



FINLAND

SUBMISSION TO THE UNITED NATIONS HUMAN RIGHTS COMMITTEE
125TH SESSION, 4-29 MARCH 2019, LIST OF ISSUES PRIOR TO REPORTING

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1. INTRODUCTION

Amnesty International provides the below information to the United Nations (UN) Human Rights Committee (the Committee) ahead of the adoption of the list of issues prior to reporting in advance of the 7th periodic report of Finland at its 125th session in March 2019.

This submission sets out some of Amnesty International's key concerns about the fulfilment of the International Covenant on Civil and Political Rights (the Covenant), and in particular with regard to violence against women (Articles 2-3, 7 and 26), forced marriage (Articles 2 and 23), discrimination on the grounds of gender, gender identity and sexuality (Article 26), use of force by law enforcement officials (Article 7), detention of asylum seekers and migrants (Articles 7 and 9-10), trafficking (Article 8), treatment of aliens (Articles 7 and 13), access to justice for aliens and non-refoulement (Articles 2, 7, 14 and 24), the prohibition of torture and other ill-treatment and fair trial guarantees (Articles 7 and 14), counter-terrorism (Article 14), communications surveillance (Article 17), and conscientious objectors (Article 18).

2. VIOLENCE AGAINST WOMEN, INCLUDING DOMESTIC VIOLENCE (ARTICLES 2-3, 7 AND 26)

Despite a high prevalence of violence against women, there is no earmarked funding to combat it.¹ An evaluation of an earlier action plan to reduce violence against women concluded that the plan was not fully implemented due to a lack of funds.² Specialized support services are scarce and fall short of international standards. By the end of 2018, Finland had only 185 shelter places, approximately 35% of the recommended number.³ Women with disabilities, lesbians, transgender women, undocumented and nonregistered migrant women and women with a poor knowledge of the Finnish language experience significant difficulties receiving support and are especially at risk of being excluded from services.⁴ Also, the decision to focus on domestic violence risks excluding childless women, women living alone and many victims of sexual violence from services.⁵

Legislative changes are needed to adequately protect access to justice for victims of sexual violence. Rape continues to be defined through the physical violence used or threatened by the perpetrator or the helpless state of the victim rather than the lack of the victim's consent.⁶ The attrition rate for sexual violence cases is very high: less than 10% of all rapes are reported to the police and of those reported, only around 50% result in a trial.⁷ As a result, most perpetrators are never held to account for their crimes. The support service network for victims of sexual violence is very poor and under-resourced, despite the establishment of Sexual Assault Support Centres.⁸

¹ European Union agency for fundamental rights (2014): Violence against women – an EU wide survey. <http://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report>

² Törmä, Sinikka ja Pentikäinen, Merja (2016): Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi. Only available in Finnish:

http://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/75030/Rap_ ja_muist_2016_15_1.pdf?sequence=1

³ Council of Europe Convention on preventing and combating violence against women and domestic violence:

<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168008482e>

Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence:

<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016800d383a>

⁴ Amnesty International's study on municipalities (2017). Only available in Finnish:

<https://frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf>

⁵ Amnesty International's study on municipalities (2017). Only available in Finnish:

<https://frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf>

⁶ Criminal Code, Chapter 20, sections 1 and 2. English translation available at

<https://www.finlex.fi/fi/laki/kaannokset/1889/en18890039.pdf>

⁷ Institute of Criminology and Legal Policy, Crime Trends in 2016, page 91, table 3. Report available in Finnish only:

<https://helda.helsinki.fi/handle/10138/191756>. Summary of sexual offences in English, page 298. See also Amnesty

International report (2010): Case closed – rape and human rights in Nordic countries:

<https://www.amnesty.org/en/documents/ACT77/001/2010/en/>

⁸ Suvi Nipuli & Katriina Bildjuschkin, *Hoitoketju seksuaalisuutta loukkaavaa väkivaltaa kokeneen auttamiseksi [Chain of care to help victims of sexual violence]*, National Institute for Health and Welfare (THL), 2016,

3. FORCED MARRIAGE (ARTICLES 23 AND 2)

Forced marriage is currently not a distinct criminal offence and there are no known convictions for forced marriage cases under the current provisions.⁹ Thus the existing legal framework is insufficient to protect victims.¹⁰ No comprehensive information on the number of victims of forced marriage is available, but NGO *Monika – Multicultural Women’s Association* has been reaching out to a growing number of victims every year.¹¹ This likely represents only a small portion of the actual cases in Finland.

