

The state of the rule of law in Europe

Reports from National
Human Rights Institutions

Finland

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Finnish Human Rights Centre (HRC) and its Human Rights Delegation

Parliamentary Ombudsman

Impact of 2022 ENNHRI rule of law reporting

Impact on the Institution's work

Monitoring and promotion of the rule of law principles together with human rights has been a long-term priority of the Finnish Human Rights Centre. This is again reflected in the HRC's Action Plan for the year 2023. The HRC has developed a tool for monitoring and reporting, which enables it to systematically collect data and to issue reports on the rule of law and fundamental and human rights in Finland.

Parliamentary Ombudsman is a constitutional guarantor for the rule of law. It supervises the exercise of public powers and has even the right to prosecute crimes committed by civil servants or persons performing a public task. This is a rarely used power. The Ombudsman equally has the competence to take initiative in matters concerning the legal responsibility of a minister and criminal responsibility of the president. The Ombudsman also supports the independence of the court system through legislative proposals and statements. The Ombudsman's judicial oversight on courts is limited to procedural matters, such as delayed proceedings. Furthermore, the Ombudsman oversees the implementation on fundamental and human rights.

The director of the HRC is the Chair of ENNHRI and one of its experts chairs the Legal Working Group. The HRC has been following closely rule of law developments in Europe and developing ENNHRI's activities in this regard. This has informed the HRC's domestic work as well by providing warning signals and examples from other European countries of what could also happen in Finland.

Follow-up initiatives by the Institution

Since the rule of law reporting started by the European Commission and ENNHRI, the Finnish NHRI notes the increasing attention paid to the rule of law also in Finland every year. The Finnish Human Rights Centre has contributed to the discussions early on by linking the rule of law to the fundamental and human rights and highlighting the need to strengthen rule of law institutions including human rights structures. As regards the Finnish Parliament, the HRC has raised concerns in many of its statements to the various parliamentary committees. The HRC and the director of the HRC have been active discussants on the rule of law in social media platforms.

For instance, the HRC continued:

- Attending rule of law related events both domestically and at the EU level (e.g. taken part in a panel at the FRA Fundamental Rights Platform meeting on the rule of law and civil society).
- Having meetings with state authorities (Ministry of Justice) to raise the need to strengthen rule of law institutions in Finland.
- Issuing statements to the parliamentary committees.
- Participating in discussions on the rule of law in social media with other rule of law actors in Finland.

NHRI's Recommendations to national and European policy makers

The Finnish NHRI recommends that:

- At the European level, there is need for more engagement with NHRIs by the European Parliament, the Council of Europe rule of law mechanisms and PACE in addition to the European Commission and EU Fundamental Rights Agency
- At the national level, the new Government (after parliamentary elections on 2 April 2023) needs to commit to uphold and strengthen the rule of law and fundamental and human rights in Finland and in its foreign and security policy,

which should be based on human rights-based approach and the rule of law principles.

Implementation of regional actors' and NHRI's recommendations on rule of law (from previous year) and actions undertaken by NHRI to facilitate implementation

State authorities' follow-up to NHRI's recommendations regarding rule of law

One of the most long-standing problems in Finland has been the length of legal proceedings. In the ENNHRI 2022 Report on Finland it was recommended that the justice system needs adequate resources to function efficiently and to ensure access to justice in reasonable time.

In March 2022, the Ministry of Justice's working group completed a report on enhancing the efficiency of the criminal process¹. The report proposes several changes to legislation, the aim of which is to improve and speed up the processing of criminal cases. The proposed amendments concern, among other things, the speeding up and centralizing investigation of crimes against children, wider possibility of audio and video recording of the interrogations, and wider cooperation between the pre-trial investigation authority and the prosecutor. The report also proposes legislative changes related to prison deaths.

