

**EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITE EUROPEEN DES DROITS SOCIAUX**



18 December 2025

Case Document No. 1

The Finnish Trade Union of Education (OAJ) v. Finland
Complaint No. 256/2025

COMPLAINT

Registered at the Secretariat on 18 December 2025



The Finnish Trade Union of Education, OAJ
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Directorate General of Human Rights and
Rule of Law
European Committee of Social Rights
Mr Henrik Kristensen
Executive Secretary

Dear Sir.

The Finnish Trade Union of Education of Finland, OAJ, respectfully submits to you the attached collective complaint due to the actions of the State of Finland and new legislation that doesn't respect the international commitments of the State and violates the teachers' and other employees' rights as they are regulated in Articles 6 and G of the European Social Charter. The complaint consists of the following sections:

- 1 Admissibility
- 2 Relevant International Law
- 3 Relevant Domestic Law and Practice
- 4 Alleged Violations

1 Admissibility

1.1 Introduction to the complaint

This complaint is submitted by the Finnish Trade Union of Education, OAJ (*hereafter: the Union*), which is

- a nationwide representative trade union with nearly 120,000 professionals working in the field of education, training and research, from early childhood education to adult education and training.
- represented by Ms Katarina Murto, President of the Union, and Ms Ulla Walli, Director of the Legal Department, who are jointly entitled to represent the Union as confirmed by the rules of the Union (*Attachments 1 and 2*)

- having a postal address: PL 20, 00521 Helsinki, Finland and a visiting address: Kellosilta 7, 00520 Helsinki, Finland

The collective complaint concerns the protection of the rights of teachers and other employees as stipulated in Articles 6 and G of the Revised European Social Charter (ESC) ratified by Finland in 2002. The recent actions of the State bodies have violated these rights concerning: the promotion of joint consultations (Art. 6§1), the promotion of collective bargaining (Art. 6§2), the establishment and use of appropriate machinery for conciliation and voluntary arbitration (Art. 6§3) and the right of workers and employers to collective action (Art. 6§4 in relation to Art. G).

1.2 The complainant trade union organisation

OAJ has as its main tasks to negotiate the collective agreements that lay out the terms of teachers' overall conditions of employment in the country. The Union negotiates, among other things, contractual provisions concerning pay and working hours through the nationwide collective agreements. The local actors of the Union are responsible for local advocacy and negotiations.

OAJ has represented teachers, researchers and teaching staff in the labour market since 1973. It has 320 local associations and 192 teacher group- or school-specific associations covering the whole country. The degree of membership varies locally between 60 and 90 per cent. The negotiated benefits have also been targeted at non-unionised teachers. Thus, the entire teaching staff has been able to benefit from the negotiation results achieved.

1.3 Alleged violations and the legal framework of the ESC

The violations at issue in this complaint are not directed at freedom of association (Art. 5) but at the commitment of a democratic state to promote the functioning social dialogue and to respect the bargaining and collective agreements of the social partners as essential part of the legal system as provided under the ESC, which two of the recent Finnish governments have sought to undermine. They have violated the requirements set out in four paragraphs of Article 6 and in Article G of the ESC by:

- not promoting joint consultations but attempting to supersede negotiations between the social partners (Art. 6§1)
- dictating the course of negotiations instead of being a genuine third party (Art. 6§2)
- imposing statutory preconditions for the conciliation of labour disputes (Art. 6§3) and

- restricting the right to sympathy strikes purely on economic grounds (Art. 6§4 in relation to Art. G).

1.4 Conclusion

The information above has been presented to demonstrate that the complaint is submitted by a representative national trade union organisation within the jurisdiction of the Contracting Party against which the Union has complained, and that the complaint formulated briefly above and more in detail below should accordingly be declared admissible under the 1995 Protocol to the ESC.

2 Relevant International Law

Key European provisions of human rights to protect the collective labour rights of employees are Articles 5 and 6 of the ESC and Article 11§1 of the European Convention on Human Rights (ECHR). The states may restrict these rights as provided in Article G of the ESC and Article 11§2 of the ECHR. The regulations are monitored by the European Committee of Social Rights (ECSR) and the European Court of Human Rights (ECtHR), whose decisions and conclusions have created an extensive case law over the decades.

The background to the regulations derives from ILO Conventions 87 and 98 and the monitoring of them. The provisions of the ESC and the ECHR, in turn, form the basis for the provisions of the Charter of Fundamental Rights of the European Union.

