



FINLAND: INSUFFICIENT IMPLEMENTATION OF THE ISTANBUL CONVENTION

AMNESTY INTERNATIONAL SUBMISSION TO THE GROUP OF EXPERTS ON ACTION AGAINST VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE (GREVIO) ON THE IMPLEMENTATION OF THE COUNCIL OF EUROPE CONVENTION ON PREVENTING AND COMBATING VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE IN FINLAND

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INTRODUCTION

In this submission to the Group of experts on action against violence against women and domestic violence (GREVIO), Amnesty International evaluates the implementation of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (hereinafter referred to as the Istanbul Convention or the Convention) by Finland and assesses the Baseline Report¹ by the Government of Finland on measures giving effect to the provisions of the Istanbul Convention.

The submission focuses on certain elements that, in Amnesty's view, hinder the effective and full implementation of the Convention in Finland, including:

- the need for independent, adequately resourced structures on the national, regional and municipal level for the effective protection of women and girls against gender-based violence;
- the need for legislative reform on rape and other types of sexual violence crimes (Chapter 20 of the Finnish Criminal Code);
- the need for a nationwide, low threshold service network for women and girls' survivors of violence;
- the need for an intersectional approach in actions designed to address violence against women including domestic violence;
- the need for a reform of the legislation on legal gender recognition (Act on Legal Recognition of the Gender of Transsexuals), and
- the need for a human rights approach to the treatment of intersex people.
- the lack of human rights training for public officials and civil servants.

In the final section of this document, Amnesty International makes several recommendations to Finland to address the human rights concerns raised in this submission.

¹ Baseline report By the Finnish Government available at Council of Europe webpages: <https://rm.coe.int/baseline-report-finland-2018/16807c55f2>

MAJOR AREAS OF CONCERN

LACK OF SUFFICIENT RESOURCES, INCLUDING FUNDING, AND LACK OF ROBUST STRUCTURES: ARTICLES 7, 8, 9 AND 18

The government is still lacking a systematic approach to assess the human rights impacts of its actions and has been urged to review how bills, policies and budget proposals may impact human rights, prior to their adoption.² To date, such assessments have been limited, or completely lacking, including in respect of bills related to violence against women and domestic violence. The need for a human rights and gendered impact assessment has also been highlighted in the context of austerity measures and the ongoing health, social services and regional government reform process (see below).³

In January 2017, the Ministry of Social Affairs and Health established an Administrative Committee to co-ordinate the work for combating violence against women in accordance with Article 10 of the Convention. However, the body has not been properly resourced. The work of the Administrative Committee is conducted within the budgetary constraints of the existing budgets of various ministries and relies on the human resources of existing bodies.⁴ While action plans to combat violence against women have been developed, lack of resourcing of the plans impedes their implementation.⁵ An independent evaluation of the national Action Plan to Reduce Violence against Women (in force in 2010-2015) indicated that the plan was not fully implemented partly due to the lack of funding.⁶ In an international comparison of 15 Council of Europe member states on the resources allocated to measures for combatting violence against women, Finland ranked second to last. On average, Finland spent only €0.01 per capita on measures for combatting violence against women, while neighbouring Sweden spent €32.26 per capita.⁷ Amnesty International regrets that despite the 46 activities included in the Finnish Action Plan for the Istanbul Convention for 2018–

² Statement of the Constitutional Committee on the Government's report on the General Government Fiscal Plan, PeVL 19/2016, available in Finnish at

https://www.eduskunta.fi/FI/vaski/Lausunto/Sivut/PeVL_19+2016.aspx and Statement by the Human Rights Centre's Delegation on Fundamental and Human Rights, available in Finnish at: <https://ihmisoikeuskeskus-fi.directo.fi/@Bin/2533549/IOV+kannanotto+Perus-+ja+ihmisoikeuksien+turvaamisesta+kaikessa+valtioneuvoston+toiminnassa.pdf>

³ Amnesty's submission for the UPR, p. 6. See:

<https://www.amnesty.org/en/documents/eur20/5354/2016/en/>

⁴ Action plan for the Istanbul Convention for 2018–2020: Funding of the Action plan (page 12, in Finnish only). Abstract available in English. <http://urn.fi/URN:ISBN:978-952-00-3970-7>. See also Baseline Report: 2.2. Allocation of financial resources (page 16) <https://rm.coe.int/baseline-report-finland-2018/16807c55f2>

⁵ Amnesty International Finnish section along with 13 other major Finnish NGO's published their proposal of the Action Plan for Istanbul Convention already in 2016. In their proposal the systematic under resourcing was identified as one of the main obstacles for effective implementation of the Convention. Proposal available: <https://frantic.s3.amazonaws.com/amnesty-fi/2016/04/Istanbulin-varjotoimintaohjelma-AMNESTY.pdf> (only in Finnish). Systematic under resourcing has not been addressed in the Action plan for the Istanbul Convention for 2018–2020, although this is the major concern of all NGO's and human rights experts, expressed directly and repeatedly over the years in their submissions in relation to the implementation of the Istanbul convention. In the concluding observations of the seventh periodic report in 2014 CEDAW committees one principal area of concern and recommendation was the lack of funding (See http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/FIN/CO/7&Lang=En). CEDAW committee recommended, that the State of Finland has to allocate adequate financial resources to the national action plan and strategies aimed at eliminating violence against women. In 10.8.2016 CEDAW committee concluded, that the State has not fulfilled this recommendation (not available online)

⁶ Törmä, Sinikka ja Pentikäinen, Merja, *Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi*, 25 June 2016, <http://urn.fi/URN:ISBN:978-952-00-3707-9>. Only available in Finnish.

