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Observations on the Finnish action plan on implementation of the European Child Guarantee (ECG)

The Finnish action plan for implementation of the European Child Guarantee was submitted to the Commission on 1 April 2022.

The action plan clearly describes the competences and responsibilities regarding the design and implementation of European Child Guarantee in Finland. It constitutes a part of the National Child Strategy.

The guidelines regarding the content of the action plan, outlined in § 11(c) of the ECG Recommendation, are largely followed:

- i. As regards targeted categories of children, the action plan focuses on:
 - families in a weak socio-economic position;
 - children, young people, and families who need support in everyday life;
 - groups of children and young people vulnerable to discrimination or other harm (a detailed list includes nine sub-categories).

Taken together, the above categories sufficiently cover the target group of ECG recommendation (children in need, i.e., children at risk of poverty or social exclusion).

- ii. As regards to the quantitative and qualitative targets, Finland's national target for reducing the number of people at risk of poverty or social exclusion by 2030 amounts to 100,000 people, a third of whom should be children. Besides that, the action plan (Section 7) lists, per targeted category of children, numerous indicators that can be used to monitor progress, but falls short from setting concrete targets and deadlines to be met.
- iii. As regards measures planned or taken in implementing the ECG Recommendation, the action plan lists a number of relevant elements of the National Child Strategy, e.g.:
 - In the domain of free high quality early childhood education and care (ECEC), the reformed Act on Early Childhood Education and Care, which entered into force on 1 August 2022, and provisions on the equality and non-discrimination plans for early childhood education and care are discussed. This responds to the recommendation to provide children in need with free and effective access to ECEC.
 - In the domain of free education, including school-based activities, Finland extended in 2021 the right to free education to the upper secondary level, i.e., until 18th birthday. The action plan would benefit from clarification to what extent this results in ensuring free and effective access to school-based activities.

- In the domain of free healthy meal each school day, each child attending public school in Finland can enjoy a free school meal. This responds to the recommendation to provide children in need with free and effective access to at least one healthy meal each school day.
- In the domain of free healthcare, the action plan states that healthcare is free for children and young people in Finland, “with some exceptions”. The nature and incidence of those exceptions is not explained in the action plan, making it difficult to assess the extent to which the action plan responds to the recommendation to provide all children in need with free and effective access to healthcare.
- In the domain of healthy nutrition, the action plan mentions drawing up a national ‘climate food’ programme. This is unlikely to result with guaranteeing effective access to healthy nutrition for all children in need.
- In the domain of adequate housing, the action plan makes reference to a partnership programme aiming at halving homelessness and drawing up a housing policy development programme. It is not clear from the action plan to what extent this responds to the recommendation to provide all children in need with effective access to adequate housing.

The action plan does not go into further detail on targets and modalities of the above measures and does not explicitly say that the respective services will be provided for free to all children in need.

- iv. As regards other measures planned or taken to address child social exclusion and to break intergenerational cycles of disadvantage, and the enabling policy framework, the action plan focuses on consistent evaluation of the possible impacts on children of regulation, policymaking, and resource allocation. The implementation plan of the National Child Strategy includes a training package for child impact assessments, child-oriented budgeting, and children’s inclusion, as well as support material for municipalities and regions. Besides that, the action plan lists among enabling measures the development of services and skills in the youth work sector, the Programme to Address Child and Family Services (LAPE), and the National Youth Work and Youth Policy Programme 2020-2023 (VANUPO). The planned (for 2027) social security reform, and a number of other reform projects are also mentioned (notably the Child Welfare Act reform, Act on Disability Services and Assistance reform, Student Welfare Act amendments, and Act on the Promotion of Immigrant Integration reform). Overall, the enabling policy framework presented in the action plan seems comprehensive and supportive for the implementation of the ECG Recommendation.
- v. As regards the national framework for data monitoring and evaluation, the action plan envisions to use existing qualitative and quantitative metrics and indicators that would be specified further at a later date.

As regards outreach, awareness raising, and stakeholders’ participation, Finland intends to create a national cooperation network to promote and monitor the action plan for the European Child Guarantee. It would involve various stakeholders and operate within the framework of the National Child Strategy.

The action plan does not specify whether the relevant authorities and partners in the autonomous region of the Åland Islands have been involved in the preparation of the plan, and whether the plan covers the children in the Islands. A confirmation that children in need residing in the Åland Islands are covered by the action plan, and an explanation how the inclusion of Åland stakeholders is safeguarded would be much appreciated.

The action plan provides information on the intended use of ESF+ resources for actions benefitting children. As outlined in the EU Regional and Structural Policy Programme for Finland 2021–2027, one ESF+ funded priority axis will be fully focused on improving child protection services while two others target children and deprived families for poverty reduction and increased inclusion.