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This submission has been prepared by Amnesty International in advance of the country visit of the European Commission against Racism and Intolerance (ECRI) to Finland in September 2024

1. INTRODUCTION

This submission has been prepared by Amnesty International in advance of the consideration by the European Commission Against Racism and Intolerance (ECRI) in advance of the country visit of ECRI to Finland in October 2024.

2. EFFECTIVE EQUALITY AND ACCESS TO RIGHTS

INCLUSIVE EDUCATION

The Finnish education system lacks a systemic approach to human rights education for trainee teachers, and civil servants. In the last few years, the government has taken steps to strengthen human rights education by establishing a Steering Group on Democracy and Human Rights Education.¹ In 2018-2019 a project run by the Human Rights Centre, the Ministry of Education and Culture, the Ministry of Justice and the University of Helsinki developed tools and an online course on democracy and human rights education for the use of universities.² However, provision of human rights education still relies greatly on non-governmental organizations and individual education providers.³

The obligation to promote equality in early childhood education through site-specific planning was added to the Non-Discrimination Act in June 2023.⁴ The obligation to create an equality plan specific to each site, which applies to organizers and providers of early childhood education, can be an important measure to promote equality. With site-specific equality plans, it is possible to support those children whose home environments and families do not support their diversity, such as children who belong to sexual and gender minorities.⁵ The staff at the sites know the children's situations better than, for example, the officials drafting an equality plan for the entire municipality.

However, as part of the government's deregulation plan, the Economic Policy Ministerial Committee decided in May 2024 that, as one means of reducing the tasks of municipalities, the Non-Discrimination Act will be amended so that instead of site-specific planning, there will only be a single equality plan covering the entire municipality or the organizer of childhood education. Amnesty International is concerned that the proposed change would particularly affect those children who experience the most discrimination and inequality, as it is likely that their specific needs would be inadequately accounted for in a more general plan. Finland's Non-Discrimination Ombudsman, the Ombudsman for Children and the Ombudsman for Equality have opposed the change and stressed that the proposal conflicts with the objectives of the Constitution and the Non-Discrimination Act, the government programme, the anti-racism action plan, and the National Child Strategy.⁶ Maintaining the obligation to create site-specific equality plans could ensure the better consideration of fundamental and human rights in early childhood education.⁷

¹ Ministry of Education and Culture, *Demokratia- ja ihmisoikeuskasvatuksen kehittämisen ohjausryhmä OKM035:00/2020* (Steering group for democracy and human rights education), 2020, okm.fi/en/project?tunnus=OKM035:00/2020.

² University of Helsinki, *Human rights, democracy, values and dialogue in education – Final report of the project for the development of education for democratic citizenship and human rights education in teacher education (1 August 2018 – 31 July 2019)* (abstract in English), 15 April 2020, helsinki.fi/sites/default/files/atoms/files/hy_hankkeen_loppuraportti.pdf.

³ Human Rights Centre, *Human rights education in Finland, 2014*, bin.yhdistysavain.fi/1586428/5JNn7JIWh5FZrX8fCnda0V3LQL/HR%20education%20in%20FIN_en.pdf_.pdf. The findings of the 2014 study are still up-to-date. See for example, Tuija Kasa and Arto Kallioniemi, *Ihmisoikeudet, demokratia ja sosiaalinen oikeudenmukaisuus opettajankoulutuksessa. Kieli, koulutus ja yhteiskunta*, 11(6), 2020, kieliverkosto.fi/fi/journals/kieli-koulutus-ja-yhteiskunta-lokakuu-2020/ihmisoikeudet-demokratia-ja-sosiaalinen-oikeudenmukaisuus-opettajankoulutuksessa.

⁴ *Yhdenvertaisuuslaki* [Non-Discrimination Act], <https://www.finlex.fi/fi/laki/ajantasa/2014/20141325>

⁵ Finnish Institute for Health and Welfare, *Miten tuetaan sateenkaarilapsen ja -nuoren perhesuhteita* [How to support family relations of children and youth who belong to gender and sexual minorities]: <https://thl.fi/aiheet/sukupuolten-tasa-arvo/tasa-arvon-edistaminen/tietopaketti-sateenkaarilapsista-ja-nuorista-ammattilaiselle/miten-tuetaan-sateenkaarilapsen-ja-nuoren-perhesuhteita>

⁶ The Finnish Public Service Media Company YLE, *Ombudsman officials slam proposed changes to equality law*, 14.8.2024, <https://yle.fi/a/74-20104869>.

⁷ *Amnestyn Suomen osaston lausunto hallituksen esityksestä laiksi yhdenvertaisuuslain muuttamisesta* [Amnesty International Finnish Section's statement on the government's proposal to amend the Non-Discrimination Act]: <https://www.amnesty.fi/lausunto-hallituksen-esityksesta-laiksi-yhdenvertaisuuslain-muuttamisesta/>.

UNDOCUMENTED MIGRANTS

The Finnish government has announced plans to replace existing legislation, which guarantees undocumented migrants some necessary non-urgent healthcare services in addition to urgent services.⁸ The planned legislation would revoke access to non-urgent services for irregularly present migrants in most situations, mainly affecting those people who do not have a valid residence permit, such as persons whose application for asylum has been denied and other undocumented migrants. According to an independent review commissioned by the Finnish Ministry of the Interior, the increase of asylum applications in Finland during 2015 and 2016 strained the asylum system, with notable problems in the quality of asylum processes, and more people ending up as undocumented migrants.⁹

LGBTI EQUALITY

Discrimination against transgender and intersex people remains widespread in different areas of life.¹⁰ People belonging to several minorities, particularly transgender people of colour, experience multiple and intersecting discrimination.¹¹

In its report on Finland in 2019, ECRI recommended as a matter of priority and in conformity with the case law of the European Court of Human Rights, that the Act on Legal Recognition of the Gender of Transsexuals should be amended to remove the requirement that persons seeking recognition in a gender other than that in which they were originally registered should be infertile or should undergo sterilisation as a precondition for legal recognition.