⁷ Celeste Montoya (2013) has compared resourcing of measures on violence against women in Council of Europe member states 2007-2010.

2021,⁸ sufficient resources for their implementation have not been allocated. In addition, non-governmental organizations working to combat violence against women and girls remain under-resourced.⁹ The lack of resources for implementing the Convention is in contravention of Article 8 of the Convention. Finland must allocate earmarked funding to combat violence against women.¹⁰

Neither women's nor victims' support organizations are represented in the Administrative Committee.¹¹ This is not in line with Article 9 of the Convention. There is a plan to include non-governmental organizations in the work of the Committee, but as a separate subcommittee.¹² This level of representation is insufficient as non-governmental organizations should be fully included in the work of the Administrative Committee.

For decades, women's rights organizations along with Amnesty International Finnish section have called for an independent National Institute on Gender-Based Violence, that is dedicated to the co-ordination, evaluation and support of different policies and activities targeted to reduce and eliminate violence against women and domestic violence.¹³

The full implementation of the Istanbul Convention calls for this crucial element for effective reduction and finally for the elimination of violence against women and domestic violence in Finland.

The government's proposal for a new regional level of government that would be responsible for the provision of social services and healthcare services¹⁴ does not pay sufficient attention to the potential impacts of the reform on women who have experienced violence. According to a study conducted by Amnesty International and published in January 2017, only 15% of key public servants and municipal government officials were aware of the challenges presented by the reform for the prevention of violence against women and for victim support services.¹⁵ These

⁸ Ministry of Social Affairs and Health, *Action Plan for the Istanbul Convention for 2018–2021*, December 2017, <http://urn.fi/URN:ISBN:978-952-00-3970-7>. Language Finnish, summary in English.

⁹ Systematic under resourcing has not been addressed in the Action plan for the Istanbul Convention for 2018–2020, although this is the major concern of all NGO's and human rights experts, expressed directly and repeatedly over the years in their submissions in relation to the implementation of the Istanbul convention. In the concluding observations of the seventh periodic report in 2014 CEDAW committees one principal area of concern and recommendation was the lack of funding (See http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/FIN/CO/7&Lang=En). CEDAW committee recommended, that the State of Finland has to allocate adequate financial resources to the national action plan and strategies aimed at eliminating violence against women. In 10.8.2016 CEDAW committee concluded, that the State has not fulfilled this recommendation (not available online). See also footnote number 5.

¹⁰ See also Amnesty's submissions to CAT (p. 5) <https://www.amnesty.org/en/documents/eur20/4994/2016/en/> and UPR (p.5) <https://www.amnesty.org/en/documents/eur20/5354/2016/en/>

¹¹ See the decree for more information <https://www.finlex.fi/fi/laki/alkup/2016/20161008> (only in Finnish)

¹² The secretary of the Administrative Committee has approached various NGO's for naming their representative for the subcommittee. Also Amnesty Finland has been asked to name a representative. However, there are no official, public documents about the Committees decisions regarding the subcommittee.

¹³ Already in 2006 the Working group established by the ministry of Social Affairs and Health proposed a model for a permanent national unit responsible for the prevention of intimate partner and domestic violence. The aim of the unit would be to coordinate the work to prevent intimate partner and domestic violence, to reinforce the knowledge and skills basis related to it and to be responsible for maintaining the best expertise in the field. The Working group stated that permanent structures and coordinated cooperation at all levels are needed to support the regional and local work to prevent violence. The report is available in Finnish, abstract also in English:

<https://julkaisut.valtionevosto.fi/bitstream/handle/10024/74212/Selv200682.pdf?sequence=1>

¹⁴ Thus far these services have been organised at the municipal level. For information on the ongoing health, social services and regional government reform, see <http://alueuudistus.fi/en/>.

¹⁵ The study surveyed senior social workers and chairpersons of municipal councils. 118 responses to an electronic survey were received from 88 municipalities (out of a total of 311). In addition, 15 in-depth interviews were conducted in five municipalities from around the country.

challenges include, for example, to ensure that victims of domestic violence and other types of violence against women receive integrated and holistic support services, as required by Article 18 of the Convention. The government must also conduct an assessment of the reform on access to services by victims of violence.

LEGISLATION ON SEXUAL OFFENCES REMAINS INADEQUATE, THE ATTRITION RATE IS HIGH, AND SUPPORT SERVICES ARE INSUFFICIENT:

ARTICLES 22, 25, 36, 40, 46 AND 49

According to a study by the European Union Agency for Fundamental Rights, 17% of women in Finland have experienced sexual violence and 71% have experienced some form of sexual harassment since the age of 15. Every third woman in Finland has suffered physical or sexual violence by her current or former partner during her lifetime.¹⁶ It is estimated that annually 45,000 to 58,000 women suffer sexual violence.¹⁷ The attrition rate of rape cases remains very high. Some alleged offences never reach the criminal justice system, either because they are not reported, or because the cases are dropped during the legal process. It is estimated that less than 10% of all rapes are reported. Between 2011-2015 in average 1160 instances of rape were reported to the police, but only 686 instances were sent to the public prosecutor for consideration. The prosecutor dropped the charges in 206 cases (30,9%), meaning only 20,7% of the rapes reported to the police were tried in court as the main offence.¹⁸ This means that women who report rape to the police have only a small chance of having their case tried in court and only around 15,5% of reported rapes result in a conviction. One factor behind the high rate of attrition is the ineffectiveness of the investigation and prosecution of rape cases, which is incompatible with Article 49 of the Convention.¹⁹

In the Finnish Criminal Code rape continues to be categorized according to the degree of physical violence used or threatened by the perpetrator.²⁰ Amnesty International considers that the definition of rape should be revised and aligned with Article 36 of the Convention so that it is

¹⁶ European Union Agency for Fundamental Rights, *Violence against women – an EU wide survey*, 2014. Data explorer: <http://fra.europa.eu/en/publications-and-resources/data-and-maps/survey-data-explorer-violence-against-women-survey?mdq1=country&mdq2=414&plot=inCountry&cntryName=Finland>; and report: <http://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report>.

