



The Association of Finnish Local and Regional Authorities: Our goals for Finland's Presidency of the Council of the EU 2019



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The EU's importance to municipalities and regions

The debate on Europe's future underlines the importance of unity. For achieving a united European Union, the Member States, regions and municipalities must resolve to commit to building a common future.

The EU has an impact on a large proportion of the decisions that Finnish local authorities make. Its influence on their work has steadily increased, even if the EU has no actual competence over local authorities' organisation of services. Local authorities implement EU legislation in many fields, but then they also

benefit from a well-functioning Single Market and the financing opportunities offered by the EU. According to a report issued by the Association of Finnish Local and Regional Authorities, the EU influences about 60 per cent of the municipalities' functions or decisions.

By influencing the EU's legislative processes the Association aims to ensure that the legislative acts promote the vitality and wellbeing of the Union's citizens, municipalities and regions.



The new EU programming period and strengthening of cooperation in Finland's neighbouring regions

The long-term objective of cohesion policy has been to reduce territorial disparities, create sustainable growth and strengthen social inclusion. The simplification measures and reforms to the funding system proposed within the new budgetary framework should be carried out in a way that enables local and regional levels to continue to support projects and investments promoting low-carbon and energy-efficient growth and skills, jobs, integration and social inclusion.

Local and regional levels should have a bigger role in the national implementation of cohesion policy. The rules and implementation must conform to the principle of subsidiarity. Matters that are for local and regional decision should not be decided on at EU or Member State level.

The Association stresses that in the forthcoming negotiations Finland should aim for maximum receipts from Cohesion Funding, as this means substantial development resources for the support of local and regional vitality.

Cross-border cooperation needs to be developed on both the EU's internal and external borders. Maritime cooperation should be on equal footing with land border cooperation. For Finland, cooperation in the Baltic Sea Region and the Arctic, as well as cross-border cooperation with Russia are important areas of development. The strategy for the Baltic Sea Region



is the EU's first macro-regional strategy, and the cooperation in its implementation should continue to be strengthened.

The TEN-T networks and their funding instrument, the Connecting Europe Facility (CEF), are an important part of the forthcoming EU Multiannual Financial Framework (MFF) and its implementation. A more efficient use of the CEF instrument needs to be ensured to promote Finland's goals related to international connections (Rail Baltica, the Helsinki-Tallinn tunnel), the development of rail links between urban regions' travel-to-work areas and the improvement of important freight transport routes.

Climate change, circular economy and energy policy

Local authorities' climate and circular economy action reflects the circumstances of local communities. The choices local authorities make are influenced by the size and geographical location of the municipality, its urban and economic structures, opportunities for partnerships and political will. The EU level climate and energy policies need to be coherent with the objectives of other policy fields, as well as being strategic and consistent. The climate and energy policy instruments should allow for adopting local-level solutions that are cost-effective and suitable for differing circumstances. Compliance with the principle of subsidiarity in climate, circular economy and energy policies is fundamental to the efficient work of municipalities and regions.

The Association of Finnish Local and Regional Authorities welcomes in principle the implementation of measures promoting circular economy and the move away from a linear economy. It is very important to

take into account the complete production cycle and the management of overall impacts.

In the context of implementing the directives on waste, it should be kept in mind that the purpose of public waste management is to ensure equal and cost-effective management of waste and to prevent any hazard to and harmful effects on health and the environment from waste and waste management. Growth in recycling should thus be driven by market demand and promote an economic model that is genuinely accomplishing these goals. Action taken should not lead to a poor-quality recycling system that is expensive for local residents.

Finnish municipalities have a greater role in climate and circular economy action than their international reputation suggests. Finland's Presidency term is a good opportunity for making the work of our municipalities more visible internationally and for sharing innovation and learning from one another.

Urban policy

Today, cities and urban areas have an increasingly greater role in promoting vitality and driving forward the economy. In cities, people's social environments come together, making networking easier for companies and employees. This creates conditions for economic growth, export and the development of digital products. Nevertheless, it is still necessary to find concrete measures to support and develop cities as the driving forces of economy and promoters of trade policy.

The implementation and development of the EU's Urban Agenda has become a central part of the cycle of Council Presidencies. New partnership themes have been introduced into the Agenda. It is important that the Urban Agenda recognises the importance of culture, for example. As the country holding the presidency, Finland should initiate an evaluation of the partnership results. The Agenda's measures should be better resourced than what they are now.





