



Submission to the Committee on the Elimination of Racial Discrimination (CERD)

Finland Review - Submission for the List of Themes

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I. Introduction

This submission for the List of Themes highlights concerns regarding structural racism, ethnic profiling, discriminatory political discourse and the potentially racialised impacts of recent legal and policy developments affecting minority communities in Finland. The submission relies on publicly available judicial decisions, Ombudsman findings, NGO reports, academic research, FHRA casework observations, and statistical evidence. It seeks to assist the Committee in identifying issues warranting further examination during Finland's review.

II. Legal and institutional framework

Finland is a State Party to the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) and is therefore under an obligation to prevent and eliminate racial discrimination in law and practice. In particular, Articles 2, 5 and 6 require States Parties to prohibit discrimination, ensure equality before the law and guarantee effective protection and remedies.

Finland is also bound by the European Convention on Human Rights and domestic constitutional guarantees relevant to equality, due process and access to justice. Sections 6 and 21 of the Finnish Constitution guarantee equality before the law and the right to legal protection and fair procedures, while the Non-Discrimination Act (1325/2014) establishes obligations to prevent and address discrimination.

The concerns outlined below are assessed within this broader legal framework. Specific legal provisions are identified where relevant throughout the submission.

III. Racialised impact of recent migration and legislative reforms



Recent migration and legislative reforms in Finland include amendments to citizenship rules, residence permit requirements, and measures strengthening the link between residence status and labour market participation. These reforms also include changes to labour-based residence permits, the extension of the Border Security Act, and increased administrative supervision related to migration status.

Amendments to work-based residence permits, entering into force in June 2025, introduced a time-limited protection period of three to six months for unemployed holders of employment-based residence permits. Under this framework, residence permits may be withdrawn if individuals do not secure new employment within the applicable period. The reforms also introduced enhanced monitoring of employment relationships and residence permit compliance.

The Office of the Non-Discrimination Ombudsman has raised concerns regarding the proportionality of employment-linked residence requirements, describing proposed deadlines as “unreasonable and unrealistic” and noting that such measures may disproportionately affect individuals facing structural barriers in the labour market.

The validity of the Border Security Act has also been extended until 31 December 2026. While adopted in response to exceptional border situations, the Act grants expanded powers to authorities in border contexts, raising questions regarding its compatibility with human rights and non-discrimination obligations, particularly in relation to asylum seekers and migrants.

Academic research indicates that migrants in Finland may face structural barriers in employment, including labour market segmentation and dependency linked to residence status. In this context, recent legislative developments raise questions regarding their potential differential effects on individuals with migrant backgrounds.

FHRA’s casework further indicates that individuals subject to migration procedures may face practical barriers in accessing effective remedies, including limitations related to language, legal assistance, and procedural capacity during removal and deportation proceedings. FHRA has additionally reviewed concerns relating to recent migration and citizenship-related legislative reforms, including measures affecting dual nationals, asylum procedures and border practices (see Annex IV).

These developments raise questions under Articles 2, 5 and 6 of ICERD concerning equality before the law, non-discrimination and access to effective protection of rights.

IV. Ethnic profiling and discriminatory policing



A. Supreme Administrative Court decision

The Supreme Administrative Court of Finland has confirmed that ethnic profiling by police authorities constitutes unlawful discrimination under Finnish law. The case concerned two Finnish women of Tanzanian background who were stopped by police in Helsinki during a surveillance operation related to suspected street prostitution. The individuals were required to present identification documents and challenged the stop as being based on their ethnic background.

The Court found that the police action lacked sufficient objective justification and that the decision to stop the individuals had been influenced by their skin colour and ethnic origin. It therefore held that the measures constituted unlawful discrimination. The judgment overturned the decision of the Helsinki Administrative Court and upheld earlier findings of the National Non-Discrimination and Equality Tribunal.

This decision establishes judicial recognition at the highest administrative level in Finland that ethnic profiling in policing can constitute unlawful discrimination under domestic and European legal standards.