In April 2023, a law came into force making legal gender recognition available to transgender adults upon written application. The new law removed the requirement for trans people to be sterilized and obtain a psychiatric diagnosis in order for them to obtain legal gender recognition. No system was introduced for children and adolescents.¹²

There have been severe delays in access to specialist medical evaluation and treatment at a trans clinic.¹³ The Parliamentary Ombudsman has given two non-binding decisions about violations of national law and the constitutional right to adequate health services when access to medical evaluation for gender affirming treatment had been delayed by more than three months. The Ombudsman stated that insufficient resourcing and organizational factors could not justify the delay.¹⁴

In June 2020, the Council for Choices in Health Care in Finland adopted recommendations for the treatment of “gender dysphoria” resulting from transgender and non-binary identities, that continue to violate the rights of trans people.¹⁵ The recommendations are based on the WHO’s outdated International Classification of Diseases 10th edition (ICD-10), which classified the identities of transgender and non-

⁸ Government Programme of Prime Minister Petteri Orpo, 20 June 2023: <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government-20062023.pdf?sequence=4>, p. 223.

⁹ Owl Group, Review commissioned by the Finnish Ministry of Interior on the asylum process in Finland (in Finnish): <https://intermin.fi/documents/1410869/3723692/Turvapaikkaprosessia+koskeva+selvitys+27.6.2019/60bd290f-ffbd-2837-7f82-25fb68fe172c/Turvapaikkaprosessia+koskeva+selvitys+27.6.2019.pdf>, pp. 94-97.

¹⁰ 46% of the Finnish trans respondents and 70% of the intersex respondents of the EU-LGBTI II Survey felt that they had been personally discriminated against due to being LGBTI in the past year. European Union Agency for Fundamental Rights, LGBTI Survey Data Explorer, 2022, fra.europa.eu/en/data-and-maps/2020/lgbti-survey-data-explorer?locale=EN&dataSource=LGBTI&media=png&width=740&topic=2.+Discrimination&question=DEXover_discr&subset=AllSubset&country=FI&superSubset=05--Trans-people&plot=inCountry&M2V=inCountry. According to the National School Health Survey 2019, 27% of gender minority youth had experienced physical threats in the past year. For respondents who identified as cisgender, the corresponding number was 14%.

¹¹ Satu Jokela, Pauliina Luopa, Anni Hyvärinen, Tupu Ruuska, Tuija Martelin and Reija Klemetti, Sukupuoli- ja seksuaalivähemmistöihin kuuluvien nuorten hyvinvointi – Kouluterveyskyselyyn tuloksia 2019, Working paper 38/2020, Finnish Institute for Welfare and Health, 2020, julkari.fi/bitstream/handle/10024/140742/URN_ISBN_978-952-343-580-3.pdf?sequence=1&isAllowed=y, p. 24.

¹² Outi Lepola, Tensions all the time – Multiple discrimination as experienced by people belonging to sexual and gender minorities (abstract in English), Ministry of Justice, 19 December 2018, julkaisut.valtioneuvosto.fi/handle/10024/161239.

¹³ Amnesty International, ‘Finland: New gender recognition law ‘a major step towards protecting trans rights’’, 1 February, https://www.amnesty.org/en/latest/news/2023/02/finland-new-gender-recognition-law-a-major-step-towards-protecting-trans-rights/?utm_source=annual_report&utm_medium=pdf&utm_campaign=2021.

¹⁴ The evaluation and treatment for gender dysphoria takes place in two specialist units located in Helsinki and Tampere.

¹⁵ The first decision concerned the trans clinic in Helsinki, the second decision concerned the Clinic in Tampere. The decisions are available from the Parliamentary Ombudsman, decisions EOAK/2842/2017 (24.10.2018) and EOAK/501/2019 (April 2020). The European Commission on Racism and Intolerance has recommended that a third Clinic be established to accommodate the need for treatment. ECRI Report on Finland, fifth monitoring cycle, CRI(2019)38, adopted 18 June 2019, paras 102-103, <https://rm.coe.int/fifth-report-on-finland/1680972fa7>.

¹⁶ The recommendations, adopted 11 June 2020, are available in Finnish from COHERE’s website: <https://palveluvaikoima.fi/valmiit-suositukset>.

binary individuals as ‘mental or behavioural disorders’, thus continuing to pathologize and stigmatize transgender and non-binary people. In addition, the recommendations make access to specialist services more difficult, as they require that the “gender dysphoria” is major and long-lasting, and that psychological support is in place in a local healthcare unit before access to specialist services. Treatment will only be started when the “gender dysphoria” has lasted at least two years. These requirements form unreasonable barriers to access to gender affirming procedures and treatment. In addition, NGOs working on the rights of trans people have expressed concern that local healthcare units do not possess sufficient expertise to provide the required psychological support. According to the recommendation on “gender dysphoria resulting from non-binary gender identity”, certain types of treatment available to transgender individuals would not be available to individuals diagnosed as non-binary under the framework of the ICD-10. The availability of gender affirming treatment should be determined through the best interests of the individual, and the diagnosis should not restrict the availability of treatment that is necessary for the attainment of the highest attainable standard of physical and mental health.

According to a study (2016) by the Finnish National Advisory Board on Social Welfare and Health Care Ethics (ETENE), intersex children in Finland are routinely subjected to medical and surgical treatments, often while very young, in order to align their physical appearances with either of the binary sexes. According to ETENE, such surgeries are often done for social reasons rather than out of medical necessity.¹⁶

Research conducted by Tikli Oikarinen in March 2019¹⁷ adds to the evidence of the human rights violations experienced by intersex people in Finland. The study is based on the experiences of intersex persons and parents of intersex children within the Finnish healthcare system and in society. It examines how decisions around health care are made when an intersex child is born and how the treatment the child receives in childhood and adolescence can affect all aspects of their life: health, education, work life and personal relationships.¹⁸

3. HATE SPEECH AND HATE-MOTIVATED VIOLENCE

Amnesty International notes that the government’s measures to combat hate speech and hate crimes remain insufficient in Finland. Amnesty considers that the activities lack overall coordination, and that limited government projects exist to address these issues.¹⁹ Most notably, a permanent national coordination structure and a whole-of-government action plan to combat hate speech and hate crimes, as well as a comprehensive data collection system to record and analyze hate incidents, are lacking.

According to a 2022 follow-up survey commissioned by the Ministry of Justice (MoJ) on hate speech against and harassment of marginalized groups, the results of many governmental actions taken to combat hate speech are not yet reflected in the experiences of marginalized groups.²⁰ Another study commissioned by the government acknowledged that hate speech has become “an integral part of the online culture”.²¹ According to a report by the Police University College which operates under the Ministry

¹⁶ There are variations between hospitals how parents are involved in the decision making in cases of non-emergency operations and the assignment of legal sex for an intersex infant. Some stress the authority of health professionals, some report the final decision is always solely the parents’. Out of the five existing University Hospitals, Oulu University is the only one that refuses to operate on intersex children for any other reason than medical necessity. In addition, according to ETENE, resources of health care units to support intersex individuals are inadequate.

