

NGO Parallel Report

on the Implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)

First thematic evaluation round

“Building trust by delivering support, protection and justice”

The report has been compiled in co-operation between 25 different NGOs:

A-Kiltojen Liitto ry
NYTKIS – The Coalition of Finnish Women's Associations
Ensi- ja turvakotien liitto – Federation of Mother and Child Homes and Shelters
Finnish Association of People with Physical Disabilities
Finnish Association of Women with Disabilities – Rosette
Ihmisoikeusliitto – Finnish League for Human Rights
Naisasialiitto Unioni – Finnish Women's Association Unioni
Kanta-Hämeen perhetyö ry
Kokkola Mother and Child Home and Shelter Association
Kuopion ensikotiyhdistys ry
Loisto settlementti ry

MONIKA – Multicultural Women's Association Finland
Naisten Linja – Women's Line in Finland
National Council of Women of Finland
Oulu Mother and Child Home and Shelter Association
Pääkaupungin turvakoti ry
Rape Crisis Centre Tukinainen, Finland
Pelastakaa lapset Suomi – Save the Children Finland
Setlementti Tampere ry
Suvanto – For A Safe Old Age
Tampere Mother and Child Home and Shelter Association
Lyömätön Linja – Unbeatable Line in Espoo
Rikosuhripäivystys – Victim Support Finland
Viola – Free from Violence
Väestöliitto, the Family Federation of Finland

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Foreword

Violence against women is a serious human rights problem worldwide. In Finland, one in three women is affected by intimate partner violence¹. Two out of three have experienced violence during their lives. Its questionable position at the top of the EU's violence statistics² has sparked much public debate in Finland. How can one of the world's most equal countries be one of Europe's most violent for women at the same time? In research, this contradiction observed in different Nordic countries has been called the Nordic paradox³ of intimate partner violence.

In its baseline evaluation report on Finland, GREVIO refers to the same observation as it comments that Finland's strong commitment to promoting equality has shifted attention from gender to gender neutrality in both services targeted at victims and in decision-making. GREVIO points out that this approach does not necessarily do justice to women's experiences as victims of intimate partner violence and does not recognise that women experience violence more often than others, and that violence against women is generally more serious.

Non-governmental organisations (NGOs) engaged in violence prevention recognise this problem. The gender-neutral approach is reflected in the inefficiency of prevention, the lack of identification of violence, and the lack of adequate sanctioning of violence. This is particularly evident in that the need for gender-specific and intersectional approaches in services for victims and for perpetrators of violence is hardly recognised in Finnish violence prevention. Efforts to reduce violence are effective only when an understanding of gender-based violence and its impacts cuts across all measures to combat violence against women, from the encounter with a victim of violence to legislation.

Strengthening the gender-based perspective means better support for victims when decision-making and coordination are guided by a genuine understanding of the nature of violence and the needs of victims. Work with perpetrators is also improved if it is guided by an understanding of the gender-based factors that generate and maintain violence in our society. Understanding the gender-based nature of violence also means improved understanding of violence as a human rights violation and as a form of discrimination against women. Taking into account the human rights perspective and dimensions of discrimination also promotes the identification of vulnerable groups as victims.

The Finnish Government has recognised the need to strengthen the gender-based perspective and intersectionality in the national implementation of the Istanbul Convention in order to prevent and combat violence against women⁴. However, achieving this objective requires concrete action. We hope that this issue receives special attention during the second GREVIO evaluation round.

¹ [Sukupuolistunut väkivalta ja lähisuhdeväkivalta Suomessa 2021](#), Tilastokeskus 2023.

² [FRA survey on gender-based violence against women](#), 2014

³ [Intimate partner violence against women and the Nordic paradox](#), Gracia, E. & Merlo, J., 2016

⁴ [Action Plan for the Implementation of the Istanbul Convention for 2022–2025](#)

The Istanbul Convention has changed the discussion on violence against women in Finland and strengthened the efforts of the Finnish Government to reduce violence. As a result of the agreement, the Government has taken a number of measures in recent years that promote the prevention and combating of violence against women in Finland.

The legislation has been reformed so that the legislation on sexual offences is now based on consent and also takes into account the various forms of digital violence. The act on restraining and protection orders has been reformed to better protect the victims. When the so-called 'shelter act' was adopted, funding for shelter services was transferred from municipalities to state, and, since 2015, the shelter network has been expanded significantly (act on state compensation to shelter service providers). In addition, by 2023, Seri Support Centres for victims of sexual assault have been established in 24 places. Furthermore, the free helpline *Nollalinja* has operated since 2016, and its operations and services are constantly being developed to meet the changing service needs. Interventions to combat violence against children have been developed through the Barnahus project launched in 2019⁵. In Finland, the Committee for Combating Violence against Women and Domestic Violence (NAPE) has been established, together with a sub-committee (NAPE JÄTY). In addition, the role of the Finnish National Rapporteur on violence against women has been established in the Office of the Non-Discrimination Ombudsman and has been active since 1 January 2022.

However, regarding special support services that NGOs provide, the situation is more uncertain, even though they still produce most of the services available for victims and perpetrators. Their role as part of the implementation of the Istanbul Convention is unclear. Cooperation between the public sector and the third sector would require clear structures, and cooperation between authorities and services would require mutual coordination. The funding of many organisations is inadequate and difficult to predict. In its official action plans and in the state reports addressed to GREVIO, the Finnish Government does not sufficiently recognise the value of specialised services for women and special support services for vulnerable women.

There is still a lot of work to be done in Finland to resolve the Nordic paradox and to start reducing violence against women. In this parallel report submitted in connection with the state report on Finland's reply to GREVIO's questionnaire for its first thematic evaluation round, 25 NGOs have summarised their views on the implementation of the selected provisions of the Istanbul Convention from the perspective of prevention of violence, protection of victims and adequate judicial remedies. There are differences in the NGOs' perceptions and views that we have combined in this report, bearing in mind the requirements of the Istanbul Convention and GREVIO's recommendations in its baseline evaluation report on Finland.

⁵ The Barnahus project (2019–2025) aims to enhance the investigation processes on suspected cases of violence against children and support services available to child victims of violence. The project is based on the European Barnahus standard.

Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence

Article 7 – Comprehensive and co-ordinated policies

States must take measures at the State-wide level to adopt and implement policies to prevent and combat all forms of violence against women. The rights of the victim must be placed at the centre of these measures. All relevant actors, including civil society, must be involved in design and implementation.

In recent years, Finland's coordinated policy measures and related legislative changes have contributed to the implementation of the Istanbul Convention in many ways. There are still clear shortcomings, however, in the coordination of both legislation and policy measures. The lack of coordination is particularly visible in how meagrely key actors such as municipalities, wellbeing services counties and NGOs providing special support services have been involved in the practical implementation of the Istanbul Convention.

Adoption of policies and legislative measures and the rights of the victim

In Finland, there is no separate legislation on intimate partner violence or violence against women. Instead, regulation of criminal law is based on general forms of violence and their characteristics. Violence against women is generally punishable as assault. Thus, Finnish legislation does not recognise the nature of intimate partner violence as a process-like, increasingly brutal and multifaceted form of crime. As an assault offence, intimate partner violence is often convicted as individual acts limited in time, which excludes the fact that, in intimate partner violence, acts are often reported to the police only after the assaults have been repeated several times. For the traumatised victim, it may be difficult to separate the acts and their timings afterwards. Examining violence as individual acts often means that the harm and seriousness of the act as a whole is not identified. For the most part, the legislation does not recognise the process-like nature of violence in other forms of violence against women either such as psychological violence or honour-based violence.

In addition, Finnish legislation does not recognise the grounds for aggravating the offence under article 46 of the Istanbul Convention, according to which the punishment for the offence should be more severe when it targets the former or current spouse/partner. In Finland, domestic violence is, as a result, often punishable less severely than what would be justified by the nature of intimate partner violence as a deeply traumatic violation of intimate partner integrity and human rights.

Moreover, legislation or the interpretation of the law does not sufficiently recognise the various forms of violence.

For example, psychological violence and coercive control are rarely punished in Finland.⁶ In fact, the criminal law of Finland should be reformed to include coercive control. The current

⁶ [Selvitys henkisen väkivallan rangaistavuudesta ja vainoamisen oikeuskäytännöstä Suomessa](#). Tolvanen, Matti; Silvennoinen, Elisa. Oikeusministeriön julkaisuja, selvityksiä ja ohjeita 2023:20.

Finnish Government has promised to investigate the necessity of criminalisation, but they have not set a timetable for the investigation nor made a decision on criminalisation.

The legislation on sexual offences based on consent has been a significant reform. Yet, in the article on sexual exploitation, the presumption is the consent of the vulnerable victim. The act also defines sexual exploitation as situations that should, in fact, be interpreted as rape: if rape occurs under institutional conditions (e.g. housing services for persons with disabilities), the length of the punishment is shorter than in other cases of rape and becomes punishable as sexual exploitation. This also applies to those aged 16–18 who are subordinate to the perpetrator, due to being at school or participating in a hobby, for example. This puts women and young people with disabilities in a legally unequal position, even though they face more sexual violence than other groups of people.⁷

The separate criminalisation of female and girl genital mutilation has not progressed. In Finland, the current legislation also fails to ensure that coercion to marriage is punishable. In the absence of separate legislation, there are attempts to investigate cases with other offence categories, which means that the victim's experience is ignored, and the act is not assessed as a whole. The Ministry of Justice has appointed a working group whose task is to prepare a legislative proposal to clarify the criminality of forced marriage. The clarification of the Criminal Code in this respect is included in the current Government Programme.

The legislation does not treat various vulnerable groups equally. For example, a possible hate motive behind acts may remain unidentified.

A gender-neutral approach and lack of competence related to gender-based violence can also be detected in the interpretation of the law, in factual issues and in the criminal process. For example, they show as attitudes that underestimate the severity of intimate partner violence or in the fact that sexual violence in a relationship is not always recognised as domestic violence; as delays in pre-trial investigations; and as challenges in the process of intimate partner violence against women.

Coordination and Implementation of the Istanbul Convention

Many measures taken in Finland in recent years have promoted the implementation of the Istanbul Convention and its coordination in Finland. There has been positive development in services for victims of domestic violence and sexual violence, but coordination of the operation is still insufficient: the responsibilities of the actors have not been defined by legislation, and the unique competence of NGOs is not adequately supported and utilised.

