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## **CUCW's Civil Society Submission to the Committee on the Elimination of Racial Discrimination Concerning the Review of Finland's Combined 24<sup>th</sup>–26<sup>th</sup> Periodic Reports in 2026**

### **Introduction / abstract**

The Central Union for Child Welfare (CUCW), founded in 1937, is an umbrella organization that works to promote child welfare and to ensure the full implementation of children's rights. CUCW's members include non-governmental organizations as well as municipalities and counties.

CUCW submits this civil society submission directly to the Committee on the Elimination of Racial Discrimination ahead of the constructive dialogue with Finland in August 2026. Due to an unexpected change in the timetable, civil society organizations were unfortunately unable to prepare a joint alternative report. The situation of civil society in Finland is currently exceptionally strained as a result of funding cuts already carried out and uncertainty regarding the targeting of forthcoming cuts. Some organizations may be forced to discontinue their activities altogether because of these cuts. At present, it appears that organizations working with and on behalf of migrants are at particular risk, including for political reasons. Against this background, and despite the short timeframe, CUCW considers it important to provide the Committee with an overview of the situation in Finland.

Finland submitted its previous report to the CERD Committee four years ago under the previous Government. The 2022 report listed measures that had been implemented or were planned but paid less attention—and in some instances no attention—to assessing the actual realization of rights or to describing the underlying problems that the measures were intended to address. In 2023, during the Government formation negotiations, the Non-Discrimination Ombudsman expressed concern that, according to contacts received by the Ombudsman and research evidence, racism in Finland manifests itself in individual racist acts, discrimination and exclusion, as well as in the structures of society<sup>1</sup>. Unfortunately, developments since then have been negative, as the current Government has pursued a restrictive policy line towards minorities.

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<sup>1</sup> Non-Discrimination Ombudsman, memorandum 19 May 2023, VVTDno-2023–733.

## Civil Society Space Is Narrowing

*(Article 2, State policy and anti-discrimination framework; 2017 Recommendations of the CERD-committee 20, paragraph 29.)*

In Finland, gambling proceeds were previously allocated in full as grants to civil society organizations and activities serving the public interest. In the 2020s, however, these proceeds were transferred to the State budget, and grants to organizations are now distributed as government grants through budgetary decisions. Until now, there has been consensus in Finland that civil society plays a significant role in promoting democracy, equality and well-being. During the current Government term, however, the resources of civil society organizations have been significantly reduced, with the cuts justified by reference to the State's fiscal situation. The total amount of grants to social welfare and health organizations will be reduced by half during the electoral term. Many organizations have already had to discontinue or scale down their activities.

In June 2026, the Minister of Social Affairs and Health outlined new grant criteria that would enter into force in the allocation of grants for 2027. Some of these criteria are discriminatory and would mean the discontinuation of the activities of entire categories of organizations. It is feared, for example, that organizations supporting and representing migrants and sexual minorities may be excluded from grant funding altogether. There is also wider concern that the voice of civil society will be weakened, as the intention is also to exclude umbrella organizations engaged in advocacy work. Through their member organizations, such umbrella organizations gather the views and experiences of the field and draw attention to shortcomings in the realization of the rights of different population groups, including the impacts of Government cuts on the position of minority groups, low-income persons, persons with disabilities, persons with long-term illnesses, gender and sexual minorities and ethnic minorities.

## Racism, Hate Speech and Anti-Immigrant Rhetoric

*(Article 2, State policy and anti-discrimination framework; Article 4, Hate speech, racist organisations, hate crime; 2017 Recommendations of the CERD-committee 20, paragraph 11.)*

The current Government has encountered serious challenges in upholding equality and non-discrimination. Within the Government, there has been continuous balancing due to the participation of an openly anti-immigrant party. One minister, for example, was forced to resign after links to the far right came to light. The Government's work has been marked by controversies concerning racism, particularly in relation to the statements, writings and social media conduct of politicians from the Finns Party. Members of the party are openly involved in right-wing populist movements, and some of its leading politicians have been convicted of incitement to hatred against a population group.