This complaint will focus on Articles 6 and G of the ESC and the case law based on them. The complaint seeks to demonstrate to what extent Finland's recent legislative amendments on industrial relations and negotiations, as well as restrictions on the right to collective action, are not in compliance with the requirements based on these provisions.

2.1 Joint Consultation

Art. 6§1 of the ESC

With a view to ensuring the effective exercise of the right to bargain collectively, the Parties undertake

1. to promote joint consultation between workers and employers;

Article 6§1 of the ESC requires that states promote the social dialogue between employers and employees. The joint consultation should cover all matters of mutual

interest, particularly issues of productivity, efficiency, workers' health, safety and welfare, as well as their conditions of employment, vocational training, and income security. This was concluded by the ECSR already with the Statement of Interpretation on Article 6§1 in 1969 (Conclusions I) and applied to the situation in Ireland in 1977 (Conclusions V). Recently, the Committee repeated the importance of the bipartite consultation in the case of Bosnia and Herzegovina (Conclusions 2022).

The ECSR has interpreted Article 6§1 to mean that "States Parties must take positive steps to encourage consultation between trade unions and employers' organisations. If such consultation does not take place spontaneously, States Parties should establish permanent bodies and arrangements in which trade unions and employers' organisations are equally and jointly represented. Consultation must take place on several levels: national, regional/sectoral and enterprise." (Digest of the Case Law of the ECSR 2022, p. 86)

The States must take positive steps, not excessively to limit the Parties or override their targeted solutions. Any restriction must be 1) prescribed by law, 2) pursue a legitimate purpose and be 3) necessary in a democratic society for the pursuance of these purposes, as stipulated by Article G of the ESC. To conform with Article 6§1, the restrictions should also be objective, reasonable, and subject to judicial review (Conclusions 2006, Albania on Art. 6§1).

2.2 Collective Bargaining

Art. 6§2 of the ESC

With a view to ensuring the effective exercise of the right to bargain collectively, the Parties undertake:

2. to promote, where necessary and appropriate, machinery for voluntary negotiations between employers or employers' organisations and workers' organisations, with a view to the regulation of terms and conditions of employment by means of collective agreements;

This second paragraph of Article 6 requires States to promote negotiations between the parties and might also participate in them. The goal of the negotiations is to reach collective agreements on wages, working hours, other working conditions of employment and the working environment. A collective agreement is binding between the parties, but might be applicable even more widely.

The background to Article 6 of the ESC is ILO Conventions 87 and 98 and Article 11 of the European Convention on Human Rights. The latter requires that employers' and workers' organisations may freely and voluntarily regulate the conditions of work and

the relations of the parties by collective agreement. The requirement is that the state does not have a dominant position in these negotiations.

The ECSR laid down its principal starting points for Article 6§2 already in the first control cycle in 1969 (Statement of Interpretation on Article 6§2, Conclusions I). According to it:

1. A domestic law must recognise that employers' and workers' organisations may regulate their relations by collective agreement.
2. Collective bargaining should remain free and voluntary.
3. Positive measures should be taken to facilitate and encourage the conclusion of collective agreements.
4. It is imperative to consult all parties during collective bargaining regularly

The last-mentioned criterion was also discussed in a Swedish case from 2012 (Swedish Trade Union Confederation (LO) and Swedish Confederation of Professional Employees (TCO) v. Sweden, Collective Complaint 85/2012 §§11 and 120).

Of the 33 situations examined during the 2022 monitoring cycle, the ECSR adopted 13 conclusions of conformity, three deferrals and 17 of non-conformity, of which 10 were deemed to have promoted negotiations between the parties to an insufficient extent (Press Briefing Elements of the ECSR on Conclusions 2022, p. 14).

2.3 Settlement of Collective Labour Disputes

Art. 6§3 of the ESC

With a view to ensuring the effective exercise of the right to bargain collectively, the Parties undertake:

3. to promote the establishment and use of appropriate machinery for conciliation and voluntary arbitration for the settlement of labour disputes;

Article 6§3 of the ESC applies to collective labour conflicts of interest. It aims at the peaceful settlement of these conflicts. Without an agreement, mediation or conciliation proceedings are not binding on the parties.