¹⁷ According to the EU FRA study above, 3% of women in Finland experience sexual violence annually. The corresponding figure in Finland's 2016 national victim survey is 2.2%. Institute of Criminology and Legal Policy, *Crime trends in Finland 2016*, https://helda.helsinki.fi/bitstream/handle/10138/191756/Katsauksia_22_Rikollisuustilanne_2016_2017.pdf?sequence=2 Language Finnish, summary in English on pp. 295-306.

¹⁸ The numbers are based on the report published by the Institute of Criminology and Legal Policy, *Crime Trends in 2016*, page 97, table 3. Report available in Finnish only: <https://helda.helsinki.fi/handle/10138/191756>. Summary of sexual offences in English, page 298.

¹⁹ Helsingin Sanomat, major newspaper in Finland, compared the investigation of rape crimes in 10 largest municipalities in Finland in 2014-2016. The comparison revealed significant differences in investigation and solving the crimes. As a result, Minister of the Interior Paula Risikko assigned the National Police Board to conduct an inquest of the police investigation of rape crimes in Finland. See: <https://www.hs.fi/kotimaa/art-200005061849.html> (only in Finnish). Insensitive and ineffective handling of rape cases has been documented in academic research (for example Jokila, H., *Consent against One's Will and the Price of Undue Trust. The Legal Constructions of Knowledge in Finnish Sexual Crimes/ Tahdonvastainen suostumus ja liiallisen luottamuksen hinta*, Suomalaisen lakimiesyhdistyksen julkaisu, 2010. <https://helda.helsinki.fi/handle/10138/18334> ., Kainulainen, H. 2004. *Raiskattu. Oikeuspoliittinen tutkimuslaitos*). Päivi Honkatukia's research for the National Research Institute of Legal Policy Research (Report No. 252, 2011) focused on the victims in the criminal process. The study revealed that the victims of sexual violence had experienced improper or slow behavior of the authorities, or problems in being informed, or having received inadequate mental support. See the summary in English: https://helda.helsinki.fi/bitstream/handle/10138/152425/honkatukia_uhrit_rikospros_summary.pdf?sequence=3 and the whole study: <https://helda.helsinki.fi/handle/10138/152425> (In Finnish).

²⁰ Chapter 20 sections 1 and 2 of the Criminal Code. English translation at <http://www.finlex.fi/en/laki/kaannokset/1889/en18890039.pdf>.

based on the lack of consent rather than the degree of violence used or threatened by the perpetrator.²¹

Amnesty International is also concerned that the current legislation does not sufficiently protect institutionalized or hospitalized individuals from sexual violence. The Finnish Criminal Code provides: “A person who abuses his or her position and entices one of the following into sexual intercourse, into another sexual act essentially violating his or her right of sexual self-determination, or into submission to such an act, [...] (3) a patient being treated in a hospital or other institution, whose capacity to defend himself or herself or to formulate or to express his or her will is essentially impaired owing to illness, handicap or other infirmity [...], shall be sentenced for sexual abuse to a fine or to imprisonment for at most four years.”²² This offence includes acts which should clearly count as rape under Article 36 the Convention.²³

The implementation of Article 40 of the Convention – which sets out the obligations of states to prevent and respond to sexual harassment – is insufficient. Only physical sexual harassment is criminalised.²⁴ Verbal and non-verbal sexual harassment is only subject to sanctions in certain spheres of life. The Act on Equality between Women and Men²⁵ covers verbal, non-verbal and physical sexual harassment and provides civil sanctions (compensation). However, the Act is mainly applied in relation to public authorities, in the work place, in educational institutions and in the provisions of goods and services and explicitly excludes relationships between family members or other private relations, as well as religious activities in religious institutions²⁶. The Occupational Health and Safety Act²⁷ and the associated provision on a work safety offence in the Criminal Code²⁸ only provide sanctions for health damaging work-related harassment, and the sanction is targeted at the employer.

The aggravating circumstances listed in Article 46 of the Convention are not adequately considered in the application of Finnish criminal law. The aggravating circumstances explicitly listed in the Criminal Code do not incorporate all the circumstances listed in Article 46. As explained above, situations where a person abuses a position of authority are defined as sexual abuse, not rape, and carry a lesser sentence. Using the position of authority is a mitigating, not aggravating, factor. Amnesty International continues to recommend that using a position of authority should be an aggravating factor as stated in Article 46.

The Criminal Code leaves discretion to the judge as to the assessment of circumstances aggravating or mitigating the punishment. In court practice, violent crimes committed by strangers are considered more reprehensible than violent crimes committed by persons known to the victim. This means that the fact that the crime was committed against a former or current spouse or partner, a family member or a person cohabiting with the perpetrator is considered as a mitigating factor in comparison to a situation where the crime was committed by a stranger. This is in violation of Article 46. The severe mental suffering caused, for example, due to the breach of a relationship of trust between the victim and the perpetrator should be considered when assessing the gravity of the crime.²⁹

²¹ Amnesty International, *Case closed – rape and Human Rights in Nordic Countries: Summary report* (Index: ACT 77/001/2010), 8 March 2010, www.amnesty.org/en/documents/ACT77/001/2010/en/.

²² Chapter 20 section 5 subsection 1 paragraph 3 of the Criminal Code.