¹⁷ Oikarinen, Tikli, *Ei tietoa eikä vaihtoehtoja : Selvitys intersukupuolisten ihmisten oikeuksista ja kokemuksista* [No information or options. Study on the rights and experiences of intersex persons]. Ministry of Justice and Ministry for Foreign Affairs, 2019.

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161410/OMSO_3_2019_Ei_tietoa_eika_vaihtoehtoja_.pdf?sequence=1&isAllowed=y

¹⁸ Amnesty International have made similar recommendations in the context of other countries. See reports: First do no harm

<https://www.amnesty.org/en/documents/eur01/6086/2017/en/> and Iceland: No shame in diversity

<https://www.amnesty.org/en/documents/eur28/9498/2019/en/>

¹⁹ European Commission against Racism and Intolerance (ECRI), Report on Finland (Fifth monitoring cycle), 18 June 2019, CRI (2019)38,

<https://rm.coe.int/fifth-report-on-finland/1680972fa7>, para. 44-45.

²⁰ Owl Group, “Että puuttutaisiin konkreettisesti”: Seurantaselvitys vihapuheesta ja häirinnästä ja niiden vaikutuksista eri vähemmistöryhmiin [“Hoping for a Concrete Intervention”: Follow-Up Survey on Hate Speech and Harassment and Their Effects on Different Minority Groups], 2022, <http://urn.fi/URN:ISBN:978-952-400-482-4> (in Finnish)

²¹ Valtioneuvoston kanslia, 2022, Verkkoviha: Vihapuheen tuottajien ja levittäjien verkostot, toimintamuodot ja motiivit [“Online hate: networks, patterns and motivations of hate speech producers and disseminators”]

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164244/VNTEAS_2022_48.pdf?sequence=1&isAllowed=y (in Finnish)

of the Interior, the number of suspected hate crimes has increased in the past two years, with most of the suspected offences seemingly motivated by the victim's ethnic or national background.²²

The issue of under-reporting hate incidents to the authorities remains a significant problem.²³ Anti-Racist Forum, an NGO working to fight for social justice, has developed an online tool to monitor hate incidents.²⁴ A 2022 report by Anti-Racist Forum noted that hate incidents reported through the online tool were rarely reported to the authorities. In cases where the respondent had indicated whether they had reported or would report the incident also to the authorities, only 8% responded having done or doing so. Very few of these respondents were satisfied with the authorities' response, often due to experiences of slowness and victim-blaming or receiving a response that the authorities would not investigate the incident.²⁵

According to a recent study commissioned by the MoJ, there are shortcomings in the identification and processing of hate motives in the criminal procedure. The study criticized the guidelines by the National Police Board (NPB) for not requiring the police to assign hate crime codes to reported offences.²⁶ According to the study, the police had recorded a significant number of hate crimes, that led to a conviction, without a hate crime code.²⁷ The study also pointed out problems in investigating whether hate was a motive for crime, as the interviewing instructions issued by the NPB make no reference to examining the motives.²⁸

Racist harassment and discrimination remain high. According to a 2022 survey by the EU Agency for Fundamental Rights, 43% of people of African descent in Finland reported experiencing racist harassment and 54% reported experiencing racial discrimination within a year before the survey.²⁹ According to a 2021 report by Anti-Racist Forum, most of the hate incidents reported through their online tool were directed at persons who belonged or were presumed to belong to an ethnic minority, often at people of African or Asian descent.³⁰

According to the European Islamophobia Report 2022, many politicians and public officials still portray Muslims as a threat to national security. The report highlights that anti-Muslim racism and xenophobic sentiment have been fueled by several events, including the parliamentary elections in April 2023. According to the report, parties like the Finns Party (FP) and the National Coalition Party (NCP) used

²² In 2022, the police recorded 930 reports on these motives. The suspected crimes were associated with the victims' sexual orientation, gender identity or gender expression in 140 cases. 121 hate crime reports were related to religion or belief, and most of these crimes were committed against Muslims. These statistics only describe the number of suspected hate crimes reported to the police. Police University College, "Growth continues in the number of suspected hate crimes", 26 October 2023, https://polamk.fi/-/viharikosepailyjenmaara-jatkakasvuaan?languageId=en_US.

²³ According to a survey, only approximately 20% of hate crime victims reported to the police. Ministry of Interior, Finland, "Suurin osa viharikoksista on rasistisia rikoksia" motiivit ["The majority of hate crimes are racist crimes"], <https://intermin.fi/polisiasiat/viharikollisuus> (in Finnish). (accessed on 14 February 2024).

A report from 2018 reveals that only a small proportion of respondents had reported hate crime incidents to the police. The main reason for not reporting to the police was due to distrust of police action in hate crime cases. According to the report frustration and numbness, fear and anxiety were also evident in many responses.

Victim Support Finland (RIKU) and The National Forum for Cooperation of Religions in Finland (CORE Forum), *Uhrien kokemuksia viharikoksista Suomessa vuosina 2014-2018* ["Victims' experiences of hate crime in Finland 2014-2018"], March 2018, https://www.riku.fi/content/uploads/su_file/2140_Uhrien_kokemuksia_viharikoksista_2014_2018.pdf (in Finnish).

²⁴ The tool does not substitute reporting a crime to the authorities, but it aims to gather information on the number and quality of hate incidents and to offer victims and witnesses a low-threshold way to report hate incidents anonymously. It was developed as a part of an EU-funded Facts Against Hate project in 2019-2021.

Anti-Racist Forum, "Together Against Hate – Hate incident monitoring tool", <https://www.yhdessavihaavastaan.fi/en/>.

²⁵ Anti-Racist Forum, *Shadow report II: Together against Hate, 2022*, <https://static1.squarespace.com/static/5c61e3977980b3278f57db6e/t/64229adf38df2175890c39c3/1679989474426/Together+Against+Hate%20+Shadow+Report+II.pdf>.

