



FINLAND

SUBMISSION TO THE UN COMMITTEE ON THE ELIMINATION OF
DISCRIMINATION AGAINST WOMEN

83RD SESSION, 10-28 OCTOBER 2022

AMNESTY
INTERNATIONAL



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1. INTRODUCTION

Amnesty International provides the below information to the Committee on the Elimination of Discrimination against Women (the Committee) ahead of the review of the eighth periodic report of Finland at its 81st session, setting out Amnesty International's key concerns about Finland's compliance with the Convention on the Elimination of All Forms of Discrimination against Women (the Convention) especially regarding violence against women (Article 5), forced marriage (Article 6), health and rights of transgender people and intersex children (Article 12).

2. VIOLENCE AGAINST WOMEN (ARTICLE 2 AND 5)

2.1 PREVALENCE OF VIOLENCE AGAINST WOMEN AND THE IMPACT OF COVID-19 PANDEMIC

Prevalence of violence against women in Finland is one of the highest in Europe.¹ In August 2022, a government funded research on the costs of domestic violence in Finland² revealed that 146,000 women have experienced physical intimate partner violence during the past five years.

Data from 2020 indicated that intimate partner violence reported to the police increased by 6% compared to 2019.³ In 2021, police received 27.7% more reports of rape than in the previous year.⁴

The state funded research *The impact of the Covid-19 crisis in Finland*⁵ asserted that the Covid-19 pandemic “[...] has not increased violence against women or domestic violence in general population significantly, although in certain groups violence has increased, the forms of violence have changed and they've become more serious”.⁶

These findings are in contradiction with earlier expert assessments of the Covid-19 pandemic's impact on intimate partner violence.⁷ Based on the interviews of 47 shelter service customers the Covid-19 pandemic increased their experiences of violence and caused delays in survivors' ability to contact support services.⁸

During the pandemic women manifested an increased need for support services provided by non-governmental organizations. The Federation of Mother and Child Homes and Shelters reported that during

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

² *Costs of domestic violence in Finland* (LAKU): thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/costs-of-domestic-violence-in-finland-laku-.

³ Terveyden ja hyvinvoinnin laitos (2021): *Covid-19-epidemiaan vaikutukset hyvinvointiin, palvelujärjestelmään ja kansantalouteen: Asiantuntija-arvio*. julkari.fi/handle/10024/142536.

⁴ Statistics Finland: stat.fi/julkaisu/cktoctw681oge0b53d5seq1nz. 9.6.2022.

⁵ Mesiäislehto, Merita; Elomäki, Anna; Närvi, Johanna; Simanainen, Miska; Sutela, Hanna; Räsänen, Tapio (2022): *Koronakriisin vaikutukset sukupuolten tasa-arvoon Suomessa*. [*The gendered consequences of the Covid-19 crisis in Finland*]: julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164176/VNTEAS_2022_46.pdf?sequence=1&isAllowed=y.

⁶ Ibid pp 102-123. Quote from page 102.

⁷ Terveyden ja hyvinvoinnin laitos [Finnish Institute for Health and Welfare]: *Impacts of the coronavirus epidemic on experiences of domestic violence and the use of services* (KOVÄ) 2020-2023: thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/impacts-of-the-coronavirus-epidemic-on-experiences-of-domestic-violence-and-the-use-of-services-kova-.

⁸ Nenonen, Hietämäki, Tuominen, Karhinen-Soppi (2022): *Turvakodin asiakkaiden kokemuksia lähisuuhdeväkivallasta ja palvelujen käytöstä koronapandemian aikana*: julkari.fi/bitstream/handle/10024/143670/JRN_ISBN_978-952-343-807-1.pdf?sequence=1.

2020 the number of people using their online services grew by 11%. The number of individuals seeking conversations with an adviser increased from approximately 1,000 in 2019 to 5,000 in 2020.⁹

Government funded telephone support service for victims of violence against women and domestic violence¹⁰ also reported an increase, in their case of 31% of people seeking assistance in 2020.¹¹ In 2021 the number of received calls in telephone support services remained higher than before the pandemic.¹²

Even before the pandemic, women with disabilities, women who identify with LGBTIQ communities, undocumented migrant women, and women with a poor knowledge of Finnish had difficulties receiving support when experiencing violence. The Covid-19 pandemic has exacerbated these.¹³ There are major challenges associated with receiving support, necessitating urgent measures to improve the situation.¹⁴