The measures required by the Istanbul Convention are coordinated by the Committee for Combating Violence against Women and Domestic Violence (NAPE). Its task is to coordinate, monitor and evaluate the implementation of the Convention in Finland. The Committee consists of representatives of ministries and the actors operating under them. The Committee also has a permanent NGO working group with representatives in the Committee. The role of the NGO working group is advisory and the opportunities for exerting influence are limited.

⁷ [Vammaisten henkilöiden kokema lähisuhdeväkivalta ja palvelujen saatavuus](#). VNTEAS 2022:24.

Finland has drawn up two national action plans to promote the implementation of the Istanbul Convention. They include comprehensive measures to prevent violence but have failed to define clear guidelines for strengthening comprehensive support services for victims and for clarifying cooperation and public sector obligations between the public and civil society.

The second national implementation plan⁸ for the Istanbul Convention for 2022–2025 identifies three main objectives:

1. Strengthening the gender-based perspective and intersectionality in the national implementation of the Istanbul Convention to prevent and combat violence against women.
2. Strengthening cross-administrative and multi-professional cooperation in preventing and combating violence against women and domestic violence at all levels.
3. Strengthening the identification of violence against women and domestic violence and intervening in violence.

The main objectives correspond to the shortcomings observed by NGOs in preventing and intervening in violence in Finland. The same shortcomings are also presented in this parallel report. The NGOs highlight three key challenges: Finland's gender-neutral approach to violence against women; lack of concrete measures concerning intersectionality and violence experienced by different vulnerable groups; and shortcomings in the identification, discussion and risk assessment of cooperation structures and violence.

However, the objectives presented in the implementation plan for the Istanbul Convention for 2022–2025 remain largely devoid of substance and, thus, also difficult to measure in terms of impact. It is a key problem that sufficient funding has not been allocated to the implementation of the national action plans. Instead, the implementation has mainly depended on individual grants and one-off appropriations.

The role of municipalities and authorities in the implementation

In its baseline evaluation report on Finland, GREVIO states that municipalities have unambiguous responsibility for providing public social and healthcare services to woman and girl victims⁹. Under the Istanbul Convention, municipalities and wellbeing services counties should be obliged to create clear structures for preventing and combating violence, and to create structures for cooperation between NGOs providing special support services and municipalities and wellbeing services counties. However, such structures have not yet been created.

The programmes and guidance developed to support coordination are recommendations, but their coordination is decentralised to several different actors, and does not oblige municipalities and wellbeing services counties sufficiently. Such key national steering structures include the recommendations published by the Ministry of Social Affairs and Health on social welfare and healthcare to direct and manage local and regional activities

⁸ [Action Plan for the Implementation of the Istanbul Convention for 2022–2025](#)

⁹ [GREVIO Baseline Evaluation Report on Finland](#), para 25. Council of Europe 2019.

geared towards preventing domestic and intimate partner violence in 2008¹⁰, as well as the guidelines of the Finnish Institute for Health and Welfare (THL) for municipalities and wellbeing services counties to organise coordination structures for preventing domestic violence and action against domestic violence in 2022. According to THL's guidance, 'effective treatment and service packages must be available for victims, perpetrators and child victims. The systematic working method assumes that a coordinating actor is appointed at every administrative level.'¹¹

The reports on compliance with the recommendations show that, in the absence of statutory and binding responsibility, the assistance provided to victims and perpetrators of domestic violence is insufficient in Finland and does not comply with national recommendations. Despite the guidelines, regional variation is still great. As domestic violence is not included in the wellbeing services counties' organisation plan, no resources are allocated to violence prevention.

GREVIO has advised Finland of the inadequate regulation of the responsibilities of municipalities and wellbeing services counties, as well as the amount and quality of the necessary services in Finland, and recommends that the issue be resolved in connection with the health and social services reform¹². The new wellbeing services counties in accordance with the health and social services reform began their activities on 1 January 2023, but no responsibilities related to action against violence have been laid down.

However, the current Government Programme promises to assess the need for legislation obliging municipalities and wellbeing services counties to strengthen the structures for preventing and combating violence. The NGOs consider it important that the responsibilities of municipalities and wellbeing services counties are laid down in an act and that the question of financing services is resolved at the same time.

Cooperation between authorities, especially judicial authorities and the police, both with victims and NGOs providing support services for perpetrators, remains inadequate. For example, there has been no routine practice in referring victims of sexual offences to special support services or communicating about them at the reporting stage or in criminal investigations. Closer cooperation between organisations and municipalities, wellbeing services counties and authorities is essential for providing long-term, effective and uninterrupted support to victims and to direct the perpetrators to support services as well.

The role of NGOs and civil society in implementation

The lack of national coordination shows as fragmentation of services to victims and in their being hard to find, and there is no continuity between different actors in the service chains. The structures of multidisciplinary cooperation vary greatly from one municipality to another, and there are no national structures for cooperation.

In the state report addressed to GREVIO, the lack of coordination of services related to

¹⁰ [Lähsuhde- ja perheväkivallan ehkäisyn suositukset. Tunnista, turvaa ja toimi. Sosiaali- ja terveystoimelle paikallisen ja alueellisen toiminnan ohjaamiseen ja johtamiseen](#), Sosiaali- ja terveysministeriön julkaisuja 2008:9.

¹¹ [Ohjeet kunnille ja hyvinvointialueille lähsuhdeväkivallan ehkäisyn koordinaattorakenteiden ja lähsuhdeväkivallan vastaisen toiminnan järjestämiseksi](#), THL 2022:10.

¹² [GREVIO baseline evaluation report on Finland](#), para 25. Council of Europe 2019.

violence prevention is reflected in the scope of the state's definition of the services available. In the report, services are primarily understood as national 24/7 telephone lines, shelters and Seri Support Centres. This leaves out much of the work with victims and perpetrators, i.e. the specialist support services that NGOs provide.

According to the Istanbul Convention, supporting NGOs and civil society means, for example, creating cooperation structures and highlighting the services provided by NGOs in official materials. This is not realised in practice. Instead, the diverse work of NGOs, such as psychosocial individual and peer support, legal advice, risk assessment and the preparation of safety plans, is for the most part invisible in public materials.

In particular, it should be noted that women-specific and gender-conscious violence prevention to support victims is not reflected at all in the state report addressed to GREVIO.

For example, the report does not acknowledge that Shelter Mona, hosted by MONIKA – Multicultural Women's Association, is Finland's only shelter intended solely for women and located at a secret address. In 2022, Shelter Mona had 175 adults and 124 children as clients. There were nearly 8,000 housing days. A total of 122 women were referred to other shelters due to lack of space. The association's services also target victims of human trafficking (37 new cases in 2022), most of which concern forced marriages.

The only women-specific telephone and chat emergency clinic maintained by the Women's Line for all female victims. Approximately 3,000 people contact the Women's Line each year, of whom the Women's Line is able to help about 1,300 women and girls annually through telephone and chat services, peer groups and digital violence advisory services. In addition, the Women's Line offers group peer support for those who have experienced violence. The possibility of women-specific work in peer support is often very important for the target group. However, these peer support services are not mentioned at all in the state report addressed to GREVIO.

A discussion about violence against women must also include girl victims. Although violence against both girls and women is about gender-based violence, it should be noted that violence against girls is somewhat different from violence against women and is manifested in different forms. Sexual violence prevention targeted at girls and young women is carried out in eight different locations at Girls' House. In 2022, the services at Girls' Houses have supported 441 girls or young women who have experienced sexual violence.

In general, the importance of women-specific work is not recognised in the national implementation or steering of the Istanbul Convention. Instead of this, Finland actively implements a policy on the availability of services for all, such as the 24/7 national telephone line required by the Istanbul Convention, which is intended for everyone who has experienced domestic violence regardless of gender. Although there is also a need for general services aimed at everyone, the Istanbul Convention requires a gender-sensitive approach to work, which also should mean gender-specific services and service providers. In addition, GREVIO has separately required the state and municipalities to cooperate with organisations organising women specialist services (WSS). However, there is no place for this cooperation within the current coordination framework.

There are still few women specialist services in Finland, their funding is uncertain, and the operating area has narrowed as national services have expanded. This poses a risk that, without a gender-aware approach in this issue as well, gender-neutral services produced under national guidance will override WSS as part of the collaborative service system of the public sector and NGOs.

Article 8 (Funding)

States must allocate appropriate financial and human resources to effectively implement policies and programmes to prevent and combat all forms of violence covered by the scope of the Convention. Resources should be available as well for NGOs and civil society.

The NGOs are responsible for most of the violence prevention and the special support services referred to in the Istanbul Convention, but there are extensive shortcomings in the funding of violence prevention concerning the provision of services and the implementation of the Istanbul Convention. At the same time, there are significant cuts to the discretionary government appropriations of many NGOs providing specialist support services.

Funding base for NGOs providing support services

Funding for NGOs often consists of various sources such as state funding (STEA and appropriations from various ministries), funding for municipalities and wellbeing services counties, and donations. However, the funding of specialist services for domestic violence comes mainly from STEA, and this funding is now being cut by 25–30 per cent from the current level.

The same concern over funding applies to services aimed at all victims of crime. The number of clients in Victim Support Finland (RIKU) has increased considerably in recent years, and the Ministry of Justice has imposed an obligation on Victim Support Finland to provide services. Despite this, the funding is very limited, which has led to very demanding tasks being carried out by volunteers.

Insufficient funding slows down the expansion of services to meet the objectives of the Istanbul Convention. Funding also involves uncertainty so that the financial situation of the following year will usually only be resolved at the end of the current year.

The funding of wellbeing services counties and cooperation with support services

GREVIO recommends that legislation on the responsibilities of municipalities and wellbeing services counties with regard to violence should also provide for the funding of NGOs providing special support services. NGOs find it important to bring this up, as it is not possible for them to accept new tasks or roles without solving the funding issue. At the moment, the majority of violence prevention carried out by NGOs is funded by STEA. If the specialist support services for violence prevention become statutory under the structural act, it should be noted that this also means the end of STEA funding. In other words, the structural act

cannot be enacted without ensuring the funding of violence prevention carried out by NGOs in some other way. In this context, we must also consider the impact of possible competitive tendering on violence prevention.