²⁶ The National Police Board, *Epäilyllä viharikoksen tai sellaisia piirteitä sisältävän rikoksen luokitteluun poliisiasian tietojärjestelmään (Ohje 2020/2011/2098)* ["Classifying a suspected hate crime or a crime containing such elements in the police information system (Guideline 2020/2011/2098)"], 13.12.2011 (in Finnish), cited in Marko Juutinen, *Hate Crimes and their Handling in the Criminal Process*, 2021, <http://urn.fi/URN:ISBN:978-952-259-934-6>.

²⁷ Marko Juutinen, *Hate Crimes and their Handling in the Criminal Process*, 2021, <http://urn.fi/URN:ISBN:978-952-259-934-6>.

²⁸ The National Police Board, *Ohje esitutkintapöytäkirjan laadinnasta. Liite 2. Käsikirja kuulustelujen kirjaamisesta. (Ohje POL-2016-8514)* ["Instructions for preparing the preliminary investigation report. Attachment 2. Manual for recording interrogations (Guideline POL-2016-8514)"], cited in Marko Juutinen, *Hate Crimes and their Handling in the Criminal Process*, 2021, <http://urn.fi/URN:ISBN:978-952-259-934-6>.

²⁹ EU Agency for Fundamental Rights, *Report: Being Black in the EU: Experiences of People of African Descent*, 2023, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2023-being-black_in_the_eu_en.pdf.

³⁰ Anti-Racist Forum, *Shadow report: Together against Hate, 2021*, https://static1.squarespace.com/static/5c61e3977980b3278f57db6e/t/61ccab3ce30d5d5fb14fd853/1640803133935/togetheragainststate_ant_i_racist_forum_A4_eng.pdf.

negative stereotypes of Muslims and so-called youth gangs to “hype up ‘the immigrant problem’ to lure voters” ahead of the parliamentary elections.³¹

A 2023 evaluation report commissioned by the MoJ found that the previous governmental anti-racism action plan was meeting the criteria set by the EU. Despite the positive overall assessment, the report recommended the government “allocate sufficient resources for anti-racism policies”, “develop specific measures to combat Afrophobia, Islamophobia and antisemitism”, and “amend the Criminal Code to comply with the EU Framework Decision 2008/913/JHA”.³²

The new government consisting of the NCP, the FP, the Swedish People’s Party and the Christian Democrats was appointed in June 2023. Amnesty International regrets that the new government programme lacks adequate commitments to combat racism, hate speech and hate crimes.³³ Instead, the government has announced plans to tighten migration and asylum policy.³⁴ Comparing the plans to the more favourable treatment offered to people fleeing Ukraine, migration researchers have highlighted the “policy of inequality” based on ethnicity in the government programme for other people seeking protection.³⁵ Amnesty International is concerned that the governments’ framing of migrants as “security threats” and “abusers of the system”³⁶ may legitimize and fuel xenophobic attitudes.

In August 2023, after media reports concerning past racist speeches and writings by three newly appointed ministers of the FP, the government introduced an equality statement that includes a list of measures to combat racism. According to the statement, these would be implemented through a separate action plan that continues the work of the previous government action plan for combating racism in 2021-2023.³⁷ A draft action plan published in May 2024 did not include effective measures to combat racism, hate speech and hate crimes, and many human rights actors considered it insufficient.³⁸

Amnesty International highlights that the government needs to take urgent steps to improve its response to racism, and to include affected and marginalized communities in all phases of planning, implementing, monitoring and evaluating the government’s anti-racism work.

Discrimination and bias-motivated violence against LGBTI persons remain common. A 2021 survey by the Finnish Institute for Health and Welfare shows that more than half of the LGBTI youth in the eighth or

³¹ Enes Bayrakli & Farid Hafez (eds.), European Islamophobia Report 2022, 2023, <https://islamophobiareport.com/islamophobiareport2022.pdf>.

³² MAP Finland ry, Arviointi valtioneuvoston Yhdenvertainen Suomi -toimintaohjelmasta rasmin torjumiseksi ja väestösuhteiden edistämiseksi [“Evaluation of the Government Action Plan on Equal Finland to Combat Racism and to Promote Good Relations”], 2023, <http://urn.fi/URN:ISBN:978-952-400-655-2>. European Commission has started an infringement procedure against Finland. According to the European Commission, the Finnish legislation incorrectly transposes hate speech inciting to violence and fails to criminalize hate speech when addressed to individual members of a group defined by reference to race, colour, religion, descent or national or ethnic origin. The European Commission saw Finland also failing to criminalize the public condoning, denial or gross trivialization of international crimes and the Holocaust, as well as to ensure that the criminal offences concerning racism and xenophobia can be investigated and prosecuted without a report or an accusation made by the victim. European Commission, Press release: “February infringements package: key decisions”, 18 February 2021, https://ec.europa.eu/commission/presscorner/detail/en/INF_21_441.

³³ Finnish Government, A Strong and Committed Finland: Programme of Prime Minister Petteri Orpo’s Government, 20 June 2023, <http://urn.fi/URN:ISBN:978-952-383-818-5>; Amnesty International Finnish Section, “Amnesty: Hallitusohjelma ihmisoikeuksien näkökulmasta heikko ja ristiriitainen” [“Amnesty: The Government Programme is Weak and Contradictory from a Human Rights Perspective”], 21 June 2023, <https://www.amnesty.fi/amnesty-hallitusohjelma-ihmisoikeuksien-nakokulmasta-heikko-ja-ristiriitainen/>.

³⁴ The government program lays down plans to “minimize the use of the asylum mechanism based on crossing European borders and applying for asylum in Finland”. According to the program, “the Government will bring Finland’s key asylum policy statutes up to the general level of Nordic countries”. Moreover, the government programs includes plans to tighten the requirements of family reunification, obtaining permanent residency and citizenship, as well as to “differentiate the social security system and social benefits of immigrants and permanent residents of Finland from each other”. Finnish Government, A Strong and Committed Finland: Programme of Prime Minister Petteri Orpo’s Government, 20 June 2023, pp. 220, 223- 224, <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government20062023.pdf?sequence=4>.

³⁵ Bodström, Erna, Blog post: “Hallitusohjelma ja eriarvoistamisen politiikka”, [“The government programme and the policy of inequality”], 7 September 2023, <https://raster.fi/2023/09/07/hallitusohjelma-ja-eriarvoistamisen-politiikka/> (in Finnish).