Promotion of wellbeing and prevention of social exclusion

Finland should use the upcoming Presidency to promote the theme of the economics of wellbeing. The economics of wellbeing means that people's wellbeing supports economic growth and sustainable economic development. Local authorities have a pivotal role in reducing inequalities in health and wellbeing between population groups and in preventing social exclusion. The work carried out by municipalities to promote local wellbeing is also an excellent example of delivering the economics of wellbeing at EU level.

Social exclusion causes substantial financial losses to

society as well as human suffering. It can be prevented by supporting families, children and young people at an early stage before problems accumulate. This requires high-standard basic public services and timely prevention.

In cities, social problems typically concentrate in certain districts. In assessing the Urban Agenda, one needs to draw attention to and make generally applicable the best practices and funding models for preventing social exclusion and combatting the problems of segregation.

Immigration

Local authorities are preparing to compete for skilled workforce. Practices within the EU that promote labour mobility also facilitate the recruitment of foreign workforce. Efficient public services encourage foreign workers and their families to stay in the area, thus contributing to the municipality's vitality. The European Employment Services (EURES) network should be made more widely known and its effectiveness improved.

The EU and Finland should provide high-level international protection for those who need it. Local authorities' work on integration is an essential component of successful immigration policy. In the forthcoming funding period, it is vital to ensure that local authorities continue to have the possibility to use the EU's financial assistance for the integration of third-country nationals. Integration and permit procedures related to recruiting third-country nationals are matters that should remain within national competence also in the future.

Gender equality

The Association of Finnish Local and Regional Authorities believes that during its Presidency, Finland should draw attention to gender equality as one of the Union's core values and to call for active measures to promote it and influence attitudes in all Member States. The key objectives are linked to sustainable economy and gender equality, safety and decision-making. The priorities should also include work-life balance, sexual and reproductive health and economic equality. Special attention should be paid to the position of immigrants. The situation and safety of girls and women must be core values and priorities in external relations as well. The delivery of priorities requires a cross-cutting approach and special measures.

It is fundamental for the achievement of equality goals that gender equality is improved within the European Semester, in the EU's own decision-making and economy, in representation and in the impact assessment of decisions and economy. Greater emphasis should be placed on the EU's gender equality strategy. The upcoming EU Multiannual Financial Framework should give sufficient weight and resources for local and regional authorities for the promotion of gender equality via programmes such as Rights and Values and the European Social Fund Plus (ESF+).



Non-Discrimination

It is important that during its Presidency, Finland should emphasise the equality of EU citizens and efforts to achieve equality. The status of minority languages should be safeguarded. The EU should promote non-discrimination of gender and sexual minorities. The implementation of the Digital Strategy should ensure equal opportunities for EU citizens in vulnerable situations — for older people, the disabled,

low-income earners and young people. The key is to promote good relations between population groups. A cross-cutting approach to the promotion of non-discrimination and equal opportunities should be adopted across the different areas of EU activity. It is particularly desirable that the EU increases awareness of the matter and influences attitudes positively.

Digital transformation

A fast-developing digital economy opens up opportunities, but also presents challenges for the EU Member States and other European countries. A more equal competition with the United States, or with China in future, requires that the EU becomes more united as a digital economic area than it is today.

The fast technological development also poses enormous challenges to political activity and legislation

for the achievement of the right balance between democracy and the benefits that technology provides. Skills development, education and life-long learning are necessary. All levels, from users to access providers and equipment manufacturers, must devote special attention to information security. The legislation needs to set minimum information security requirements for devices connected to the Internet, and sanctions for non-compliance.

Citizens' digital services and eHealth



eHealth is part of the Digital Single Market. It is an instrument for an efficient promotion of health policy goals. eHealth will guarantee sustainable health systems by generating long-term cost savings. A key aim of Finland's eHealth Strategy is to increase the role of citizens. It is for the authorities to ensure that citizens can have confidence in how their health data is used. To increase the public's trust, authorities must comply with the principles of the General Data Protection Regulation, or GDPR, and ensure information security and good communication.

Health technology industry is one of Finland's leading export sectors. The country has a vast number of health technology companies that would benefit from a wider market. The EU's financing mechanisms should be used actively to support health care digitisation and digital innovations. Finland has developed a wide range of innovative health technology applications, which can be disseminated as best practices in Europe. The opportunities offered by self-care services should be seized to make citizens' self-care part of the joint ambition of the European welfare states.