If the law has set preconditions for the mediation or conciliation, the process is no longer a peaceful settlement of conflict, but it then involves compelling elements. Any form of compulsory recourse to arbitration constitutes a violation except in the situations provided in Article G of the ESC (Statement of Interpretation of Article 6§3, Conclusions I of the ECSR, 1969).

2.4 Right to Act Collectively

Article 6§4 of the ESC

With a view to ensuring the effective exercise of the right to bargain collectively, the Parties undertake and recognise:

4. (to recognise) the right of workers and employers to collective action in cases of conflicts of interest, including the right to strike, subject to obligations that might arise out of collective agreements previously entered into.

A strike or other industrial action may be called in cases of conflict to promote the negotiations and to influence the conditions of the following collective agreement. The right of workers to strike for their interests is a key element in a democratic society. A strike may also be organised to support another professional group in its collective action (*sympathy strike*), having thus a secondary nature. Often, this is a situation where a larger union will support a smaller one, which would otherwise not have the resources to pursue its own interests through collective action.

If sympathy strikes are restricted, the result may be that less resourced unions would not have the possibility of effective industrial action to promote their interests in practice. In the 2022 monitoring cycle, the ECSR concluded negatively, where the right to strike was reserved only for certain trade unions (Press Briefing Elements of the ECSR on Conclusions 2022, pp. 16–17).

Losses in an individual strike, whether it has a primary or secondary nature, can be significant and might also hurt third parties. Nevertheless, democratically governed states recognise the right to strike as a fundamental right for all employees.

Appendix to Article 6§4 of the ESC

It is understood that each Party may, insofar as it is concerned, regulate the exercise of the right to strike by law, provided that any further restriction that this might place on the right can be justified under the terms of Article G.

Although the right to strike is a fundamental right of workers, its use might be restricted to protect other vital interests of society. Under Article G of the ESC, the conditions for limiting the right to strike follow those in Article 11§2 of the ECHR. However, the wording and case law of Article G of the ESC are somewhat different from those of the ECHR.

Article G of the ESC

1. The rights and principles set forth in Part I when effectively realised, and their effective exercise as provided for in Part II, shall not be subject to any restrictions or limitations not specified in those parts, except such as are prescribed by law and are necessary in a

- democratic society for the protection of the rights and freedoms of others or for the protection of public interest, national security, public health, or morals
2. The restrictions permitted under this Charter to the rights and obligations set forth herein shall not be applied for any purpose other than that for which they have been prescribed.

In the ESC, the three conditions for restrictions on the right to strike are (Statement of Interpretation on Article 6§4, Conclusions I of the ECSR, 1969) that the restriction:

1. is *prescribed by law*, requiring: 1) a clear and concrete legal norm, or 2) is regulated by a collective agreement, 3) by generally known case law or 4) by generally accepted doctrine (as specified in the Statement of Interpretation of Article 6§4, Conclusions II of the ECSR, 1971).
2. serves a *legitimate purpose* for the protection of 1) the rights and freedoms of others, 2) public interest, 3) national security, 4) public health, or 5) morals.
3. is *necessary in a democratic society*, i.e. the restriction must be proportionate to the legitimate aim pursued; there must be a reasonable relationship of proportionality between the restriction on the right and the legitimate aim(s) pursued.

By referring to the Complaint 111/2014. (Greek General Confederation of Labour (GSEE) v. Greece, Complaint No. 111/2014), The ECSR has described the last criterion in more detail as follows:

“Restrictions must be adopted only in response to a 'pressing social need (§83).

In transposing restrictive measures into national law, legal acts must ensure proportionality between the goals pursued and their negative consequences for the enjoyment of social rights (§87). Consequently, even under extreme circumstances the restrictive measures put in place must be appropriate for reaching the goal pursued, they may not go beyond what is necessary to reach such goal, they may only be applied for the purpose for which they were intended, and they must maintain a level of protection which is adequate (§87).

Moreover, a thorough balancing analysis of the effects of the legislative measures should be conducted by the authorities, notably of their possible impact on the most vulnerable groups in the labour market, as well as a genuine consultation with those most affected by the measures (§90).” (Digest of the Case Law of the ECSR 2022, p. 209)

Article G provides for an exception to Article 6§4, which means that the legitimate purposes must be interpreted narrowly. Pure economic or ideological reasons don't serve a legitimate aim.

Restrictions on strikes can be included in collective agreements rather than in law, and the wording must indicate the agreement of the parties and must not be worded too broadly. In Norway, the extended peace obligation of state employees was too general.