4. DISCRIMINATION ON THE GROUNDS OF GENDER, GENDER IDENTITY AND SEXUAL ORIENTATION (ARTICLE 26)

Transgender individuals and intersex children face widespread discrimination, including in public service provision. Most instances of discrimination go unreported.¹² The procedure to obtain legal gender recognition is lengthy and discriminatory.¹³ The applicant must be diagnosed with ‘transsexualism’, which is classified as a mental disorder, and present a medical statement certifying that he or she permanently identifies with the opposite gender, lives in that gender role, and has been sterilized or is for some other reason infertile.

Intersex children in Finland are routinely subjected to medical and surgical treatments to align their physical appearances with one of the binary sexes.¹⁴ Operations are often done for social reasons rather than out of medical necessity.

https://www.julkari.fi/bitstream/handle/10024/130504/URN_ISBN_978-952-302-625-4.pdf?sequence=1, in Finnish, abstract in English. The Committee against torture recommended in its concluding observations on 20.1.2017 that the State of Finland should increase the number of rape crisis centres and ensure a higher rate of reporting; strengthen the support services available to victims of sexual violence and develop a low-threshold service network that also provides long-term support: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/010/32/PDF/G1701032.pdf?OpenElement>. See also Amnesty’s submission to the Committee Against Torture, p. 5-6: <https://www.amnesty.org/en/documents/eur20/8716/2018/en/>

⁹ The Istanbul convention calls on criminalization forced marriage (art. 37). Also the Council of Europe parliamentary assembly adopted Resolution no. 1468 on forced marriage and child marriage calling the member states to “consider the possibility of dealing with acts of forced marriage as an independent criminal offence, including aiding and abetting the contracting of such a marriage” <http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=17380&lang=en>

¹⁰ Hansen, Sams, Jäppinen and Latvala (2016): *Kunniakäsitykset ja väkivalta – selvitys kunniaan liittyvästä väkivallasta ja siihen puuttumisesta Suomessa*. Summary available in English. https://ihmisoikeusliitto.fi/wp-content/uploads/2016/06/Kunniak%C3%A4sitykset-ja-v%C3%A4kivalta_B5_netiti-002.pdf

¹¹ In 2015, Monika – Multicultural Women’s Association reached 25 victims, but in 2016 the same number was reached already by mid-year.

¹² *Survey on hate speech and harassment and their influence on different minority groups*, 3 March 2016. Available at: <http://urn.fi/URN:ISBN:978-952-259-496-9>. Language Finnish, summary in English. Cf Report by Seta on the rights and wellbeing of trans- and intersex children, 24.4.2018. Only available in Finnish.

https://www.dropbox.com/sh/copnqdn4ckhbj3/AAC4tY4hyQ2AZng57nCncrgFa?dl=0&preview=Moninaiset_lapsemme_2018.pdf

¹³ Amnesty International: *The state decides who I am* (Index: EUR 01/001/2014), 4 February 2014, www.amnesty.org/en/documents/EUR01/001/2014/en/

¹⁴ Wahlman-Calderaram, Tuula ja Halila, Ritva: *Intersukupuolisuus, Taustaraportti ETENE:n kannanottoon*. Study available only in Finnish: <http://etene.fi/documents/1429646/2056382/IS-raportti20160331.pdf/58bf2412-48a9-4521-b5ae-81a3ee3bc07b>; the Federation of Finnish Midwives (May 2016): *Intersex children have the right to self-determination of their gender*, available in Finnish <http://intersukupuolisuus.fi/2016/05/04/katiloiton-kannanotto-intersukupuolisten-lasten-hoidosta/>; Ombudsperson for Children (August 2016): *The Rights of Intersex Children need to be strengthened*, available in Finnish at <http://lapsiasia.fi/tata-mielta/tiedotteet/2016-2/lapsiasiavaltuutettu-intersukupuolisten-lasten-oikeuksia-vahvistettava/>