General development of education policy

The debate on Europe's future underlines the importance of modernising education systems. The Association of Finnish Local and Regional Authorities aims for a comprehensive approach to the development of the education system rather than sector-specific reforms. The EU has emphasised education's instrumental value in providing skilled workforce for the labour market, but it is important to recognise that education has other values besides maintaining and producing competence. Education has pedagogical and cultural functions that should be valued.

The Association's goal is to contribute to the implementation of the new Erasmus programme. The

programme's goals are generally consistent with the goals set for today's Finnish education policy. The Association agrees with the European Commission that it is important to clarify the rules for and facilitate the mobility of pupils and students in vocational education and training and in general education.

The formulation of EU guidelines and recommendations should ensure that national governments — and in case of Finland, local authorities — retain their decision-making powers relating to educational, cultural, sports and youth services. Municipalities and regions must be able to make operational decisions based on local circumstances and capacities.

Vocational education and training

The EU policy largely sees the vocational education and training (VET) and professional competence development as means to promote employment and to solve the problems of matching and social exclusion. In the Association's opinion, VET should prioritise vocational competence, professional growth, and life-long learning skills. There should be a pathway from VET to higher education. The education system should not have barriers to progress.





Foreign language proficiency

Finland should pursue the European Commission's and Council's goal to have a larger proportion of EU citizens learn to speak at least two foreign languages besides their own mother tongue. This means achieving an advanced level in at least one European language and an intermediate level in a third language in addition to one's language of schooling.

The EU's education policy should emphasise the

importance of language skills and especially the development of the education system to support the acquisition of language proficiency. Because diversity in Europe is based on the diversity of nations, ethnic groups and languages, a good knowledge of one's own mother tongue or the language of schooling plays an important role in the learning process. Language proficiency is also about linguistic rights and hence about non-discrimination and accessibility.

Background memorandum

The Association of Finnish Local and Regional Authorities: Our goals for Finland's Presidency of the Council of the EU 2019

The new EU programming period and strengthening of cooperation in Finland's neighbouring regions

The long-term objective of cohesion policy has been to reduce territorial disparities, create sustainable growth and strengthen social inclusion. The simplification measures and reforms to the funding system proposed within the new budgetary framework should be carried out in a way that enables local and regional levels to continue to support projects and investments promoting low-carbon and energy-efficient growth and skills, jobs, integration and social inclusion.

Cohesion policy instruments have stimulated growth and increased employment and social cohesion both locally and regionally. Local and regional players have a key role in making the EU objectives tangible to citizens. Municipalities and regions take concrete action to promote sustainable growth and social cohesion, bringing together different sectors of society, including the citizens. The special status of the sparsely populated areas of Eastern and Northern Finland is recognised under Finland's accession treaty, and this specificity should continue to be taken into account in the upcoming programming period.

The role of local authorities in improving the vitality of communities and regions and in building and promoting a sustainable operating environment, and as the government tier closest to the citizens will be increasingly important in the future. In the pursuit of a greener and lower-carbon Europe, it is important to ensure the development of local climate and circular economy measures also in the future. It should also be possible to use EU funding for promoting employment, social fairness, gender equality and non-discrimination and for integrating immigrants and encouraging citizen-driven development in urban and rural areas.

Local and regional levels should have a bigger role in the national implementation of cohesion policy. The rules and implementation must conform to the principle of subsidiarity. Matters that are for local and regional decision should not be decided on at EU or Member State level.

The Association stresses that in the forthcoming negotiations Finland should aim for maximum receipts from Cohesion Funding, as this means substantial development resources for the support of local and regional vitality.

The national implementation needs to ensure that municipalities continue to have an opportunity to contribute to the attainment of the EU objectives. Municipalities have an important role in contributing to the funding of projects. National cooperation should be flexible. The programming work needs to be simpler and more flexible than it is now: it should be possible to review the focus and content of the programmes during the programming period. The Association of Finnish Local and Regional Authorities is pleased that the Commission is offering development tools for responding to the needs of diverse cities and municipalities in the next programming period. The opportunities for using such tools and their synergy should be analysed carefully as the national programme preparation progresses. There is a need to improve communications and information on the best practices resulting from projects.

Cross-border cooperation needs to be developed on both the EU's internal and external borders. Maritime cooperation should be on equal footing with land border cooperation. For Finland, cooperation in the Baltic Sea Region and the Arctic, as well as cross-border cooperation with Russia are important areas of development. The strategy for the Baltic Sea Region is the EU's first macro-regional strategy, and cooperation in its implementation should continue to be strengthened.