In light of the information compiled by ECRI, hate speech appears to have become more widespread in Finland and to have reached a critical level both online and in politics, while measures aimed at countering it remain insufficient. ECRI also identifies some positive developments, but it remains concerned, inter alia,

about hate speech and hate-motivated violence and has issued numerous recommendations to Finland to promote equality.<sup>2</sup>

The spread of anti-immigrant rhetoric and hate speech is problematic not only for the groups targeted, but also because it distorts public debate and perceptions of immigration. In reality, immigration in Finland remains modest compared with many other EU countries. Nevertheless, Finland is also affected by hate speech and propaganda disseminated by populist forces and right-wing radical digital platforms, in which immigration is presented as the root cause of economic decline and other social problems. The spread of hate speech normalizes racism, as if it were an ordinary and lawful expression of social dissatisfaction.

If the Government does not oppose these forces sufficiently visibly, there is a risk of an increase in racist violence, as has occurred, for example, in the United Kingdom. For the time being, the situation in Finland still appears preventable if it is addressed. When asked, 86 per cent of people felt that racism undermines the safety of society, and as many believed that taking action against racism increases safety for everyone in Finland.<sup>3</sup>

## Discrimination, Hate Speech and Racism Experienced by Children and Young People

*(Article 3, social segregation; Article 4, hate speech; Article 5, equality in the enjoyment of rights; 2017 Recommendations of the CERD-committee, paragraphs 11, 13, 19, 23)*

According to studies by the Ombudsman for Children, the discrimination experienced by Sámi children<sup>4</sup> and Roma children<sup>5</sup> casts a shadow over their growth and well-being in Finland. For people of African descent, discrimination and racist harassment are part of everyday life in Finland. For example, experiences of discrimination and harassment among persons from sub-Saharan African countries were more common in Finland than in other EU Member States. Studies report experiences of racism already in early childhood education.<sup>6</sup> In this light, it is concerning that the Government decided to remove the obligation to prepare unit-specific equality plans in early childhood education units. In its most recent concluding observations,

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<sup>2</sup> European Commission against Racism and Intolerance (ECRI), Report on Finland (sixth monitoring cycle), Council of Europe, 2025. <https://rm.coe.int/sixth-report-on-finland/48802911ec>

<sup>3</sup> Survey by Taloustutkimus commissioned by the Finnish Red Cross in 2026. <https://www.redcross.fi/news/2026/finnish-red-cross-survey-majority-of-people-living-in-finland-feel-that-racism-undermines-the-safety-of-society/>

<sup>4</sup> Ombudsman for Children: Study on the well-being of Sámi children and young people and the realization of their rights in Finland. <https://lapsiasia.fi/selvitys-saamelaislapset>

<sup>5</sup> Weckström, Elina; Kekkonen, Karri & Kekkonen, Outi (2023): Romanilasten hyvinvointi ja oikeuksien toteutuminen. Publications of the Office of the Ombudsman for Children 2023:3. <https://lapsiasia.fi/-/tiedote-romanilasten-selvitys2023>

<sup>6</sup> European Union Agency for Fundamental Rights (FRA), Second European Union Minorities and Discrimination Survey – Main results, 2017; Non-Discrimination Ombudsman, 2020. <https://yhdenvertaisuusvaltuutettu.fi/-/yhdenvertaisuusvaltuutetun-selvitys-afrikkalaistaustaisille-suomalaisille-rasismi-ja-syrjinta-ovat-arkipaivaa>

the UN Committee on the Rights of the Child identified the prevention of racial discrimination, hate speech and hate crimes as an area in which urgent measures must be taken<sup>7</sup>.

Structural discrimination is manifested, inter alia, in the fact that services are not distributed equally among different population groups. For example, persons with an immigrant background use health and social services less and at a later stage than the majority population. Recent research evidence shows that access to mental health care is more difficult for children with an immigrant background than for children with a Finnish background<sup>8</sup>. According to the latest School Health Promotion Study, young people with a foreign background fare worse than children with a Finnish background in many areas of health, well-being and safety: they reported discrimination, bullying, violence and loneliness more often than others<sup>9</sup>.