At the moment, many wellbeing services counties' budgets are underestimated, and many have reported on savings measures, especially in services that are not statutory. Non-statutory services also include all specialist support services for violence prevention and, for example, its coordination.

The financial situation of municipalities, wellbeing services counties and NGOs alike raises the question of whether it is possible for wellbeing services counties and NGOs to take on new tasks or roles to prevent violence and support victims, and whether it is possible to maintain and develop services in accordance with the objectives of the Istanbul Convention, unless sufficient funding can be allocated to the activities.

Funding for shelters

The Istanbul Convention requires Finland to take the necessary legislative or other measures to provide for the establishment of adequate, accessible shelters, in order to provide safe accommodation and proactive assistance to victims of violence – especially women and their children (article 23).

There are currently 29 shelters in Finland with a total of 230 beds. Funding for shelters has more than doubled during the validity of the agreement (EUR 11.55 million in 2015, EUR 24.55 million in 2023). Despite this, Finland falls short of the objective of the Istanbul Convention, according to which shelters should have one family seat per 10,000 inhabitants. In Finland, this would mean 555 family places in proportion to the population. There are currently only 42 per cent of the estimated need and there are large regional disparities in the availability of places.

Developing the accessibility of shelters for victims of domestic violence has been based on project-based funding, and it has not been possible to develop the accessibility of shelters for the long term. There are currently not enough accessible shelters available. In July 2023, the Parliamentary Ombudsman pointed out that shelters have not yet been accessible in late 2022. The shortage of shelters poses challenges to persons with disabilities due to distances. Improving the availability and accessibility of shelter services is essential in order to ensure equal treatment of persons with disabilities and to safeguard the rights laid down in the law. However, according to the current Government budget proposal, EUR 0.6 million will be cut from the accessibility of shelters compared to 2022. It is, therefore, difficult to develop the reachability and accessibility of shelters for victims of domestic violence and to establish new shelters in municipalities where the necessary services are not yet available. The situation does not correspond to Finland's obligations as a party to the Istanbul Convention.

Funding for the national implementation of the Istanbul Convention

Finland has an ambitious national action plan to implement the Istanbul Convention, but its implementation is not systematically funded, and the funding is not long-term.

In the state budget for 2024, EUR 1.5 million has been reserved for the operational expenditure of the National Institute for Health and Welfare coordinating the action plan,

which is EUR 300,000 less than in 2023. In addition, NAPE, which coordinates the implementation of the action plan, has been allocated an operating grant of EUR 150,000, which, however, mainly covers the wage costs of coordination.

The budget does not allocate a separate appropriation to the concrete promotion of the action plan. Instead, the measures will be promoted as part of the spending limits for each administrative sector. The allocation of appropriations is not transparent.

For example, the funding of the national 24/7 helpline *Nollalinja* has not been sufficient to maintain another telephone line, and the *Nollalinja* chat service has had to be closed at times in the absence of funding. The chat makes it possible for people with hearing impairments and deaf people to make contact, for example, so continuous funding of the chat function is also an accessibility issue.

GREVIO has pointed out to Finland that it promotes the implementation of the Istanbul Convention from each ministry's own appropriations instead of allocating a targeted appropriation towards the implementation of the National Action Plan (NAP). According to GREVIO, this threatens to lead to a reduction of measures under the NAP, instead of funding for preventing violence against women being driven by demonstrated need.

The NGOs share their concern about the point of funding and feel that the long-term development of violence prevention together with the state, municipalities and wellbeing services counties is demanding without a more systematic view of the future of funding.

Article 11 (Data collection and research)

States must collect disaggregated statistical data on all forms of violence, data should be collected at regular intervals. States should support research in the field of gender-based violence. Data collected should be made public.

Currently, sufficient disaggregated data or research is not available on violence against women in Finland. In particular, there are shortcomings in the data on reports of offences against women and their progress in the judicial process. In addition, data is missing on the number of family and relationship killings and the background of the killings. Research on violence against women is not centralised, and research funding is the responsibility of individual researchers.

Statistics and data collection

GREVIO has pointed out to Finland that its official statistics on violence against women are inadequate, especially with regard to the police and the judiciary. The state report (para 81 and 83) notes that, despite the development of police data management systems, no recent changes have been made to the data management of cases of violence and domestic violence against women. It is still not possible to obtain direct statistics on violence against women or domestic violence from the registers of legal actors. The shortcomings highlighted by GREVIO in its first baseline evaluation report have not been corrected at all.

More detailed and systematic information is needed, for example, on the type of relationship between the perpetrator and the victim, the victim's gender, age and forms of violence. Systematic monitoring data is also needed on criminal offences reported in cases of violence against women: how many of them have led to prosecution and what criteria have been used, as well as on convictions for these offences and their consequences.

The shortcomings identified in the statistics related to different forms of violence include honour-based violence, forced marriages, young people's experiences of whether they can decide on their own dating relationships or marriage, digital violence, and the number of emergency barring orders. Statistics on the motives behind intimate partner murders and killings would be essential to make this extremely gender-based violence more visible.

Among the groups of people experiencing violence, there is a lack of statistics and other data collection on the violence experienced by women with disabilities, older women and women with substance abuse problems. For example, support services should include statistics on whether the customer has a disability or impairment, whether it has been an obstacle to accessing the primary support service and where the customer has been directed.

Women who experience violence and belong to many different minority groups are not visible in the statistics either. Data should, therefore, be collected on how violence against women in a particularly vulnerable position is identified and prevented.

There is no comprehensive data and statistics on identifying and bringing up violence in social and healthcare services or the police. No systematic entries are made in the registers of social welfare and healthcare services or the police of observations of violence or bringing up issues and referral to services. Domestic violence is a very under-identified problem in healthcare, and less than one per cent of victims seeking treatment are identified there¹³.

In the information systems of the authorities and, in particular, the Police, it would be important to record where the victim has been directed based on the different offences. Comparable information would be essential for the development of support services for victims and for providing information on services. However, according to statistics from shelters (19 in total) of the member associations of the Federation of Mother and Child Homes in 2022, 7.6 per cent of the clients had been referred to a shelter by the Police, whereas 31.2 per cent of the clients had been referred from social welfare services. The low number of clients directed there by the Police is worrying compared to the number of people – and especially women – law enforcement encounters in the course of their work who have experienced domestic violence.

For service statistics, no data is collected on Women Specialist Services (WSS). There is no overall picture of specialist support services provided by NGOs, and information is mainly collected from shelter services.

¹³ [The Documentation of Family Violence in Healthcare and the Associations of Violence on Well-Being](#). Kivelä, S. 2020. Tampere University Dissertations 197.
[Family Violence as a Public Health Problem. Effects and Costs in Finnish Health Care](#). Siltala, H., 2021. Jyväskylä University Dissertations 421.

There is no accurate and regularly updated data on violence experienced by women with disabilities, as according to the Act on the Openness of Government Activities section 24(25), disability is confidential information. Disability as confidential information in the Police Register should be removed to provide information on the prevalence of violence against women with disabilities.

Research

In recent years, many good studies on the prevalence and identification of violence have been published in Finland, but the research is not systematic and, for example, the Government's analysis, assessment and research activities (VN TEAS) have been discontinued by the current Government. No permanent funding has been allocated to research into violence against women, and research has not been centralised to a certain university. Instead, research is based on individual researchers interested in the topic and applying for funding for it.

There are several shortcomings in the quality of gender impact assessments in political decision-making. The *Tasa-arvoa talousarvioon* report (in English, increasing equality in the budget)¹⁴ developed gender impact assessment and gender-aware budgeting in Finland. The report highlighted a number of deficiencies in the quality of gender impact assessments: research data and statistics are used in less than one third of gender impact assessments; even when statistics are used, they are usually not examined analytically, or then attempts are made to identify possible inequalities behind statistical differences. Furthermore, the narrow understanding of gender equality as equal treatment of women and men ignores the effects of the law's *de facto* inequality between the sexes.

A study¹⁵ on the progress of digital violence against women in the criminal process will be completed at the end of the year, which will provide statistics on digital violence in Finland for the first time.

¹⁴ [Tasa-arvoa talousarvioon project 2017–2018, Valtioneuvoston selvitys- ja tutkimustoiminta \(VNTEAS\)](#)

¹⁵ [Naisiin kohdistuvaan digitaaliseen väkivaltaan puuttumisen haasteet poliisin työssä, rikosprosessissa ja tukipalveluissa](#), Husso et al, research project 2022–2023 to be published early 2024, Tampere University.

Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution

Article 12 (General obligations)

States shall take the necessary measures to promote changes in the social and cultural patterns of the behaviour of women and men with a view to eradicating prejudices, customs, traditions and all other practices which are based on the idea of the inferiority of women or on stereotyped roles for women and men.

Efforts to change the social and cultural behaviour of women and men to overcome prejudices have been limited and are dependent on NGOs.

The gender perspective and intersectionality are still not mainstreamed in the national implementation of the Istanbul Convention. Gender neutrality and incomplete consideration of intersectional factors are an obstacle to the full implementation of the agreement, in which consideration of gender and intersectionality should be at the centre of all measures.

The state report(para 75) highlights statistical information on statistics on how common violence against women is in the eyes of the public. According to a national survey, 17 per cent of women and only 4 per cent of men consider violence against women to be very common. This partly reflects the fact that our society still does not recognise the full extent of the problem and the need for preventive work and education. In the spring 2023 parallel report of NGOs¹⁶, the topic is discussed quite comprehensively as regards various from political decision-making to individual grassroots actors.

The NGOs find the ERASE GBV project particularly positive, the aim of which was to raise awareness of gender-based violence among teaching and education employees and other school staff, and to develop practices for encountering as well as intervening in violence. In the future, it would be important to focus similar projects aimed at dismantling harmful attitudes on various sectors of society.

Article 14 (Education)

States should include, where necessary, teaching material on: equality between men and women, non-stereotyped gender roles, respect, non-violent conflict resolution, gender-based violence against women, and the right to personal integrity, in all forms of education and at all levels.

The promotion of gender equality is not being sufficiently implemented. Work must be done at schools to prevent violence and to change values and attitudes from pre-school onwards, including families. Courses on promoting equality must be more clearly integrated into teacher education curricula.