These findings engage Articles 2, 5 and 6 of ICERD concerning the obligation to eliminate racial discrimination, ensure equal treatment before the law, and guarantee effective remedies against discriminatory acts.

B. Kuri1 Roma operation

Concerns regarding discriminatory policing practices affecting Roma communities have been raised in relation to the Helsinki Police Department's "Kuri1" operation, conducted between 2013 and 2015. The operation involved crime prevention and intelligence-gathering measures focusing on individuals identified as Roma or presumed to belong to the Roma minority in the Helsinki metropolitan area.

Available information indicates that the operation included the collection of data relating to individuals' movements, social networks, and vehicles, and that records concerning approximately 1,500 persons identified as Roma were compiled.

The Office of the Non-Discrimination Ombudsman found that there were grounds to suspect discriminatory treatment and expressed concerns that operational guidelines may have resulted in the targeting of persons on the basis of perceived Roma background. The Ombudsman further highlighted risks associated with ethnic profiling in intelligence and surveillance activities, and issued recommendations to strengthen safeguards, including



improved monitoring mechanisms, anti-discrimination measures within policing, and enhanced engagement with Roma communities.

These findings raise concerns regarding safeguards against discriminatory policing practices and their impact on trust in law enforcement institutions.

These issues engage Articles 2, 5 and 6 of ICERD concerning the prohibition of racial discrimination, equality before the law, and access to effective remedies.

C. Police institutional culture and accountability concerns

Academic research has identified concerns regarding institutional culture, perceptions of discrimination, and levels of trust in law enforcement among minority communities in Finland. A 2025 study on institutional racism and inclusivity within the Finnish police reported differing attitudes towards ethnic profiling and discrimination, and noted that elements of “colour-blind” approaches may persist within policing culture despite formal equality commitments. The study further indicated lower levels of trust in police institutions among Roma communities and individuals of African and Middle Eastern background.

Public reporting has also documented concerns regarding discriminatory conduct by some law-enforcement personnel. In 2017, investigative reporting revealed racist and anti-immigrant discussions in a closed social media group with approximately 2,800 members, which included police officers among other participants. The disclosures led to official responses from the Ministry of the Interior and the National Police Board, as well as disciplinary measures following internal investigations, including written and verbal reprimands imposed on individual officers.

Taken together, these findings raise broader institutional concerns regarding police culture, accountability safeguards and trust between law enforcement authorities and minority communities. Effective protection against discrimination requires not only legal prohibitions but also institutional measures capable of strengthening confidence and addressing concerns regarding discriminatory conduct.

These concerns raise questions under Articles 2, 5 and 6 of ICERD.

V. Political discourse and normalisation of racist theory

Public controversies involving political figures in Finland have raised concerns regarding discriminatory rhetoric in political discourse. While isolated incidents do not reflect public institutions as a whole, repeated controversies involving elected representatives may



contribute to broader concerns regarding public discourse and public confidence in institutions.

Several incidents involving members of the Finns Party have generated public debate regarding discriminatory political expression. In 2023, media reports concerning historical online statements attributed to Riikka Purra, then Minister of Finance and Deputy Prime Minister, referred to racist, anti-immigrant and anti-Muslim remarks. The case led to public criticism and complaints before the Chancellor of Justice, although no further proceedings were initiated due to jurisdictional limits relating to the timing of the conduct.

In 2025, public controversy also arose following social media posts by members of Parliament involving gestures perceived as mocking individuals of East Asian origin, prompting criticism from political actors and public authorities.

Earlier, Member of Parliament Juho Eerola was subject to a police investigation for suspected ethnic agitation in relation to statements concerning Roma communities.

Taken together, these incidents raise broader concerns regarding the normalisation of discriminatory rhetoric and the possible effects such discourse may have on minority communities and public confidence in institutions. Public expression by political figures may carry particular significance due to the influence of elected representatives in shaping public debate and broader social attitudes. Such developments may also contribute to perceptions of exclusion among minority communities and raise concerns regarding the broader social environment in which racialised groups exercise their rights.