In September 2023, the Advisory Board for Ethnic Relations (ETNO) carried out a series of dialogues on racism and harassment experienced by young people and their impacts on young people's lives. Dialogues were organized in 16 localities across Finland. On the basis of the discussions, racism is part of young people's everyday lives in Finland and affects their well-being and confidence in the future. The dialogues highlighted young people's wish that all people, and especially adults, would intervene more clearly in racist and discriminatory behaviour observed in different situations. According to young people, adults in schools and educational institutions, for example, should intervene in racism, bullying and racist joking, and should support group-building among young people from different backgrounds not only in schools but also in workplaces and leisure activities.<sup>10</sup>

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<sup>7</sup> Committee on the Rights of the Child, Concluding observations on the combined fifth and sixth reports of Finland, CRC/C/FIN/CO/5–6, 2 June 2023, para. 16.

<sup>8</sup> Khanal P. et al. (2025): Parental immigration status and offspring mental health service use for anxiety and depression: A Finnish nationwide register study, *Journal of Affective Disorders*, Volume 405. <https://www.sciencedirect.com/science/article/pii/S0165032726003708?via%3Dihub>

<sup>9</sup> Castaneda, Anu; Matikka, Anni; Nykänen, Sanna; Eid, Mona & Kuusio, Hannamaria (2026): Results of the School Health Promotion Study by origin, Finnish Institute for Health and Welfare (THL). <https://www.julkari.fi/items/df0f2ba5-ba6a-47b9-8932-5d06fab73f28>

<sup>10</sup> Henttonen, Elina & Kareinen, Janne (2023): 'No one is born hating': Youth dialogues on racism and discrimination. Ministry of Justice publications, Reports and guidelines 2023:34. <https://julkaisut.valtioneuvosto.fi/items/5d64524b-2ef2-4581-a64c-cc7ff2743890>

## **Restrictive Amendments to Immigration Legislation Have Weakened the Rights and Status of Migrants, Especially Applicants for and Beneficiaries of International Protection**

*(Article 5, Equality in the enjoyment of rights – migrants, asylum seekers and non-citizens; 2017 Recommendations of the CERD-committee, paragraph 25)*

The current Government has significantly weakened the position of non-citizens in Finland. Above all, the situation of persons applying for and receiving international protection has deteriorated. Both seeking and obtaining protection have become more difficult.

The following are examples of legislative amendments adopted by the Government that have weakened the position of asylum-seekers and migrants:

- The right to seek asylum has been endangered: pushback legislation (Government Proposal HE 18/2025 vp); the border procedure and expansion of the accelerated procedure and of grounds for considering an application unfounded (HE 30/2024 vp; HE 52/2026 vp). In 2024, Finland introduced the possibility of a special border procedure under the Asylum Procedures Directive, even though the issue was being regulated jointly at EU level. In connection with the EU Pact, Finland sought to apply the border procedure in all possible situations, in addition to the mandatory grounds for border procedures.
- Access to legal aid has become more difficult (HE 52/2026 vp).
- The reception allowance has been reduced and services have been restricted (HE 28/2024 vp; HE 52/2026 vp).
- Grounds for refusing residence have been expanded; residence permits have been shortened; and obtaining a permanent residence permit has become more difficult (HE 26/2024 vp; HE 29/2024 vp; HE 62/2025 vp).
- Removal from the country has been made more effective (HE 10/2025 vp; HE 51/2026 vp).
- Detention may be imposed for longer periods and entry bans have been expanded (HE 143/2024 vp).
- The conditions for family reunification have been tightened (HE 26/2024 vp; HE 11/2025 vp).
- Funding for integration is being cut, and the policy emphasis is shifting from rights to obligations (HE 74/2026 vp).
- Acquisition of citizenship has become more difficult (HE 27/2024 vp; HE 19/2025 vp; HE 54/2026 vp).
- The right of undocumented migrants to adequate health services has been removed (HE 50/2025 vp).

The Government adopted these legislative amendments at the same time as the new *EU Pact on Migration and Asylum* was being finalized and its implementation prepared<sup>11</sup>.