The work carried out within the INTERREG programme should be given a major role in boosting the European Union's unity and competitiveness also in the future. The programmes for cooperation on EU internal borders should seek to establish close links with the regions' businesses, local authorities, educational institutions and local residents. This is also true for maritime border programmes involving Sweden, Estonia



and Latvia. The implementation of all INTERREG programmes should take place as close to municipalities and regions as possible. Regional cooperation across Europe should also be made possible.

Finland has the longest land border with Russia among the EU countries. External border cooperation with Russia has boosted investments, business activities, environmental cooperation and cultural activities and thus increased the border regions' vitality. Finland is located on the EU's northern and eastern borders. In the long term, the region is facing new EU-level



economic and geopolitical risks, but there will also be opportunities. The maintenance of good relations between border-regions will gain more importance and require sufficient programme funding for cooperation with Russia.

The TEN-T networks and their funding instrument, the Connecting Europe Facility (CEF), are an important part of the forthcoming EU Multiannual Financial Framework (MFF) and its implementation. A more efficient use of the CEF instrument needs to be ensured to promote Finland's goals related to international connections (Rail Baltica, the Helsinki-Tallinn railway tunnel), the development of rail links between urban regions' travel-to-work areas and the improvement of important freight transport routes.

During this programming period, the CEF is financing projects that will fill the missing links in Europe's energy, transport and digital backbone. Ensuring funding for the CEF is important in the forthcoming EU programming period as well, as the instrument supports the aim to link all of Europe, including its northernmost parts, to the EU market.

Finland should develop its transport network on a long-term basis beyond government terms. It would then have a better chance of receiving funding for its transport investments from financial instruments including the CEF. An examination of the TEN-T network's scope is to take place in 2023, and now is the time Finland should start preparing for it. The long-term aspect of planning can be supported by designing a national transport system plan with impact assessment and prioritisation. There is a need to raise the EU's awareness of Finland's transport development needs.

Climate change, circular economy and energy policy

Local and regional governments have a recognised role in the delivery of climate and circular economy targets. This should translate into opportunities for municipalities and regions to participate in decision-making and into allocation of resources to municipal and regional climate and circular economy action.

Local authorities' climate and circular economy action reflects the circumstances of local communities. The choices that local authorities make are influenced by the size and geographical location of the municipality, its urban and economic structures, opportunities for partnerships and political will. The EU level climate and energy policies need to be coherent



ent with the objectives of other policy fields, as well as being strategic and consistent. The climate and energy policy instruments should allow for adopting local-level solutions that are cost-effective and suitable for differing circumstances. Compliance with the principle of subsidiarity in climate, circular economy and energy policies is fundamental to the efficient work of municipalities and regions.

Making local investments and choices to achieve climate targets (for instance land use, energy production) will require an overall assessment of the environmental, health and economic impacts of solutions and confidence in the long-term goals. Diverse steering instruments should be used in the implementation of climate and energy policies. Contractual arrangements, partnerships, financing for trial projects and other incentives have proved to be efficient in speeding up local action on climate change and energy efficiency.

The Association of Finnish Local and Regional Authorities welcomes in principle the implementation of measures promoting circular economy and the move away from a linear economy. It is very important to take into account the complete production cycle and the overall impact management.

For the creation of a circular economy model that will work well for European society, the Association believes it is important that the European Parliament and Council take account of local authority views in formulating their positions in the follow-up to the Commission's Circular Economy Action Plan.

In the context of implementing the directives on waste, it should be kept in mind that the

purpose of public waste management is to ensure equal and cost-effective management of waste and to prevent any hazard to and harmful effects on health and the environment from waste and waste management. Growth in recycling should thus be driven by market demand and promote an economic model that is genuinely accomplishing these goals. Action taken should not lead to a recycling system that is of low quality and expensive for local residents.

An efficient delivery of the climate and circular economy targets requires production of information for the support of municipalities and regions, and structures enabling trials and communication. The information



produced should be used in the evaluation of municipal climate and circular economy action. The monitoring and reporting on the achievement of targets should provide useful information that is comparable between municipalities. Local authorities need EU level recommendations for monitoring the emissions. However, changes to these recommendations and the burden of reporting should be kept to a minimum.

Progress in combatting climate change requires that high-standard Education for Sustainable Development (ESD) is given at all levels of education. Finland is renowned for the quality of its education and is thus well-placed to bring forward the sustainability aspect.