5. USE OF FORCE BY LAW ENFORCEMENT OFFICIALS (ARTICLE 7)

Amnesty International is concerned about the increase in the use of force by the police¹⁵, including frequent use of projectile electric shock devices (Tasers) and other less-lethal weapons. In August 2016, the Deputy Parliamentary Ombudsman issued a decision according to which the supervision and instruction of electroshock device use should be strengthened.¹⁶ In 2013, the Parliamentary Ombudsman had issued a decision concerning the use of the devices in prisons, urging more precise regulation on use of force and clearer instructions to be issued by the Criminal Sanctions Agency.¹⁷

6. DETENTION OF ASYLUM SEEKERS AND MIGRANTS, INCLUDING CHILDREN (ARTICLES 7 AND 9-10)

While immigration detention is not mandatory, Finland continues to detain foreign nationals including unaccompanied children and families with children.¹⁸ The detention of unaccompanied children who are under 15 years old was prohibited in 2015. However, the Aliens Act still allows for the detention of unaccompanied children aged between 15 and 17 for up to 72 hours once there is an enforceable decision on their removal from Finland; the period can be extended by 72 hours for extraordinary reasons¹⁹. The Act also allows for families with children to be held in detention for up to 12 months.²⁰ Amnesty International has received reports of lengthy detentions of families and single parents who have been detained with young children and babies for several months. Asylum-seekers and irregular migrants in need of special care, such as pregnant women, persons with serious medical conditions, persons suffering from mental illness or trauma related to torture or ill-treatment, and women who have suffered serious violence, are being detained pending their removal from the country. Convicted criminals facing deportation are sometimes held in the same detention centres as asylum seekers and irregular migrants, including children.

Legislation that was passed in 2017 introduced “directed residence” as an alternative to detention of asylum-seekers and irregular migrants awaiting return.²¹ Under this law, authorities can order asylum seekers to live in a specific reception centre and in addition report to the reception centre up to four times per day. Applicants subject to accelerated proceedings may also be subject to the measure. Directed residence and reporting obligations are not subject to judicial review or any other form of remedy or complaint mechanism. Amnesty International is further concerned that stringent, daily reporting obligations in combination with directed residence may hinder asylum applicants from enjoying their rights and freedoms and can impair persons from seeking and receiving legal aid, education or medical treatment.

Children between the ages 15-17 can also be subject to directed residence for a maximum time of two weeks, with the possibility of a further two weeks extension.²² During this time, the child is not allowed to leave the premises of the reception centre/housing where they have been directed to stay. Children have the right to judicial review within four days of the decision ordering them to directed residence and reporting. Amnesty International is concerned that this so-called alternative to detention for unaccompanied children is in fact a form of detention, with the only exceptions being that: it takes place in a reception centre instead of a traditional detention centre; the length of detention is up to two plus two weeks; and judicial review is possible only four days after the initial decision to place the child in directed residence. In fact, the new

¹⁵ The use of force by the police has increased since the year 2000. Six deaths have occurred following police firearm use during the century, three of which in 2015. According to the statistics by the National Police Board, 5 700 use of force situations were documented in 2015. Article by Sunnuntaisuomalainen, 9.10.2016 (in Finnish):

<http://www.ksml.fi/teemat/sunnuntaisuomalainen/lhmisoikeusi%C3%A4rjest%C3%B6-Poliisin-voimakeinojen-k%C3%A4ytt%C3%B6-%C3%A4%C3%A4-pimentoon/851162>

¹⁶ The decision eoak 1187/2015 issued 31 August 2016 is available in Finnish at <http://www.eduskunta.fi/eoaratkaisut/eoak+1187/2015>

¹⁷ The decision eoak 4733/2/09 issued 15 January 2013 is available in Finnish at <https://www.oikeusasiamies.fi/fi/ratkaisut/-/eoar/4733/2009>.

