multiculturalism in Finnish Media Initiatives*

¹⁴³ Tukachinsky, R. (2015), *Where we have been and where we can go from here: Looking to the future in research on media, race and ethnicity*. Journal of Social Issues

¹⁴⁴ Bayer, J. and Bárd, P. (2020), *Hate speech and hate crime in the EU and the evaluation of online content regulation approaches*. European Parliament, Policy Department for Citizens' Rights and Constitutional Affairs, Directorate-General for Internal Policies

¹⁴⁵ FRA (2002), *Racism And Cultural Diversity In The Mass Media*

¹⁴⁶ ARTICLE 19 (2018.) *Responding to 'hate speech': Comparative overview of six EU countries*

¹⁴⁷ Horsti, K. (2007), *Managed Multiculturalism in Finnish Media Initiatives*

¹⁴⁸ Tukachinsky, R. (2015), *Where we have been and where we can go from here: Looking to the future in research on media, race and ethnicity*. Journal of Social Issues

¹⁴⁹ Ibid.

¹⁵⁰ Voices of Culture (2016), *Promoting intercultural dialogue and bringing communities together through culture in shared public spaces*. Brainstorming Report

¹⁵¹ Bayer, J. and Bárd, P. (2020), *Hate speech and hate crime in the EU and the evaluation of online content regulation approaches*. European Parliament, Policy Department for Citizens' Rights and Constitutional Affairs, Directorate-General for Internal Policies

¹⁵² FRA (2016), *Incitement in media content and political discourse in Member States of the European Union. Contribution to the second Annual Colloquium on Fundamental Rights*

¹⁵³ Ekman, M. (2019), 'Anti-immigration and racist discourse in social media'. European Journal of Communication, 34(6), pp. 606–618

¹⁵⁴ Papacharissi, Z (2015), *Affective Publics. Sentiment, Technology and Politics*. Oxford: Oxford University Press.

¹⁵⁵ Farkas, J, Schou, J, Neumayer, C (2018), *Platformed antagonism: Racist discourses on fake Muslim Facebook pages*. Critical Discourse Studies 15(5): 463–480

¹⁵⁶ Ekman, M. (2019), 'Anti-immigration and racist discourse in social media'. European Journal of Communication, 34(6), pp. 606–618

¹⁵⁷ ARTICLE 19 (2018), *Responding to 'hate speech': Comparative overview of six EU countries*

¹⁵⁸ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*. Final Report

¹⁵⁹ FRA (2002), *Racism And Cultural Diversity In The Mass Media*

¹⁶⁰ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*. Final Report

some Member States.¹⁶¹ Overall, members of minorities ‘perceive the social climate as condoning racism, xenophobia and intolerance’.¹⁶²

In addition, there is a persisting lack of diversity in media management boards and ownership.^{163,164} Worryingly, the number of minority journalists too tends to decrease in the aftermath of socio-economic crises, which warrants specific attention given the current COVID-19 crisis.¹⁶⁵ It is also argued that even where issues with minorities are addressed and acknowledged by the media, the “white European Culture” continues to be presented as the norm¹⁶⁶ and the perspective is that of the “assimilation” of minorities with the dominant national or European culture¹⁶⁷ rather than substantial and mutual acknowledgement of the different identities.

Furthermore, once a negative discourse on ethnic minorities is established, it tends to remain prevalent.¹⁶⁸ Negative representation of minorities, often in association with crime, frequently comes with lack of quotes, lack of analysis, use of labelling with negative connotation, misleading headlines.^{169,170} It was also showed that the creation of empathy towards minorities typically occurs through reinforcing stereotypes (e.g. a story of a Latino worker does not reach the public as well as a story of a good Latino family man).

5.1.3. Remedy measures

One possible answer to the structural problems highlighted above is necessarily that of media literacy, which finds overwhelming support in the specialist literature. In particular it is suggested to:

- facilitate young viewers’ ability to develop critical skills necessary to resisting harmful media effects in all educational settings;¹⁷¹
- consider media, peers, families, and school not as independent but interrelated factors shaping children’s racial/ethnic perceptions;¹⁷² and
- encourage media literacy in the digital environment.¹⁷³

Awareness raising initiatives should be considered also to empower a range of key stakeholders involved in the regulatory framework (justice official, law enforcement, social partners etc.).¹⁷⁴