Based on the report, in October 2022 the Government presented changes to the Coercive Measures Act and the Pretrial Investigation Act. The Ministry of Justice also appointed a new working group in autumn 2022 to evaluate ways to streamline the preliminary investigation and the criminal process. The working group prepares proposals that would specifically respond to deficiencies and challenges that have arisen in situations of practical application of the law.

In November 2022, the Government Report on the Administration of Justice was published². The report describes the current state of the administration of justice in

Finland. According to this report, despite increases in budget appropriations during the current parliamentary term, the situation remains unsatisfactory. Key problems regarding legal protection include the excessive length of legal proceedings and the high costs of trials. At the same time, the personnel of the justice administration are overburdened. The Report includes proposals for measures to ensure resources for justice administration, to make internal structures and processes more efficient, and to improve the availability of legal services.

The Government has thus taken some preliminary measures to reduce the length of legal proceedings and costs. The real impact of these measures needs to be closely monitored and evaluated.

It is important to note that the length of proceedings is not the only problem. For example, the Deputy Chancellor of Justice gave in December 2022 a decision where the length of proceedings in the Finnish Immigration Service was assessed³. Proceedings were found to be systematically too long. The Immigration service states that the delays are caused by a backlog of applications that in turn has its background in the lack of and frequent changes in the personnel and in the unpredictability and inadequacy of the resources given to the Office.

NHRI's follow-up actions supporting implementation of regional actors' recommendations

The Finnish Human Rights Centre has recommended on several occasions, including in its rule of law reporting and statements, that the Government should be strategic when developing national human rights structures. The Finnish human rights architecture consists of many actors with legislative tasks to promote, monitor and/or protect human rights. Some of the actors have a broad human rights mandate whilst some of them are mandated to focus on specific human rights groups or themes.

Besides the Finnish NHRI, and the two constitutional bodies (the Chancellor of Justice and again the Parliamentary Ombudsman), these actors include two Equality Bodies

(Non-Discrimination Ombudsman and Equality Ombudsman), Data Protection Ombudsman, Intelligence Ombudsman, Ombudsman for Children, and the newly established Ombudsman for Older People. Furthermore, the Non-Discrimination and Equality Tribunal is a low threshold judicial body that considers cases of discrimination.

The specialized bodies – called ombudsmen - are organizationally attached to the Ministry of Justice and are included in the budget of the Ministry. The Government also appoints the specialized ombudsmen. Their independence is thus limited to functional independence, while the Finnish NHRI is a parliamentary body and completely independent from the executive also structurally.

While new actors and new tasks for the existing human rights bodies have been created, no thorough analysis or discussion on the human rights structures and their development has taken place, even though there are overlaps and gaps in some of the actors' mandates. From the rightsholders' perspective this is problematic, as it is difficult to understand what the division of task between the actors is, and which instance is eligible to consider their complaints.

For the abovementioned reasons, the Finnish Human Rights Centre decided to conduct a study in 2021–2022 on national human rights actors that focuses on the strengthening and development of these structures⁴. The study clearly shows that there is a need for a more holistic and strategic approach. Balance should be sought between general and specific human rights mandates. When structures become too fragmented, resources and expertise are scattered in between several actors which risks weakening the clarity, coherence, resilience and efficiency of the bodies. Furthermore, international and regional standards, praxis and recommendations on human rights actors' independence should be better taken into account when developing the national actors' status and capacities. Therefore, the Finnish NHRI stresses that:

- The existing human rights structures should be strengthened instead of setting up new human rights bodies. This is particularly important as regards

competencies to protect, supervise and monitor human rights and fundamental rights. New actors should be set up only after needs assessment has been carried out and based on evidence on real need.