These concerns raise issues under Articles 2 and 4 of ICERD concerning State obligations to combat racial discrimination and discourage discriminatory rhetoric.

VI. Structural racism and discrimination affecting minority communities

Beyond individual incidents and judicial findings, reports from public authorities, civil society organisations and academic research identify concerns regarding structural discrimination affecting minority communities in Finland across multiple sectors.

In its 2026 Report to Parliament, the Office of the Non-Discrimination Ombudsman identified structural discrimination affecting employment, education, healthcare, housing, migration procedures and policing. The Ombudsman stated that discrimination remains “deeply entrenched in the structures, practices and attitudes of society” and highlighted concerns relating to ethnic profiling, barriers affecting migrants and asylum seekers, discrimination affecting Roma communities and shortcomings in anti-discrimination measures. Similar concerns were reiterated in a 2026 public statement on equality and



legislative reform, including reference to Roma communities, persons of African descent and Muslim communities.

Civil society organisations have reported comparable findings. In 2023, Amnesty International identified structural racism affecting multiple groups, including migrants, asylum seekers, Sámi, Roma, Black African, Asian and Russian communities, with recurring concerns in relation to harassment, ethnic profiling, labour market barriers and stereotyping.

Survey data similarly indicates widespread exposure to racism. A 2024 Finnish Red Cross survey found that 82% of respondents had witnessed or experienced racism and 14% reported structural discrimination in areas such as employment, housing or public services. A 2026 survey further found that 86% of respondents considered racism to undermine social safety and 85% had witnessed racist incidents.

Academic research also documents persistent labour market and social participation barriers, including lower recruitment prospects for persons with foreign-sounding names and discriminatory treatment affecting persons of African descent.

Taken together, these sources raise broader concerns regarding structural discrimination affecting minority communities in Finland across employment, housing, education, healthcare and access to public services. These findings suggest that concerns relating to racial discrimination may extend beyond individual acts and raise questions regarding broader institutional and structural patterns.

These developments raise issues under Articles 2, 5 and 6 of ICERD concerning equality, equal enjoyment of rights and access to effective protection against discrimination.

VII. Observations from FHRA casework: access to justice, remedies and institutional barriers

FHRA has assisted individuals and organisations in cases involving alleged discrimination, barriers to access to justice, policing concerns, migration procedures and access to essential services. FHRA casework observations indicate practical barriers faced by migrants, racialised persons and migrant-led civil society organisations in Finland.

To protect privacy and confidentiality, sensitive case examples included in this submission have been anonymised where appropriate.

A. Access to interpretation and fair trial safeguards

FHRA has assisted individuals in complaints involving alleged barriers relating to interpretation and procedural safeguards. Complaints raised concerns regarding whether



interpretation needs were adequately recognised during judicial proceedings. Additional allegations included procedural irregularities during court proceedings and concerns regarding access to legal assistance during police questioning and detention. These observations raise broader questions regarding equal access to justice and procedural protections for migrants and racialised persons (see Annex I).

Relevant protections include sections 6 and 21 of the Finnish Constitution, Article 6(3)(e) of the European Convention on Human Rights, Chapter 22 section 6 of the Code of Judicial Procedure and Chapter 4 section 10 of the Criminal Investigation Act.

B. Police accountability and evidence-handling concerns

FHRA has handled complaints alleging failures by authorities to respond effectively to reported threats, concerns regarding access to legal counsel and alleged deficiencies relating to evidence handling and investigative procedures. Complaints also raised concerns regarding the treatment of complainants during police interactions and the adequacy of institutional responses to alleged misconduct. While these complaints do not constitute established legal findings, they may raise broader concerns regarding accountability mechanisms and confidence in equal treatment by law-enforcement authorities (see Annex I).

C. Migration and deportation safeguards

FHRA casework has documented concerns relating to deportation and removal procedures involving pending legal remedies and vulnerability considerations. Complaints raised concerns regarding whether proportionality assessments, effective remedies and individual circumstances, including disability-related or educational considerations, were adequately considered during removal procedures. These observations raise broader questions regarding access to procedural safeguards in migration proceedings (see Annex II).