In addition to equipping individuals with the tools to interpret and discern whether the information they are accessing is reliable (and should be spread), there is a need to ensure more pluralism. Amongst measures suggested to improve the related regulatory framework are:

¹⁶¹ Media Diversity Institute (2021), *ANTI-MUSLIM HATE ON EUROPEAN MEDIA*

¹⁶² FRA (2016), *Incitement in media content and political discourse in Member States of the European Union, Contribution to the second Annual Colloquium on Fundamental Rights*

¹⁶³ Burke, M. (2020), *How the media and entertainment industry is addressing systemic racism*. World economic forum

¹⁶⁴ Kleis Nielsen, R., Selva, Andi, S. (2020), *Race and leadership in the news media 2020: evidence from five markets*. Reuters Institute

¹⁶⁵ Ibid.

¹⁶⁶ Horsti, K. (2009), *Antiracist and Multicultural Discourses in European Public Service Broadcasting: Celebrating Consumable Differences in the Prix Europa Iris Media Prize*

¹⁶⁷ Horsti, K. (2007), *Managed Multiculturalism in Finnish Media Initiatives*

¹⁶⁸ FRA (2002), *Racism And Cultural Diversity In The Mass Media*

¹⁶⁹ Horsti, K. (2007), *Managed Multiculturalism in Finnish Media Initiatives*

¹⁷⁰ FRA (2002), *Racism And Cultural Diversity In The Mass Media*

¹⁷¹ Ramasubramanian, S. and Scharrer, E. (2015), *Intervening in the Media's Influence on Stereotypes of Race and Ethnicity: The Role of Media Literacy Education*. Journal of Social Issues

¹⁷² Tukachinsky, R. (2015), *Where we have been and where we can go from here: Looking to the future in research on media, race and ethnicity*. Journal of Social Issues

¹⁷³ FRA (2016), *Incitement in media content and political discourse in Member States of the European Union, Contribution to the second Annual Colloquium on Fundamental Rights*

¹⁷⁴ FRA (2015), *Promoting respect and diversity - Combating intolerance and hate*

- setting standards in the codes of conduct as well as effective compliant mechanisms;¹⁷⁵
- training of journalist and editors¹⁷⁶ and promoting multicultural journalism¹⁷⁷ also involving journalist organisations;¹⁷⁸
- setting up exchange fora;¹⁷⁹
- ensuring independence of the regulatory bodies from governments and private entities, and that bodies in charge of this adopt clear policies to prevent hate-speech;¹⁸⁰ and
- working with platforms to ensure actions to counter disinformation.¹⁸¹

Other important remedy measures go through fostering diversity in the industry. In particular, it is recommended to:

- integrate minority journalists¹⁸² and creators¹⁸³ in the industry, also by publishing online vacancies and recruitment policies;¹⁸⁴
- put minorities at the centre of the content creation process;¹⁸⁵
- facilitate the access of minorities to power position in the industry;¹⁸⁶
- provide support and consulting with expertise in diversity;¹⁸⁷
- collect sufficiently granular data on recruitment;¹⁸⁸ and
- establish and communicate goals also in terms of diversity.¹⁸⁹

It is also considered helpful to:

- boost incentives/ create awards for media and representations with pro-social potential;¹⁹⁰ and
- promote comparative studies on the effects of different forms of media on interracial attitudes.¹⁹¹

Finally, it is important that multiculturalism is understood and enacted not as the extension of a dominant identity over those of the minorities, but substantial mutual acknowledgment of mutual identities.¹⁹² This could be facilitated, e.g., through orchestrating debates among representative of

¹⁷⁵ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*. Final Report

¹⁷⁶ Ibid.

¹⁷⁷ Horsti, K. (2007), *Managed Multiculturalism in Finnish Media Initiatives*

¹⁷⁸ ARTICLE 19 (2018), *Responding to 'hate speech': Comparative overview of six EU countries*

¹⁷⁹ Ibid.

¹⁸⁰ Ibid.

¹⁸¹ Colomina, C., Sánchez Margalef, H., Youngs, R. (2021), *The impact of disinformation on democratic processes and human rights in the world*, European Parliament

¹⁸² Horsti, K. (2010), *Celebrating Multiculturalism: European Multicultural Media Initiatives as Anti-Racist Practices, Anti-Racism & Multiculturalism: Studies In International Communication*

¹⁸³ RTBF (2021), *Racisme, médias et société*

¹⁸⁴ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*. Final Report

¹⁸⁵ Burke, M. (2020), *How the media and entertainment industry is addressing systemic racism*. World economic forum

¹⁸⁶ Tukachinsky, R. (2015), *Where we have been and where we can go from here: Looking to the future in research on media, race and ethnicity*. Journal of Social Issues

¹⁸⁷ Ibid.