³⁶ Hallituksen esitys eduskunnalle valtion talousarvioksi vuodelle 2024, [“Government proposal to Parliament on the state budget for 2024”], 9 October 2023, p. 241, https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Documents/HE_41+2023.pdf (in Finnish).

³⁷ Finnish Government, Government statement to Parliament on promoting equality, gender equality and non-discrimination in Finnish society, 31 August 2023, <http://urn.fi/URN:NBN:fi-fe20230829112043>; Ministry of Justice, Finland, An Equal Finland: Government Action Plan for Combating Racism and Promoting Good Relations between Population Groups, 2022, <http://urn.fi/URN:ISBN:978-952-259-813-4>.

³⁸ Uutta vauhtia yhdenvertaisuuteen Suomessa - Valtioneuvoston toimenpideohjelma rasmin torjumiseksi ja yhdenvertaisuuden edistämiseksi [The Finnish Government Draft Action Plan on Combating Racism and Promoting Non-discrimination], 30 April 2024 <https://www.lausuntopalvelu.fi/FI/Proposal/Participation?proposalId=9819f652-21d9-4328-944f-449964b101a1>; see also Amnesty International Finnish Section comments on the draft action plan, 7 June 2024, https://www.amnesty.fi/uploads/2024/06/lausunto-ai-fi-37_2024_vnk_valtioneuvoston-toimenpideohjelma-rasmin-torjumiseksi-ja-yhdenvertaisuuden-edistamisesta.pdf; the Human Rights Centre 10 June 2024, <https://bin.yhdistysavain.fi/1586428/cNBWJlvEonErZj0rg2n10aPMEx/Lausunto%20luonnoksesta%20valtioneuvoston%20toimenpideohjelmaksi%20rasmin%20torjumisesta%20ja%20yhdenvertaisuuden%20edist%C3%A4misest%C3%A4.pdf>; the Non-Discrimination Ombudsman 10 June 2024, [https://yhdenvertaisuusvaltuutettu.fi/documents/25249352/0/YVlausunto+Vnktoimenpideohjelma2024+\(2\).pdf?1=1718032890566](https://yhdenvertaisuusvaltuutettu.fi/documents/25249352/0/YVlausunto+Vnktoimenpideohjelma2024+(2).pdf?1=1718032890566); the Finnish League for Human Rights 10 June 2024: <https://ihmisoikeusliitto.fi/wp-content/uploads/2024/06/Lausunto-VNK-rasminvastainen-toimenpideohjelma.pdf>.

ninth grade have experienced discrimination at schools or in their free time.³⁹ According to ILGA Europe's Annual Review 2023, several hate speech incidents against trans people and especially trans women took place during the parliamentary debates for legal gender recognition reform.⁴⁰ In 2022, 22 out of 25 Pride organizers that responded to an NGO questionnaire reported experiencing some sort of harassment or violence.⁴¹

Furthermore, under-reporting of hate-motivated violence and discrimination against LGBTI persons remains a problem. According to an EU-wide survey published by the European Union Agency for Fundamental Rights in 2024, only 18% of respondents in Finland had reported to the police physical or sexual attacks they had experienced, and only 11% had reported their discrimination experiences to an equality body or another organisation in Finland.⁴²

In November 2023, 14 NGOs expressed concern that neither the government programme nor the equality statement include specific measures to promote the rights of LGBTI persons in Finland.⁴³ Amnesty further regrets that no LGBTI action plan has been established, despite the calls of NGOs and recommendations of human rights bodies.⁴⁴

4. INTEGRATION AND INCLUSION

TREATMENT OF REFUGEES AND MIGRANTS - NON-REFOULEMENT AND ACCESS TO FAIR ASYLUM PROCESS

Amnesty International is concerned that the legislative changes to the Aliens' Act from 2015-2019 continue to place asylum seekers at risk of human rights violations such as refoulement.⁴⁵ These restrictions violate asylum seekers' right to a fair asylum procedure and to an effective remedy and there is a risk of forcible returns in violation of the principle of non-refoulement.⁴⁶ Moreover, the current Government programme includes various plans to weaken asylum seekers' legal protection. For example, the government has said it will examine the possibility of limiting appeals against deportation to the first instance court, meaning further appeals to the Supreme Administrative Court would not be possible.⁴⁷ If

³⁹ Finnish Institute for Health and Welfare, Kouluterveyskysely 2021: Sukupuolivähemmistöjen tulokset ["School Health Promotion Study 2021: Results of Gender Minorities"], 2022, <https://thl.fi/documents/10531/3554284/KTK2021-talukot-sukupuolivahemmistot-FI.pdf/c2b63fab41fa-00ae-1abf-1033635182a7?t=1656333051663>; Finnish Institute for Health and Welfare, Kouluterveyskysely 2021: Seksuaalivähemmistöjen tulokset ["School Health Promotion Study 2021: Results of Sexual Minorities"], 2022, <https://thl.fi/documents/10531/3554284/KTK2021-talukot-seksuaalivahemmistot-FI.pdf/fe3aaa6f-a16d-1d1b-3df8-1043ccfc2aa?t=1656333083769>.

⁴⁰ ILGA Europe, 2023 Annual Review of the Human Rights Situation of Lesbian, Gay, Bisexual, Trans and Intersex People in Europe and Central Asia, 2023, <https://www.ilga-europe.org/files/uploads/2023/02/annual-review-2023.pdf>.

⁴¹ Most common types of acts reported were inappropriate and offensive speech, vandalism, and theft of Pride flags. Vandalism included burning and destructing rainbow symbols such as Pride flags, painted stars, and park benches. Harassment and violence were also taking place during Pride events. Far-right protesters aimed to disrupt a drag story time event in the Oodi Central Library during Helsinki Pride month. In Mikkeli, two young persons detonated a homemade bomb close to where the Pride march was taking place.

Yle – The Finnish Public Media Service Company, "Most Pride event organisers in Finland report harassment, violence", 17 June 2022, <https://yle.fi/a/3-12498465>; ILGA Europe, 2023 Annual Review of the Human Rights Situation of Lesbian, Gay, Bisexual, Trans and Intersex People in Europe and Central Asia, 2023, <https://www.ilga-europe.org/files/uploads/2023/02/annual-review-2023.pdf>.

⁴² The European Union Agency for Fundamental Rights 2024, Harassment and violence against LGBTIQ people on the rise: <https://fra.europa.eu/en/news/2024/harassment-and-violence-against-lgbtqi-people-rise-and-country-data-from-finland>: https://fra.europa.eu/sites/default/files/fra_uploads/lgbtiq_survey-2024-country_sheet-finland.pdf.