According to a government study published in 2022, people with disabilities experienced domestic violence more often than others.¹⁵ It also revealed that lifetime experiences of sexual violence and harassment were more common among women with disabilities than women without disabilities. The prevalence was particularly high among girls (from 14 to 21 years) with physical or/and other disabilities. 60–62% of the girls who answered the survey had experienced sexual harassment and 22–26% had experienced sexual violence within the past 12 months.¹⁶

In April 2022, Amnesty Finland's questionnaire on the availability of long-term services for survivors of gender-based violence revealed that the majority of the respondents found it alarmingly insufficient.¹⁷

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Develop targeted interventions and allocate sufficient resources that address root causes of sexual violence, stigma and discrimination, including on the basis of disability.
- Create a nationwide network of long-term services alongside other low threshold services for survivors.
- Develop a comprehensive plan to understand and address the specific forms of violence faced by women and girls with disabilities and barriers to access to justice faced by them, with meaningful participation of women and girls with disabilities.
- Ensure that service providers are trained to understand the experiences and consequences of multiple, intersecting forms of discrimination - including specifically in connection with the needs of affected people with disabilities.

⁹ Press release from Mother and Child Homes and Shelters: *Coronavirus revolutionized the ways of reaching for support*: ensijaturvakotienliitto.fi/enska/korona-mullisti-avun-hakemisen/.

¹⁰ Nollalinja is a free of charge telephone service, open 24/7, for victims of domestic violence and violence against women. Funded by the Ministry of Justice.

¹¹ Terveyden ja hyvinvoinnin laitos reported the increase in 2.3.2021: thl.fi/fi/-/nollalinja-ottaa-chat-palvelun-kaytoon-kevaan-aikana-takana-puheluiden-maarassa-mitattuna-ennatysvuosi.

¹² Mesiäislehto, Elomäki, Kivipelto, Närvi, Räsänen, Sutela, Kärkkäinen (2022): *Koronakriisin vaikutukset sukupuolten tasa-arvoon Suomessa [The consequences of the COVID-19 crisis for gender equality in Finland]*: julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164176/VNTEAS_2022_46.pdf?sequence=1&isAllowed=y.

¹³ Amnesty International's study on municipalities (2017): frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf and the follow up study (2021) amnesty.fi/amnestyn-kuntatutkimus-2021.

¹⁴ Concluding Observations of the Seventh Periodic Report of Finland the Human Rights Committee (HRC, 2021): *Persistence of violence against women and the rise in cases of domestic violence in the context of the Covid-19 pandemic is a principal matter of concern*. tinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR/C/FIN/CO/7&Lang=En. See also: GREVIO, [168097129d](https://www.greio.org/en/168097129d) (coe.int).

¹⁵ Luoma, Valtokari, Väre, Holm, Sainio, Ervasti, Vuorenmaa, Hiekkala, Leppäjoki-Tiistola, Heini, Purhonen (2022): *Vammaisten henkilöiden kokeman lähisuhdeväkivallan yleisyys ja palvelujen saatavuus: Määrällinen ja laadullinen tarkastelu*. julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163918/VNTEAS_2022_24.pdf?sequence=4&isAllowed=y.

¹⁶ Ibid pp 42-43.

¹⁷ Amnesty International (2022): *Järjestökentän arvio: väkivaltaa kokeneiden naisten ja tyttöjen tarvetta pitkäkestoiseen tukeen ei tunnusteta, palvelut ovat sirpaleisia eikä palvelujen järjestämistä resurssoida*: amnesty.fi/jarjestokentan-arvio-vakivaltaa-kokeneiden-naisten-ja-tyttojen-tarvetta-pitkakestoiseen-tukeen-ei-tunnusteta-palvelut-ovat-sirpaleisia-eika-palvelujen-jarjestamista-resurssoida/.

2.2 LEGAL DEFINITION OF RAPE AND ACCESS TO JUSTICE FOR RAPE SURVIVORS

Annually around 50,000 women in Finland experience sexual violence. However, only around 1,500 sexual crimes against women are reported to the police. Less than 10% of all rapes are reported to the police and of those reported, around 30% result in a trial.¹⁸

There are currently sixteen Sexual Assault Support Centres in operation.¹⁹ The centres assist survivors aged 16 and over, and whose experience of sexual violence has occurred within the last one month.²⁰

In June 2022, the Parliament adopted new legislation on sexual offences.²¹ The central aspect of the legal definitions of rape and other sexual crimes is lack of consent assessed in the context of surrounding circumstances. The new law states that consent should be expressed voluntarily and if obtained through serious abuse of authority, the act is considered rape.