Finnish municipalities have a greater role in climate and circular economy action than their international reputation suggests. Finland's Presidency term is a good opportunity for making the work of our municipalities more visible internationally and for sharing innovation and learning from one another.

Urban policy

Today, cities and urban areas have an increasingly greater role in promoting vitality and driving forward the economy. In cities, people's social environments come together, making networking easier for companies and employees. This creates conditions for export, economic growth and the development of digital products. Nevertheless, it is still necessary to find concrete measures to support and develop cities as the driving forces of economy and promoters of trade policy.

The implementation and development of the EU's Urban Agenda has become a central part

of the cycle of Council Presidencies. New partnership themes have been introduced into the Agenda. As the country holding the presidency, Finland should initiate an evaluation of the partnership results. The Agenda's measures should be better resourced than what they are now.

New themes have been proposed for the Agenda. It is important that the Urban Agenda recognises the role of culture, for example. Culture crosses society's sectoral boundaries both socially and economically, and it contributes significantly to the success of cities. At the same time, it is important to find out how the partnerships set up within the Agenda have contributed to better regulation and access to financing, and to the exchange of knowledge and best practices. Without this evaluation there is the risk that the Agenda's original policy objectives are lost in the vast number of partnership networks. The Urban Agenda's role should not be transformed into a promoter of urban networking, a role that the Urbact programme is already fulfilling. New partnerships should not be started before completing a proper evaluation of the results, structures and implementation measures of the current partnerships. Spontaneous global relations between cities should be harnessed as a way of increasing the vitality of regions.

Public transport is the foundation for efficient and sustainable urban transport and for new mobility services, as it promotes the goals of sustainable urban development on a long-term basis. It is important to ensure that urban regions can continue integrated development of their public transport systems on the basis of the EU Regulation on public passenger transport services.

Promotion of wellbeing and prevention of social exclusion

Finland should use its upcoming Presidency term to promote the theme of the economics of wellbeing. The economics of wellbeing means that people's wellbeing supports economic growth and sustainable economic development. Local authorities have a pivotal role in reducing inequalities in wellbeing and health between population groups and in preventing social exclusion. The work carried out by municipalities to promote local wellbeing is also an excellent example of delivering the economics of wellbeing at EU level.

In cities, social problems typically concentrate in certain districts. In assessing the Urban Agenda, one needs to draw attention to and make generally applicable the best practices and funding models for preventing social exclusion and combating the problems of segregation.

Social exclusion refers to forms of deprivation caused by unemployment, poverty, mental health problems, alcohol addiction, or by having become distanced from participation in today's society. Structural factors and systems that do not provide adequate support for individuals may also contribute to social exclusion. People in life transitions are especially vulnerable to social exclusion. Regionally concentrated, intergenerational social problems may exacerbate problems or give rise to new ones.

Social exclusion causes substantial financial losses to society as well as human suffering. It can be prevented by supporting families, children and young people

at an early stage before problems accumulate. Early support is targeted at those individuals and groups that are in an especially vulnerable situation. This requires high-standard basic public services and timely prevention. The inclusion of adults should also be supported. Meaningful activity improves wellbeing.

The promotion of wellbeing should be an integral part of a municipality's strategic planning and operation. The impact of every decision on the wellbeing of local residents should be considered. Measures such as provision of additional resources to schools, youth work, and other services have yielded good results in preventing social exclusion. Organisations need to be safeguarded proper conditions to work in, as they complement public service provision in a significant way. It is important to support the diversity of regions. A good tool for monitoring the development of wellbeing and the prevention of health inequalities and social exclusion is an electronic welfare report used by close to 90 per cent of Finnish municipalities. The welfare report is a useful tool for promoting, planning, monitoring, evaluating and reporting on wellbeing and health in the municipality. The report guides the municipality's policy on wellbeing. Municipalities are key players in promoting socially sustainable development.

Respect for gender equality and non-discrimination of local residents, safety and security and prevention of gender-based violence are essential for a vital and socially sustainable society. Local authorities can also establish forums for cooperation.

Immigration

The purpose of the European Agenda on Migration is to improve migration management across Europe. The EU is delivering the Agenda's goals by protecting

its own borders and pursuing a responsible migration policy. Promotion of legal immigration is a key instrument for this purpose.

Local authorities are preparing to compete for skilled workforce. Practices within the EU that promote labour mobility also facilitate the recruitment of foreign workforce. Efficient public services encourage foreign workers and their families to stay in the region, thus contributing to the municipality's vitality. The European Employment Services (EURES) network should be made more widely known and its effectiveness improved.