¹⁶ [NGO Parallel Report on the Implementation of the Istanbul Convention in Finland](#), 2023

The general provisions of the Act on Equality between Women and Men on the promotion of equality in education and teaching, as well as the provisions of the Act on the prevention of discrimination based on gender identity or gender expression, were also extended to early childhood education and care in June 2023. At the same time, the preparation of the operational equality plan required by the Act on Equality between Women and Men became mandatory. In addition, the reformed Non-Discrimination Act extended equality planning and the promotion of equality to ECEC providers and service providers, but there is no mention of gender sensitivity.

In 2020, the Ombudsman for Equality examined the gender equality competence of teacher trainees by means of a survey, on the basis of which the importance of promoting gender equality has been widely acknowledged in teacher education. However, the courses on equality available in teacher education units are optional for students, which means that the graduates' ability to offer gender and equality-conscious teaching specifically relies on personal interest.¹⁷

In addition, teachers should be educated about different forms of violence and the specific aspects of the violence people with disabilities may face. This is not clearly visible in programmes, materials or actions at the moment. It should be ensured that teaching material used in school present diversity including people with disabilities, without conveying negative gender stereotypes of women and men who are at risk of intersectional discrimination.

Children and young people should be provided with adequate gender-conscious body-emotion education, comprehensive sexuality education, tools for intervening in discrimination and harassment from early childhood education and care onwards, and at comprehensive schools and upper secondary education institutions.

Article 15 (Training of professionals)

States should provide training for professionals on dealing with victims or perpetrators of gender-based violence.

Finland does not have systematic training for professionals in various fields in violence against women and children. Training depends on each party's own interest, resources and opportunities for employees to participate in training while working. The NGOs consider the shortcomings in the competence of law enforcement authorities and prosecutors to be particularly serious. The authorities and professionals do not have sufficient competence to identify varying forms of violence against women.

In their baseline evaluation report on Finland, GREVIO states that it has gained a contradictory picture of the level of education of representatives of various professional fields regarding violence against women. Human rights awareness and education should be increased in order for authorities and professionals to better identify the different forms of violence against women and domestic violence.

¹⁷ [2020 Tasa-arvon valtuutetun vuosikertomus. Tasa-arvojulkaisuja 2021:1](#)

In recent years, training for authorities and professionals has been increased in a variety of ways, including within the framework of the *'Naisiin kohdistuvan väkivallan torjuntaohjelma'*¹⁸ (2020-2023) on combatting violence against women, but the training of law enforcement authorities and prosecutors still remains very limited in Finland. This is also reflected in the state report (para 180–215), according to which a large number of professionals, including the judiciary, rely almost exclusively on voluntary training in terms of understanding the phenomena of violence against women and domestic violence. There are concerns about the short duration of both compulsory and voluntary training and the extent to which the contents of the training have highlighted the core dynamics of phenomena, such as gender-based violence.

The NGOs have repeatedly brought up the lack of training of the authorities, social welfare and healthcare professionals and other professionals working on the phenomenon in connection with the phenomena of violence against women and domestic violence; for instance, forms of violence against women such as honour-based violence, forced marriages and female genital mutilation. It is particularly worrying that social workers and other authorities may recognise violence but still do not consider it necessary to act in accordance with section 11 of the Social Welfare Act. In addition to the lack of resources, this indicates deliberate or unintentional incomprehension of violence committed against women and children.

National Institute for Health and Welfare (THL) and NGOs provide free national continuing education on domestic violence. The lack of education affects the ability and skills of graduating professionals to identify domestic violence and intervene in it with the necessary expertise.

Training for authorities such as prosecutors and judges on the provisions of the Istanbul Convention should be mandatory. Only voluntary training on violence against women and children is now available for court judges. They are not required to be familiar with the phenomenon. The state report states that training on violence against women has been organised for judges and other authorities in the criminal process, but the number of participants has varied and in, for example, the training series coordinated by Victim Support Finland (RIKU) referred to in state report (para 189), the number of participants was very small and fell short of the target.

In 2022, the National Police Board of Finland prepared a functional handbook for intervention in domestic violence.¹⁹ However, according to the experiences of NGOs, the guidelines are poorly known among police or police students. It would therefore be extremely important to carry out a study on how the police comply with and implement instructions and what prevents the intervention of violence against women, especially in the case of marginalised women. It should also be investigated what kind of expertise the police have in preventive police activities related to violence against women.

The state report (para 206) also highlights how higher education institutions acting as independent organisations decide on their educational contents independently, in which case the educational contents related to, for example, the phenomena of violence against women

¹⁸ [Naisiin kohdistuvan väkivallan torjuntaohjelman 2020-2023 loppuraportti](#), Oikeusministeriön julkaisuja 2023:9

¹⁹ [Toiminnallinen käsikirja lähisuhteiden väkivaltaan puuttumiseksi ja ennalta estämiseksi](#), Poliisihallitus 2022.

and domestic violence may vary from university to university, and no statistical data on the topic is available either. General universities and universities of applied sciences do not have compulsory studies related to violence. Questions concerning the promotion of equality should be more clearly included in the curricula for teacher education, as most of the courses on equality are optional for students and rely on personal interest. Several educational institutions offering higher education in the social and healthcare sector, and their study programmes should include the identification, prevention and combating of domestic and intimate partner violence as mandatory, as well as international agreements binding on Finland and national legislation to address violence.

Article 16 (Preventive intervention and treatment programmes)

States should encourage the private sector and media to participate in the elaboration and implementation of policies to prevent violence against women, including the development of programmes aimed at children, parents and educators on how to deal with the information and communication environment that provides access to degrading and harmful content.

In the current situation, NGOs maintain a large share of the services available to perpetrators. In most of the country, there are no services available for domestic violence perpetrators. Access to assistance often depends on where you live, the availability and accessibility of services, as well as the irregularity of practices of cooperation between authorities and organisations. The models and methods of working vary in different areas and services.

In Finland, the practices of violence prevention continue to vary, which is influenced not only by the resources of different actors but also by the varying principles and background theories of the actors. There is variation in how gender-based violence is taken into account in the programmes, for example: Virtually none of the actors are members of the Working With Perpetrators (WWP) network and committed to work to break violence in accordance with the network's criteria.

In recent years, it has been possible to develop efforts to prevent violence by means of projects funded by the Ministry of Justice, implemented within the framework of the '*Naisiin kohdistuvan väkivallan torjuntaohjelma*²⁰ programme on combatting violence against women to develop working methods targeting perpetrators of domestic, sexual and honour-based violence, among others. These include the *Turvallisille raiteille* project run jointly by the Federation of Mother and Child Homes and Shelters, *Viola väkivallasta vapaaksi ry* association and *Lyömätön Linja Espoo ry* association, as well as the *Setlementti Tampere Välitä! Nuorten hanke* project aimed at sexual violence perpetrators, Sexpo Prevention Project SeriE and *Siltavalmennus* association ROAD project.

The Ministry of Justice has established quality criteria for programmes that prevent and

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combat violence²¹. However, in terms of quality criteria aimed at harmonising the quality of services, the lack of resources of the actors implementing the work is a challenge. Different actors also have different principles in terms of how cooperation with services aimed at victims is implemented as well as what kind of emphasis is placed on taking the safety of victims into account in their work. It should be noted that this is also affected by the structures of cooperation with other actors. Local differences are significant, and cooperation is easily personalised in the absence of clear structures at the national and wellbeing services county level.

Project funding received through the Ministry of Justice has been a good start, but the services offered to the authors and the development of work cannot rely on uncertain project funding if they are to have genuine impact. At the end of the programme to combat violence against women, it is uncertain how the programme to prevent violence developed in the project can be further developed and implemented comprehensively at the national level. If no solution is found to the funding issue, the number of low-threshold services specialised in the work with perpetrators will decrease and will only be available in a few cities throughout Finland.

Article 18 (General obligations)

Parties shall take the necessary legislative or other measures to protect all victims from any further acts of violence.

Although Finland recognises the need for a gender-aware perspective that identifies various vulnerable groups, there are no practical measures to promote the gender and human rights perspective. Support services and service chains are still fragmented, and there are shortcomings in their accessibility. The possibility of long-term support is rare. The legal process does not always recognise the victim's status; in which case the pre-trial investigation phase and prolonged criminal proceedings, for instance, may expose victims to secondary victimisation.

The perspective of gender-based violence

Gender-based violence is still widely discussed in Finland at the level of policy recommendations, guidance and practices as a gender-neutral phenomenon. Finland also still has an identifiable view of intimate partner violence as a problem of interaction or an internal conflict within the family, rather than identifying the gender-based dimension of the phenomenon. Poor recognition of the gender-based nature of violence conceals the enormous problem of equality associated with violence against women.

However, statistics on intimate partner violence, in which Finland holds a leading position in calling into question specifically the amount of violence against women, strongly justify the need to consider the gender-based nature of violence more vigorously than before, as well as its impacts in all laws, measures and practices related to violence prevention and

²¹ [Laatukriteerit väkivallan ehkäisy- ja katkaisuohjelmille](#), Oikeusministeriö 2022

supporting victims. Separation from gender neutrality and making the gender perspective a cross-cutting principle in all implementations of the Istanbul Convention is a prerequisite for Finland's ability to effectively intervene in and reduce violence against women.

Vulnerable groups

The needs of different vulnerable groups such as persons with disabilities, immigrants, children exposed to or experiencing violence, or older people experiencing violence, are not sufficiently identified. Even if intersectionality is defined as a principle in different programmes, it is not visible as a reality or measures.

For example, women with an immigrant background experience violence and the threat of violence many times more often than women in the native population. Low-threshold services with the ability to identify violence against immigrant women and its different forms are not sufficient, however, and regional differences are significant. Questions about interpreters are also relevant in encountering immigrant women. Getting qualified, reliable interpreters is challenging, especially for small ethnic and language groups. Guaranteeing an interpreter for women on request enables, for example, reporting experiences of sexual violence in Police interviews.