Amnesty is welcoming this reform after many years of campaigning.

However, in certain cases when there is abuse of a position of authority, the crime continues to be defined as sexual abuse (Section 20, 5 §), not rape. This includes cases where the perpetrator abuses their position of authority over a person who is hospitalized, living in an institution, or is unable to form or express consent regarding intercourse or other forms of sexual conduct that violates bodily autonomy.

This places the survivor in a vulnerable position in terms of access to justice, and risks sending a dangerous message that committing the crime abusing a position of authority may still not be seen as an aggravating circumstance in sexual violence crimes.²²

Consent may also be affected by other factors outlined in the legislation. Fear, an impaired state of consciousness, sudden action and violence or a threat thereof may invalidate consent.

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Ensure that sexual offences committed through the abuse of one's position of authority are classified as sexual violence and rape (as opposed to treated as sexual abuse which is considered a lesser crime) in the Criminal Code, as per international law and standards.
- Reform legislation in a way that identifies aggravating factors as required under Article 46 of the Istanbul Convention.

2.3 MEDIATION IN CASES OF INTIMATE PARTNER VIOLENCE

In Finland, mediation is covered by the Act on Conciliation in Criminal and Certain Civil Cases. The Act requires consent by both parties and restricts mediation in cases of intimate partner violence: only prosecutors or the police may initiate it.²³ In 90% of the mediated cases in 2019 the referral was made by police.²⁴

¹⁸ Amnesty International (2019): "Fighting the Lottery: Overcoming barriers to justice for women rape survivors in Finland", pp. 14-15: https://s3-eu-west-1.amazonaws.com/frantic/amnesty-fi/2019/03/19144800/Fighting-the-lottery_final.pdf.

¹⁹ Sexual Assault Centres in Finland: thl.fi/fi/web/vakivalta/apua-ja-palveluja/seri-tukikeskus-seksuaalivakivallan-uhreille.

²⁰ UN Committee against Torture, Concluding observations on the seventh periodic report of Finland: ohchr.org/en/documents/concluding-observations/catcfinc07-concluding-observations-seventh-periodic-report. See also Amnesty's submission to the Committee Against Torture, p. 5-6: amnesty.org/en/documents/eur20/8716/2018/en/.

²¹ Decision of the Finnish Parliament and the list of laws that are affected by the changes of the Sexual Offences Act: valtioneuvosto.fi/paatokset/paatos?decisionId=0900908f807c91d8.

²² This formulation conflicts with the principle of freely given consent and does not fulfil the obligations of the Istanbul Convention, e.g., Articles 36 and 46 or CEDAW's General Comment 35: gender-based violence against women, updating general recommendation No. 19, 14 July 2017, UN Doc. CEDAW/C/GC/35.

²³ Act on Conciliation in Criminal and Certain Civil Cases, in Finnish & Swedish: finlex.fi/fi/laki/ajantasa/2005/20051015.

²⁴ Press release from Terveystieteiden tutkimuskeskus ja hyvinvoinnin laitos 7 May 2021: *Police initiated 90% of the mediated case in 2019*. thl.fi/fi/-/korjaus-sovittelutilastoon-2019-sovitteluun-ohjattujen-rikos-ja-riita-asioiden-maara-laski.

The latest statistics from 2021 reveal that 18.6% of all cases mediated were domestic violence cases (2,476).²⁵

Since 2011 the police have been obliged by law to investigate all assaults.²⁶ THL reported in 2019, upon request, that in one third of cases referred to mediation by the police there was no preliminary criminal investigation, and in one third of the cases the investigation was unfinished.²⁷ This raises the concern that police may be referring cases to mediation as an alternative to conducting an investigation into the crime. This is in violation of the requirements of the current Criminal Code, as well as a potential failure to protect and uphold the survivors right to justice and protection.