¹⁸ Alien's Act, chapter 7. Available in Finnish at <https://www.finlex.fi/fi/laki/ajantasa/2004/20040301>

¹⁹ The law does not make clear what constitutes “extraordinary reasons”.

²⁰ Alien's Act, chapter 7, section 122.

²¹ Alien's Act, chapter 7, section 120 a.

²² Alien's Act, chapter 7, section 120 b.

legislation has made the deprivation of liberty of unaccompanied children easier than it was under previous legislation. Additionally, detained persons may be placed in solitary confinement cells or transferred to police holding facilities. Currently, there is no complaint mechanism regarding this measure, nor for conditions of detention. Refugees and migrants are sometimes held in police detention facilities around the country in conditions contrary to international standards, and the circumstances in the police detention facilities amount to solitary confinement. There is no maximum time for this placement, and it is not subject to judicial review.²³ There continues to be a lack of comprehensive and reliable statistics concerning the detention of asylum-seekers and others held solely for immigration purposes.

7. TRAFFICKING IN PERSONS (ARTICLE 8)

Victims of trafficking are frequently not identified or referred to the Finnish assistance system for victims of trafficking. Some victims have been deported from Finland without receiving any assistance.²⁴ The identification of victims is hampered by what appears to be a lack of expertise about trafficking as well as insufficient resources at the municipal level, among the police and in NGOs providing support to victims.²⁵

Uncertainties about the victim's legal status and conflicts between different legal processes create barriers to accessing support. Identification is done primarily as part of a criminal investigation. There is an urgent need to decouple assistance from criminal proceedings and for a separate, victim-centred law on identification and assistance.²⁶ It is not possible for the current assistance system to identify and support a victim in cases where the prosecutor has not been able to gather sufficient evidence for a criminal case, the victim is Finnish and exploitation has occurred in Finland.²⁷

8. TREATMENT OF ALIENS, INCLUDING REFUGEES AND ASYLUM SEEKERS (ARTICLES 7 AND 13)

Humanitarian protection as a basis for a temporary residence permit was repealed in 2016.²⁸ The amendment came into force with retroactive effect. Therefore persons, who have previously enjoyed humanitarian protection in Finland, will not automatically receive a residence permit when their current permit expires, which may force people into irregular migration status.

In 2016 the Parliament amended the Aliens Act, significantly restricting the right to family reunification with a requirement for a secure income for those granted international protection.²⁹ Together with various previous amendments as well as bureaucratic obstacles family reunification is significantly more difficult to obtain, including for unaccompanied children. Furthermore, numerous studies have expressed concerns

²³ Act on the Treatment and Detention Unit of Detained Aliens. Available in Finnish at <https://www.finlex.fi/fi/laki/ajantasa/2002/20020116>

²⁴ Report by the National Rapporteur on Trafficking. https://www.syriinta.fi/documents/10181/36404/nigeriaisselvitys_verkkoon_FINAL.pdf/1b136c3b-e80f-4b57-bedc-339f4a12e68b. Language Finnish.

²⁵ Non-Discrimination Ombudsman and the European Institute for Crime Prevention and Control, *Tuntematon tulevaisuus: selvitys ihmiskaupan uhrien auttamista koskevan lainsäädännön toimivuudesta [An unknown future: A report on the effectiveness of legislation concerning assistance for victims of human trafficking]*, 16.3.2018, www.heuni.fi/material/attachments/heuni/projects/sY6sAotTr/FINAL_Tuntematon_tulevaisuus_selvitys_ihmiskaupan_uhrien_auttamista_koskevasta_lainsaadannosta.pdf Language Finnish, abstract in English. Doc No. GRETA(2015)9: Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Finland, first evaluation round. Adopted on 15 June 2015 at the 16th meeting of the Committee of the Parties, Doc No. THB-CP(2014)RAP16.