The EU and Finland should provide high-level international protection for those who need it. Local authorities' integration work is an essential component of a successful immigration policy. During the forthcoming funding period, it is vital to ensure that local authorities continue to have the possibility to use the EU's financial assistance for the integration of third-country nationals.

Integration and permit procedures related to recruiting third country nationals are matters that should remain within national competence also in the future.

The cities and municipalities of the future will have strong international networks. Immigrants concentrate in large cities and growth centres, but immigration may offer an opportunity for small municipalities and the ones with a declining population to boost population growth and to improve their operating conditions.

Municipalities and regions need skilled workforce for



businesses, services and administration to maintain and promote their vitality. Immigration may also be beneficial to municipalities in the regions experiencing workforce shortages. EURES (European Employment Services) is a wide European cooperation network and a public service to facilitate contacts between employers and employees in all parts of Europe.

The EU has approved the general principles of integration policy, which underpin the common approach to the integration of third-country nationals. The Finnish integration laws take account of these principles. The Commission has also published an Action Plan for Integration of Third Country Nationals and proposed a more strategic and coordinated approach to the use of EU funds. Local authorities have been able to use

EU funding for the improvement and practical implementation of integration work. There is a need for a clearer division of work among authorities dealing with persons residing in the country without a residence permit.

Gender equality

The equality between women and men is one of the fundamental principles of European Union law. Local and regional authorities have a key role to play in ensuring gender equality, and in this role they have an effect on the daily life of EU citizens. Respect for gender equality, the safety of local residents, and prevention of gender-based violence make the building blocks of a vital and socially sustainable society.

The Association of Finnish Local and Regional Authorities considers it important that Finland uses its Presidency to highlight gender equality as one of the Union's core values and calls for active measures to promote it and influence attitudes in all Member States. The key targets are linked to sustainable economy and gender equality, safety and decision-making. The priorities should also include work-life balance, sexual and reproductive health and economic equality. Special attention should be paid to the position of immigrants. The situation and safety of girls and women must be core values and priorities in external relations as well. The delivery of priorities requires a cross-cutting approach and special measures.

Account should be taken of the impact of economic developments on gender equality, and the social dimension should be strengthened. Gender equality should be given greater prominence within the European Semester. The positive impact of gender equality on vitality should be seen as an asset. Security and prevention of all forms of gender-based violence are basic rights of all EU citizens. It is necessary to support an efficient implementation of the Istanbul Convention.

It is fundamental for the achievement of equality goals to increase gender equality within the European Semester, in the EU's own decision-making and economy, in representation, and in the impact assessment of decisions and economy. Greater emphasis should be placed on the EU's gender equality strategy.

The key programmes in terms of gender equality (Rights and Values and ESF+) within the new MFF should guarantee sufficient

prominence and resources for local and regional authorities for the promotion of gender equality.

Non-Discrimination

EU citizens attach importance to equality of treatment and opportunities regarding employment, social protection, education, participation and access to goods and services. Equality means that no one may be discriminated against because of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics. Accessibility of services is one means of ensuring equality at a practical level.

The Association of Finnish Local and Regional Authorities believes it is important that during its Presidency, Finland should emphasise the equality of EU citizens and efforts to achieve equality. The status of minority languages should be safeguarded. The EU should promote non-discrimination of gender and sexual minorities. The implementation of the Digital Strategy should ensure equal opportunities for EU citizens in vulnerable situations — for older people, the disabled, low-income earners and young people. The key is to promote good relations between population groups. A cross-cutting approach to the promotion of non-discrimination and equal opportunities should be adopted across the different EU policy areas. It is particularly desirable that the EU increases awareness of the matter and influences attitudes positively.

In practice, equality is largely implemented in municipalities and regions. The Finnish Non-discrimination

Act is already comprehensive as such and applies to all entities belonging to a local authority corporation, in their role as employers, public authorities and services and education providers. New EU-level legislation imposing more obligations on municipalities should not be enacted.

It is important that the new MFF (including the Rights and Values and ESF+ programmes) will support the promotion of equality in municipalities and regions and networking at European level.

Digital transformation

A fast-developing digital economy opens up opportunities, but also presents challenges for the EU Member States and other European countries alike. A more equal competition with the United States, or with China in future, requires that the EU becomes more united as a digital economic area than it is today.