⁴³ Seta – LGBTI Rights in Finland, Yhteiskannanotto: Sateenkaari-ihmisten oikeuksia edistettävä konkreettisilla toimilla ["Joint statement: LGBTIQ+ rights must be promoted by concrete actions"], 9 November 2023, <https://seta.fi/2023/11/09/yhteiskannanotto-sateenkaari-ihmistenoikeuksia-edistettava-konkreettisilla-toimilla/> (in Finnish).

⁴⁴ Seta – LGBTI Rights in Finland, Yhteiskannanotto: Sateenkaari-ihmisten oikeuksia edistettävä konkreettisilla toimilla ["Joint statement: LGBTIQ+ rights must be promoted by concrete actions"], 9 November 2023, <https://seta.fi/2023/11/09/yhteiskannanotto-sateenkaari-ihmistenoikeuksia-edistettava-konkreettisilla-toimilla/> (in Finnish); ECRJ General Policy Recommendation No. 17 on preventing and combating intolerance and discrimination against LGBTI persons, 28.9.2023, <https://rm.coe.int/general-policy-recommendation-no-17-on-preventing-and-combating-intolerance/1680acb66f>; European Commission, Union of Equality: LGBTIQ Equality Strategy 2020-2025, 12.11.2020, https://commission.europa.eu/system/files/2020-11/lgbtiq_strategy_2020-2025_en.pdf; UN Human Rights Council, Universal Periodic Review of Finland (4th Cycle – 41st Session): Thematic list of recommendations, 9.11.2022, https://www.ohchr.org/sites/default/files/documents/hrbodies/upr/sessions/session41/fi/UPR41_Finland_Thematic_List_of_Recommendations.doc.

⁴⁵ Legislative changes included for example restrictions to the right to appeal to the Supreme Administrative Court, the right to choose one's preferred legal adviser in the asylum determination process as well as the suspensive effect of subsequent asylum applications. Also, a heightened threshold for admissibility of the first subsequent asylum application was set. These restrictions violate asylum seekers' right to a fair asylum procedure and to an effective remedy and there is a risk of forcible returns in violation of the principle of non-refoulement.

⁴⁶ Finland: Time to Address Remaining Gaps in Human Rights Protection: Amnesty International Submission for the 41st Session of the UPR Working Group, 7 – 18 November 2022, March 2022, <https://www.amnesty.org/en/documents/eur20/5402/2022/en/>

⁴⁷ Government programme, section 10.3

plans are implemented, this would mean that the final legal guarantee at the national level would be omitted. The Supreme Administrative Court also aligns the interpretation of the asylum legislation between different lower instance courts. Moreover, the government plans to accelerate deportations and expulsions at the appeal stage where enforcement is not prohibited by a court decision.⁴⁸

People who applied for asylum in 2015 are at particular risk. According to a number of studies the quality of asylum procedure was especially weak in 2015-2016,⁴⁹ because of several legislative and procedural amendments weakening asylum seekers' rights, resulting in a situation where their application might have never been properly assessed. The amendment to the Aliens Act in June 2019 increased the threshold for getting one's subsequent application assessed.⁵⁰ The current government plans to further tighten the conditions for submitting subsequent applications and "prevent unfounded subsequent applications".⁵¹ This means that their applications may never be adequately assessed, further increasing the risk of refoulement.

A report commissioned by the government analysed the combined effects of the amendments to the Aliens Act and the practice of applying the Act between 29 May 2015 and 6 June 2019 with regard to the status of those requesting and receiving international protection. The report noted that the focus of the amendments was on making the asylum process efficient, rather than protecting the applicants' human rights. There was an increase in cases where applicants were not granted residence permits and, at the same time, it was not possible to remove them from the country. Therefore, several people were left in positions of marginalization and vulnerability and remained in Finland with undocumented status after the 2016 amendments.⁵² Data on people affected in this way is scarce, but reports suggest that many are men of working age who come from Somalia, Iraq and Afghanistan.⁵³

The current government's objective is to "tighten asylum policy".⁵⁴ The government has announced plans to tighten migration and asylum policy significantly. In addition to the already mentioned plans to weaken asylum seekers' legal protection, tighten the conditions for submitting subsequent applications and accelerate deportations and expulsions, the government program of Prime Minister Petteri Orpo's government includes plans to tighten the requirements of family reunification, nationalisation, permanent residency and citizenship, as well as to "differentiate the social security system and social benefits of immigrants and permanent residents of Finland from each other".⁵⁵

In 2016, the Parliament amended the Aliens Act, significantly restricting the right to family reunification by extending an income requirement to include those granted international protection.⁵⁶ Together with

⁴⁸ Government programme, section 10.3.

⁴⁹ E. Saarikkomäki, N. Oljakka, J. Vanto, E. Pirjatanniemi, J. Lavapuro and A. Alvesalo-Kuusi, *Kansainvälistä suojelua koskevat päätökset Maahanmuuttovirastossa 2015–2017 - Pilotitutkimus 18–34-vuotiaita Irakin kansalaisia koskevista myönteisistä ja kielteisistä päätöksistä* [Finnish Immigration Service's decisions on international protection – A pilot study on positive and negative decisions concerning Iraqi nationals aged between 18 and 34], 2018, [Owal group, *Turvapaikkaprosessia koskeva selvitys* \[A study on the asylum procedure\], 27 June 2019, <https://intermin.fi/documents/1410869/3723692/Turvapaikkaprosessia+koskeva+selvitys+27.6.2019/60bd290f-ffbd-2837-7f82-25fb68fe172c/Turvapaikkaprosessia+koskeva+selvitys+27.6.2019.pdf>.](https://yhdenvertaisuusvaltuutettu.fi/documents/25249352/34268331/Kansainv%C3%A4list%C3%A4+suojelua+koskevat+p%C3%A4%C3%A4t%C3%B6kset+Maahanmuuttovirastossa+2015-2017+(PDF).pdf/ccc99990-a899-4029-a84b-79fa46d558fa/Kansainv%C3%A4list%C3%A4+suojelua+koskevat+p%C3%A4%C3%A4t%C3%B6kset+Maahanmuuttovirastossa+2015-2017+(PDF).pdf?version=1.2&t=1608046718316, Oikeustieteellisen tiedekunnan tutkimusraportteja ja katsauksia 1/2018.</p></div><div data-bbox=)

⁵⁰ Amnesty International, *Finland: Submission to the United Nations Committee against Torture 68th session, 11 November - 6 December 2019*, (Index: EUR 20/0560/2019), 25 June 2019, <https://www.amnesty.org/en/documents/eur20/0560/2019/en/>

⁵¹ Government program 10.3.