²⁶ Non-Discrimination Ombudsman and the European Institute for Crime Prevention and Control, *Tuntematon tulevaisuus: selvitys ihmiskaupan uhrien auttamista koskevan lainsäädännön toimivuudesta [An unknown future: A report on the effectiveness of legislation concerning assistance for victims of human trafficking]*, 16.3.2018, www.heuni.fi/material/attachments/heuni/projects/sY6sAotTr/FINAL_Tuntematon_tulevaisuus_selvitys_ihmiskaupan_uhrien_auttamista_koskevasta_lainsaadannosta.pdf Language Finnish, abstract in English.

²⁷ Non-Discrimination Ombudsman, *Annual report 2015*, 15 May 2016, https://www.syriinta.fi/documents/14490/0/Englantia_YHDENV_VUOSIKERTOMUS_2016.pdf/153ed14a-b602-457a-aa12-a07e9d372e01. Language English

²⁸ HE 2/2016 available in Finnish at <https://www.finlex.fi/fi/esitykset/he/2016/20160002>

²⁹ HE 43/2016, available in Finnish at <https://www.finlex.fi/fi/esitykset/he/2016/20160043>

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 inadequate legislation of the Aliens Act.³⁰

9. ACCESS TO JUSTICE FOR ALIENS AND NON-REFOULEMENT (ARTICLES 2, 7, 14 AND 24)

Legislation restricting asylum seekers' right to fair and effective asylum determination procedures entered into force in 2016. Deadlines for lodging appeals were cut from 30 days to 21 days before the Administrative Court and from 30 days to 14 days before the Supreme Administrative Court. The right to appeal a case to the Supreme Administrative Court was restricted further in asylum cases compared to other cases and appeals do not have an automatic suspensive effect in all cases. A study published in December confirmed that these changes have endangered asylum seekers' right to a due process.³¹ In December 2018, the government proposed further amendments to Alien's Act, which would restrict the suspensive effect of subsequent applications.³²

The risks of refoulement are further exacerbated by significant restrictions to legal aid. Assistance of legal counsel in the first instance, in particular during the personal interview within the Immigration Service, is no longer covered to all asylum seekers and public Legal Aid Offices determine whether an applicant is in need of legal aid and whether the applicant can seek support from a lawyer of their choosing or whether a public legal aid attorney will provide counsel.³³ However, public legal aid attorneys do not specialise in refugee law and these changes undermine asylum seekers' right to choose their lawyer. In addition, the remuneration to legal counsels working with asylum seekers has been set to a standard fee, which often does not cover the entire work needed to process the case.³⁴ This further restricts asylum seekers' right to a fair trial as legal counsels must either restrict their efforts or work pro bono.

10. THE PROHIBITION AGAINST TORTURE AND FAIR TRIAL GUARANTEES (ARTICLES 7 AND 14)

The Code of Judicial Procedure provides in Chapter 17, Section 25(1) that a court cannot use evidence that has been obtained through torture.³⁵ However, this prohibition does not specifically extend to cruel, inhuman or degrading treatment. Section 25(3) provides that a court may use evidence obtained unlawfully if it will not prejudice a fair trial. It therefore remains for the court to decide whether evidence obtained through ill-treatment is admissible. This is contrary to international human rights law which provides for absolute prohibition of torture and other ill-treatment under all circumstances. Amnesty International therefore recommends that all evidence obtained through cruel, inhuman or degrading treatment should be inadmissible.