¹⁸⁸ Council of Europe (2009), *Media & Diversity: The next steps to promote minority access to the Media*, Final Report

¹⁸⁹ Ibid.

¹⁹⁰ Tukachinsky, R. (2015), *Where we have been and where we can go from here: Looking to the future in research on media, race and ethnicity*. Journal of Social Issues

¹⁹¹ Ibid.

¹⁹² Ekman, M. (2019), 'Anti-immigration and racist discourse in social media'. *European Journal of Communication*, 34(6), pp. 606–618

different minorities in European broadcasting services rather than offering “consumable” products for the majority audience.¹⁹³

5.2. The EU Anti-racism Action Plan and the role of media

Fighting racism in and through media is centre stage in the EU Anti-racism Action Plan.

In terms of the direct actions to combat overt forms of racism, discrimination and hate-speech, the Framework Decision on combating racism and xenophobia by means of criminal law¹⁹⁴ together with the code of conduct on countering illegal hate speech online and subsequent Recommendation¹⁹⁵ aim to improve the framework with more certainty about the criminalisation of hate speech in all Member States and to enforce an active involvement of platform providers in contrasting hate-speech online. Yet, the EU Anti-racism Action Plan acknowledges that the uneven enforcement of the framework decision across MS means that follow up activities might be necessary including at the EU level. The work on combatting racism on media is furthered through the new legislative proposal on Digital Services Act (DSA)¹⁹⁶ – reinforcing responsibilities of online platforms and social media providers and improving data collection on the phenomenon – and through the Audiovisual Media Services Directive¹⁹⁷, within the boundaries of the principle of freedom of expression.

Media play a big role also in tackling the structural causes of racism. The EU Anti-racism Action Plan fully acknowledges that social cohesion is hampered by underrepresentation - both in content production and media professions - as well as stereotypical, negative representation of minorities. The EU Anti-racism Action Plan also recognizes the importance of plurality for the democratic debate. Hence the efforts proposed in mutual learning and training activities for journalists, as well as media literacy for all. The EU Anti-racism Action Plan proposes to involve high-level figures also in culture and media for targeted awareness raising campaigns. To tackle disinformation which can be particularly harmful for minorities, the EU Anti-racism Action Plan indicates the work of the European Digital Media Observatory to support fact-checkers, in addition to the work on media literacy. Finally, the cooperation with private actors across all sectors is considered key to ensure diversity. To this end, work to promote the voluntary registration to the diversity charters is foreseen. The Commission is also engaged in providing companies and industries with online toolkits to check their diversity strategies and better understand how to foster diversity in their workforce.

5.3. The role of funding programmes in the field of media

As per the field of culture, also in the field of media one key programme directly addressing racism and discrimination, especially in their more overt forms such as hate-speech, is the CERV programme. Due to the thematical focus, Creative Europe too provides significant resources, especially to foster diversity and multiculturalism in the audiovisual sector. Of relevance for the media section are the media and cross-sectoral work strands.

Although more limited, some specific support is offered also by the European Solidarity Corps programme. The latter is not reviewed in detail but only cited where relevant in the sections below.

¹⁹³ Horsti, K. (2009), *Antiracist and Multicultural Discourses in European Public Service Broadcasting: Celebrating Consumable Differences in the Prix Europa Iris Media Prize*

¹⁹⁴ European Council (2008), *Council Framework Decision 2008/913/JHA of 28 November 2008 on combating racism and xenophobia by means of criminal law.*

¹⁹⁵ European Commission (2018), *Recommendation of 1 March 2018 on measures to effectively tackle illegal content online (C (2018) 1177)*

¹⁹⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020PC0825>

¹⁹⁷ Directive (EU) 2018/1808 of 14 November 2018

5.3.1. Regulatory Framework

The regulatory framework of the CERV and ESC programmes have been presented in section 4.3.1 above. Thus, their description is omitted to avoid overlap. The same findings apply, for these are general to the support offered in the programme and not specific to the field of culture. In essence, explicit references to fighting racism and discrimination are foreseen under the CERV programme, whereas under the ESC the main goal is to avoid discrimination in participation and support to social inclusion. A more detailed overview is offered below of the Creative Europe programme, in relation to the Media and cross-sectoral strands as these were excluded from the previous assessment.