²³ See also Amnesty’s submission to Committee Against Torture (p.7): <https://www.amnesty.org/en/documents/eur20/4994/2016/en/>. In its concluding observations 20.1.2017 The Committee recommended that the State of Finland should revise the definition of rape in national legislation so that it includes lack of consent. Concluding observations available here: <http://formin.finland.fi/public/default.aspx?contentid=67689>

²⁴ Chapter 20 section 5a of the Criminal Code.

²⁵ English translation at https://www.finlex.fi/en/laki/kaannokset/1986/en19860609_20160915.pdf.

²⁶ For example: religious institution (parish) decides whether women can act as priests.

²⁷ English translation at https://www.finlex.fi/en/laki/kaannokset/2002/en20020738_20060053.pdf.

²⁸ Chapter 47 section 1 of the Criminal Code.

²⁹ See also Amnesty’s submission to CEDAW in 2014:

<http://www.ohchr.org/Documents/Issues/Women/SR/Shelters/Amnesty%20International%20Publications.pdf>

Despite the high prevalence of sexual violence, the state has a very poor support service network for victims.³⁰ Specialized support services are scarce and fall short of international standards. In May 2017, the first Sexual Assault Support Centre was opened at the Women's Hospital in the capital, Helsinki. The support centre serves all people over the age of 16 who have experienced sexual assault within the last month regardless of sex or gender.³¹ Amnesty International welcomes plans to open similar Sexual Assault Support Centres in other cities including Turku, Tampere, Kuopio and Oulu. Nevertheless, the need remains for a nationwide, low threshold service network,³² available for victims of all forms of sexual violence, providing also long-term support, and providing support irrespective of how long ago the crime was committed, as required by Articles 22 and 25 of the Convention. Adequate resources for the Support Centres as well as other support services must also be ensured.³³

CONCERNS AROUND ENSURING EQUALITY AND NON-DISCRIMINATION: ARTICLES 4, 12, 15 AND 18

For women who are in especially vulnerable situations it is difficult to access support services. In some cases, they are excluded from support services.³⁴ According to Amnesty International's study on municipalities, there is poor understanding of intersectionality and of factors creating vulnerability at the municipal level, where most support services are provided.³⁵ Especially women with disabilities, lesbians, transgender and intersex women, undocumented and nonregistered migrant women and women with a poor knowledge of Finnish are at risk of being excluded from appropriate services. An excessive focus on domestic violence also risks excluding childless women, women living alone and many victims of sexual violence from services.³⁶ The development of services, especially the development of a low-threshold network of services, should appropriately provide for the specific needs of vulnerable groups, as stated under Articles 4 and 18 of the Convention.

Ninety percent of municipalities do not consider women with disabilities as a specific group in their services for victims of violence, according to Amnesty International's study.³⁷ In addition, the

³⁰ 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, https://www.julkari.fi/bitstream/handle/10024/130504/URN_ISBN_978-952-302-625-4.pdf?sequence=1. In Finnish, abstract in English.

³¹ See <http://www.hus.fi/en/medical-care/hospitals/womens-hospital/outpatient-clinics/Pages/Seri-Support-Center.aspx>.

³² Low-threshold services refer to easily accessible services that do not necessarily require co-operation with the authorities, provide services for example free-of-charge and anonymously. Specific attention should be paid to vulnerable groups.

³³ See also Amnesty's submission to CAT (Committee Against Torture), p. 5-6. In its concluding observations 20.1.2017 The Committee recommended 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. The concluding observations available here: <http://formin.finland.fi/public/default.aspx?contentid=67689>

³⁴ For example, women who are victims of trafficking are not allowed to use the support services of shelters – recently the majority of those seeking help from the national system of assistance have an asylum seeker background, thus they are in especially vulnerable situation. Source: Tuntematon tulevaisuus. Joint report by the Non-Discrimination Ombudsman and The European Institute for Crime Prevention and Control, HEUNI 2018.

³⁵ Amnesty International's study on municipalities (2017): <https://frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf>. Only available in Finnish.

³⁶ Amnesty International's study on municipalities (2017): <https://frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf>. Only available in Finnish.

³⁷ Amnesty International's study on municipalities (2017): <https://frantic.s3.amazonaws.com/amnesty-fi/2017/01/Amnestyn-kuntaselvitys-naisiin-kohdistuvasta-v%C3%A4kivallasta.pdf>. Only available in Finnish.

accessibility of services for women with disabilities remain inadequate, in contravention of Articles 4 and 18 of the Convention.³⁸

The threshold for using the services provided by the State, such as the Sexual Assault Support Centre (SERI Center) in Helsinki or the 24-hour, free telephone helpline Nollalinja, is higher for women who do not speak Finnish, Swedish or English. The largest linguistic minorities – after Swedish speaking Finns – are Russian, Estonian, Somali and Arabic speakers³⁹. SERI and Nollalinja services are not provided in those languages.⁴⁰ Neither Sámi women who have experienced violence have services in Sami languages, which is a violation of the Finnish legislation on Sámi Language Act.⁴¹

Living in Finland without a residence permit is a major factor creating and amplifying vulnerability to violence for women who are undocumented and unregistered.⁴² The term undocumented refers to migrants who are, for various reasons, residing in Finland without residence permit. The term nonregistered refers to EU citizens, who are residing in Finland, but have not registered their stay with the Finnish administration. Undocumented and especially nonregistered migrant Roma-women who have no home municipality, are often excluded from most social and healthcare services. In most Finnish municipalities, people without legal residency are only entitled to emergency healthcare services under the same conditions (including cost) as other residents.⁴³ Undocumented and nonregistered women have only limited access to shelters and no access to housing services after the crisis stage. Consequently, women often return to live in conditions that expose them to violence, such as homelessness, trafficking and so called ‘honour-related violence’. The treatment of undocumented and nonregistered migrant women who are victims of violence violates the non-discrimination provision of Article 4 of the Convention.