It exceeded the limits of the right to strike laid down in Article 6 §4 of the ESC when the current (framework) agreement (*hovedtariffavtale*) provided that the parties had a mutual peace obligation and could not take industrial action on issues not covered by the agreement (Conclusions XV-1, Norway, p. 432).

The key point for the present complaint in this regulation is that economic disadvantages or losses for the parties are not among the acceptable reasons mentioned in criterion 2 of Article G. It means that economic losses alone are not sufficient grounds for restrictions. In principle, the state therefore does not have either the possibility, considering its commitments under Article 6§4, to impose proportionality requirements linked purely to economic losses (criterion 3).

3 Relevant Domestic Law and Practice

For decades, the Finnish labour market system operated in a tripartite manner, in which the federations of employers and employees negotiated a framework agreement, which was then supplemented by union-specific collective agreements. The state promoted joint consultations and collective bargaining, did not intervene in the negotiations, but could enter them as a third party with fiscal policy solutions, which finally led to one- to three-year social pacts.

When ratifying the ESC (1991) and even 10 years later, when the state ratified the Revised ESC, Finland fulfilled the conditions of Articles 5 and 6 of the ESC. The state: promoted joint consultations (Art. 6§1), did not dictate or invade the direction or content of the negotiations (Art. 6§2), did not set preconditions for the settlement of labour disputes (Art. 6§3) and respected the parties' possibilities to take industrial action and to support the other Union with a sympathy strike, to achieve a better negotiation result (Art. 6§4).

Still under the 2022 monitoring cycle, the Committee considered Finland to comply with all four paragraphs of Article 6. However, it was left waiting for more detailed explanations on several questions to which the State didn't give answers.

3.1 New Direction of the Social Dialogue

Referring to the national report, the ECSR noted on the situation in Finland that:

“... social partners engage routinely in joint consultation at the sector level on a variety of issues of mutual interest, and that collective agreements contain clauses on joint consultation. At the national level, employees' and employers' organisations engage in joint consultation on different issues pertaining to working conditions, including measures taken

in response to the pandemic, or the impact of new technologies at the workplace. The report further states that the legislation on employment and pensions is drafted in a tripartite procedure, and that advisory bodies operating at ministerial level include representatives of employees' and employers' organisations." (Conclusions 2022, Finland, p. 23)

The description in the Report of the Government was historically relevant but did not consider the ongoing changes towards less contractual and more authoritative labour relations. The Report failed to answer many of the questions raised by the Committee, and it could merely repeat its previously deferred conclusions.

Already, the government of 2015–2019 had taken the chair in the labour market negotiations. The government demanded that the trade union movement refrain from wage increases under the threat of legislative measures even more against its interests. The employers supported the demands for zero-rate increases, prolonged working time, cuts in vacation pay and a larger share of pension contributions to be paid by the employees themselves. The labour unions agreed to preserve what could still be decided through sector-specific agreements and signed the so-called KIKY agreement tailored by the government and the employer representatives. Finally, the employer side withdrew from the negotiations on the federation level, which ended the tripartite negotiations.

The idea behind the zero-rate agreement was, as it was expressed, "internal devaluation". It was supposed to improve the competitiveness of the country's export and attract foreign investments by reducing labour costs in production. – These objectives were not achieved.

The present government (2023–) continued chairing the labour market relations. However, changes were no longer sought by social dialogue, not even through forced negotiations as in 2016, but with the government's political program and new legislation based on it. This was a change of direction in the Finnish societal order: Instead of negotiations and collective agreements, labour market relations were decided politically, by law and ignoring the interests of employees. Wages started to lag behind the rest of Europe and fell below inflation; radical cuts were made to social benefits for families and vulnerable people. Purchasing power weakened for the great majority of people, also among teachers, researchers and other public sector employees and their families. The purchasing power and the domestic market shrank, and by autumn 2025, the unemployment rate rose above 10%.

3.2 Changes by Law

In accordance with its programme of 20 June 2023, the current *Government of Prime Minister Petteri Orpo* invested in 1) promoting the enterprise-level local bargaining

and creating a parallel negotiation system as part of it, 2) setting a wage ceiling for the conciliation system, and 3) restricting political and sympathy strikes.