Table 15 – Regulatory Framework Creative Europe in the field of media and racism

	Creative Europe¹⁹⁸ - focus on the media strand
Preamble	<ul style="list-style-type: none"> • No reference to racism other than non-discrimination on all grounds as per the Charter of Fundamental Rights.¹⁹⁹ • Non-discrimination, tolerance, human rights and cultural heritage are recalled in several paragraphs of the preamble • Diversity is particularly prominent in the preamble (> 10 paras) • Specific references to media literacy and pluralism
General Objectives	<p>No specific references to racism or discrimination based on racial or ethnic origin, religion, beliefs.</p> <p>In general, promotion of European cultural diversity.</p>
Specific Objectives	<p>Art. 3(2) c) <i>'to promote policy cooperation and innovative actions supporting all strands of the Programme and to promote a diverse, independent and pluralistic media environment, and media literacy, thereby fostering freedom of artistic expression, intercultural dialogue and social inclusion.'</i></p> <p><i>'The Programme objectives shall be pursued in a way that encourages inclusion, equality, diversity and participation, which, where appropriate, shall be achieved through specific incentives that:</i></p> <p><i>(a) ensure that people with disabilities, people belonging to minorities and people belonging to socially marginalised groups have access to the cultural and creative sectors and that encourage their active participation in those sectors, including in both the creative process and audience development; and'</i></p>

5.3.2. Programming

At the programming level, the CERV programme shows clear steering with respect to combatting racism in programme activities given the targeted nature of the call for proposals. Several strands contribute in different ways to combatting racism through media, e.g. by both providing training, tools, mutual learning and awareness raising to staff in intermediate bodies and journalist associations (Equality, Rights and Gender Equality strand), but also by supporting grassroots initiatives and the Civil Society (Union value strand). Media are indicated also as a tool for launching awareness raising campaigns and combatting disinformation (Citizens' engagement and participation strand).

With respect to the Creative Europe programme, as per the regulatory framework, there are no explicit references to racism. Non-discrimination is recalled in broad terms and several actions generally aim to promote diversity, independent producers, cultural heritage, and awareness raising. They also aim to remove barrier to fruition for minorities (e.g. subtitles). This seems very well aligned with the specialist literature. However, at least at the programming level, there seems to be overriding emphasis on the

¹⁹⁸ Regulation (EU) 2021/818

¹⁹⁹ "In particular, this Regulation seeks to ensure full respect for the right to equality between men and women and the right to non-discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, socioeconomic background [...]"

European cultural heritage rather than full cross-fertilisation with other cultures for deeper and more inclusive multiculturalism.

Discrimination and hate-speech on social media are not directly addressed through the Creative Programme, but this is done through the CERV programme.

Table 16 – Programming EU programmes in the field of media and racism

	Creative Europe²⁰⁰ - focus on the media and cross-cutting strand	Citizenship, Equality, Rights and Values
References in work programmes and programmes' guides	<p>No specific reference to racism, but eligibility and award criteria on diversity.</p> <p><i>"MEDIA schemes will aim at promoting diversity and inclusiveness at all stages of the value chain of the media and the audiovisual sectors. In line with best practices established by the Rights, Equality and Citizenship Programme (REC), the following instruments provisions will be embedded in the support actions:</i></p> <ul style="list-style-type: none"> <i>require the applicants to provide a strategy as regards the project or their management practices and describe how they aim to introduce diversity, inclusion and equality,</i> <i>Introduce award criteria to evaluate their strategy."</i> 	<p>Several specific references to racism as per table in section 4.3.2. In addition: <i>"The work programme will also continue to address the worrying phenomenon of online hate speech and improve Member State capacity to:</i></p> <ul style="list-style-type: none"> <i>(i) develop national and local strategies and action plans against racism,</i> <i>(ii) develop a common methodology for collecting data on hate crimes and hate speech,</i> <i>(iii) promote a comprehensive training strategy for law enforcement to effectively prosecute instances of hate crime and speech, and</i> <i>(iv) provide support services for victims of hate crime."</i> <p>Social media platforms are also indicated as tools to promote awareness raising initiatives in the field of combatting racism.</p>
Relevant expected results	<p>In general:</p> <ul style="list-style-type: none"> the programme will contribute to the implementation of the European Democracy Action Plan (EDAP) and the Media and Audiovisual Action Plan; and one of the objectives of the European Democracy Action Plan is to strengthen media freedom and pluralism as well as to support media literacy. <p>Under the cross-sectoral strand:</p> <ul style="list-style-type: none"> to promote cross-sectoral activities aiming at adjusting to the structural and technological changes faced by the media sector, including enhancing a free, diverse, and pluralistic media environment, quality journalism and media literacy, including in the digital environment. 	<p>Equality, Rights, and Gender Equality</p> <ul style="list-style-type: none"> <i>'increased knowledge and awareness of biases and stereotypes, in particular among school staff and journalists;</i> <i>increased knowledge on the phenomenon of hate speech online, gathered in particular through systematic reporting and recording of hate speech cases and incidents online;</i> <i>strengthened cooperation between public authorities, civil society organisations and internet companies, in particular in the area of prevention, reporting, education and awareness raising about tolerance and against hatred online, targeting young people;</i> <i>increased public awareness of online hate speech, including through the promotion of positive narratives and campaigns.</i> <i>identification, safeguarding and making available in particular online, archival material, testimonies [...]"²⁰¹</i>