The Deputy Chancellor of Justice reviewed police instructions in cases of domestic violence and intimate partner violence in 2019.²⁸ In his review, the Deputy Chancellor of Justice emphasized that mediation must not mean that criminal process is being bypassed and stressed that the Finnish authorities must ensure that all law-enforcement staff are aware that mediation is prohibited in cases of repeated violence.²⁹

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Ensure that crimes of violence against women are effectively investigated and prosecuted without undue delay.
- Reform legislation on mediation so that it does not result in the discontinuation of criminal investigation and prosecution in violence against women cases and ensure that all law-enforcement and prosecution staff are aware that mediation is prohibited in cases of repeated violence.

2.4 INADEQUATE FUNDING OF SUPPORT SERVICES FOR SURVIVORS OF VIOLENCE

In August 2022, a government funded research on the costs of domestic violence in Finland³⁰ revealed the direct additional health care costs of the physical intimate partner violence experienced by women were thus EUR 150 million per year.³¹

In Finland, support services for survivors of gender-based violence are predominantly provided by non-governmental organizations. Services provided by NGO's are mainly funded through the gaming revenue of Veikkaus³², a state-owned company operating slot machines and gambling.³³ Funding has been gravely inadequate.³⁴ Funding is distributed through the Funding Centre for Social Welfare and Health Organizations (STEA).³⁵ Based on applications, STEA prepares a funding proposal to the Ministry of Social Affairs and Health, which makes the final decisions.

²⁵ Update from Terveyden ja hyvinvoinnin laitos: thl.fi/fi/tilastot-ja-data/tilastot-aiheittain/sosiaalipalvelut/rikos-ja-riita-asioiden-sovittelu.

²⁶ Criminal Code was reformed in 2011: all assaults are now under official prosecution: oikeusministerio.fi/-/lindrig-misshandel-ska-hora-under-allmant-atal-fran-och-med-ingangen-av-ar-2011.

²⁷ Email from National Institute of Health and Welfare researcher Suvi Nipuli 30.4.2019 to the office of Deputy Chancellor of Justice. Amnesty International Finnish Section researcher Pia Oksanen was copied in the email.

²⁸ Deputy Chancellor of Justices review of instructions to the police by the National Police Board of Finland (2019, only in Finnish): okv.fi/media/filer_public/91/d9/91d93319-8df9-4a37-a949-7cf22426b382/okv_11_50_2019.pdf.

²⁹ Ibid, pp. 14-16.

³⁰ *Costs of domestic violence in Finland* (LAKU): thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/costs-of-domestic-violence-in-finland-laku.

³¹ Siltala, Hisasue, Hietämäki, Saari, Laajasalo, October, Laitinen and Raitanen (2022): *Domestic violence increases the use and costs of services. Policy brief*: julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164292/24-202Domestic%20violence%20increases%20the%20use%20and%20costs%20of%20services.pdf?sequence=6&isAllowed=y.

³² Veikkaus – a Finnish gaming company: veikkaus.fi/fi/yritys?lang=en.

³³ Finnish Lotteries Act: intermin.fi/en/police/gambling.

³⁴ Service providers along with other NGO's published a joint letter to the Government on the prevailing inadequacy of the funding (12.5.2020): *Järjestöjen vetoamus ministereille väkivallan vastaista työtä tekevien järjestöjen rahoituksen turvaamiseksi*. Available at amnesty.fi/jarjestojen-vetoamus-ministereille-vakivallan-vastaista-tyota-tekevien-jarjestojen-rahoituksen-turvaamiseksi/.

³⁵ Funding Centre for Social Welfare and Health Organisations (STEA): stea.fi/en/

Because of the restrictions due to the Covid-19 pandemic Veikkaus estimated that the gambling revenue annually remitted to the state would be reduced by about EUR 300 million.³⁶ The funding of the services financed with gambling revenue will likely be reduced as well.³⁷

During the budget negotiations in April 2021, the government decided to start preparing a new model of financing for organisations.³⁸ Ministry of Social Affairs and Health has prepared a draft proposal of the new legislative frame for financing non-governmental organisations that provide social and health services.³⁹

The systematic lack of funding for support services for survivors can also be seen in the financing of Government Action Plans on violence⁴⁰ and State funded services for survivors seeking safety, like shelters. A 2016 study evaluating earlier Action Plans concluded that measures aimed at reducing violence against women were not fully implemented due to lack of funds.⁴¹ Also, even after increase in funding, by May 2021 Finland still only had 231 family places in shelters, the number recommended by Council of Europe being 550.⁴²

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Ensure adequate funding for non-governmental organizations providing support services for survivors of violence.
- Adopt legislation obliging regions and municipalities to establish effective preventive measures to reduce and eliminate violence against women, including structures and mechanisms that are coordinated in cooperation with non-governmental organizations.