Relevant protections include sections 7 and 21 of the Finnish Constitution, sections 146, 147 and 201 of the Aliens Act, Articles 8 and 13 of the European Convention on Human Rights, and Article 18, 19 and 47 of the EU Charter of Fundamental Rights.

D. Banking access and exclusion of migrant-led organisations

FHRA has documented practical barriers relating to access to banking services affecting migrant-led civil society organisations. FHRA experienced repeated difficulties in opening a bank account, including refusals and inconsistent or unclear explanations from several banks. Such barriers may affect access to funding opportunities, administrative compliance and broader participation in public life. These observations raise broader questions regarding



equal access to essential services and participation by migrant-led organisations (see Annex III).

Relevant protections include ICERD Article 5(e), the Non-Discrimination Act (1325/2014), and, where applicable, Directive 2014/92/EU concerning payment accounts.

VIII. Anti-Muslim and anti-Arab discrimination

Available evidence raises serious concerns regarding anti-Muslim and anti-Arab discrimination in Finland, including structural and institutional dimensions affecting equal treatment and access to rights.

The Office of the Non-Discrimination Ombudsman has identified Muslims as a group experiencing structural discrimination. In 2025, it found that the Ministry of the Interior's preparation of Finland's refugee quota policy involved instructions prioritising refugees from Christian-majority countries while limiting arrivals from Muslim-majority countries. The Ombudsman concluded that this amounted to discrimination based on religion and national origin and raised concerns regarding equality safeguards in public decision-making.

Academic and civil society sources report persistent Islamophobia and discrimination affecting Muslim communities in daily life, including harassment, exclusion, and negative attitudes compared to European averages. Research further indicates that individuals with Muslim or Arab backgrounds may face discrimination in employment, housing, and interactions with public authorities.

Administrative and statistical data similarly indicate the prevalence of anti-Muslim hate speech and hate crime. A Ministry of Justice report found that the term "Muslim" appeared in approximately 26% of hate speech content identified through monitoring tools, while police statistics recorded 155 hate-crime reports in 2018, with around one third targeting Muslims or Islam.

Taken together, these findings indicate concerns regarding discrimination affecting Muslim and Arab communities across social, institutional and public spheres.

These concerns raise issues under Articles 2, 5 and 6 of ICERD.

IX. Migrant workers and labour inequalities

Academic research and recent legislative developments raise concerns regarding structural inequalities affecting migrant workers in Finland, particularly individuals with temporary residence status and non-EU backgrounds. Existing evidence suggests that labour market



precarity, immigration status and broader structural barriers may interact in ways that create disproportionate impacts on migrant and racialised communities.

A series of academic studies published between 2017 and 2025 on migrant workers and student migrants in Finland consistently identify patterns of labour precarity, including concentration in low-paid and unstable sectors, barriers to employment corresponding to qualifications, dependence on residence status, and unequal access to labour protections. Research further highlights exclusion linked to foreign background, language and perceptions of “otherness” in the labour market.

The studies additionally highlighted how immigration status and labour conditions are closely interconnected, with migrants often accepting unstable work to maintain residence status and avoid risks linked to unemployment. Research on platform and delivery work similarly suggests that migration frameworks may reinforce long-term precarity in certain sectors.

Recent legislative reforms affecting work-based residence permits introduce stricter conditions linked to unemployment periods and reinforce the connection between residence status and employment. The Office of the Non-Discrimination Ombudsman has expressed concern that such measures may have disproportionate effects on migrant workers.

Taken together, these developments raise broader concerns regarding the interaction between immigration regulation and labour precarity, with potential cumulative impacts on equal treatment and social integration of migrant workers.

These concerns raise issues under Articles 2, 5 and 6 of ICERD concerning equality, protection against discrimination and equal enjoyment of economic and social rights.