### **Implementation of the EU Pact in Finland: Regulation Stricter Than Required by EU Law**

The EU Pact on Migration and Asylum, adopted in 2024, entered into application on 12 June 2026. Overall, it tightens legislation and makes it more difficult for people to access the territory of the Union. For this reason, national discretion should be used in a manner that supports the human rights of applicants. Unfortunately, Finland acted in the opposite direction by using the national margin of discretion under EU law to further weaken the position of applicants for international protection, in some respects adopting stricter rules than those required by EU law.

The Pact contains specific safeguards for children, especially unaccompanied children. If an applicant states that they are under 18 years of age and enters the country without their guardian, it is essential that they are able to exercise their rights as a child. There is, however, a risk that children will not be identified as minors. The focus of vulnerability assessment shifts to the initial stage, where it is determined to which procedure the applicant will be referred and what support services they may receive. Decisions made at these early stages on referring an applicant to a specific procedure may have consequences affecting the rest of the child's life. If there is uncertainty as to whether the applicant is a minor, the EU Pact provides for a multidisciplinary age assessment. CUCW does not consider the national regulation concerning multidisciplinary age assessment to be sufficiently precise or consistent with the best interests of the child.

### **Children's Right to Family Life Is Not Respected**

Family reunification has been further tightened during the current Government term. The proposed amendments disregard the concluding observations addressed to Finland by the UN Committee on the Rights of the Child; the Committee specifically calls for the removal, without discrimination, of barriers to family reunification for children who arrived as asylum-seekers.

When specifying provisions of the Aliens Act concerning circumvention of the rules on entry, the Government sought to 'eradicate' conduct that it considers to constitute circumvention of those rules. While making it easier to refuse residence permits and more difficult to obtain a permanent residence permit, the Government amended a provision (section 36 of the Aliens Act) that particularly affects unaccompanied children (HE 26/2024 vp). As a result of the amendment, sending or allowing a child to flee ahead of the family can now more clearly be regarded as blameworthy conduct on the part of the parents. Even if the child is granted international protection, the child's family may later not necessarily be welcome. According to this interpretation, the child was sent solely with the aim of later obtaining residence permits for the guardians on the basis of family ties.

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<sup>11</sup> Implementation of the EU Pact, HE 52/2026 vp; see also CUCW statement on implementation of the EU Migration and Asylum Pact. <https://www.lskl.fi/lausunnot/lapsen-etu-on-otettava-ensisijaisesti-huomioon-eun-muuttoliike-jaturvapaikkasopimuksen-toimeenpanossa/>

Many of the amendments made by the Government to the Aliens Act place persons with different protection statuses in unequal positions. This applies, for example, to the conditions for family reunification: the Government introduced a two-year residence requirement for beneficiaries of subsidiary protection (HE 11/2025 vp). The sponsor must have resided in the country for at least two years after receiving subsidiary protection before a residence permit on the basis of family ties may be granted to a family member. In the case of persons with refugee status proper, the requirement applies only to so-called new families, not to family relationships established before arrival in Finland.

The Government also introduced an income requirement for family reunification of beneficiaries of international or temporary protection, including where the sponsor is a minor (HE 11/2025 vp). When the guardians of a child who has received subsidiary protection apply for a residence permit on the basis of family ties, they must be able to show that the family's livelihood is secured. The income thresholds are so high that many employed ethnic Finns would be unable to meet the required income level.

### **Insufficient Legislative Preparation and Inadequate Impact Assessments**

During the current Government term, legislative proposals have been prepared under extreme time pressure, resulting in inadequate impact assessments and short consultation periods. The Chancellor of Justice has criticized the quality of legislative preparation (decision OKV/1772/10/2023-OKV-6, 29 January 2024). Numerous separate amendments are being made, and their combined effects may be highly significant for those affected by them.

It has already previously been observed that child impact assessments are not conducted to the extent required by the relevant guidelines: negative impacts are not identified, and impacts or the absence of impacts have not been documented in Government proposals<sup>12</sup>.