3. FORCED MARRIAGE (ARTICLE 6)

Forced marriage is currently not a distinct criminal offence in Finland.⁴³ The Government assessment report and the draft bill on the annulment of forced marriage and the recognition of a marriage concluded abroad by a minor is inadequate. The legal effect of an annulment would be that the marital status of the parties would revert to 'unmarried'. The proposed time limit for seeking an annulment is one year after moving to separate addresses or divorce and at the latest five years after the factual end of the marriage. The proposal concerning the recognition of a marriage concluded abroad by a minor fails to adequately protect child victims, as the high threshold for recognizing marriages would only apply to marriages concluded while at least one party was resident in Finland.⁴⁴

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Adopt legislation that prohibits and prevents any type of forced or coerced marriages.

³⁶ 2020 report from Veikkaus: veikkaus.fi/site/binaries/content/assets/dokumentit/vuosikertomus/2020/vuosi_-ja_vastuullisuusraportti_2020.pdf.

³⁷ Working group: *Placing gambling proceeds within the Budget and beneficiaries under the spending limits procedure*: valtioneuvosto.fi/en/-/1410845/working-group-placing-gambling-proceeds-within-the-budget-and-beneficiaries-under-the-spending-limits-procedure.

³⁸ Decisions in the mid-term review promote wellbeing and support COVID-19 recovery efforts: valtioneuvosto.fi/en/-/1271139/decisions-in-the-mid-term-review-promote-wellbeing-and-support-covid-19-recovery-efforts.

³⁹ *Luonnos hallituksen esitykseksi eduskunnalle laiksi sosiaali- ja terveysalan yhdistysten ja säätiöiden rahoituksesta*: lausuntopalvelu.fi/FI/Proposal/ParticipationNonJsShowReport?proposalId=8f95bb21-2c65-483d-8961-91732986dd84.

⁴⁰ *Action plan for the Istanbul Convention for 2022-2025* (julkaisut.valtioneuvosto.fi/handle/10024/163902), *Action Plan for Combating Violence against Women for 2020-2023* (julkaisut.valtioneuvosto.fi/handle/10024/162499).

⁴¹ Törmä & Pentikäinen (2016): *Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi*, julkaisut.valtioneuvosto.fi/bitstream/handle/10024/75030/Rap_ ja_muist_2016_15_1.pdf?sequence=1.

⁴² Explanatory Report to the Istanbul Convention, para 135:

rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016800d383a.

⁴³ Istanbul Convention, article 37.

⁴⁴ Assessment report: oikeusministerio.fi/-/pakkoavioliittojen-ehkaisya-ja-torjuntaa-tehostetaan.

- Ensure that victims of forced or coerced marriage can choose freely between divorce, annulment of a marriage or dissolution of marriage according to their individual needs and rights. In assessing the legality of an early marriage protecting the rights of the child must be priority.

4. RIGHTS OF TRANSGENDER PEOPLE AND INTERSEX CHILDREN (ARTICLE 12)

The procedure to obtain legal gender recognition continues to violate transgender people's rights to privacy, and rights of the child. Current legal gender recognition requirements include proof of sterilization or infertility, a psychiatric diagnosis, and a blanket minimum age of 18.⁴⁵

According to the draft bill dated 18.2.2022, the new law on gender recognition would make the procedure available upon application, by an adult who presents a reasoned account of his or her permanent experience of representing the other gender. The procedure would include a period of reflection for the applicants.⁴⁶

According to the government, the bill will be issued to the parliament in late September after several postponements. Despite the ongoing process to amend the legislation, the government has not introduced a plan to enact a gender recognition system for minors.

Children with variations in sex characteristics are routinely subjected to 'normalizing' surgical and other medical procedures.⁴⁷ According to the Ombudsman for Children and the NGOs, current legislation remains insufficient to protect bodily integrity of intersex children.⁴⁸

In March 2022, a working group published its memorandum to strengthen intersex children's right to self-determination. It recommended authorities to gather more information, to ensure sufficient information for parents, to strengthen steering, and to raise awareness among the professionals.⁴⁹

Implementation of the recommendations remains unclear, and no concrete plans for explicit legal protection of intersex children's right to bodily integrity have been introduced.