X. Recommendations

In light of the concerns outlined above regarding ethnic profiling, structural discrimination, migration-related reforms, anti-Muslim discrimination, and unequal treatment affecting minority communities, Finnish Human Rights Advocates Ry respectfully recommends that Finland adopt the following measures:

- Ensure equal access to qualified interpretation and legal assistance in police, court, administrative, and migration-related proceedings;
- Strengthen independent oversight mechanisms for complaints involving allegations of discriminatory policing, evidence-handling concerns, and denial of procedural safeguards;



- Conduct systematic equality and human-rights impact assessments of recent migration, citizenship, border-security, asylum, and labour-migration reforms;
- Ensure effective and accessible remedies prior to deportation or removal decisions, particularly in cases involving vulnerable persons, students, persons with disabilities, and long-term residents;
- Ensure transparent and non-discriminatory access to essential banking services and administrative systems for migrant-led organisations and civil society actors;
- Improve the collection, publication, and analysis of disaggregated data concerning discrimination complaints, ethnic profiling, hate crimes, access to remedies, and unequal treatment by public authorities.

XI. Suggested questions for CERD to raise with Finland

In light of the information presented in this submission, Finnish Human Rights Advocates Ry respectfully recommends that CERD request additional information from Finland on the following issues during the review process:

- What measures has Finland taken to ensure that recent and proposed migration, asylum, citizenship, and border-related reforms do not have discriminatory effects on persons of foreign origin or minority backgrounds? How does Finland systematically assess the equality and human-rights impacts of such legislative and policy reforms prior to and following their adoption?
- How does Finland ensure equal access to interpretation, legal assistance, and effective procedural safeguards in criminal investigations, court proceedings, and migration-related procedures? What measures are in place to guarantee that language barriers or lack of legal representation do not undermine the right to a fair process?
- Following publicly documented cases involving racist or anti-immigrant expressions by law-enforcement personnel, what measures has Finland implemented to ensure effective accountability, prevent discriminatory misuse of authority, and maintain public confidence in the equal treatment of all individuals by police authorities?
- What safeguards exist to ensure that individuals have access to effective, accessible, and timely remedies in cases of alleged discrimination by public authorities, including police, migration authorities, and courts?



- What measures has Finland implemented to strengthen the prevention, investigation, and prosecution of hate crimes motivated by ethnic or national origin? How does Finland ensure accurate data collection and monitoring of such crimes?

- How does Finland assess the human-rights and equality implications of labour-based residence permit regimes, particularly in cases where individuals may lose residence status due to unemployment? What safeguards exist to prevent disproportionate impacts on migrant workers and ensure adequate procedural protections and access to review mechanisms?

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Annex I - Finnish Human Rights Advocates casework summary on access to justice and procedural safeguards

Finnish Human Rights Advocates (FHRA) has reviewed complaint materials, procedural documents and related correspondence concerning allegations of procedural irregularities, access-to-justice barriers, and concerns relating to police and judicial proceedings.

The examples below are presented in anonymised form where appropriate and are included solely to illustrate recurring concerns observed in FHRA casework.

Access to legal assistance during police proceedings

FHRA assisted individuals who reported concerns regarding access to legal assistance during police detention and questioning. According to complaint materials reviewed by FHRA, legal counsel was allegedly requested repeatedly during several days of detention but was reportedly not provided. Similar concerns were raised regarding access to legal assistance during lengthy police questioning involving another family member.

The complaints raised questions concerning procedural safeguards relating to access to legal representation during investigative procedures. Relevant legal safeguards include Section 21 of the Constitution of Finland, Chapter 4, Section 10 of the Criminal Investigation Act, and Article 6 of the European Convention on Human Rights.

Interpretation and fair trial safeguards

FHRA also documented concerns relating to interpretation and procedural fairness during judicial proceedings.

In one anonymised complaint, an individual reported that the necessity of interpretation assistance was questioned during appeal proceedings. Concerns were additionally raised regarding an approximately 30-minute recording gap during a hearing and whether all testimony had been properly preserved in the official record.