Victims of trafficking are a particularly vulnerable group whose members are frequently not recognised and often do not have access to services they are entitled to under national law and Chapter IV of the Convention. Women who are victims of trafficking, especially those trafficked for sexual exploitation, are not recognized as such. According to a new report by the Non-Discrimination Ombudsman⁴⁴ and the European Institute for Crime Prevention and Control (HEUNI),⁴⁵ the identification of victims is hampered by a lack of expertise about trafficking as well as a lack of resources at the municipal level and among the police, and a lack of resources and trust towards the official assistance system in non-governmental organizations in the field. Also,

³⁸ National Institute for Health and Welfare has informed Amnesty International Finnish Section, that most of the shelters are accessible for users of wheelchairs. However, the overall accessibility has not been assessed.

³⁹ https://en.wikipedia.org/wiki/Demographics_of_Finland

⁴⁰ Amnesty International Finnish Section has interviewed service providers of SERI Center and Nollalinja (9.11.2017 and 24.8.2017). Both service providers confirmed, that the number of contacts from women of different ethnic & linguistic background than Finnish speaking Finns, is 1-2% of the overall contacts.

⁴¹ The Sámi Language Act <https://www.finlex.fi/en/laki/kaannokset/2003/en20031086.pdf>

⁴² The international Gemma Project (2015-2017) by the Helsinki Deaconess Institute studied violence against undocumented and nonregistered women and the services available to them.

⁴³ See the study Suojattomat (only in Finnish) which highlights the discrimination against undocumented people living in Finland, published by the Helsinki Deaconess Institute 2017: <https://www.hdl.fi/wp-content/uploads/2018/01/Helsingin-Diakonissalaitos-Suojattomat-raportti-2017-web.pdf>

⁴⁴ As the National Rapporteur on Trafficking in Human Beings, the Non-Discrimination Ombudsman monitors instances of human trafficking, oversees action against human trafficking and issues proposals, recommendations, statements and advice relevant to developing anti-trafficking work and promoting the status and rights of victims of human trafficking. The Ombudsman provides legal advice and can also assist victims of trafficking and related crimes in securing their rights.

⁴⁵ 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_ihmis_kaupan_uhrien_auttamista_koskevasta_lainsaadannosta.pdf Language Finnish, abstract in English.

uncertainties about the victim's legal status and conflicts between different legal processes hamper the identification of victims.⁴⁶ The new report by the Ombudsman, as well as reports by the Finnish National Rapporteur on trafficking, the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA),⁴⁷ and several non-governmental organizations have stressed the need for more systematic training and guidelines for professionals who may encounter victims of trafficking to identify and support them. Article 15 of the Convention requires Parties to provide appropriate training for professionals dealing with victims of violence, and the requirements of Article 12 should be observed in the provision of training.

According to the National Rapporteur on Trafficking, potential victims of trafficking are often not referred to the Finnish assistance system for victims of trafficking, and in some cases they have been deported from Finland without receiving any assistance.⁴⁸ Both identification and access to support is strongly linked to criminal proceedings, in contravention of Article 18(4) of the Convention. A legislative amendment that came into force in 2015 reinforced this link by providing that identification is done primarily by a preliminary investigation official or by the prosecutor as part of their criminal investigation. The report by the Equality Ombudsman and HEUNI stressed the need to decouple assistance from criminal proceedings and the need for a separate, victim-centred law on identification of and assistance to victims of trafficking.⁴⁹ Some victims do not wish to enter the official assistance system, as they do not consider it to provide them with the assistance they need.⁵⁰ It is not possible for the assistance system to identify and provide support to a victim in cases where the victim is Finnish, and exploitation has occurred in Finland, but the prosecutor has not been able to gather sufficient evidence for a criminal case.⁵¹ The process is uncertain and unclear and this potentially creates a barrier for victims of trafficking to seek and receive support to which they are entitled.

Amnesty International is also concerned that the Aliens Act currently allows deportations of non-EU citizens suspected of selling sex.⁵² This section of the Aliens Act provides that if there are reasonable grounds to suspect that a person may sell sexual services, they can be removed from

⁴⁶ For example, a victim who is seeking asylum may be called to an asylum interview so quickly, that there is no time to investigate the person's trafficking victim status. The victim may also be too traumatized to be able to provide a coherent account of their situation. In addition, the identification of a victim of trafficking requires them to provide sufficient detail about their situation. Any emerging inconsistencies between the statements given in the context of the asylum application and those given in the context of the trafficking victims' assistance system may impact negatively on the victim's asylum application.

⁴⁷ 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.

⁴⁸ A report from the National Rapporteur on trafficking revealed that a Nigerian female victim of trafficking for sexual exploitation had been deported to Italy where no adequate support system exists. The report examined decisions made by the Finnish Immigration Services in 2015-2016. According to the report no sufficient, individual investigations into victims' (and their children's) circumstances were made to assess the risk of re-victimization before deportation. The report is available at:

https://www.syriinta.fi/documents/10181/36404/nigerialaisselvitys_verkkoon_FINAL.pdf/1b136c3b-e80f-4b57-bedc-339f4a12e68b. Language Finnish.

⁴⁹ Currently provisions on the assistance system are included in the same law as provision on the reception and treatment of asylum seekers.

⁵⁰ 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_ihmis_kaupan_uhrien_auttamista_koskevasta_lainsaadannosta.pdf Language Finnish, abstract in English.