The Government's 2022 report found that persons with disabilities face significant challenges in seeking and receiving help with domestic violence they have experienced.²² Over one fourth of people with disabilities facing violence do not tell about it to the authorities. Only a half of those who seek help have received it. Only fewer than one fourth of respondents thought it was easy to get help. The obstacles to receiving help included accessibility and prejudice. The service path and process are easily interrupted and the person is left alone with the problem. Identification of victims with disabilities should be more efficient, including not only health services but also social services. In the case of victims with disabilities, the possibility of a hate crime should be documented and investigated.

The equal access of particularly vulnerable women, including homeless women and women with mental health problems, to the services they need, to shelters and to good quality service and treatment without discrimination should receive much more attention. It is particularly worrying that social welfare and healthcare services systematically fail to comply with sections 3 and 11 of the Social Welfare Act, according to which social services must be provided for victims in need of special support, including those suffering from substance abuse and mental health problems. In addition, the services systematically violate sections 8 and 9 of the Non-discrimination Act when victims with substance abuse or mental health problems are not offered the services they need. The long-standing situation indicates that current legislation is not sufficient to secure access to services or support for particularly vulnerable victims.

In practice, women with substance abuse issues have no access to shelter services. The experiment to be launched in 2024 on remote shelters for women with substance abuse issues is not enough to meet the needs of women in a special risk group. The gender-based nature of violence in the lives of women with a substance abuse background is not necessarily recognised in the services of violence prevention. According to a survey

²² [Yammaisten henkilöiden kokema lähisuhdeväkivalta ja palvelujen saatavuus](#), VNTEAS 2022:24

conducted by the VEERAT project, up to 95 per cent of women with a substance abuse background have experienced domestic violence. However, in social welfare and healthcare services, violence remains unrecognised or is not intervened in. Victims suffering from addiction diseases in social welfare and healthcare services continue to feel blamed and belittled.

In relation to adult women, minor girls are in a vulnerable position. Girls often have less chance of protecting themselves from and recognising violence, facilitating their greater likelihood of becoming victims. For example, girls are subjected to a significant amount of sexual violence in digital environments. Nationally comprehensive, state-funded sexual and legal education is needed to prevent sexual violence against girls.

In general, it is not possible to see special challenges or vulnerabilities related to gender or background in the services. Although adding a gender perspective and an intersectional perspective has been identified as one of Finland's three main objectives in Finland's National Action Plan, there is a lack of concrete measures and funding to promote the objective.

Integrated approach and multi-professional cooperation

The challenge in multi-professional cooperation is the lack of effective practices: The MARAK multi-professional risk assessment is still missing in many regions, despite its development. The Barnahus model, which focuses on more efficient procedures for investigating suspected violence against children and on supporting and treating children who have experienced violence, has not yet been established at the national level in all regions. Another challenge is the lack of training and understanding of violence against women and domestic violence by authorities and other actors, as well as the gender-based nature of these phenomena.

The challenge of sharing information between the authorities is a concern raised in a recent report on the killings against women in relationships²³, the 2012 report on the backgrounds of family killings and child killings²⁴, and even earlier. There has been little change. The Government's recent report²⁵ on problems related to the authorities' own provision of information perceives improvements in legislative drafting as a solution. However, the challenges do not exclusively concern the authorities' own provision of information, and it cannot be considered that improving the drafting of legislation alone will solve the problem if, for example, no investments are made in the training of the authorities on violence in the future.

Article 20 (General support services)

The states should make sure that victims have access to services to facilitate their recovery from violence, including access to health care and social services.

Deficiencies in identifying, bringing up and recording violence in Finnish

²³ [Naisiin kohdistuvat parisuhdetapot: Tapahtumaketjut, taustat ja ehkäisy](#), VNTEAS 2023:16

²⁴ [Selvitys perhe- ja lapsensurmien taustoista vuosilta 2003–2012](#), sisäasiainministeriön julkaisu 35/2012

²⁵ [Oma-aloitteinen tietojen antaminen rikosten torjumiseksi](#), VNTEAS 2023

healthcare and official registers are serious. Deficiencies in the identification of violence prevent victims from getting help from primary healthcare and, at worst, prevent them from getting help on time.

General services under the Istanbul Convention have been understood here as general social and healthcare services or general services intended for all victims of crime.

According to recent research data, less than one per cent of victims of domestic violence are identified in Finnish healthcare, even though those experiencing violence use up to 80 per cent more services than others²⁶. Deficiencies in raising the issue, identifying violence and recording signs of violence were also highlighted in the study on relationships with women. A register study of cases that led to the death of women showed that before becoming a victim of homicide, women had increasingly used healthcare services and the amount of Police home visits to their home had increased without a record of violence or the measures it caused²⁷.

Organisations also report that emergency healthcare services do not primarily ask about domestic violence, especially if the victim is intoxicated, even when the violence experienced is obvious. On the other hand, those who have experienced violence may encounter blame and retraumatising attitudes and practices in general services.

Intervention and prevention would be particularly important in child health clinics and early childhood education and care. The situation is usually already escalated if it progresses to child welfare or other social welfare notifications instead of being prevented by bringing them up in early support services and getting help on time. There has been progress in defining 'preventing domestic violence' as one of the seven tasks of family centres, and in some family centres, work has begun to build service paths for violence prevention in cooperation with various actors, including the third sector.

The deficiencies in identifying and addressing violence have been known for a long time, but the situation has remained unchanged despite the tool developed by THL to support identifying and addressing violence²⁸. Victims do not receive sufficient assistance from general services. For this reason, wellbeing services counties must have sufficient services specialising in violence, preferably as services provided by NGOs offering strong expertise in violence prevention.

It is positive that general services aimed at victims of crime and their coverage have been developed in recent years; for example, by Victim Support Finland (RIKU). Another positive development is that the obligation to refer victims of crime to support services has been added to the Police Act.

At the moment, cooperation between basic services and special support services is inadequate, and cooperation structures are missing. This can be seen, for example, as

²⁶ [Lähisuhdeväkivallan tehokkaampi tunnistaminen vähentäisi väkivallasta aiheutuvia terveyshaittoja ja -kustannuksia](#), Siltala, Heli, 2022. Duodecim, 138 (11), 1115-1119.

²⁷ [Naisiin kohdistuvat parisuhdetapot: Tapahtumaketjut, taustat ja ehkäisy](#), VNTEAS 2023:16

²⁸ [Lähisuhdeväkivallan suodatin- ja kartoituslomake](#), THL

problems with service coordination. Referral to shelters works better than other services, but in the case of psychosocial support and counselling and recovery support services provided by NGOs, victims are often forced to search for information about services themselves in order to apply for basic services within the scope of specialist support services.

Article 22 (Specialist support services)

These support services for victims should be provided, in an adequate geographical distribution, including immediate, short- and long-term services.

The number of specialist support services targeted at victims of violence has increased in recent years and are reaching an increasing number of victims. There are still few services available for perpetrators. The NGOs produce most of the special support services, but in the state report addressed to GREVIO, the role of NGOs in the service system is not sufficiently recognised, especially with regard to non-residential support. The state report also does not identify deficiencies in the service system, such as the regionally weak accessibility of various services or the duration of the support offered.

Special support services under the Istanbul Convention have been understood here as services specialising in gender-based violence prevention as a difference from general social and healthcare services or general services intended for all victims of crime.

Non-residential specialist support services

Only some of those who have experienced violence seek help at a shelter, but most seek help from low-threshold specialist support services. Non-residential specialist support services are low-threshold services in which victims are offered short-term and long-term support such as online, telephone or face-to-face support and advice, service counselling and provision of services, legal counselling and other similar support for coping with and recovering from violence. In its baseline evaluation report on Finland, GREVIO has pointed out that there are not enough specialist support services available in Finland for women and girl victims or those under the threat of violence, and that the services are not available throughout Finland.

The majority of non-residential specialist support services are provided in the third sector through NGO grants. In terms of the objectives of the Istanbul Convention and adequate support for victims, it is important that, alongside shelter activities, the structures of non-residential violence prevention and the funding of NGOs providing specialist support services required by the Convention are also safeguarded. In addition, it must be possible to ensure the continuity of work involving women in particular, as well as the provision of long-term support for recovery and funding for it.

There still are not enough services in different regions. In addition, non-residential specialist support services do not have a clear role in the Finnish service system. Previously, municipalities and now, wellbeing services counties collaborate with some actors, for example, to enable psychosocial support based on individual meetings, either as part of the

MARAK process or as service coordination from general social and healthcare services. However, cooperation does not have a clear structure or production model.

WSS are very limited, in practice only provided by Women's Line, MONIKA - Multicultural Women's Association, Finland and Rape Crisis Centre Tukinainen. There are also many shortcomings in services aimed at special groups. For example, only a limited number of services are available for women with an immigrant background, and many localities have no services at all.

Support services for victims of honour-based violence (including forced marriage and female genital mutilation) are provided by NGOs in only a few localities, which is inadequate. The coordination provided by THL's *Kunniaan liittyvä väkivalta* (honour-related violence) steering group is positive, but it should also be reflected in the allocation of resources to the work, so that it can be done much more extensively.

Need for long-term support

The possibility of long-term support is limited and, as a rule, services are not available long enough from the perspective of recovery from violence. For example, the Funding Centre for Social Welfare and Health Organisations (STEA) has imposed a restriction on the activities of NGOs supported from state funds, according to which discussion assistance may only be offered for an average of five visits, even if there is a great need for longer-term support, especially in violence prevention.

NGOs should have the opportunity to offer prolonged individual support that genuinely meets the needs of those who have experienced violence by supporting recovery and preventing re-victimisation. This requires the removal of the currently imposed restrictions on forms of support, sufficient funding and strengthening cooperation with municipalities and wellbeing services counties in customer coordination.

Information on the lack of services providing long-term support for women and girls is available in Amnesty Finland's 2022 report²⁹.

Shelters and their accessibility

Despite the increase in shelter places, there are still not enough of them. Shelters need to direct clients elsewhere because there is no space.

Under the law, shelters offer crisis assistance. Nationally, an average of 17 days are spent in shelters. This time is not enough to break the cycle of violence or provide sufficient support for coping with violence. As social services do not comply with section 3 of the Social Welfare Act and especially section 11, victims do not receive the statutory services they need during or after the shelter period. As a result, victims of violence, especially persons in need of special support, remain alone and the violence continues, resulting in repeated shelter periods. Recurring shelter periods without sufficient other services lead to disappointment of victims towards the authorities and services, which, in turn, raises the threshold for victims to seek help in the future. Recurring shelter periods without sufficient other services lead to disappointment of victims towards the authorities and services, which,

²⁹ [Amnestyn Suomen osaston järjestöille osoitettu kysely pitkäkestoisesta tuesta](#), Amnesty Finland 2022

in turn, raises the threshold for victims to seek help in the future.