²⁰⁰ Regulation (EU) 2021/818²⁰¹ Extracts from the 2021 CERV work programme

		<p>Union Values: <i>Support to Civil Society Organisations and NGOs active in human rights, non-discrimination etc. This includes support to NGOs that work as watchdogs, including on the media sector</i></p> <p>Citizens' engagement and participation: <i>'countering disinformation and other forms of interference in the democratic debate, empowering citizens to make informed decisions by helping them identify disinformation and promoting media literacy, with journalists' involvement'</i></p>
Relevant types of actions	<p>Media Strand:</p> <ul style="list-style-type: none"> • support to linguistic diversity and accessibility of audiovisual contents (also via subtitles); • support to independent producers; • European Festivals and European Networks, also ensuring substantial coverage of non-nationals; and • specific measures for a more balanced gender representation. <p>Cross sectoral strand:</p> <ul style="list-style-type: none"> • support policy development and mutual learning, with emphasis on the role of social inclusion through culture and media; • creative innovation labs, to spur creativity and contamination; and • cross cutting actions on news media sector, including promotion of pluralistic media, independent monitoring, media literacy, and a more balanced gender representation in the media sector. 	As per section 4.3.2, with a focus on the media sector.

5.3.3. Implementation

Projects planned in the 2021 work programme of the CERV programme include several activities that are relevant to the aims of combatting racism through the media, including monitoring, and combatting hate-speech also online, support to training media professionals on biases and intersectional stereotypes, support to victim empowerment and support, support to digital skills and critical thinking. These are closely aligned with the EU Anti-racism Action Plan and specialist literature. In addition, support to fostering common values, heritage, and democracy through the Union Values and particularly through supporting grassroots initiatives and CSOs for the work as watchdogs in several fields seems to be also very relevant.

With respect to the Creative Europe programme, all projects generally contribute to diversity through the award and eligibility criteria. There are some specific initiatives, especially with respect to media literacy, partnerships among journalists for mutual learning and the Media Pluralism Monitor that are expected to play an important role in combatting discrimination and disinformation. These activities might omit the word “combatting racism” in their stated goals, but are in line with what is suggested by the specialist literature when it comes to tackling the structural causes of racism. Nevertheless, these actions seem to be rather small in scale if compared with the overall support provided by the programme and combatting racism and hate speech seem to be somewhat underemphasised.

Table 17 – Implementation of EU programmes in the field of media and racism

	Creative Europe²⁰² - focus on the media and cross-cutting strand	Citizenship, Equality, Rights and Values
Relevant projects	<p>With respect to specific initiatives, it is possible to identify the following within the 2021 work programme:</p> <ul style="list-style-type: none"> the European Audiovisual Observatory, funded by the programme, which i.a. carries out research, workshops and publishes reports on Diversity and Inclusion Media Pluralism Monitor (MPM); Media literacy expert group; Journalism partnerships; and Creative Innovation Labs, with horizontal priority theme on tackling i.a. disinformation <p>However, these actions appear to rather small in scale. There is also no specific reference to racism or hate-speech.</p>	<ul style="list-style-type: none"> Awareness raising for journalists Training on hate-speech Strengthened cooperation on hatred online among institutions Use of the media for heritage activities Support to Civil Society organisations acting as human-rights respect watchdogs Activities to counter disinformation

If one turns attention to the 2014-2020 programmes:

- **European Solidarity Corps:** tackling discrimination through media does not appear in the regulatory framework or programming material. However, media literacy was found in 82 projects of the European Solidarity Corps (>1%). Hence, despite no specific mention in the regulatory framework, a non-negligible number of projects deal with media literacy activities.