RECOMMENDATIONS

Amnesty International recommends that Finland:

- Ensure that the process for legal gender recognition is quick, accessible, and transparent and is in accordance with the individual's sense of gender identity, without the requirement of psychiatric diagnosis.
- Enact a new law on gender recognition that is based on self-determination and protects the rights of the child. Ensure timely access to quality gender-affirming healthcare.
- Adopt legislation, policies and practices that ensure bodily integrity of intersex people.

⁴⁵ [Act on Legal Recognition of the Gender of Transsexuals](#) (562/2002).

⁴⁶ [Draft of Government Proposal to Parliament for an Act on Gender Recognition](#) (18.2.2022).

⁴⁷ The National Advisory Board on Social Welfare and Health Care Ethics (ETENE) (2016) [Intersex: Background Report for ETENE's Position Statement on Care and Treatment of Intersex Children](#); Oikarinen, Tikli (2019) [No Information or Options: Study on the Rights and Experiences of Intersex Persons](#).

⁴⁸ Press Release by the Ombudsman for Children (25.4.2022) [The Right to Bodily Integrity of Intersex Children Must Be Ensured](#).

⁴⁹ Ministry of Social Affairs and Health (31.3.2022) [Memorandum by the Working Group to Renew Legislation on Transgender Rights: Suggestions to Strengthen Intersex Children's Right to Self-Determination](#).

ANNEX:

Amnesty International (2019): "Europe: Time for Change: Justice for Rape Survivors in the Nordic Countries", available at: [amnesty.org/en/documents/eur01/0089/2019/en/](https://www.amnesty.org/en/documents/eur01/0089/2019/en/).

Amnesty International (2019): "Fighting the Lottery: Overcoming barriers to justice for women rape survivors in Finland", available at: s3-eu-west-1.amazonaws.com/frantic/amnesty-fi/2019/03/19144800/Fighting-the-lottery_final.pdf.

Amnesty International Finnish Section and Satu Lidman (2017, only in Finnish), research report on the actions of municipalities in combatting violence against women: "Kuka ottaa vastuun? Naisiin kohdistuva väkivalta ja ihmisoikeusvelvoitteiden toteutuminen", available at: frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf. Follow up report (2021): "Onko reitti selvä?", available at: s3-eu-west-1.amazonaws.com/frantic/amnesty-fi/2021/03/17124706/Amnestyn-seurantatutkimus-2021.pdf.

Submissions to UN Committees 2018 - 2020:

Amnesty International submission on Finland to the Human Rights Committee, 130th session, 12 October — 6 November in 2020. Ref. EUR 20/2940/2020. Available at: [amnesty.org/en/documents/eur20/2940/2020/en/](https://www.amnesty.org/en/documents/eur20/2940/2020/en/).

Amnesty International submission on Finland to the UN Committee on Economic, Social and Cultural Rights: 68th Session, 8-9 October 2020. Ref. EUR 20/2939/2020. Available at: [amnesty.org/en/documents/eur20/2939/2020/en/](https://www.amnesty.org/en/documents/eur20/2939/2020/en/).

Amnesty International submission on Finland (Focus on Criminalization and Prosecution of Rape in Finland) to the Special Rapporteur on Violence against Women, its Causes and Consequences. Ref. EUR 20/2427/2020. Available at: [amnesty.org/en/documents/eur20/2427/2020/en/](https://www.amnesty.org/en/documents/eur20/2427/2020/en/).

Amnesty International submission on Finland to the UN Committee on the Elimination of Discrimination against Women: 81st pre-sessional working group, 5-9 July 2021, List of Issues. Available at: [amnesty.org/en/documents/eur20/4205/2021/en/](https://www.amnesty.org/en/documents/eur20/4205/2021/en/).

Amnesty International submission on Finland to the UN Committee against Torture, 68th Session, 11 November – 6 December 2019. Ref. EUR 20/8716/2018. Available at: [amnesty.org/en/documents/eur20/8716/2018/en/](https://www.amnesty.org/en/documents/eur20/8716/2018/en/).

Amnesty International submission on Finland for the 41st session of the UPR working group, 7 – 18 November 2022. Available at: [amnesty.org/en/documents/eur20/5402/2022/en/](https://www.amnesty.org/en/documents/eur20/5402/2022/en/).

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FINLAND

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