- The review of the Non-Discrimination Act and the Equality Act should be carried out simultaneously to harmonise the legal protection against discrimination on different grounds and to strengthen intersectional perspective. Despite some amendments to the Non-Discrimination Act, there are still differences in the legal remedies according to the Non-Discrimination Act (covers discrimination grounds such as age, origin, religion, disability and sexual orientation) and the Equality Act (covers discrimination based on gender, gender identity and gender expression).
- The structural independence of special ombudsmen from the Ministry of Justice should be strengthened. Analysing the status of the two Finnish Equality Bodies (Non-Discrimination Ombudsman and Equality Ombudsman) is of particular importance due to the EU directive proposals on Equality Body standards.⁵

Independence and effectiveness of the NHRI

International accreditation status and SCA recommendations

The Finnish National Human Rights Institution (FNHRI) is comprised of the Human Rights Centre, its Human Rights Delegation, and the Parliamentary Ombudsman. All the three parts that together form the FNHRI have their own specific legal duties, whereby the role of the Human Rights Centre is to take part and represent the FNHRI in international and European human rights co-operation among its statutory tasks. It needs to be emphasized that despite the three-part structure of FNHRI, there is only one NHRI in Finland.

The FNHRI was last reaccredited with A-status in October 2019⁶. First, the SCA recommended that adequate funding be made available to the FNHRI to perform its function as a National Preventive Mechanism under the OPCAT (only the Parliamentary

Ombudsman) and National Monitoring Mechanism under the CRPD (the FNHRI joint task), and for the Human Rights Centre to work on business and human rights. The SCA encouraged the FNHRI to continue advocating for the necessary funding to ensure that it can effectively carry out its mandate. Further, the SCA was of the view that due to the different procedures through which the annual reports of the FNHRI are submitted to the Parliament, the Parliament is not provided with a complete account of the work of the FNHRI. The SCA encouraged the FNHRI to continue to advocate for the Human Rights Centre to have the competence to table reports to the Parliament for discussion to align this procedure with that followed by the Parliamentary Ombudsman.

Furthermore, while recognising that the Government Bill establishing the three components of the NHRI is a source of law in Finland, the SCA encouraged FNHRI to advocate for legislative amendments that would clearly stipulate these structures as one NHRI by the Parliamentary Ombudsman Act.

Follow-up to SCA Recommendations and relevant developments

The SCA recommendations that concerns the annual report of the HRC and the stipulation of the NHRI in the Parliamentary Ombudsman Act (its founding legislation) were included in the Human Right Centre's study on national human rights actors⁷. The HRC also recommended that its general task to follow-up the realization of human rights in Finland (monitoring function) should be more clearly stipulated in the Parliamentary Ombudsman's Act. Currently, only the promotion of fundamental and human rights is a clear statutory task of the HRC, while the mandate to monitor and follow-up is expressed indirectly through Centre's more specific legislative tasks.

There have been no changes in the regulatory framework of the Finnish Human Rights Centre and its Delegation after the 2022 ENNHRI Rule of Law Report.

For the Parliamentary Ombudsman, important changes have taken place. The new Act on the Division of Duties between the Chancellor of Justice and the Parliamentary

Ombudsman came into force in October 2022. The act does not change the constitutional competences and tasks of the two supreme guardians of legality.

The Parliamentary Ombudsman oversees and promotes the legality of actions taken by authorities and other parties performing public tasks as well as the implementation of fundamental and human rights. The Ombudsman examines complaints, investigates matters on his own initiative and carries out inspections of administration, and more importantly, at prisons, military garrisons and other closed institutions or places where people can be held against their will.

The new Act on the Division of Duties strengthens the role of the Ombudsman as regards the rights of vulnerable persons and the oversight of security authorities. Based on the new Act the Ombudsman will be the main institution to supervise the implementation of fundamental and human rights at the individual level. The reform of the Act by increasing the focus on vulnerable persons and increasing the specialization of the Ombudsman staff provides opportunities also to further strengthen the cooperation within the FNHRI.

According to the new Act, the oversight of legality by the Chancellor of Justice is directed towards examining structural issues related to the implementation of fundamental and human rights in the development of public administration. The Chancellor is also responsible for supervising matters relating to anti-corruption.

The aim of the reform is to reduce the challenges caused by the overlapping duties between the Ombudsman and the Chancellor, and to improve the quality and effectiveness of the oversight of legality and to support the consistency of the decision-making practice.