The complaint raised broader questions concerning equal participation in judicial proceedings and practical safeguards for individuals requiring interpretation assistance. Relevant legal safeguards include Section 21 of the Constitution of Finland, Article 6(3)(e) of the European Convention on Human Rights, and Chapter 22, Section 6 of the Code of Judicial Procedure.

Police accountability and evidence-handling concerns



FHRA casework additionally included complaints relating to police accountability and evidence-handling practices.

Complaint materials reviewed by FHRA included allegations concerning failure to respond effectively to earlier requests for police assistance, concerns regarding the preservation of evidence, and claims that relevant materials may not have been fully considered during subsequent proceedings.

While FHRA does not present these allegations as established findings, the complaints raise broader questions regarding confidence in complaint mechanisms, procedural accountability and access to effective remedies.

Taken together, FHRA casework observations indicate potential barriers affecting access to justice, procedural safeguards and confidence in institutional remedies among individuals interacting with law-enforcement and judicial institutions.



Annex II - Finnish Human Rights Advocates casework summary on migration and deportation safeguards

Finnish Human Rights Advocates (FHRA) has reviewed complaint materials, procedural documents and related correspondence concerning allegations relating to migration procedures, deportation safeguards, and access to effective remedies.

The examples below are presented in anonymised form where appropriate and are included solely to illustrate recurring concerns observed in FHRA casework.

Access to effective remedies in deportation proceedings

FHRA assisted individuals who reported concerns regarding deportation and removal procedures while legal proceedings were reportedly ongoing.

According to complaint materials reviewed by FHRA, concerns were raised regarding deportation measures being pursued despite ongoing judicial proceedings and pending legal remedies. Complaint materials also included allegations that practical barriers may have affected individuals' ability to effectively challenge removal decisions.

The complaints raised broader questions concerning access to effective remedies and procedural safeguards prior to the implementation of irreversible measures. Relevant legal safeguards include Sections 7 and 21 of the Constitution of Finland, Sections 146 and 201 of the Aliens Act, Article 13 of the European Convention on Human Rights and Article 47 of the Charter of Fundamental Rights of the European Union.

Vulnerability and proportionality considerations

FHRA also documented concerns relating to proportionality assessments and consideration of individual circumstances in migration-related proceedings.

In one anonymised complaint, an individual with reported special educational needs raised concerns regarding whether personal circumstances, educational support needs, and ongoing legal processes had been adequately considered prior to removal measures.

The complaint raised broader questions concerning procedural safeguards intended to ensure individualised assessment and consideration of vulnerability in migration proceedings. Relevant legal safeguards include Section 146 of the Aliens Act, Article 8 of the European Convention on Human Rights and Articles 18 and 19 of the Charter of Fundamental Rights of the European Union.



Detention and procedural safeguards

FHRA casework additionally included complaints concerning detention measures and administrative restrictions during migration proceedings.

Complaint materials reviewed by FHRA included allegations concerning the retention of travel documents, reporting obligations, and concerns regarding the proportionality and legal basis of such measures during ongoing proceedings.

While FHRA does not present these allegations as established findings, the complaints raise broader questions concerning procedural safeguards and practical access to remedies in migration-related proceedings.

Taken together, FHRA casework observations indicate potential barriers affecting access to remedies, procedural safeguards, and protection of vulnerable individuals in migration and deportation procedures.



Annex III - Finnish Human Rights Advocates documentation on banking-access barriers affecting migrant-led NGOs

Finnish Human Rights Advocates (FHRA) has reviewed complaint materials, correspondence and procedural documents concerning allegations relating to access to banking services, and potential discriminatory barriers affecting civil society organisations and newly established entities.

The examples below are presented in anonymised form where appropriate and are included solely to illustrate recurring concerns observed in FHRA casework.

Access to banking services and organisational functioning

FHRA documented concerns regarding difficulties encountered by organisations seeking access to banking services necessary for carrying out their activities.

According to materials submitted to FHRA, organisations reported repeated requests for documentation, changing procedural instructions and prolonged delays during account-opening procedures. Concerns were also raised regarding uncertainty surrounding application requirements and the absence of clear timelines during the review process.