⁵² Elina Pirjatanniemi, Inka Lilja, Maija Helminen, Kristiina Vainio, Outi Lepola and Anne Alvesalo-Kuusi, *Ulkomaalaislain ja sen soveltamiskäytännön muutosten yhteisvaikutukset kansainvälistä suojelua hakeneiden ja saaneiden asemaan*, [The combined effects of the amendments to the Aliens Act and the practice of applying the Act with regard to the status of those requesting and receiving international protection], 16 February 2021, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162850/VNTEAS_2021_10.pdf?sequence=1&isAllowed=y (description sheet in English).

⁵³ Ministry of the Interior, *Selvitys mahdollisista kansallisista ratkaisuista maassa ilman oleskeluoikeutta olevien tilanteeseen* [A study on possible national solutions to the situation of those residing in the country without a right of residence], Publication of the Ministry of the Interior 2022:16, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163827/SM_2022_16.pdf?sequence=1&isAllowed=y, pp. 12-13 and 28.

⁵⁴ Finnish Government, *A Strong and Committed Finland: Programme of Prime Minister Petteri Orpo's Government*, 20 June 2023, <http://urn.fi/URN:ISBN:978-952-383-818-5>, 10.3.

⁵⁵ Finnish Government, *A Strong and Committed Finland: Programme of Prime Minister Petteri Orpo's Government*, 20 June 2023, pp. 220, 223- 224, <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government20062023.pdf?sequence=4>.

⁵⁶ The requirements for family reunification explained in the ministry of interior's webpage: *Family reunification - Ministry of the Interior (intermin.fi)* Before 2016, the requirement that the family reunification sponsors have a secure income applied to all aliens except those given international protection.

various previous amendments as well as bureaucratic obstacles⁵⁷, family reunification is significantly more difficult to obtain than before 2016, including for unaccompanied children. The Finnish Discrimination Ombudsman recently studied how unaccompanied children's right to family reunification is applied. The Ombudsman discovered that only half of the children who are granted international protection are reunited with their families in Finland and that applications for family reunification are being refused on grounds that are not explicitly laid down in legislation. The Ombudsman stated that children are being punished because of their parents' actions, for example that their parents did not travel with them. According to the Ombudsman, the legislation allows the Immigration Service a lot of discretion which has led to an interpretation that significantly limits fundamental human rights – the right to live together with one's family – even of children who have been granted international protection.⁵⁸ Amnesty International is concerned that the best interest of the child is not always a primary consideration in matters related to asylum and migration. In part, this is due to inadequacies in the Aliens Act.⁵⁹

The current government is planning further law amendments to restrict family reunification, such as an age limit and a residence time requirement.⁶⁰ Amnesty International is concerned that the planned legal amendments will hinder the right to live together with one's family significantly affecting the most those who have received international protection, as they do not have the possibility to choose to live together with their family in their country of origin. The current government also plans to tighten the requirements on nationalisation which will be carried out in three stages. The first legal changes have been accepted by the parliament in July 2024 and involved the required length of the residence time being extended up to eight years from the previous five years.⁶¹ Further changes will include, for example, amendments to financial resources required as well as a citizenship test.⁶²

Amnesty International is concerned that the combined effects of the planned legal changes on the rights of migrants and asylum-seekers have again not been analysed while introducing the draft laws. This repeats the practice of 2015-2019 when several legal changes negatively affected migrants and asylum seekers, leading to people being marginalized as mentioned above.

BORDER POLICIES

The current government has introduced several legal amendments and new legislation that effectively hinder asylum seeking at the eastern border between Finland and Russia. The Government introduced amendments to the Border Guard Act which came into force in July 2022. The amendments entail barriers to access to territory and curtail the right to seek asylum, as they allow authorities to restrict people's ability to make asylum applications to specifically designated border crossing points and to close others. They also provide for the construction of barriers in the border zone.⁶³ The Finnish office of Amnesty International and various other human rights actors criticized the amendments.⁶⁴ Despite the criticism, in September 2022 the Border Guard proposed the construction of 200 kilometres of border

⁵⁷ These include the requirement for a family member to submit an application abroad instead of a sponsor having the right to submit an application in Finland, application fees extended for those given international protection, requirement to have a valid permit to visit the country where a Finnish embassy is situated in order to submit the application.

⁵⁸ The report from the Non-discrimination ombudsman, 2 March 2020: Report of the Non-Discrimination Ombudsman: The rights of a child are not realised in family reunification decisions | Non-Discrimination Ombudsman (yhdenvertaisuusvaltuutettu.fi)

⁵⁹ Numerous studies in addition to the above mention Non-discrimination ombudsman's report, have provided evidence that the best interest of the child is not a primary consideration in asylum and migration proceedings in Finland, a concern reflected in the concluding observations of the Committee on the Rights of the Child. See for example Annika Parsons research for the Ombudsperson of the Minorities 2010: The best interest of the child in asylum and refugee procedures in Finland. (Publication 6, 2010, National Rapporteur in Trafficking of Human Beings),

http://ec.europa.eu/justice/news/consulting_public/0009/contributions/public_authorities/042_ombudsman_for_minorities_finland_report.pdf

⁶⁰ More details about the government's plans see: Sisäministeriön hanke valmistelee muutoksia perheen yhdistämiseen - Valtioneuvosto

⁶¹ More details of the amendment here: Hallitus esittää Suomen kansalaisuuden saamisen tiukentamista - Valtioneuvosto

⁶² More details of the amendments here: Reform of the Citizenship Act - Ministry of the Interior (intermin.fi)

⁶³ Finland, Border Guard Act, 1999, translation from Finnish by the Ministry of Interior, en20050578.pdf (finlex.fi), Section 16.