⁵¹ Non-Discrimination Ombudsman, *Annual report 2015*, 15 May 2016, https://www.syriinta.fi/documents/14490/0/Englanti_YHDENV_VUOSIKERTOMUS_2016.pdf/153ed14a-b602-457a-aa12-a07e9d372e01 Language English.

⁵² Chapter 9 section 148 subsection 6 of the Aliens Act. English translation at <http://www.finlex.fi/fi/laki/kaannokset/2004/en20040301.pdf>.

the country and/or banned from re-entering it. The provision raises the threshold for victims to report trafficking to the police, as well as other kind of violence, therefore hampering the identification of and provision of assistance to victims of trafficking.⁵³

MEDIATION IS INCREASINGLY USED IN CASES OF DOMESTIC VIOLENCE: ARTICLE 48

Mediation remains widely used in crimes of domestic violence and violence against women in Finland. The number of domestic violence cases referred for mediation has doubled from approximately 1000 cases in 2010 to almost 2000 cases in 2011 and has continued to rise to 2300 cases in 2016.⁵⁴ This is partly explained by the fact that petty assault is no longer a complainant offence following the revision of the Penal Code in 2011.

The outcome of mediation in cases concerning intimate partner violence or domestic violence is unpredictable. There are diverging views among prosecutors in Finland as to whether criminal proceedings should be conducted alongside mediation. Some prosecutors may drop criminal charges when the case is referred to mediation; some may take the outcome of mediation into account when determining what penalty to seek in the case; and others may not allow mediation to affect the legal process in any way.⁵⁵

Amnesty International opposes the use of mediation in domestic violence cases as these are not appropriate methods to deal with crimes of violence against women. Mediation undermines the principle of equality before the law, and frequently leads to repeated re-victimization of women at risk.⁵⁶ Although mediation is not mandatory, the continued rise in the number of cases referred to mediation indicates a worrying trend where the best interests of the victim are not adequately considered. Finland must provide clear guidelines on the use of mediation, ensuring that mediation is used sparingly in domestic violence cases and only when it is in the best interest of the victim. Mediation should not be used as an alternative to criminal proceedings.

CONCERNS ABOUT VIOLATIONS OF THE RIGHTS OF TRANSGENDER AND INTERSEX PEOPLE: ARTICLES 4, 12 AND 39

Despite legislation against discrimination,⁵⁷ transgender individuals and intersex children continue to face widespread discrimination, most of which goes unreported.⁵⁸ Transgender and intersex

⁵³ During the consultation process for Amnesty International's sex work policy in 2014 Amnesty Finland interviewed a wide range of civil society actors as well as sex workers themselves. The discriminatory effects of the current Aliens Act were the most commented issue during the circle of interviews. The compilation of the interviews are available only in Finnish: <https://frantic.s3.amazonaws.com/amnesty-fi/2014/06/Amnesty-Suomen-osaston-vastaus-kansainv%C3%A4liselle-sihteerist%C3%B6lle-060602014-FINAL.pdf>.

⁵⁴ The number of domestic violence cases referred to mediation: 1058 cases in 2010, 1929 cases in 2011 and 2070 cases in 2012. In 2012 domestic violence cases amounted to 17 per cent of all the cases referred to mediation. Mediation in Criminal Cases, statistics available at <https://thl.fi/fi/tilastot-ja-data/tilastot-aiheittain/aikuisten-sosiaalipalvelut/rikos-ja-riita-asioiden-sovittelu> (only in Finnish).

⁵⁵ According to research report 252 published by the National Research Institute of Legal Policy there are different practices between prosecutors even within same city. See: Honkatukia Päivi, Research report 252, Victims in the Criminal Process. Vulnerability, Services and Treatment. Summary: <http://www.optula.om.fi/en/Etusivu/Julkaisut/Tutkimuksiasarja/1290610276900>.

⁵⁶ The Committee on the Elimination of Discrimination against Women also expressed its concern about the wide use of mediation in partner violence and domestic violence in its follow up letter to the government of Finland on 25 August 2010, see <http://www2.ohchr.org/english/bodies/cedaw/docs/folowup/Finland.pdf>

⁵⁷ Provisions on prohibition of discrimination based on gender identity or gender expression were added to the Act on Equality between Women and Men and came into force in January 2015. However, this Act does not apply to relations in private life or to religious activities.

⁵⁸ *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. One fifth

people also face discrimination in public service provision.⁵⁹ In addition, the procedure to obtain legal gender recognition is very lengthy, taking up several years, exposing transgender individuals to discrimination in situations where they are required to present documents with gender markers not corresponding to their gender identity and expression.⁶⁰ Finland has not taken sufficient measures to protect transgender and intersex people from discrimination, as required by Article 4.

The current procedure to obtain legal gender recognition in Finland is humiliating and forces transgender people to choose between their right to recognition before the law and to self-determination on the one hand and the right to be free from cruel, inhuman or degrading treatment, to the highest attainable standard of health, to equality, to personal integrity, and to privacy and family life on the other.⁶¹ According to the Act on Legal Recognition of the Gender of Transsexuals (the Trans Act),⁶² the gender marker registered at birth can only be changed if the person is over the age of 18 and presents a medical statement certifying that they permanently identify as the opposite gender, live in that gender role, and have been sterilized or are infertile. To obtain the medical statement they must receive a psychiatric diagnosis of 'transsexualism' and must undergo a 'real life test' during which they live in their preferred gender role. The requirement of a real-life test is based on stereotypical roles for women and men and violates Article 12(1) of the Convention.