²⁰² Regulation (EU) 2021/818

- **Creative Europe, media, and cross-sectoral strand:** the overall share of projects addressing racism is quite small (around 1% in terms of the budget, below Erasmus+ and the culture strand, as indicated in table 13 in the previous chapter). However, it should be stressed that some projects such as media literacy might be not explicitly indicating that they prevent racism whilst providing significant contribution to its fight. Supported projects that explicitly address the topic discrimination and racism in the field of media in 2014-2020 include: festival support (total 2 projects, such as the 'BUFF 2015 project' that shows films which touch the viewer and reflect different cultures, norms and situations of life, that the audience would not be otherwise confronted with), TV programming support (in total 6 projects, such as the project 'Born in Syria'), video games development (one project called 'Girl of Glass' that take place in fictional country in an alternative Europe run by an authoritarian regime), and development of a single movies, television programmes, or digital platforms (in total 5 project, such as the documentary film "Irena" about the holocaust contemporary issues – xenophobia, fear and nationalism that threaten to return into our society).

5.3.4. Monitoring and Evaluation

Monitoring and evaluation of EU action to combat racism through the media remain somewhat weak, as indicated in the previous section. In particular there are no focused assessments in mid-term evaluations of the REC or Creative Europe programmes in this respect. There seem to be no arrangements in place to discuss the programmes results or effects in this specific field. Nevertheless, some indicators exist in the Creative Europe programme which might allow some granularity in the assessment of the individuals involved with respect to their country of origin (output indicators).

Table 18 – Monitoring and evaluating Creative Europe in the field of media and racism

	Creative Europe²⁰³ - focus on the media and cross-cutting strand
Monitoring and Evaluation requirements	<p>A mid-term and a final evaluation are foreseen. At the moment, no specific focus nor requirements in the regulation.</p> <p>There are a few relevant monitoring indicators on diversity:</p> <ul style="list-style-type: none"> • Media Strand: <ul style="list-style-type: none"> ○ the number of audiovisual works in lesser-used languages developed, produced, and distributed with the support of the Programme; and ○ the number, budget and geographical origins of co-productions developed, created, and distributed with the support of the Programme and co-productions with partners from countries with different audiovisual capacities.
Relevant findings in Mid-Term Evaluation	<p>No specific assessment in the Mid-Term Evaluation of Creative Europe linked to racism or non-discrimination.</p> <p>Some interesting conclusions include:</p> <ul style="list-style-type: none"> • the need for strengthened support for media literacy through the education systems and by sharing best practices; and • <i>'MEDIA Mundus (EUR 14 million, 2007-2013) was effective in improving European and third countries professionals' knowledge of audiovisual markets, but less so in facilitating access to films from third countries. Over time, it created a growing network of EU and third countries professionals who participated in the Programme'</i>²⁰⁴

²⁰³ Regulation (EU) 2021/818

²⁰⁴ SWD (2018) 159 Final, Mid-Term evaluation of the Creative Europe programme (2014-2020)

6. CONCLUSIONS

6.1. EU Anti-racism Action Plan reflects the diversity of remedy measures in specialist literature

The EU Anti-racism Action Plan 2020-2025 is a suitable tool within the policy competences of the EU to combat racism in the fields of culture, education, media, and sports. Virtually all remedy measures identified in the specialist literature are embedded in the EU Anti-racism Action Plan. The EU Anti-racism Action Plan makes clear reference to the important role of EU programmes, supporting Member States' efforts to promote social inclusion by ensuring equal opportunities for all and tackling discrimination. Nevertheless, it does not offer a comprehensive assessment and baseline how current EU policies and programmes are addressing the topic of anti-racism by means of education, sport, culture, and media, and what can be strengthened in comparison to the baseline situation.

The question is to what extent the Action Plan limits itself mainly addressing overtly racist acts within football, and whether enough is done to deal with more subtle or unconscious forms of structural racism such as (unconsciously) excluding women or people with a migrant background from key positions within the sports. Moreover, much attention is given to the role of football in the Action Plan. It is just one of the many sports practised in the EU, and it is therefore necessary that also other initiatives are taken in other professional (non-recreational or grassroots) sports. Concerning the role of education, media and culture, great emphasis is placed upon EU identity and values. Part of the specialist literature warns against the risks of enacting activities that push minorities to simply assimilate the EU values. This might inhibit real multicultural exchanges towards effective integration.