In one anonymised complaint, an organisation reported that delays and uncertainty associated with banking procedures allegedly affected aspects of its administrative functioning and ability to continue parts of its activities.

These concerns raise broader questions regarding practical access to essential financial services and the extent to which barriers in account-opening procedures may affect the operation of associations and civil society actors.

Relevant legal safeguards include Section 6 of the Constitution of Finland, the Equality Act (1325/2014), and Article 21 of the Charter of Fundamental Rights of the European Union.

Allegations of discriminatory refusal of banking services

FHRA also reviewed complaints concerning refusals by financial institutions to provide banking services.

Submitted materials included allegations that multiple financial institutions declined account applications while providing limited or unclear explanations. In certain cases, references were reportedly made to customer strategies or internal policies, giving rise to concerns regarding transparency and individualised assessment.



One anonymised complaint described repeated refusals by several financial institutions that allegedly created practical obstacles affecting the organisation's ability to receive funding, process payments and conduct day-to-day activities.

FHRA does not present these allegations as established findings. However, the materials reviewed raise broader questions regarding equal access to services and whether institutional practices may create disproportionate barriers for some organisations or newly established actors.

Relevant legal safeguards include the Equality Act (1325/2014), the Act on Credit Institutions (610/2014), Article 21 of the Charter of Fundamental Rights of the European Union, and principles reflected in Directive 2014/92/EU concerning access to payment accounts.

Access to remedies and institutional responses

FHRA additionally reviewed materials concerning efforts to challenge decisions and seek redress through available institutional channels.

Concerns were raised that complainants experienced difficulties obtaining clarification regarding available remedies and follow-up procedures after raising concerns with relevant institutions.

These allegations raise broader questions regarding access to effective remedies and mechanisms available to address allegations of discrimination affecting access to services.

Relevant legal safeguards include Section 21 of the Constitution of Finland, Article 13 of the European Convention on Human Rights, and Article 47 of the Charter of Fundamental Rights of the European Union.

Taken together, FHRA casework observations indicate potential barriers relating to access to banking services, transparency of decision-making processes and effective remedies, with possible consequences for organisations seeking to carry out their activities.



Annex IV - Finnish Human Rights Advocates complaint concerning migration and citizenship-related legal reforms

Finnish Human Rights Advocates (FHRA) reviewed complaint materials and related correspondence concerns relating to recent and proposed migration and citizenship-related legislative reforms in Finland.

The examples below are presented in summarised form and are included solely to illustrate broader concerns raised in materials reviewed by FHRA.

Citizenship and equality concerns

FHRA reviewed complaint materials concerning legislative reforms affecting dual nationals and citizenship-related measures.

According to materials submitted to FHRA, concerns were raised that certain provisions may create differential treatment between categories of citizenship and could disproportionately affect persons with immigrant backgrounds or dual nationality.

The materials raised broader questions concerning equality before the law and equal treatment in citizenship-related legislation. Relevant legal safeguards include Sections 6 and 9 of the Constitution of Finland, Articles 20 and 21 of the Charter of Fundamental Rights of the European Union, and principles reflected in the European Convention on Nationality.

Migration procedures and access to safeguards

FHRA additionally reviewed complaint materials concerning recent reforms affecting asylum procedures, border measures and administrative removal practices.

Materials submitted to FHRA included concerns that accelerated procedures and exceptional measures may affect individualised assessment, access to remedies and procedural safeguards. Concerns were also raised regarding the cumulative impact of such measures on migrants and asylum seekers.

The materials reviewed raised broader questions concerning procedural fairness and access to international protection. Relevant legal safeguards include Articles 18, 19 and 47 of the Charter of Fundamental Rights of the European Union, Article 3 of the European Convention on Human Rights and protections reflected in the Refugee Convention.



Taken together, FHRA casework observations indicate concerns regarding the cumulative impact of migration and citizenship-related reforms on equality, procedural safeguards and access to rights for migrants and persons with immigrant backgrounds.