The requirement of infertility amounts to forced sterilization in violation of Article 39 of the Convention. A certificate of infertility is normally given after 6-12 months of hormone treatment. However, in cases where the person refuses hormone treatment, or the treatment does not cause infertility, the person is required to undergo surgical sterilization. Even when a person consents to hormone treatment, the threat of surgical sterilization hangs over them. A transgender person cannot be said to have given their informed consent to the procedure, as infertility is a compulsory requirement to achieve legal gender recognition. The situation endured by transgender persons violates their right to private life and personal integrity.⁶³ The Finnish Law on the Gender Recognition of Transsexuals violates Article 39 of the Convention.

There is no specific legislation on the treatment of intersex people in Finland. The decisions are made by medical professionals usually in the first months of a person's life according to the general legislation on the provision of health care.⁶⁴ Intersex infants and children are still

of respondents said they had experienced hate speech or harassment more than once within a month. 81% of the LGBTI respondents said they never reported the incident of hate speech or harassment further. The most common reason for not reporting was that it was not believed that any action would have been taken. Ministry of Justice, "*Usein joutuu miettimään, miten pitäisi olla ja minne olla menemättä*". *Selvitys vihapuheesta ja häirinnästä ja niiden vaikutuksista eri vähemmistöryhmiin ["I often find myself thinking how I should be or where I shouldn't go"*

⁵⁹ See for example the report from Seta, published in 24.4.2018, of the rights and wellbeing of trans- and intersex children. Only available in Finnish. https://www.dropbox.com/sh/copnqdn4ckh1bj3/AAC4tY4hyQ2AZng57nCncrgFa?dl=0&preview=Moninaiset_lapsemme_2018.pdf.

⁶⁰ 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/ The report includes a study on the specific human rights situation of transgender persons in Finland. During its 2014 review of Finland, the CEDAW Committee recommended that the State party amend the Law on Legal Recognition of the Gender of Transsexuals (the Trans Act) to ensure that gender recognition is carried out without requiring transgender persons to conform to stereotypical ideas of masculine or feminine appearance or behavior and that it does not require individuals to consent to sterilization.

⁶¹ 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/

⁶² English translation at <https://www.finlex.fi/fi/laki/kaannokset/2002/en20020563.pdf>.

⁶³ European Court of Human Rights: *A.P., Garçon & Nicot v. France* (Application nos 79885/12, 52471/13 and 52596/13), Judgement 6 April 2017.

⁶⁴ See for example: Mika Venhola explains the current approach to treating intersex infants and adolescents to camera, in English: https://www.youtube.com/watch?time_continue=25&v=riNtxjntqZE. Venhola is the Deputy Chief of the Oulu University Hospital, Department of Paediatrics and Adolescence. See also

subjected to medical procedures, including surgery resulting in sterilization, for social or cosmetic purposes.⁶⁵ The UN Special Rapporteur on Torture has considered unnecessary medical interventions without the free and informed consent of the person concerned to constitute torture and ill treatment.⁶⁶ According to a study and statement by the Finnish National Advisory Board on Social Welfare and Health Care Ethics (ETENE), intersex children in Finland are routinely subjected to medical and surgical treatments, often while very young, to align their physical appearances with either of the binary sexes.⁶⁷ The operations are performed without the person's informed consent and neither are parents of intersex children often well informed nor given adequate time or options necessary to provide genuinely informed consent. This type of treatment of intersex infants and children is a form of structural violence sanctioned by the state according to UN Special Rapporteur on Torture Juan Méndez.⁶⁸ In October 2016, to mark Intersex Awareness Day, a group of UN and regional human rights experts issued a statement calling for an end to human rights violations against intersex children and adults and specifically to prohibit harmful medical practices on intersex children, including unnecessary surgery, treatment without their informed consent and sterilization⁶⁹.

Finland has failed its obligation to take the necessary legislative and other measures to prevent and eradicate all forms of violence against women, established in Article 12(2), as well as its obligation to criminalize forced sterilization, established in Article 39 of the Convention.

webpages of Trans Support Center, where the current medicalized and pathologized approach to intersex children, adolescent and adults is explained in Finnish: <http://transtukupiste.fi/intersukupuoisuus/>. Last, <http://intersukupuoisuus.fi/tutkimuksia/>

⁶⁵ See for example the report from Seta, published in 24.4.2018, of the rights and wellbeing of trans- and intersex children. Only available in Finnish.

https://www.dropbox.com/sh/copnqdn4ckhlbj3/AAC4tY4hyQ2AZng57nCncrgFa?dl=0&preview=Moninaiset_Iapsemme_2018.pdf.

⁶⁶ See: A/HRC/31/57, Para 42, Para 72 (g) (h) (i) (j) and http://antitorture.org/wp-content/uploads/2016/02/Gender_Report_A_HRC_31_57_E-5.pdf.

⁶⁷ The study and statement refer to cases in which there is ambiguity in assigning sex and does not address unnecessary medical treatment of infants and children with intersex conditions when assigned sex is not in question. ETENE, *Intersukupuoisuus. Taustaraportti ETENE:n kannanottoon*, 2016, <http://etene.fi/documents/1429646/2056382/IS-raportti20160331.pdf/58bf2412-48a9-4521-b5ae-81a3ee3bc07b> (In Finnish).

⁶⁸ UN Special Rapporteur on Torture, *Report of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment*, Juan E. Méndez, Human Rights Council, Twenty-second session, Report No. A/HRC/22/53, 1 February 2013

⁶⁹ Full statement available from

<http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=20739&LangID=E>. The signatories were: UN Committee against Torture (CAT); UN Committee on the Rights of the Child (CRC); UN Committee on the Rights of People with Disabilities (CRPD); UN Subcommittee on prevention of Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (SPT); Mr. Juan Méndez, UN Special Rapporteur on torture and other cruel, inhuman, or degrading treatment or punishment; Mr. Dainius Pūras, UN Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health; Ms. Dubravka Šimonovic, UN Special Rapporteur on violence against women, its causes and consequences; Special Representative of the UN Secretary-General on Violence against Children Ms. Marta Santos Pais; Commissioner Lawrence Murugu Mute, Chairperson of the Committee for the Prevention of Torture in Africa, Council of Europe: Mr. Nils Muižnieks, Council of Europe Commissioner for Human Rights; Inter-American Commission on Human Rights.