### **Recent Legislative Changes Undermine Refugees' Sense of Security and Belonging in Finnish Society**

Obtaining permanent protection has become more difficult and now requires, in the case of international protection, three permit processes and, in the case of subsidiary protection, as many as five permit processes before a permanent residence permit can be obtained. The legislation steers the system towards continuous suspicion: even if applicants have already passed a strict screening process and have been granted protection, they are required to earn that protection again and again. The continuous renewal of permits creates uncertainty in the lives of persons with a refugee background and slows integration. Obtaining a permanent residence permit has become more difficult, and the Government proposal itself estimates that the majority of beneficiaries of international protection will continue to depend on a fixed-term permit even after six years of residence (HE 62/2025 vp).

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<sup>12</sup> Pirjatanniemi et al. (2021): Combined effects of amendments to the Aliens Act and its application practice on the position of persons who have applied for and received international protection. Publications of the Government's analysis, assessment and research activities 2021:10. <https://julkaisut.valtioneuvosto.fi/items/45957308-0694-439f-9868-edbff475adc5>

Nor is sufficient investment being made in integration. When the State cuts the reception system of the Finnish Immigration Service, central government transfers for municipal basic services and education funding, greater responsibility is shifted to municipalities. Thus, the responsibilities and tasks of municipalities in promoting integration are increasing while the funding allocated for this purpose is being reduced. From the point of view of migrants, integration policy has shifted from rights to obligations, as the integration period (the right to integration support) has been shortened while obligations and sanctions have been increased. Integration is now more strongly focused on guidance towards the labour market and less on broader integration support.

### **The System of Representatives for Unaccompanied Children Remains Underdeveloped**

An unaccompanied minor asylum-seeker, refugee or victim of trafficking is appointed a representative to exercise the child's right to be heard and to act on the child's behalf. The system of representatives has existed in Finland for a quarter of a century, but its development remains incomplete. The competence of representatives varies, qualification requirements are lax, and representatives operate without an adequate support structure.

Particular attention should be paid, in line with European recommendations and EU legislation, to the competence and independence of the representative. The Finnish system is peculiar: the Finnish Immigration Service examines the child's application and issues the decision, but it also pays the representative's fee, supervises the representative and guides the entire system of representatives. It is therefore necessary to ask why, in the case of unaccompanied non-citizen children, Finnish law refers to a 'representative' rather than a 'guardian', as is the case, for example, in child protection and criminal matters.

### **Immigration Detention of Children**

There are concerns that detention will increase as a result of the tightening of EU legislation. Finland has not fully prohibited the detention of children, although it has restricted it. The most recent restriction was adopted in 2025, when the duration of child detention was limited to three months (HE 143/2024 vp). In certain situations, detention could be extended for a further three months, meaning that a child may still be held in detention for six months (section 122 of the Aliens Act).

The Finnish Government also adopted a legislative amendment under which the maximum duration of detention in situations related to removal from the country was extended by six months, from twelve months to eighteen months (HE 143/2024 vp). Although the detention of children has been restricted, this may have implications for the situation of families with children.

An international coalition and the Parliamentary Assembly of the Council of Europe have called on States to actively develop alternatives to detention<sup>13</sup>. In 2016, Finland intended to identify alternatives, but no

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<sup>13</sup> End Immigration Detention of Children; Parliamentary Assembly of the Council of Europe, Recommendation 2056 (2014), 3 October 2014, Alternatives to the immigration detention of children.

genuine alternatives were ultimately proposed (HE 133/2016); instead, the Act was mainly supplemented with new precautionary measures.

The UN Convention on the Rights of the Child provides that no child shall be deprived of his or her liberty unlawfully or arbitrarily (article 37b). The Committee on the Rights of the Child has clarified this in its general comment on unaccompanied children, which guides the interpretation of the Convention. The Committee has subsequently formulated an even clearer negative position, according to which States must expeditiously and completely cease the immigration detention of children on the basis of their migration status. In its most recent recommendations, the Committee on the Rights of the Child called on Finland to end the detention of children. The Committee against Torture also expressed concern, in its concluding observations on Finland's eighth periodic report, that children can still be detained in connection with a negative decision and return.