Limiting the Social Dialogue

The State authorities of Finland, by amending the Employment Contracts Act (942/2024), created a new bargaining system to function in parallel with the traditional negotiations of the social partners. It promoted local bargaining and gave a say to non-unionised workers, which allowed for replacing the agreements negotiated by the Unions. Section 7a of the Act provides for the observance of employment terms and conditions that deviate from the collective agreement.

Section 7a (translation by AI)

A local agreement based on a universally binding collective agreement may be concluded within the limits permitted by the collective agreement, in compliance with the provisions concerning the parties and procedures of the collective agreement. However, when concluding an agreement, it is not necessary to follow the collective bargaining agreement's negotiation procedure provisions. Unless otherwise agreed, the agreement is binding on all employees covered by the collective bargaining agreement.

If a union representative is required to be a party to a local agreement under a collective agreement, the agreement shall be concluded with the union representative. The union representative shall then represent all employees to whom the collective agreement in question applies. However, employees who are not members of an employee association bound by the collective agreement shall have the right, by majority vote, to elect a shop delegate from among themselves to represent them in matters concerning the local agreement alongside the shop steward. In such a case, the local agreement shall be concluded with the union representative and the shop delegate.

The purpose of the law is to set up an alternative for the non-unionised workers and for the enterprises to complement but also to counter the influence of labour unions and to reduce the normative impact of the nationwide collective agreements. This was expressed in the Government Programme of 20 June 2023, as follows: "Labour legislation will be amended to allow a company-specific collective agreement to derogate, by agreement, from the same provisions of labour legislation from which a derogation is now only possible by means of a national collective agreement." (Section 4.1)

The amendment to set up a parallel non-union bargaining system, for local negotiations by law (942/2024), weakens and does not promote joint consultations as stipulated in Article 6§1 of the ESC.

The amendment has been done as a political solution, contrary to the requirements to promote social dialogue. It ignores the views and interests of labour unions, intending to bypass the nationwide sectoral bargaining and agreements in which trade unions are involved. Neither on this point does the law comply with the requirement for positive measures to facilitate and encourage the conclusion of collective agreements as provided in Article 6§2 of the ESC. The amendment to the law entered into force on 1 January 2025.

Precondition for the Conciliation System

The government has also enacted, by amendment of law, a ceiling on wage increases as a predetermined condition for the settlement of labour disputes based on the Act on the Conciliation of Labour Disputes (816/2024). Also, this Act entered into force on 1 January 2025.

It was argued that to safeguard the overall benefit of the national economy, the wage settlement must not exceed the wage increase in the export-oriented technology industry. The wage cap is a type of guarantee for shareholders and investors of stability and ensures them positive benefit expectations by law.

Section 11,2 (translation by AI)

To safeguard the overall interest of the national economy, the mediator must proceed in his or her mediation activities in such a way that wage formation functions as well as possible and the functioning of the labour market is not jeopardised.

The change of the law set the ceiling for wage increases as a precondition for the conciliation. It must not be exceeded, even if the wages had lagged in previous wage rounds. That is the situation with the great majority of service sector employees, particularly with teachers and others working within the public services. The amendment of the law obstructs negotiations on catching up with previous wage lags and wage gaps.

With this ceiling, the process is no longer a peaceful settlement of conflict, but it involves compelling elements, being in breach of the requirements laid down by Article 6§3 of the ESC.

Restrictions of Sympathy Strikes

Before the two amendments above, the Government ran through the Act on Amendments to the Collective Agreements Act (246/2024). It entered into force immediately on 18 May 2024.

The purpose of it is to restrict sympathy strikes and avoid the economic losses caused to the enterprises and shareholders. The amendment added a new section 8a to the Act.

Section 8a,2 (translation by AI)

A compassionate industrial action (*sympathy strike*) shall be considered disproportionate if:

- 1) the employer's service or production activities are restricted to a greater extent than those activities that serve or benefit the employer in the primary dispute; and
- 2) the restriction causes such harmful consequences to the employer whose employees are participating in the compassionate industrial action or to its contractual partner that cannot be considered reasonable in the circumstances.

The new provision restricts the workers' right to strike as provided for in Article 6 § 4 of the ESC. A sympathy strike must not significantly increase the negative impact on production or economic losses than those of the primary strike.

In practice, this limits and prevents a union with more substantial resources from supporting a weaker union in its industrial action. The restriction makes it substantially more difficult for or blocks small trade unions from resorting to industrial action for better working conditions.