RECOMMENDATIONS FOR ACTION TO THE STATE UNDER REVIEW

AMNESTY INTERNATIONAL CALLS ON GREVIO TO URGE THE GOVERNMENT OF FINLAND TO IMPLEMENT THE FOLLOWING RECOMMENDATIONS:

With regard to the national human rights framework

- Systematically assess the human rights and gender impact of all bills, budget and policy proposals, and other government activities, prior to their adoption, and ensure modifications are made based on the result of the assessment when necessary;
- Allocate adequate and independent human and financial resources to the Administrative Committee established as per Article 10 of the Convention;
- Back up the Action Plan for the Istanbul Convention with sufficient and independent resources;
- Provide adequate funding for non-governmental organizations working to combat violence against women;
- Ensure full representation and meaningful participation of non-governmental organizations in the Administrative Committee;
- Conduct an assessment of the human rights and gender impact of the regional government and social and healthcare services reform on victims of violence;
- Ensure that integrated and holistic support services are provided to survivors of violence against women and domestic violence within the new administration framework of social and healthcare services;
- Establish a well-resourced National Institute on Gender Based Violence dedicated to the co-ordination, evaluation and support of different policies and activities targeted to reduce and eliminate violence against women and domestic violence;

With regard to preventing and prosecuting sexual violence

- Ensure that sexual violence crimes are effectively investigated and prosecuted without undue delay;
- Facilitate access to justice for victims of rape to ensure that more cases of rape are reported and prosecuted in court;
- Define rape as a violation of sexual autonomy by basing the definition of rape in the Criminal Code on the lack of consent from the victim rather than the degree of violence used or threatened by the perpetrator;
- Revise Chapter 20 section 5 subsection 1 paragraph 3 of the Criminal Code (sexual abuse) so that acts that constitute rape under the Istanbul Convention and other international human rights standards are defined as such;
- Ensure that acts of verbal and non-verbal sexual harassment are subject to legal sanction in all spheres of life, including when committed between private actors in accordance with Article 40;
- Ensure the factors listed in Article 46 are considered as aggravating circumstances when applying the Criminal Code;

- Establish a network of low threshold support services (including walk-in-centres, rape crisis centres and shelters), as well as long term support for victims of gender-based violence and address the specific barriers to access faced by victims from marginalised groups due to the intersectional discrimination they experience;
- Extend the network of Sexual Assault Support Centres, ensuring adequate geographical coverage for the whole country, and remove the time limit during which victims can approach the service.

With regard to ensuring non-discrimination

- Incorporate an intersectional approach to the provision of all support services and to other procedures for women victims of violence and victims of domestic violence;
- Provide training and resources for support services to increase expertise on working with marginalised groups, such as women with disabilities, women from minority ethnic groups, lesbians, transgender and intersex women, refugee women and women with a limited knowledge of Finnish;
- Ensure that women who are undocumented and unregistered migrants and have experienced violence do have access to shelters and to the necessary social and healthcare services, including housing services;
- Ensure that undocumented and unregistered migrant women can access support services anonymously and have access to an interpreter and to low threshold support services, and that confidentiality is maintained when undocumented and unregistered migrant women approach support services;
- Enact separate, victim-centred legislation on the assistance system for victims of human trafficking;
- Ensure that women victims of trafficking are recognized as such by the relevant authorities and provided with protection and assistance;
- Provide systematic, specialised training and written guidelines to professionals who may come into contact with victims of human trafficking in the course of their work;
- Amend the Aliens Act to ensure that all potential victims of human trafficking, also non-EU citizens, are provided protection and not removed from the country because of their sex work;
- Decouple the identification procedure and access to the assistance system from criminal proceedings.

With regard to the use of mediation in domestic violence cases

- Mediation should not be used in cases of domestic violence or violence against women, as it does not provide equality before the law and may lead to re-victimization of women at risk;
- Provide clear guidelines on the use of mediation, ensuring that mediation is used sparingly in domestic violence cases and only when it is in the best interest of the victim. Mediation should not be used as an alternative to criminal proceedings.

With regard to upholding the rights of transgender and intersex people

- Take all necessary measures to abolish structural violence and discrimination against transgender and intersex people;
- Revise the Trans Act by abolishing the requirement of infertility, other medical treatment, being of age, and a mental health diagnosis for a person's legal recognition of their gender identity;

- Develop a gender recognition procedure that is quick, transparent, based on self-determination, and available irrespective of age, medical or financial status;
- Develop and implement a healthcare protocol for individuals with variations of sex characteristics that respects and guarantees their bodily integrity, autonomy and self-determination and to ensure that no child is subjected to non-emergency, invasive and irreversible surgery or treatment with harmful effects.

ANNEX

AMNESTY INTERNATIONAL DOCUMENTS FOR FURTHER REFERENCE⁷⁰

Finland: Submission for the United Nations Universal Periodic Review, 27th session, May 2017 – September 2017. (Index: EUR 20/5354/2016).

Finland: Submission to the United Nations Committee Against Torture, 59th session, November –December 2016 (Index: EUR 20/4994/2016).

Finland: Submission to the United Nations Committee on the Elimination of Discrimination against Women, 57th session February 2014 (Index: EUR 20/001/2014).

⁷⁰ All these documents are available on Amnesty International's website:
<https://www.amnesty.org/en/countries/europe-and-central-asia/finland/>

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