⁶⁴ Amnestyn lausunto hallituksen esityksestä rajavartiolaitain muuttamisesta | Amnesty, ai-fi-191_2022-4-lisatalousarvio_rajaeste.pdf (amnesty.fi), Finland: amendments to Border Guard Act must be accompanied by clear human rights safeguards - Commissioner for Human Rights (coe.int), Lausunto+luonnoksista+hallituksen+esityksiksi+rajavartiolaitain+ja+valmiuslain+muutoksiksi+(pdf).pdf (yhdenvertaisuusvaltuutettu.fi), Lausunto rajaesteiden rakentamisen vaikutuksista turvapaikan hakemiseen | Yhdenvertaisuusvaltuutettu, Lausunto: itärajan raja-aitaa suunniteltaessa on huomioitava ihmisoikeudet | Ihmisoikeuskeskus / Människorättscentret / Human Rights Centre, Lausunto: turvapaikan hakemisen tulee aina olla tosiasiallisesti mahdollista | Ihmisoikeuskeskus / Människorättscentret / Human Rights Centre

fence along the 1300-kilometre-long border with Russia.⁶⁵ The Parliament approved the funding for the fence in the government's fourth supplement budget of 2023.⁶⁶

On 16 November 2023, and for a period of time going from 18 November 2023 to 18 February 2024, the government closed all four southeastern border crossing points between Finland and Russia, restricting the submission of asylum applications at only two crossing points near Salla and Vartius. Salla and Vartius were also closed from 24 November onwards leaving only Raja-Jooseppi, the northernmost border crossing point, open. Finally, the last border crossing point in the eastern border was closed from 30 November onwards, thus closing the entire eastern border. On 4 April 2024, the Government decided to continue the closure of the eastern border until further notice.⁶⁷

The government justified its action on its suspicion that Russia was directing asylum seekers toward the Finnish border as part of a "hybrid operation".⁶⁸ Gradually, in absence of safe and regular alternatives to enter Finland, the closure of all the border crossing points at the eastern border has in practice prevented individuals coming from Russia to access territory and seek asylum in Finland. The closure of the border can result in individuals being rejected at the border, in violation of the principle of non-refoulement.⁶⁹

In July 2024, the parliament adopted an emergency law allowing the government to make a decision on empowering the authorities to limit the reception of asylum applications in specific parts of the Finnish border, granting them powers to prevent entry, including by force.⁷⁰ The law allows Finnish border guards to make exceptions in cases involving people they consider to be in vulnerable situations or those at risk of serious violations upon return to the country where they crossed from. However, assessing people's situations and vulnerabilities requires specially trained personnel as well as adequate time. It is highly questionable that such an assessment would be possible in the context of brief interactions with border officials. The proposed law also does not offer any real possibility of appeal, only allowing those affected to request an administrative review, which would not suspend the return. The emergency law gravely undermines access to asylum and the protection from refoulement in Finland. It not only endangers the rights of people seeking safety, but it risks leading to arbitrariness and violence at the border. The Finnish Non-Discrimination Ombudsman wrote a letter to the Minister of Interior stating that in the current situation where the eastern border crossing points are closed, Finland is jeopardizing the right to seek asylum and risks breaching the principle of non-refoulement. The Ombudsman continued that these circumstances do not allow an effective and genuine access to asylum.⁷¹ The Council of Europe's Human Rights Commissioner and UNHCR have also expressed their concerns about the risk of violation of access to asylum and non-refoulement.⁷²

⁶⁵ The Finnish Public Service Media Company YLE, Finland's political party leaders express support for partial border fence, 18 October 2022, <https://yle.fi/a/3-12662282>.

⁶⁶ The Finnish Public Service Media Company YLE, €139m earmarked for border fence next year, 17 November 2022, <https://yle.fi/a/3-12678396>.

⁶⁷ The Finnish Government, Finland's eastern border to remain closed until further notice, 4 April 2024, <https://valtioneuvosto.fi/en/-/1410869/finland-s-eastern-border-to-remain-closed-until-further-notice>

⁶⁸ Government Communications Department, Ministry of the Interior, Finland's entire eastern border to be closed, 28 November 2023, https://valtioneuvosto.fi/-/1410869/koko-suomen-itaraja-suljetaan?language=en_US.

⁶⁹ Amnesty International Finnish office has continuously criticized the decision to close the border, see for example: Päätäs jatkaa itärajan sulkua on kohtuuton [Decision to continue closure of Eastern border is unreasonable], 8 February 2024, <https://www.amnesty.fi/paatos-jatkaa-itarajan-tayssulkua-on-kohtuuton/>.

⁷⁰ The ministry of Interior's press release on the emergency law, 16 July 2024: Suomi varautuu välineellistetyin maahantulon torjumiseen uudella lainsäädännöllä - Sisäministeriö (intermin.fi)

⁷¹ Non-Discrimination Ombudsman Kristina Stenman, Letter to the Minister of the Interior Mari Rantanen, 30 January 2024, https://yhdenvertaisuusvaltuutettu.fi/documents/25249352/42723475/YVW__30tammi2024+sis%C3%A4ministeri+Rantanen.pdf/185f41ff-7ab6-ea7b-3136-828f3eeebfc1/YVW__30tammi2024+sis%C3%A4ministeri+Rantanen.pdf?t=1706681621755

⁷² Council of Europe Commissioner for Human Rights, Finland: Concern over right to seek asylum and need for human rights safeguards after full closure of Eastern land border, letter to the Minister of the Interior Mari Rantanen, 4 december 2023, <https://www.coe.int/en/web/commissioner/-/finland-concern-over-right-to-seek-asylum-and-need-for-human-rights-safeguards-after-full-closure-of-eastern-land-border>. The Commissioner also expressed concern on the emergency law, 11 June 2024: Letter to the speaker of the Parliament of Finland, by Michael O'Flaherty, Council of Europe Commissioner for Human Rights (coe.int)

Non-Discrimination Ombudsman, Itärajan rajanylityspaikkojen pitäminen suljettuina vaarantaa edelleen vakavasti oikeuden hakea turvapaikkaa, 12 January 2024, <https://yhdenvertaisuusvaltuutettu.fi/-/itarajan-rajanylityspaikkojen-pitaminen-suljettuina-vaarantaa-edelleen-vakavasti-oikeuden-hakea-turvapaikkaa>
UNHCR, UNHCR urges Finland to protect the right to seek asylum, 30 November 2023, UNHCR urges Finland to protect the right to seek asylum – UNHCR Northern Europe. UNHCR also expressed concern on the emergency law, 22 May 2024: Closing borders to those seeking asylum in Finland sets a dangerous precedent, warns UNHCR | UNHCR Europe.

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