As regards the resources of the FNHRI, both the HRC and the Parliamentary Ombudsman have received additional resources as recommended by SCA. In 2022 again, both were granted more budget funds by the Parliament for additional permanent staff members as requested.

Enabling and safe space

In view of the Finnish NHRI, the authorities sufficiently ensure enabling space for the institution to carry out its work independently and effectively.

NHRI's recommendations to national and regional authorities

- FNHRI and its three component parts (Human Rights Centre, its Human Rights Delegation and the Parliamentary Ombudsman) should be explicitly stipulated as the Finnish NHRI in the Parliamentary Ombudsman's Act (at the text of the Act).
- Finnish Human Rights Centre should have a competence to table its reports to the Parliament for discussion.

Human rights defenders and civil society space

Laws, measures and practices negatively impacting on civil society space and/or on human rights defenders' activities

Regarding protection of civil society space, there have been several legislative processes in 2022 during which the problem of hate speech has occurred. Especially discussions – including the plenary discussion in the Parliament - concerning the Government Proposal on the legal recognition of gender as well as the Government Proposal on the Sami Parliament increased hate speech towards these minorities. Trans activists and Sami activists - as well as those supporting them - have been targeted and attacked in the social media.

The ongoing discussions and the hate speech they have generated have had negative impacts on the well-being of some trans people, especially trans youth⁸. Regarding hate speech against the Sami people, the Sami Parliament made a statement in November 2022 where it drew the attention to the increased hate speech and expresses concern regarding especially Sami youth and how they are coping with the situation⁹.

The HRC has provided information and statements in support of the legislative proposals and called for more respectful discussion not offending those who are concerned¹⁰.

Regrettably, while the Trans Act passed in the Parliament, the Sami Parliament Act did not. The Constitutional Committee voted not to proceed with the proposal. This failure – already by the 4th consequent government – to remedy the violations against Sami people’s right to self-determination is highly problematic as it is the duty of the Constitutional Committee to ensure that legislation complies with international human rights obligations and the Constitution.

Measures undertaken by State authorities to protect and promote civic space

In 2022, there have been some activities undertaken by state authorities to protect human rights defenders abroad. The MFA provides funding for several INGOs whose activities include protection of human rights defenders.

In November 2022, the Ministry for Foreign Affairs published new internal guidelines for supporting human rights defenders¹¹. The guidelines are based on the European Union's guidelines for human rights defenders as well as an independent report made in 2017. The updated guidelines consider that human rights defenders can also be harassed by companies and, for example, various armed groups.

However, the guidelines still do not address situations in which a human rights defender needs to relocate to safety to Finland. Finland does not have a national mechanism to assist and protect human rights defenders.

In late 2022, the MFA finally started the process of preparing a special humanitarian visa for defenders¹². Internal report was first drafted at the MFA and some meetings were organized including with the HRC. Such visa would allow for human rights defenders, reporters and activists fleeing their country to legally enter Finland. The initiative by the MFA was positive as such but was launched too late and as a result, the process will not be finished during this Government term.

In December 2021, the Government Report on Human Rights Policy was published¹³.

During the spring 2022, it was discussed in the Parliament. The report outlines Finland's fundamental and human rights policy both internationally and domestically. In the report, supporting the work of human rights defenders is one of the priorities.

Despite the policy priority of the Government to protect human rights defenders, the lack of protection mechanism diminishes the credibility of the otherwise important work done by the MFA politically, and in supporting many international NGOs working to protect defenders.

The Finnish Human Rights Centre is aware of an increasing number of human rights defenders at risk who have managed to enter Finland but have left for other countries because they have not received residence permits or protection. Some defenders have been refused visa and have ended up in neighboring countries or have not been able to flee. Due to the nature of the information the source is confidential but reliable.

In addition to the protection that could be provided in Finland, it would be important for the human rights defender to receive fast and flexible support also in the country in which they work. This kind of help could be offered through the network of Finland's diplomatic missions.