The fast technological development also poses enormous challenges to political activity and legislation for the achievement of the right balance between democracy and the benefits that technology provides. Skills development, education and life-long learning are necessary.

All levels, from users to access providers and equipment manufacturers, must devote more attention to information security. The legislation needs to set minimum information security requirements for devices connected to the Internet, and sanctions for non-compliance.

The EU's research, development and innovation funding and the Digital Europe Programme have increased the adoption of digital

services and smart urban solutions. In the new funding period, local authorities should continue to have a central role in the development projects together with research organisations and companies.

The new technology increases business opportunities and provides the private and public sectors with opportunities for operational efficiency and better services. However, account should be taken of the differences between the Member States and population segments in the level of assimilation and introduction of technologies. These differences partly arise from the Member States' size and available resources, yet the example of Finland and Estonia shows that even small countries can be trailblazers in digitisation. Good solutions and practices are too rarely introduced outside the countries in which they were first adopted.

The differences are also apparent between regions and municipalities within individual countries. Prosperous regions and municipalities have resources to take advantage of digitisation in services and administrative development, whereas citizens of poorer regions are at risk of being excluded from progress. Ecosystems evolve naturally around the players that are already advanced in using technology. Thought should be given to how to involve players at all levels in the ecosystems. Efforts should be made to reduce the imbalance between countries and regions, and EU funding could be used for this purpose.

It is a considerable challenge to keep up with the development while avoiding the pitfalls of rapid progress. Artificial intelligence (AI) is one example. There are currently unreasonable expectations for it, and the risk is that AI is thought to solve problems that the technology is not yet ready for. The need for maintaining genuine interactive skills in doing business or

working is not going to disappear. These skills cannot be replaced by electronic connections.

Citizens' digital services and eHealth

eHealth is part of the Digital Single Market. It is an instrument for efficient promotion of the health policy goals. eHealth will guarantee sustainable health systems by generating long-term cost savings. A key aim of Finland's eHealth Strategy is to increase the role of citizens.

It is for the authorities to ensure that citizens can have confidence in how their health data is used. To increase the public's trust, authorities must comply with the principles of the General Data Protection Regulation, or GDPR, and ensure information security and good communication.

Health technology industry is one of Finland's leading export sectors. The country has a vast number of health technology companies that would benefit from a wider market. The EU's financing mechanisms should be used actively to support health care digitisation and digital innovations. Finland has developed a wide range of innovative health technology applications, which can be disseminated as best practices in Europe. The opportunities offered by self-care services should be seized to make citizens' self-care part of the joint ambition of the European welfare states.

The number and range of digital transactions and internet-based social welfare and health services is constantly growing. These services are no longer used solely by professionals but also by citizens.

Health care services are largely based on information and communication technologies: they use mobile technology, cloud services, machine learning, AI, and IOT (Internet of Things) technology. Today, health care services are more often provided in the homes of patients and clients than they used to be.

Customer-responsive social welfare and health care means that local residents receive the necessary digital services tailored to their individual needs. The new systems allow municipal residents access to their own health and wellbeing data and an efficient use of this data in decision-making and research. EU legislative acts dealing with communication can promote the update of practices, so that it will be possible to streamline care and service processes.

Sustainable health systems focus on preventive care and inclusion of citizens. Society's digitisation paves way for innovation and for the health sector's development. Electronic systems promote a more efficient use of resources and support health professionals in their work. The ODA project (My Wellbeing Services for the Digital Age) has developed a service (Omaolo, How I feel) that combines wellbeing data stored by both professionals and clients. Several municipalities have introduced e-services, for example maternity and child health clinic services, remote physician's appointments, and patient wellbeing monitoring (e.g. diabetes).

The systems enable local residents to take stock of their own wellbeing and gain information on the services that meet their needs and on improving their life situation. Such self-assessment is a good basis for the cooperation between the individual and a professional. The digital services acknowledge local residents as experts in their own life.

When seeking savings in health and social services costs, it is important to understand that the new, digitised services cannot, as such, solve problems or their root causes, unless there is readiness for the evaluation and development of the current processes.

Education policy

General development of education policy

The debate on Europe's future underlines the importance of modernising education systems. The Association of Finnish Local and Regional Authorities aims for a comprehensive approach to the development of the education system rather than sector-specific reforms. The EU has emphasised education's instrumental value in terms of providing skilled workforce



for the labour market, but it is important to recognise that education has other values besides maintaining and producing competence. Education has pedagogical and cultural functions that should be valued.