GREVIO has given Finland a strong recommendation to improve the accessibility of shelters so that shelters are available throughout Finland. According to the Istanbul Convention, shelters and other special support services under it must be available regionally. There must also be shelters for women only, and they must also be accessible to various minority groups such as people with disabilities, in the same proportion as the majority population.

In Finland, however, shelter services and other special support services continue to focus on the southern parts of the country and large population centres. Finland is a country with long distances, where the nearest shelter can be hundreds of kilometres away. There is only one shelter for women in Finland. The Sámi minority living in Northern Finland still has fewer shelters than the great part of the majority population. Only two shelters are available for women with substance abuse issues in the remote unit to be opened in 2024. There are only professional forms of secure supported housing for those victims of human trafficking who have also been subjected to domestic violence. In addition, an increasing proportion of shelter clients belong to linguistic and cultural minorities (e.g. immigrants, Roma), so shelters should have more cultural special expertise and resources for increasing competence.

Article 25 (Support to victims of sexual violence)

States must set up rape crisis and sexual violence referral centres for victims to provide medical and counselling services.

At the legislative level, the reform of the legislation on sexual offences has been a big step in the right direction. Since the ratification of the Istanbul Convention, the network of support units for sexual violence, the Seri Support Centres, has been significantly increased. However, Finland does not sufficiently recognise support services for sexual violence victims produced by NGOs.

The Seri Support Centres' services include forensic sampling, an overall assessment of the situation, psychosocial support for crises situations, and a follow-up care plan. Seri Support Centres only serve persons over 16 years of age who have been subjected to a sexual offence less than a month previous. The primary task of the Seri Support Centres is to take forensic samples. Psychosocial support is often available only for a few weeks after applying for the service, and is available on average 1–3 times.

Deficits in wellbeing services counties' budgets and pressures to save money also threaten the operations of the Seri Support Centres. In order to ensure the continuity of their operation, it would be important to secure their funding through government grants in the same way as shelter funding.

However, the Seri Support Centres alone do not cover service needs. Of the services provided by the NGOs, the specialist support services provided by the Rape Crisis Centre *Tukinainen* include psychological and legal support for all victims of sexual offences, regardless of the victim's age or the length of time since the offence was committed. The

majority of sexual offences are not discovered within a month of the act but much later. In addition, *Tukinainen* offers further services at the end of the support received from the Seri Support Centre. It is positive that guidance practices from Seri Support Centres to organisations have become established in all areas where specialist sexual offence services provided by NGOs are available.

However, the state report on specialist support services for victims of sexual violence does not mention Rape Crisis Centre *Tukinainen*, which is the only rape crisis centre for victims of sexual violence maintained by an NGO. In 2022, *Tukinainen* encountered nearly 6,000 clients who had experienced sexual violence, 96 per cent of whom were women and girls.

The services provided by NGOs can provide victims with psychosocial support faster, more flexibly and more diversely as, for example, a support group. If they so wish, the victim can participate anonymously, which lowers the threshold for seeking help. The support provided by NGOs is independent of the authorities, and the threshold for seeking assistance is therefore lower as well. In addition, the support they provide is often longer-term and covers, for example, legal aid. NGOs also carry out preventive work, which, for example, wellbeing services counties are often unable to do above and beyond their service obligations.

The CEDAW Committee, which oversees the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), has recommended that Finland be flexible with the one-month deadline of the Seri Support Centres to obtain service. Even if the deadline is abandoned, the services of the Seri Support Centres are not sufficient on their own. The majority of victims of sexual offences may be left without support services if, for example, the operating conditions of Rape Crisis Centre *Tukinainen* and other organisations deteriorate. Funding for organisations and operating conditions for helping victims of sexual violence as well as organising longer-term further treatment must be secured.

Article 31 (Custody, visitation rights and safety)

Incidents of violence should be taken into account in the determination of custody and visitation rights of children, and that the exercise of such rights does not endanger the victim or the children.

The authorities still do not sufficiently recognise domestic violence and its impacts, or using a child as a tool for violence, especially when making decisions on custody and visits. At worst, non-identification of violence enables domestic violence or its continuation. The responsibility for investigating the child's overall situation and coordinating assistance does not seem to belong to any authority.

In its baseline evaluation report on Finland, GREVIO highlighted several observed shortcomings in relation to children's custody and visitation rights and urged Finland to take action to address these shortcomings.

Article 31 of the state report points out that violence against women and domestic violence are considered in decisions on custody and access rights. Later (para 327) it is stated, however, that even though the understanding of the harmfulness of witnessing violence to the child has increased, an individual judge's understanding depends on their interest in the subject.

The NGOs are concerned about the ability of the Finnish legal system to identify violence and protect its victims, mainly women and children. The competence and understanding of courts of law regarding the phenomenon of violence are haphazard. The attitudes of the judge may influence the handling of the matter, and often the aim is to 'fix the relationship between the parents'. In the justifications for court decisions, violence is not considered, and knowledge of the situation of an individual child is not sufficiently utilised in the justifications for decisions. At worst, the inability of the judicial system to identify and validate perceived violence is revictimising.

It is also a question of the length and cost of legal proceedings. Court-assisted custody dispute mediation when there is violence in the family is often chosen because no other alternative means are available.

Some of the visitation and custody decisions place significant emphasis on the parent's rights rather than on the child's best interest or rights. Meeting rights can be used to continue the use of violence after the divorce, but denying the right of access to a violent parent is very rare. In practice, the continuation of violence after granting of access rights is not monitored by the authorities at all, and those who have used violence are not actively directed to work to stop violence.

The current situation does not comply with the obligations of the Istanbul Convention or the UN Convention on the Rights of the Child (Treaty Series of the Statute Book of Finland 59/1991), nor does it comply with the Act on Child Custody and Right of Access. The authorities making custody decisions must have sufficient competence and an obligation to comprehensively take violence against women into account in their decisions, to identify the injurious effects of the parent's violence on children and to restrict the parent's custody and access rights to ensure the child's safety and interests as necessary.

Identification of domestic violence and family support in other authorities

In addition to the court authorities, the social welfare authorities or the Police often classify post-divorce violence as a 'custody battle', in which case psychosocial problems in particular in the background of a 'custody battle' and the child's need for help may not be identified. In particular, the identification of psychological violence and, for example, coercive control is inadequate. This may mean that the child is excluded from assistance for the entire duration of their childhood.³⁰ The prolonged situation related to separation and custody, defined as a battle, is, at worst, one form of child abuse, which may have far-reaching consequences for the child's well-being. The authorities and other actors should, therefore, also pay attention to the prevention of serious custody proceedings and timely intervention in the situation.

³⁰ [Vaativan erotyön käsikirja](#). Vaitomaa, J., Muukkonen, T. & Rautio, S. (ed.). Ensi- ja turvakotien liitto 2021.

A legal decision is obtained from the court, but the coordination of the child's assistance as a whole when deciding on the situation related to custody and meetings is often deficient and it is not necessarily perceived to fall under any authority's duties. Child welfare workers can withdraw from addressing even children's difficult problems or support needs by naming them as 'custody battles' between parents. This may leave families alone too often to solve issues related to custody, which may lead to continued violence and fragmentation of assistance and support. According to section 27 of the Child Welfare Act (417/2007), a child exposed to violence should have access to a child welfare client relationship because the child's growth conditions endanger the child's growth and development. However, exposure to violence or even violence against a child is not always considered a basis for starting a child welfare client relationship.

Victims of violence have not necessarily been allowed to discuss the violence they have experienced during the custody or visitation case if they have not had strong evidence of the matter. Violence is only relevant when the experiences can be proven. This is a challenge, for example, in the context of psychological violence, coercive control, post-divorce violence and persecution. When violence is ignored in courts and the phenomenon is interpreted as related to a dispute or a 'custody battle', at worst, the interpretation views the victim as a 'battling parent', 'uncooperative parent' or 'alienating parent', who does not 'grant access' to the child to meet the perpetrator parent.

National studies show that the authorities often consider a non-violent parent to also be obliged to protect the child, and if the parent fails to do so, they can be regarded unfit as a guardian.

According to GREVIO, it should be guaranteed that the Finnish judicial authorities are aware of and familiar with the phenomenon in which the perpetrator accuses the victim of alienating the child from the other parent. According to the NGOs' experiences, the phenomenon and the different perspectives related to it are not sufficiently recognised in the Finnish legal system.

Perpetrators often try to invalidate their violence and control of women and children by accusing their ex-spouse of 'alienating'. The phenomenon may also include the perpetrator's attempt to alienate the child or children from the parent who has been a victim. The instrumentalisation of children as tools in custody disputes may be part of domestic and intimate partner violence, which has begun during family life and continues after the divorce.

If the relationship between the child and the parent has been safe and good before the parents' divorce, and the child has not been subjected to or exposed to violence, and the other parent still alienates the child from the other parent, this is also abuse.

NGOs also highlight situations in which the child's residence and address information should be concealed from another guardian for security reasons. In any case, the child's right to contact the other guardian can still be implemented safely from the child's perspective.

Availability of services for child victims of violence

The child should always receive help for the violence they have experienced. However, children who have experienced violence and have been exposed to it in close relationships

do not always have access to the support services they need. There are not enough services for children, and children in a particularly vulnerable position or at-risk group cannot always be identified. According to the Ombudsman for Children, Finland lacks professional skills in encountering and recognising domestic violence and difficult divorce situations. Finland has also been criticised for the situation by those who monitor the implementation of international human rights.

If the perpetrator parent is the child's guardian, they may refuse access to the assistance because both guardians' consent is required for receiving support for the child.

Article 48 (Prohibition of mandatory alternative dispute resolution processes or sentencing)

States should prohibit mandatory alternative resolution processes, including mediation and conciliation, in relation to all forms of violence covered by the Convention.