NHRI's role in promoting and protecting civil society space and human rights defenders

In September 2022, the HRC and its Human Rights Delegation, which is the Human Rights Centre's broad-based cooperation body, published a strong statement on the protection of human rights defenders, where it demands that the Government develops a comprehensive model to support the human rights defenders both in the country of origin and in Finland, secures the human rights defenders' quick and legal entry to Finland with a fast and flexible visa procedure, and guarantees sufficient resources for protection¹⁴.

The Finnish Human Rights Centre has during the 2022 advocated for a mechanism to protect human rights defenders in Finland. This was one of the priorities of the HRC in its statements for the Parliamentary committees during the discussions on the Government Report on Human Rights Policy¹⁵. For example, in its statement to the Foreign Affairs Committee, the Human Rights Centre drew attention to the fact that although human rights defenders have been made a priority in the Government report, Finland still does not have a mechanism to protect human rights defenders by enabling their entry into Finland.

The Foreign Affairs Committee in its statement on the report insisted that a mechanism must be developed to enable the protection of human rights defenders in Finland¹⁶. As Finland is a member of the UN Human Rights Council during 2022–2024, it is essential that the emphasis on supporting the work of human rights defenders mentioned in the Report on Human Rights Policy is also reflected in Finland's activities in the Human Rights Council.

NHRI's recommendations to national and regional authorities

- The Finnish Government and in particular the MFA should urgently establish a comprehensive mechanism to protect human rights defenders and their families, including a fast and flexible visa procedure to relocate to safety in Finland and the necessary support.
- The Finnish Government should cooperate and learn from other Governments supporting defenders with protection programmes and to cooperate and support the EU mechanism on human rights defenders including by providing relocation possibilities in Finland.
- The Finnish Government should continue providing support to international NGOs that protect and assist defenders.

Implementation of European Courts' judgments

Assessment of follow-up activities of State authorities

Finland has 18 judgments from the ECHR pending implementation.¹⁷ Several of them would only require updated information on the implementation status to be sent to the Committee of Ministers and could be closed. The Government has not been capable of finalizing the reports.

Leading European Courts' judgments awaiting implementation

The number of leading judgments of the European Court of Human Rights pending implementation did not change in 2022. Still 9 leading judgments were pending implementation¹⁸.

For the first time, a judgment against Finland is being examined under enhanced procedure before the Committee of Ministers. The case of *X. v. Finland* (application no. 34806/04¹⁹) concerns lack of legal remedy against forced medication in psychiatric hospital. The Court found a violation on 3 July 2012, among others, of Art. 8 (Right to private life). Regarding the violation of Article 8, implementation has not taken place, more than 10 years on. The Committee of Ministers examined the status of implementation and reasons for its delay in December 2021. The case is due to be examined again in March 2023.

Two further complaints on the same issue (*E.S. against Finland*, application no. 23903/20 and *H.H. against Finland*, no. 19035/21) have been lodged before the Court in June 2020 and April 2021 and communicated to the Government in March 2021 and December 2021, respectively.

The main reason for non-implementation in most cases is not prioritizing or having the resources available for the final reporting on the implementation, as in most cases the actual implementation work is done. This situation is difficult to comprehend, also for

the staff of Department for the Execution of Judgment, who visited Finland in early 2023.

In cases like X. v. Finland, where the required legislative changes are in process for a long time and not proceeding, there is lack of political will to prioritize these reforms combined with lack of resources and lack of uniform understanding on the importance of the full implementation.

NHRI's actions to support the implementation of European Courts' judgments

The Human Rights Centre has requested information from the Ministry for Foreign Affairs already in 2021 on all pending cases asking for the reasons for the delay²⁰. In 2021 (and in January 2023 again²¹) the Finnish Human Rights Centre has submitted Rule 9 communication on the case of X v. Finland²². In early 2023 NHRI held discussions with the Department of Execution of the Judgments of the ECHR during their country visit, specifically on the case of X v. Finland²³.