6.2. Limited steering by EU programmes on their contribution to the fight against racism, except for the CERV

Generally, Erasmus+, Creative Europe, and the European Solidarity Corps programmes did not define specific objectives on fighting racism and discrimination, but only refer to horizontal principles that 'the programme promotes inter alia equality between men and women and measures to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation'. This tends not to be operationalised into more explicit objectives and monitoring. The Regulation for Erasmus+ includes a dedicated chapter on inclusion and discrimination, but it does not provide specific measures for steering on combating racism/ discrimination. Programme guides and annual work programmes of Erasmus+, European Solidarity Corps, and Creative Europe do not refer to the EU Anti-racism Action Plan. This is partly due to the recent approval of the Anti-Racism Action Plan (2020), but also to the fact that the principles of the fight against racism are considered sufficiently embedded as horizontal policy and mainstreamed in all interventions, under the umbrella of the inclusion and diversity approach.

The CERV is an exception to the rule, where clear referencing is made to the EU Anti-racism Action Plan at all stages of the policy cycle. It shows that attention to racism and non-discrimination is particularly apparent in the regulatory framework of the CERV programme, with specific references in preamble and objectives. Whilst the Equality, Rights and Gender Equality strand aims to prevent discrimination and improve policies combatting racism and discrimination, the other two strands take a more horizontal approach looking at the root causes of discrimination, promoting heritage, EU values, citizens' participation. The CERV programme also fosters diversity through eligibility and award criteria that ensure that funding steers positive change in the beneficiary organisations, it supports grassroots initiatives to ensure greater diversity and helps create bridges between small and large organisations.

This is confirmed in the mid-term evaluation of the predecessor REC programme and by the fact that anti-racism is amongst the single largest calls for proposal issued in 2021 and 2022. Both the Creative Europe programme and the European Solidarity Corps programmes have little to no direct references to fighting racism per se, but aim to foster diversity, intercultural dialogue, cultural heritage, inclusion, and community development under their remit. In particular positive action on the representation of minorities is explicitly underlined in the Creative Europe programme objectives.

An important document to steer on inclusion and diversity are the Implementation guidelines for Erasmus+ and the European Solidarity Corps Inclusion and Diversity Strategy²⁰⁵. These guidelines provide mechanisms to support inclusion and diversity of the programmes and refer to the role of applicant organisations and National Agencies, Resource Centres, and the European Education and Culture Executive Agency (EACEA). One important element to steer in this strategy is that inclusion and diversity is part of the criteria to select applications for funding and to allocate financial support, and that projects that involve participants with fewer opportunities, newcomer and grass-root organisations should be given priority in the grant awarding process. However, no specific steering interventions are mentioned for steering on the discrimination barrier or projects on combating discrimination. This is, however, not the case for the sport-related actions within Erasmus+. Here, combating violence, racism, discrimination, and intolerance in sport and tackling violent radicalisation is defined as priority for partnerships for cooperation in the sports field and for small-scale cooperation partnerships for projects in the field of sport. Erasmus+ also supports not-for-profit European sport events in the field of non-discrimination.

A concern could be that the regulatory framework and programme guides are, partially due to their strategic nature, quite broadly formulated and do not sufficiently set clear elements binding programmes to specifically address the objectives of the EU Anti-racism Action Plan. As a result, the fight against racism could receive sub optimal levels of recognition and guidance in the studied EU programmes.

6.3. Significant share of projects addresses the fight against racism, reflecting a diversity of remedy measures

The study shows that a substantial share of racism-related projects has been implemented over the period 2014-2020, despite limited steering in programming, as well as that the type of projects supported represent the variety of remedy measures proposed in specialist literature to tackle racism within the education, sport, culture, and media sector. It is noted though that the Creative Europe Programme reports lower figures.

- For Erasmus+ a total of 9 281 education and training projects were identified that are related to the theme racism and discrimination (6.1 % of the total number of projects). This corresponded to an awarded budget of slightly over EUR 578 million (3.6% of the total budget awarded).
- For sports, a total of 94 Erasmus+ projects were identified that can be linked to the theme racism and discrimination (8.0 % of the total number of projects). This corresponded to an awarded budget of slightly over EUR 20 million (8.0% of the total budget awarded).