According to the policies on mediation of domestic violence in Finland, domestic violence should not be mediated if the violence has been repeated. However, serious and repeated domestic violence and sexual offences are still referred to mediation in Finland. The NGOs have been working to promote the abolition of mediation in domestic violence and sexual offences for a long time, and the current government has now proposed banning most of the mediation.

Mediation of domestic violence

The amount of mediation in criminal and civil cases has increased annually. Most of the cases referred to mediation concern domestic violence. The police do not always have sufficient competence to assess which cases are suitable for mediation, so repeated violence is also directed to mediation in violation of the policies, and mediation has also reconciled these. The most typical mediation agreement is an apology³¹.

It may be difficult for a victim to express their views in a mediation situation, as an unequal power setting will not be eliminated even in mediation. An outsider often does not notice how fear affects the behaviour of a victim. Mediation transfers the responsibility for violence to the victim and leaves them unprotected³². At worst, mediation is a way for the perpetrator to target more violence and the threat of violence to the other party.

Both the Committee of the Parties and GREVIO have stressed that mediation must not lead to the suspension or non-prosecution of criminal investigations in cases of violence against women. In practice, however, referring violence to mediation often interrupts the criminal process. The mediation agreement often leads to a decision not to prosecute. From the point of view of the principle of impunity, the situation is alarming.

³¹ [Lähisuhdeväkivallan sovittelu: Yleiset piirteet ja osapuolten kokemukset prosessista](#), VNTEAS 2023

³² [Parisuhdeväkivallan sovittelu Suomessa](#), Qvist, Tiina, 2019.

The state report (para 344) describes the mediation process, which includes informing the parties of the potential impacts of the mediation process on the criminal process. It, therefore, seems that, instead of making changes to the process itself, the responsibility has been imposed on those involved in the mediation process by informing them of the shortcomings related to the process. However, this cannot be regarded as eliminating the problem to any extent. For more information on the topic, see for example Amnesty's article and the NGO parallel report from March 2023³³.

GREVIO's baseline evaluation report on Finland notes the limited training of mediators. The situation has not changed significantly. In a recent report on mediation³⁴, mediators of domestic violence highlighted the understanding the phenomenon of domestic violence and the identification and processing of power imbalances as their main educational needs.

Mediation of sexual offences

In practical work, it has been observed that more and more sexual offences have been referred to mediation in recent years. With the reform of the law on sexual offenses, there is a risk that this will increase further unless sexual offences are clearly excluded from mediation. Victims of sexual violence are particularly vulnerable because research has shown that sexual violence is the most traumatising form of violence after torture.

Mediation of custody disputes when there has been violence in a relationship

In addition to mediation in domestic violence, the issue of mediation in custody disputes in cases involving violence must also be addressed. The state report (para 348) establishes that the suitability of expert-assisted court mediation in custody disputes is not limited in terms of the specificities of an individual case. This means that cases of violence against women and domestic violence are also being mediated.

With regard to the court mediation of expert-assisted custody disputes, the practices are rather unclear. There are no clear criteria in terms of what kinds of cases are mediated in general, how a possible background for violence is investigated and how the risk assessment of violence is carried out. A brochure for parents³⁵ considering court mediation describes the advantageousness and speed of mediation only without mentioning the risks associated with mediation or the situations in which mediation may not be an appropriate option.

In the state report addressed to GREVIO, the competence of an expert assistant plays a key role in identifying possible alarm signals. The state report (para 332) notes that the mediating judge is familiar with family matters and assisted by a psychologist or social worker who is familiar with parenthood and child development. On the other hand, the report makes no mention of competence related to violence against women or domestic violence.

It has already been pointed out above that the authorities' training on violence against women and domestic violence is haphazard and deficient. In custody mediation, the same lack of competence creates a clear risk that violence against women and domestic violence will be indirectly mediated as part of custody dispute mediation.

³³ [NGO Parallel Report on the Implementation of the Istanbul Convention in Finland](#), 2023, pp. 24–27

³⁴ [Suomalaisen sovittelun tila ja mahdollisuudet](#), VNTEAS 2023

³⁵ [Huoltoriidan sovittelu tuomioistuimessa](#), Tuomioistuinvirasto 2022.

On discontinuation of mediation of domestic violence

For years, NGOs have highlighted serious shortcomings related to the mediation of domestic violence that endanger the interests of victims and their legal protection, but these concerns have systematically been ignored in mediation activities. The interventions to mend the concerns raised in GREVIO's baseline evaluation report on Finland have been incomplete and positively ineffective.

As stated in the current Government Programme, the NGOs believe that mediation of domestic violence must be discontinued. Mediation must be completely abandoned, not only for the most part, and it must concern both mediation of domestic violence and mediation of sexual offences. At the same time, instructions must be drawn up for mediation in custody disputes when there has been violence in the family. When discontinuing mediation, it is essential to pay attention to the fact that both parties to violence are directed to assistance and support right at the beginning of the criminal process.

The NGOs are mainly united in their views. However, Victim Support Finland (RIKU) considers that although it takes a critical stance towards mediation in domestic violence and sexual offences, it considers it possible to mediate these when certain precise criteria are met. However, such criteria have not been sufficiently introduced in Finland.

There have been efforts to defend mediation by referring the parties to support during the process, but mediation barely directs customers to support services for victims or perpetrators. Support for the parties can be provided safely and professionally through support services, especially those provided by NGOs.

In many criminal and civil cases, mediation brings benefits both to the parties involved and to society, so mediation should also be developed in the future. However, these resources should be directed to other targets than mediation of domestic violence and sexual offences.

Articles 49 & 50 (General obligations and immediate response, prevention and protection)

States shall take the necessary legislative or other measures to ensure that investigations and judicial proceedings in relation to all forms of violence are carried out without undue delay, while taking into consideration the rights of the victim during all stages of the criminal proceedings; and in conformity with the fundamental principles of human rights and having regard to the gendered understanding of violence, to ensure the effective investigation and prosecution of offences.

States shall take the necessary legislative or other measures to ensure that the responsible law enforcement agencies respond to all forms of violence promptly and appropriately by offering adequate and immediate protection to victims; and to ensure that the responsible law enforcement agencies engage promptly and appropriately in the prevention and protection against all forms of violence, including the employment of preventive operational measures and the collection of evidence.

There are still significant deficiencies in the criminal processes related to violence against women and the punishability of acts in Finland. More resources are needed for investigative and judicial processes so that cases can be handled without delay, appropriately, and through the implementation of the victims' fundamental and human rights and legal protection.

In 2022, the Deputy Chancellor of Justice published a report on police action in pre-trial investigations of sexual and domestic violence offences³⁶. In the report, the Deputy Chancellor of Justice found numerous shortcomings in police activities such as unjustified delays in pre-trial investigations, as well as shortcomings in the assessment of the victim's need for protection, referral to support services and informing the victim of their rights. In addition, the Deputy Chancellor of Justice found that the police did not always identify the characteristics of sexual offences and violent crimes committed in close relationships, or that the offences were considered less serious.

The state report highlights the challenges posed by insufficient resources in articles 49 and 50, but we would like to stress that this is not a resource shortage alone. Other factors such as insufficient understanding of the phenomena and the harmful attitudes and stereotypes of the authorities also have an impact. The Deputy Chancellor of Justice's report also revealed that although the police in their responses appealed to the scarcity of resources due to delayed investigations, this was not true in the cases in question. With reference to the observations made, the Deputy Chancellor of Justice also questions whether, despite the training and instructions provided by Police Departments, the obligations in the Istanbul Convention have been adopted to encounter victims, especially in matters concerning domestic violence and sexual offences.

Only about 20 per cent of suspected rapes reported to the police lead to prosecution and 15 per cent to a conviction. The results of the investigation on the gatekeepers of criminal proceedings showed that even after the legislative amendments, the police will exercise considerable discretion in determining the criminal nature of domestic violence, and significant responsibility for advancing the matter remains with the victim. The investigation revealed that if, according to the police, the victim did not demand or want a report of the offence to be recorded, or the victim could submit the report later on, this reduced the number of reports recorded. In addition, domestic violence is directed from the police to mediation through a deficient pre-trial investigation, and the end result of mediation often affects whether the matter progresses to the prosecutor.³⁷

The police and the judiciary must ensure their competence in violence against women such as female genital mutilation, honour-based violence and sexual violence. Of the emerging forms of crime, digital violence is not always considered serious, and resources are not directed to its investigation. Evidence of crimes related to digital violence is largely the responsibility of the victim of the crime. Competence related to encountering victims of violence should be developed so that police activities do not retraumatise victims.

³⁶ [Poliisin menettely lähisuhdeväkivallan ja seksuaalirikosten esitutkinnoissa](#) (OKV/325/70/2022)

³⁷ [Rikosprosessin portinvartijat: lähisuhdeväkivallan rikosluonteen rajanveto poliisin puuttumisen näkökulmasta](#), Fagerlund, M. Helsinki University 2023.

In addition, police instructions should be strengthened and nationalised. Protocols / standard operating procedures or guidelines should provide guidance to treat a victim with disability and gender-based violence and its different forms such as honour-based violence.

Developing multi-professional cooperation and exchange of information would be of primary importance in order to guarantee victims' rights during the criminal proceedings.

It may take years for a report of an offence to be handed down for a final conviction. This is unreasonable primarily for the victims, but it also consumes the resources of the helping parties in a protracted manner. The long duration of criminal proceedings undermines trust in the legal system. It is important to investigate crimes without delay and carefully throughout Finland. According to the Criminal Investigation Act section 4(7), investigative measures against persons under the age of 18 must be given to researchers with special knowledge of this task. The investigation of violence against women must be regulated accordingly. Provisions on the order of priority of suspected offences should be laid down by law.

Article 51 (Risk assessment and risk management)

Parties shall take the necessary legislative or other measures to ensure that an assessment of the lethality risk, the seriousness of the situation and the risk of repeated violence is carried out by all relevant authorities in order to manage the risk and, if necessary, to provide coordinated safety and support.

The MARAK operating model has been found effective and helpful to victims, but the model is still not comprehensively used everywhere in the country. It is also not obligatory to base the risk assessment on legislation. As regards the development of risk assessment, it would thus be necessary to take a more expanded approach to the challenges of multi-professional cooperation and the exchange of information between different actors, and to correct them. In addition, a jointly identified risk assessment tool would be needed for conflicted divorce and custody situations.