NHRI's recommendations to national and regional authorities

The Finnish NHRI recommends to:

- Take urgent measures to finalise the remaining implementation of judgments of the European Court of Human Rights.
- Ensure sufficient resources for the office of the Government Agent to enable speedy implementation of any future judgments;
- Enhance the knowledge and respect for the judgments of the ECtHR especially among the authorities responsible for drafting legislation

Other challenges in the areas of rule of law and human rights

Legislative changes in the Border guard Act

Finland amended its Border Guard Act in 2022²⁴. Both the legislative process and the amended Act raise concerns from a rule of law and human rights perspective. 16.2 § of the new Border Guard Act gives authorities the option to concentrate the reception of

asylum applications to one or more border crossing points in case of instrumentalization of migration or sudden and large-scale arrivals of asylum-seekers, if concentration is deemed necessary based on public order, national security, or public health.

Although the Act in its final form enables the concentration of asylum applications in case of sudden and large-scale arrivals of asylum seekers, the reasoning for the legislation is based only on the threat of instrumentalisation of migration. The Government Proposal mentions for example the EU's plans on combating instrumentalisation of migration and hybrid threats. The possibility of concentration in the situation of sudden and large-scale arrivals of asylum seekers when there is no reasonable suspicion of instrumentalization is problematic as sufficient motivations for it were not given in the legislative process²⁵.

The possibility to concentrate the reception of asylum-seekers to only one border point is not in line with the requirement of genuine and effective access to the asylum procedure. The Finnish Eastern border is over 1300 km long.

According to 16.3 § of the Act, if the decision is made to concentrate the reception of asylum applications, they can only be received at designated border crossing points, except in individual circumstances considering the rights of children, disabled persons, or others in a particularly vulnerable position. Yet the Administration Committee of the Parliament indicates in its reasoning that persons seeking asylum from the Finnish border authorities on other border crossing points than the designated ones could be removed from the country without the possibility to seek asylum. This would result in pushbacks.

Both the Council of Europe Commissioner for Human and the Director of the European Fundamental Rights Agency (FRA) have expressed their concern regarding the amended Act²⁶.

Media freedom

The situation of media continues to be relatively good and stable in Finland. However, hate speech, different type of harassment and targeting of journalists have been an alarming threat against media freedom in Finland. In addition, concentration of the national media market continues to raise some concern.

In 2022, Finland fell from second place to fifth place in the press freedom index²⁷. The index prepared annually by the organization Reporters Without Borders measures the realization of press freedom in 180 countries. Finland's ranking is the weakest since 2007.

One of the reasons for the weaker ranking are the charges against three journalists of the national daily newspaper Helsingin Sanomat for revealing and for attempt of revealing a security secret²⁸. The charges concern the publication of an article in 2017 concerning military intelligence by the Defence Forces and the activities of the Communications Experiment Centre (*Viestikoekeskus*) conducting signals intelligence. The main question of the case relates to the journalists' right not to reveal their sources. Helsinki District Court made its judgment on 27.01.2023: one of the reporters received fines, and the article is to be removed.²⁹ The judgment came only in 2023, in other words after the press freedom index evaluation. However, the charges themselves can have affected Finland's result in the index.

The case has raised broader discussion on the limits of freedom of speech and on the responsibility of journalists in their work. On the other hand, on 11 January 2022, the Supreme Court overturned the defamation sentence of a journalist in relation to commenting political action. The court thus clarified the ambit of freedom of speech, and what is allowed within the freedom of speech, which is of importance for future cases.

The Media Pluralism Monitor 2022 report identifies several risks concerning Finland's media environment³⁰. The most relevant risks are those related to the concentration of

news media and online platforms, and the underdevelopment of the field of local and regional media. Many local communities or minority groups are underserved or neglected by both private and public service media, and there are shortcomings in accessibility of media services for persons with disabilities. According to the report, Finland should also better prepare for the threat of coordinated mis- and disinformation campaigns. When looking at the legislation, defamation and blasphemy remain punishable under the Criminal Code and may be punished relatively harshly.