²⁰⁵ European Commission (2021), *Implementation guidelines - Erasmus+ and European Solidarity Corps Inclusion and Diversity Strategy*.

- Around one-fifth (20.4%) of the total of 7 073 projects of the European Solidarity Corps programme in 2018-2020 explicitly aims to tackle overt forms of racism and discrimination, in addition to the substantial share of projects contributing to social inclusion, diversity and tolerance.
- For the Creative Europe programme, a total of 41 projects were identified (0.9 % of the total number of projects) that are related to the theme racism and discrimination. This corresponds to an awarded budget of slightly over EUR 8.6 million (1% of the total budget awarded). The results of this exercise show that a small share of racism-related projects have been implemented over the period 2014-2020, compared to the Erasmus. However, this needs to be interpreted with caution, because low explicit attention to fighting racism in the cultural sector does not exclude that projects address the subject more indirectly, for instance by boosting diversity and thereby still contributing to fighting root causes of discrimination.

Figures should however be treated with caution, as the analysis was limited to search terms like racism, xenophobia, discrimination, that is, terms related to projects that address more overt forms of racism. Moreover, the concept racism is differently interpreted and used in Member States and sectors. The number of projects that are addressing racism and discrimination from an intersectional lens is probably much higher. This might be especially true for programmes such as Creative Europe, taking a holistic approach to tackling the structural causes of racism through the promotion of diversity in arts and media.

As no benchmarks and targets are provided in the Anti-Racism Action Plan for EU programmes, no conclusions can be drawn whether EU programmes match the level of the ambition of the Action Plan. Yet, if higher ambition in this field is needed, this can only go through more direct and explicit references to fighting racism in the regulatory frameworks and work programmes. This would drive additional attention at the programming and implementation stage on this specific objective.

6.4. Lack of measuring programmes' contribution to the fight against racism

There is no baseline information available on how EU programmes contribute to the fight against racism. The monitoring framework of Erasmus+ for instance does not define specific indicators to measure its contribution to the fight against racism. Instead, it only measures the number of people with fewer opportunities taking part in activities and the newcomer organisations and institutions taking part in the programme. With regards to the first indicator, this also includes groups of people who face discrimination, next to obstacles related to economic, social, cultural, geographical or health reasons, due to their migrant background, or for reasons such as disability or educational difficulties or for any other reason. The mid-term evaluation of the previous Erasmus+ programme also does not include a comprehensive analysis on programme's contribution to the fight against racism. Similar conclusions can be drawn for the European Solidarity Corps and Creative Europe programmes.

Sport-related actions within Erasmus+ are an exception, since the previous programme included a specific objective related to intolerance and discrimination and equal access to sport for all. As a result, the midterm evaluation provided more information on programmes' contribution, showing that around one third (32%) of Erasmus sport organisations reported that their project contributed to the fight against racism and violence.

Generally, information on results and effects seems limited. This is due to inherent difficulties in measuring and demonstrating effects in this area, but is also related to the size of the programmes and limited emphasis on the monitoring of fighting racism. Failing to clearly demonstrate the effects of these programmes in the area of combatting discrimination and racism might be a deterrent for

additional investments and should hence be considered an important aspect for review. However, this assessment is hampered pending the publication of the final evaluations of the 2014-2020 programmes.

6.5. There is a need for further building on existing good practices and incentives developed by programmes and implementing institutions

As described above, the European Commission does not directly steer programmes on the level of contribution to the fight against racism. The specific strategies and actions in place towards these objectives are not systematically recorded. Currently, each National Agency further develops their national Inclusion and Diversity action plan based on the local reality in their country. No good practice guides are available that facilitate the development of national plans and facilitate learning between National Agencies in strengthening programmes' contribution in the fight against racism. Also, programmes' contributions to the fight against racism and relevant supported projects are not systematically analysed (thematic and impact studies), as a result of which there is not a clear overview of good practices.

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The study concludes that the EU Anti-racism Action Plan 2020-2025 reflects the diversity of remedy measures identified in the specialist literature. Despite of the limited steering and monitoring within EU programmes of their contribution to the fight against racism, except for the CERV programme, there is a significant share of projects that are addressing racism related topics, also reflecting a diversity of remedy measures. There is a need for further building on existing good practices / incentives developed by programmes and implementing institutions.