The Association's goal is to contribute to the implementation of the new Erasmus programme. The programme's goals are generally consistent with the goals set for today's Finnish education policy.

The Association agrees with the European Commission that it is important to clarify the rules for and facilitate the mobility of pupils and students in vocational education and training and in general education.

The formulation of EU guidelines and recommendations should ensure that national governments — and in case of Finland, local authorities — retain their decision-making powers relating to educational, cultural, sports and youth services. Municipalities and regions must be allowed to make operational decisions based on local circumstances and capacities.

Education in Finland is for the most part funded and organised by local authorities. The educational system has a solid foundation and high standards, for which it has also received international acclaim. This system must be upheld and maintained and made visible in the international EU-debate.

The focus of the new Erasmus programme is on supporting inclusion, Europe's innovation capacity and excellence. It is important to understand the connection between the EU's strategic cooperation in education

and the new EU Youth Strategy (2019–2027) and the programme promoting them. Life-long learning, the youth, and sports were key elements of the former Erasmus programme. The programme has made an important contribution to Europe’s competitiveness and economic growth and strengthened active citizenship, democracy and gender equality.

At the national level, there is a need for increasing opportunities for international mobility of general upper secondary school students. Especially in case of underage students, student mobility requires specific support measures and arrangements to deal with their funding.

Education policy needs a long-term development programme and objectives extending beyond several government terms. Education should emphasise connections to employment and the radical transformation of work. National education policy should efficiently promote the international mobility of students.

The Association of Finnish Local and Regional Authorities welcomes the decision to launch discussions on the revision of the pay system between the current Member States. A viable solution to the matter should be found from the 2020/2021 school year onwards. A balanced cost-sharing system is also crucial for the financial sustainability of the European School system. A revised cost-sharing mechanism should also properly take into account the real needs of the schools and education providers and the possible consequences of Brexit.

Vocational education and training

The EU policy largely sees the vocational education and training (VET) and professional competence development as means to promote

employment and to solve the problems of matching and social exclusion. In the Association’s opinion, VET should prioritise vocational competence, professional growth, and life-long learning skills. There should be a pathway from VET to higher education. The education system should not have barriers to progress.

The EU policy also focuses on apprenticeships and contrasts them with school-based VET. Finland has carried out a VET reform, which addresses the challenge of developing the vocational skills of both young people and adults to meet the needs of future work. The reform offers new opportunities for developing learning in different environments and for creating flexible and individual training paths.

Rather than focusing on apprenticeships, the Association of Finnish Local and Regional Authorities wants to draw attention to a new way of combining learning in different learning environments: educational institutions’ workshops, virtual and simulated environments, online studying, on-the-job learning. The goal is to provide students with the best possible general and vocational skills for both today’s and tomorrow’s working life. Efficient, high-standard learning guidance prevents students from dropping out of school and ensures them adequate skills for working life and further studies.

The EU recognises Finland’s vocational education system, where education and training is funded and organised for the most part by local authorities. The Association of Finnish Local and Regional Authorities is the voice of Finnish municipalities, and in this role it also represents vocational education providers that are under municipal control.

Foreign language proficiency

Finland should pursue the European Commission's and Council's goal to have a larger proportion of EU citizens speak at least two foreign languages besides their own mother tongue. This means achieving an advanced level in at least one European language and an intermediate level in a third language in addition to the language of schooling.

The EU education policy should emphasise the importance of language skills and especially the development of the education system to support the acquisition of language proficiency. Because diversity in Europe is based on the diversity of nations, ethnic groups and languages, a good knowledge of one's own mother tongue or one's language of schooling plays an important role in the learning process. Language proficiency is also about linguistic rights and hence about non-discrimination and accessibility.

In EU Member States, the number of foreign languages studied on completion of basic education averages 1.6. Finland has the second highest number (2.2) after Luxembourg (2.5). Knowledge of foreign languages not only enables individuals to pursue employment and move freely, but it also supports the cultural development of citizens. This highlights the important role of library services, liberal adult education and the EU's various exchange and study programmes, which complement the official education system. Continuous learning is part of the operating model of learning languages.

It is wise to take advantage of the critical periods in language acquisition. Finland is fostering first foreign



language learning by beginning its instruction in the first grade of comprehensive school, which is one year earlier than previously, and by increasing the number of lessons. However, language learning is not only about quantity, but also about quality. In this respect, linguistic awareness has an important role in both learning and teaching.



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