¹ See [the report on enhancing the efficiency of the criminal process by the Ministry of Justice's working group](#), only in Finnish

² See [the Government Report on the Administration of Justice](#)

³ See [the Decision of the Deputy Chancellor of Justice on the processing times of the Immigration Service](#), only in Finnish

⁴ See [Finnish Human Rights Centre's study on national human rights actors 2022](#) in Finnish

⁵ See [Finnish Human Rights Centre's study on national human rights actors 2022](#) in Finnish.

⁶ [SCA Report October 2019](#)

⁷ See [Finnish Human Rights Centre's study on national human rights actors 2022](#) in Finnish

⁸ See article "[Sateenkaarinuoret poikkeusaikana](#)" in the book *Nuorten elinolot 2022*, available in Finnish

⁹ The [Sami Parliamentary Council on hate speech against Sami people](#), available in Finnish

¹⁰ See the info package and press statement of the HRC on Sami rights - [Saamelaiskäräjälain ehdotettu uudistus poistaa ihmisoikeusrikkomuksen | Ihmisoikeuskeskus / Människorättscentret / Human Rights Centre](#)

¹¹ See "[Supporting Human Rights Defenders Together, Guidelines of the Finnish Foreign Service](#)" by the [Ministry for Foreign Affairs](#), abstract in English

¹² See a [press release by the Ministry for Foreign Affairs where drafting of a proposal for a national humanitarian visa is mentioned](#)

¹³ See [the Government Report on Human Rights Policy](#), abstract in English

¹⁴ See [Statement of the HRC's Human Rights Delegation: Protection of human rights defenders at risk must be strengthened](#)

¹⁵ See [the statements of the Finnish Human Rights Centre to different parliamentary committees concerning the Government Report on Human Rights Policy](#), available only in Finnish

¹⁶ See [the Report of the Foreign Affairs Committee on the Government Report on Human Rights Policy](#), available only in Finnish

¹⁷ [Justice delayed and justice denied: report on non-implementation of European court rulings, p. 38 on Finland](#)

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- ¹⁸ See [Pending cases of ECtHR concerning Finland, waiting implementation – 18 cases \(17.1.2023\)](#)
- ¹⁹ [ECtHR judgment in the case of X v. FINLAND](#)
- ²⁰ See [Finnish Human Rights Centre’s letter in 2021 to the Minister for Foreign Affairs on pending cases](#)
- ²¹ See Finnish Human Rights Centre’s Rule 9 communication in 2023 on the case of X v. Finland [Ihmisoikeuskeskus lausui toistamiseen Euroopan ihmisoikeustuomioistuimen pakkolääkintätuomiosta – Euroopan neuvoston täytäntöönpano-osasto vierailulla Suomessa täytäntöönpanon viiveiden takia | Ihmisoikeuskeskus / Människorättscentret / Human Rights Centre](#)
- ²² See [Finnish Human Rights Centre’s Rule 9 communication in 2021 on the case of X v. Finland](#)
- ²³ See [information on visit to Finland on implementation of the European Court’s judgments](#)
- ²⁴ See the [English press release on the amendments to the Border Guard Act](#) from July 2022
- ²⁵ See [the Statement of the Finnish Human Rights Centre on the Draft Government Proposal for the Border Guard Act](#), which is available in Finnish
- ²⁶ See [Letter to the Minister of the Interior of Finland from the Commissioner for Human Rights of the Council of Europe](#)
- ²⁷ See [the World Press Freedom Index 2022](#) by Reporters Without Borders
- ²⁸ See article in Finnish: [Tapaus Viestikookeskus ja journalistin vastuu](#)
- ²⁹ [Communication on the District Court Judgment](#)
- ³⁰ See [Media Pluralism Monitor 2022 Country Report of Finland](#) with an abstract in English