Due to the secondary nature of sympathy strikes, a state may limit them to focus on the same *purpose* as the primary strike. Other restrictions may only be used exceptionally. The ECSR has considered that Article 6§4 establishes a right to which Article G constitutes an exception, in which the three conditions laid down therein must be interpreted narrowly.

Article G of the ESC primarily targets the state. It sets restrictions on when the state can impose restrictions on industrial actions. Article G allows for the possibility of restricting the right to strike *by law* if it serves a *legitimate purpose*, listed in the Article. In that framework, a State may impose restrictions to achieve a balancing of interests if there is a legitimate purpose for it and the restriction is *necessary in a democratic society*.

Strikes often cause economic and business losses for both sides, which cannot be compensated for later. In general, ideological objectives or economic losses alone do not constitute any justified reason for restrictions. The restriction constitutes a breach of Article 6§4 of the ESC if it is not justified under Article G. That is not the case here. Pure economic reasons are not on the list of Article G.

The government's proposal to Parliament on the last-mentioned amendment to the law highlighted the commitments set by the ESC, but at the same time incorrectly stated that Finland as a state is not committed to complying with the case law that has

emerged from it. The government's proposal, prepared by the Ministry of Employment and the Economy, limited the right to sympathy strikes to the need to protect the rights and freedoms of company shareholders and explicitly stated that the *ECSR's interpretation practice is not binding on Finland* (HE 12/2024 vp, p. 39).

Section 8a in the Collective Agreements Act ties the restrictions of sympathy strikes to their economic and business effects. That is not what the ECSR has confirmed in the light of Article 6§4 of the ESC in relation to Article G.

4 Alleged Violations

The State has violated the requirements set out in four paragraphs of Article 6 and Article G of the ESC.

ESC Art. 6§1

Opposite to the requirements of promoting joint consultations, the State has attempted to supersede negotiations between labour market parties by fostering a parallel local negotiation system based on non-membership. That would divide into two and diminish the employees' opportunities to protect their rights and interests, and would allow enterprises to bypass the nationwide collective agreements.

With these actions, the state has not promoted the joint negotiations of the contractual society as required by Article 6§1 of the ESC.

ESC Art. 6§2

Opposite to requirements to promote collective bargaining of the two labour market parties, the State has limited their opportunities to freely regulate the conditions of employment and the relations of the parties by collective agreement. This has taken place in two stages. First, the government (2016) dictated the course of negotiations. It threatened to override the negotiations of the social partners with legislation unless working conditions were agreed upon in the manner determined by the government. In the second stage (2023), the government took a leading role in industrial relations and reregulated the bargaining system through legislation, thus bypassing the social dialogue.

Following the government program, this was implemented through three acts: 1) promoting a parallel local bargaining system, 2) placing a ceiling on the settlement of industrial disputes, and 3) restricting the right to a sympathy strike on economic grounds, thus replacing in advance the negotiations between the parties and regulation

through collective agreements contrary to the requirements provided under Article 6§2 of the ESC.

Art. 6§3

By imposing a statutory ceiling on wage increases, the State has added a precondition to the conciliation system that has changed its nature. By this pre-set condition, there is no longer a free mediation or conciliation system available for the settlement of labour disputes, which constitutes a breach against Article 6§3 of the ESC.

Art. 6§4 and Art. G

Article G of the ESC allows the State to impose restrictions on sympathy strikes regarding the expansion of the purpose of the primary strike. The Amendment by Section 8a to the Finnish Collective Agreements Act, the State limited the right to sympathy strikes also on the grounds of economic losses for enterprises and shareholders.

As the ECSR has considered, Article 6§4 of the ESC establishes a right to which Article G constitutes an exception. Due to this, the conditions laid down therein must be interpreted narrowly. Pure economic or ideological reasons are not among the acceptable purposes provided in Article G and don't serve a legitimate aim.

In this case, the Finnish government has expanded the interpretation of the scope of Article G outside what is considered legitimate under the ESC. Opposite to its commitments, the State therefore has violated the fundamental rights of employees and acted contrary to Article 6§4 of the ESC in relation to its Article G.

Attachments:

- 1 Extract from the Finnish Register of Associations
- 2 Official translator's translation of Section 23

Helsinki 15th of December 2025

On behalf of the Finnish Trade Union of Education, OAJ



Katarina Murto
President of the Union



Ulla Walli
Director of the Legal Department