³⁰ Numerous studies 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, https://www.syriinta.fi/documents/10181/10850/31699_w_lapsen_etu_2010_englanti.pdf/13a6a442-710f-426e-9bbd-2daefea7cd6f

³¹ Lepola Outi: Turvapaikanhakijat oikeusavun asiakkaina. Kohti yhdenvertaisia ja laadukkaita oikeusapupalveluita. Valtioneuvoston selvitys- ja tutkimustoiminta, Policy brief 33/2018, available in Finnish at <https://tietokayttoon.fi/julkaisu?pubid=28901>

³² https://intermin.fi/en/article/-/asset_publisher/turvapaikanhakijoiden-uusintahakemusten-kasittelyyn-esitetaan-muutoksia

³³ Alien's Act, chapter 1, section 9, available in Finnish at <https://www.finlex.fi/fi/laki/ajantasa/2004/20040301#L1P9>

³⁴ Legal Aid Act, chapter 3, section 17 a, available in Finnish at <https://www.finlex.fi/fi/laki/ajantasa/2002/20020257>

³⁵ Chapter 17, Article 25, Code of Judicial Procedure, 4/1734, <https://www.finlex.fi/fi/laki/ajantasa/1734/17340004000>

11. COUNTER-TERRORISM (ARTICLE 14)

Finland has recently amended the definitions of terrorist crimes in the Criminal Code.³⁶ Amnesty International is concerned that the amendments are vague and open to abuse. In addition, the criminalization of ancillary offences involving conduct which is removed from the principal offence (“terrorist offence”) is of concern as it is more difficult to identify with certainty. This raises serious concerns as to compliance with the principle of legality and may violate the peaceful exercise of rights such as to freedom of movement.

Furthermore, there is a need for independent and effective oversight of the Finnish intelligence service, which currently operates without regular and effective parliamentary supervision.

12. COMMUNICATIONS SURVEILLANCE (ARTICLE 17)

The government has proposed draft legislation on civilian and military intelligence agencies and communications surveillance³⁷, which would enable the acquisition of information on threats to national security by giving military and civilian intelligence agencies permission to conduct communications surveillance without any requirement for a link to a specific criminal offence. The definitions for situations amounting to threats to national security are vague and open to interpretation. The law must be sufficiently clear to give people an adequate indication of the conditions and circumstances under which the authorities are empowered to resort to communications surveillance measures.

The proposed legislation requires, as a general rule, a court permit for surveillance. In urgent situations, however, the Head of the Security Intelligence Service can decide on surveillance until the court has decided on a permit. It is not clear what would amount to an urgent situation. The proposed legislative changes also contain provisions on creating an Intelligence Ombudsman, but a restricted mandate and limited resources put into question the effectiveness of such monitoring.

The proposed legislation is under revision in the Parliament and the Constitutional Law Committee has underpinned several parts that are in conflict with the Constitution. This is the case even though the provision on the right to privacy in the Finnish constitution has recently been amended to enable passing these laws³⁸.

13. CIVILIAN ALTERNATIVES TO MILITARY SERVICE AND CONSCIENTIOUS OBJECTION (ARTICLE 18)

The length of the civilian alternative to military service in Finland remains punitive and discriminatory. At present, conscientious objectors are obliged to perform 347 days of civilian service, more than double the shortest period of military service of 165 days. Amnesty considers this difference in duration to be punitive. In March 2018, the Helsinki Court of Appeals ruled that legislation exempting Jehovah’s witnesses but no other conscientious objectors from military and civilian service is contrary to the prohibition of discrimination guaranteed by the Finnish Constitution.³⁹ In September, a bill proposing removal of the above-mentioned exemption from the legislation was presented to the parliament.⁴⁰

³⁶ Government proposal HE 30/2018 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_30+2018.aspx (in Finnish and Swedish).

³⁷ Government proposal HE 199/2017 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_199+2017.aspx, Government proposal HE 202/2017 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_202+2017.aspx, Government proposal HE 203/2017 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_203+2017.aspx

³⁸ Government proposal HE 198/2017 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_198+2017.aspx

³⁹ HelHO:2018:4 available in Finnish at <https://oikeus.fi/hovioikeudet/helsinginhovioikeus/fi/index/hovioikeusratkaisut/hovioikeusratkaisut/1519992936168.html>

⁴⁰ Government proposal HE 139/2018 https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_139+2018.aspx

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