The effectiveness of the risk assessment of intimate partner violence and the multiprofessional MARAK operating model for support has been assessed in Finland between 2010 and 2015, and the results have been very positive. However, the model is currently used only in 38 places, and the model is not applied comprehensively across Finland. Where the model is used, the functionality of the group varies. Risk assessment does not have a binding basis in legislation, and this is also reflected in the activities of MARAK groups.

It would also be important to take the perpetrator perspective into account in the risk assessment. For example, in Scotland, in addition to MARAK, there is "Multi-Agency Tasking and Coordination" (MATAC), which draws attention to the perpetrator rather than the victim and uses risk assessment and management methods to ensure that the perpetrator stops the use of violence. It would be very important to introduce a risk assessment model such as this, or another one found effective in preventing violence in Finland.

In addition, in the opinion of the NGOs, training different actors on the dynamics of violence against women and the phenomenon of domestic violence requires attention. If violence is not identified, the risk assessment will not be carried out at all or it may be incomplete.

People experiencing domestic violence are already encountered in basic services, where carrying out a risk assessment could help with service coordination, and it would also be important in preventing the situation from worsening. Even after a direct request from a victim, a risk assessment may not be carried out. Especially in cases of honour-based violence against immigrant women, it would be very important to carry out a risk assessment. At the moment, the special needs of victims such as disabilities are not adequately considered in risk assessments.

Another key problem in identifying risks is that suspected violence is not recorded in official registers and various registers do not communicate with each other.³⁸ As regards the development of risk assessment, it would thus be necessary to take a more extensive approach to the challenges of multi-professional cooperation and the exchange of information between differing actors and to correct them.³⁹ As regards the development of risk assessment, it would thus be necessary to take a more extensive approach to the challenges of multi-professional cooperation and the exchange of information between different actors and to correct them. The NGO parallel report from March 2023 describes the observations in detail.

Risk assessment is also essential in the case of conflicted divorce and custody situations. Risk assessment does not guide decision-making related to custody or meetings, as there is no jointly identified risk assessment tool for these situations. The risk assessment should be carried out in a multiprofessional manner and from the perspective of the child, it should consider the safety of the child and the parent (victim), and it should always be carried out before a decision is made on the right of custody and access to the child. In order to achieve this, a national authority is needed for creating consultation structures, training professionals and establishing good practices.

Article 52 & 53 (Emergency barring orders and restraining or protection orders)

Parties shall take the necessary legislative or other measures to ensure that the competent authorities are granted the power to order, in situations of immediate danger, a perpetrator of domestic violence to vacate the residence of the victim or person at risk for a sufficient period of time and to prohibit the perpetrator from entering the residence of or contacting the victim or person at risk. Measures taken pursuant to this article shall give priority to the safety of victims or persons at risk.

³⁸ [Naisiin kohdistuvat parisuhdetapot. Tapahtumaketjut, taustat ja ehkäisy](#), VNTEAS 2023:16

³⁹ [NGO Parallel Report on the Implementation of the Istanbul Convention in Finland](#), 2023

Parties shall take the necessary legislative or other measures to ensure that appropriate restraining or protection orders are available to victims of all forms of violence covered by the scope of this Convention.

The reform of the restraining and protection orders has improved their effectiveness and has improved the position of victims in this respect. However, clarity is still needed to apply for the orders, and it should better safeguard the victims' rights. When applying for restraining and protection orders, special attention should also be paid to referring to support services.

Legislative amendments on restraining and protection orders adopted by Parliament in December 2022 improve the effectiveness of restraining and protection orders and strengthen the right to life, personal integrity and security of victims of violence against women and those living under threat of domestic violence. The changes enable electronic control of the restraining and protection orders. Submitting the application for restraining and protection orders free of charge and obtaining legal aid for the costs of an assistant also in the restraining and protection orders trial are important legislative reforms.

However, applying for restraining and protection orders against a violent party should be clearer and easier, and the victim's rights should be safeguarded more extensively.

The benefits of the improved Act on Restraining Orders do not extend to communal violence, in which there may be several perpetrators. The authorities must ensure adequate protection of victims of honour-based violence in other ways than through restraining and protection orders.

Emergency barring order

The restraining and protection orders issued by the Police are still rare in Finland, and it should be investigated whether the rights of victims of violence could be improved if restraining and protection orders immediately entering into force were issued with a lower threshold. There are also shortcomings in the instructions and training of authorities such as the Police in imposing an emergency barring order. For example, people with disabilities may have more difficulties to protect themselves or leave threatening situations, and this should be taken into account with emergency barring orders. If the victim with a disability is dependent on help from the perpetrator, other forms of help should also be provided to cover this need of help.

Restraining and protection orders

Monitoring of violations of restraining and protection orders is still not sufficient, and the responsibility is too much on the victim. From the victim's perspective, processing a violation of restraining and protection orders in court is slow and difficult, and the punishability of the violation of restraining and protection orders is still too mildly regulated.

In its baseline evaluation report on Finland, GREVIO highlighted the concern that custody and access rights in Finland take precedence over restraining orders if the prohibition has not been specifically ordered to protect the child. Since then, no changes have been made to

the legislation as to how the restraining order affects the child's right of custody and access. Instead of this, the NGOs would like to draw attention to how, under the leadership of the ruling practice of the highest courts of law (KKO:2019:50, Helsinki HO 4 July 2023 R22/2051), it is becoming established that when imposing restraining and protection order on a parent to protect the child, the court must carefully consider whether an exception to the restraining order can be made to carry out meetings between the child and the parent. This is a very problematic direction and may contribute to undermining the importance of the restraining and protection order issued to protect the child. The situation is particularly problematic because the identification and consideration of violence is still quite inadequate among the judicial authorities.

At the very least, a meeting with children should always be arranged under supervision when the protection of restraining and protection orders has been extended to children, or when previous violence or threats give rise to it. The child must be protected from being used as a means of circumventing the restraining order. At the same time, the safety of the parent subject to a restraining and protection order should be ensured when organising supervised meetings.

Part III: Emerging trends on violence against women and domestic violence

a. Emerging trends in violence against women and domestic violence, including its digital manifestations (types of perpetration, groups of victims, forms of violence)

- The increase in different forms of digital violence is a clear growing trend, which is manifested, for example, as digital persecution and coercive control.
- The cuts in social security and people's livelihoods planned by the current government may increase domestic violence.
- The relative increase in the number of older people in the population will also increase the number of older victims and perpetrators.
- The risk of being subjected to harassment and violence (e.g. honour-based violence and hate speech) has increased in recent years among sexual and gender minorities and vulnerable persons.
- According to the latest studies, dating violence among young people (aged 14-17) is worrying. Girls with disabilities experience more sexual harassment and violence than others, and such incidents have increased from 2019 to 2021.
- Sports hobbies show the stretching of the boundaries of sexual harassment and the so-called grey area in which adult men, often coaches, abuse their dominance in relation to young girls.
- In recent years, new paid private services based on AI technology have been launched in Finland to provide support for victims.

b. Emerging trends in domestic case law related to violence against women

- More defamation charges have been brought against victims who have reported sexual offences where there is insufficient evidence to bring charges.
- A woman was convicted of defaming her abusive ex-partner after she told a social media following of mainly close friends that she had ended an abusive relationship. According to the judgement, the information was likely to cause the perpetrator anxiety⁴⁰. According to the law, violence in the relationship was undeniable.
- Social media highlights cases of domestic violence in a special way. This has also been reflected in the convictions, as the negative publicity they have received has caused a reduction in the sentence.

c. Emerging trends in the allocation of funding and budgeting by your state authorities

- Funding for low-threshold services has remained the same even though the target group of the work and the understanding of the phenomenon have increased. Low-threshold services are mainly able to respond to corrective work instead of using the resource for prevention.
- Due to the poor financial situation of the wellbeing services counties, it is not expected that the level of grants will be maintained. However, in addition to service

⁴⁰ [Nainen kertoi Instagramissa väkivaltaisen liittonsa päättymisestä ja sai tuomion kunnianloukkauksesta – Asiantuntijat pitävät oikeuden viestiä huolestuttavana](#), Helsingin Sanomat 8.9.2023, accessed 29.12.2023.

provision, grants are a key way of organising special support services in the municipality or wellbeing services county.

- Grants allocated to domestic violence by STEA do not require compliance with the Istanbul Convention or use commitment to the Convention as a tool for steering funding. State-guided funding can be granted for domestic violence work, which is incompatible with the Istanbul Convention.

d. Innovative approaches to primary prevention, for example new target audiences and means of communication, public/private partnerships etc.

- Promising openings have been created in work to combat honour-based violence and domestic violence, for example in cooperation with the Roma community.
- Body-emotion education for children is sexual and safety skills education for children aged 0–9 and it is already widely applied in early childhood education and care and comprehensive school. Children learn, for example, body rights, privacy, rules of touch and norms.
- Sexual violence and harassment in sports have been introduced in Finnish public debate in recent years, including the *Älä riko urheilua* (Don't break the game) campaign of The Finnish League for Human Rights and the You are not alone (*Et ole yksin*) service of the Family Federation of Finland.
- In the work carried out with boys and young men, new support services have been developed in which boys and young men aim to increase their consent culture and that support boys and young men themselves and their respectful attitudes.

e. Emerging trends related to access to asylum and international protection for women victims of violence against women.

- The position of asylum seekers has deteriorated: asylum processes have become even longer, criteria for entry and asylum have been tightened and family reunification has been hampered.
- If the victim's residence permit is linked to the spouse's residence permit on the basis of marriage, the victim may not be issued a residence permit even if there has been violence in the relationship. Amnesty Finland has brought NGOs together to influence the matter.
- The status of victims of human trafficking has improved and their rights to services have been strengthened so that the continuation of assistance received through the system of assistance no longer depends on the progress of the human trafficking offence process concerning them. Assistance is primarily based on assessing the victim's individual situation.
- The new law on the annulment of forced marriage is difficult to interpret. In the preparations for the criminalisation of forced marriage, the NGOs have been consulted, but criminalisation alone does not solve the problem. Victims fear seeking help in fear of worsening violence. When the perpetrator may also be charged with criminal charges in the future, the victims are even more afraid of the consequences, and the result may be that the violence will remain hidden even more. Security and support services and preventive work are needed alongside legislation.