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## Save the Children Finland's comments to The Group of Experts on action against violence against women and domestic violence (GREVIO)

### Report by the Government of Finland on the implementation of recommendations addressed to states parties by the Committee of the Parties 28 February 2023

#### Finnish Ministry of Foreign Affairs VN/14786/2022-UM-12

Save the Children Finland (SCF) appreciates the opportunity to give feedback to the Group of Experts on action against violence against women and domestic violence (GREVIO) on the reporting form submitted by the Finnish authorities on the implementation of the recommendations of the Committee of the Parties.

#### 1. Sexual violence against children requires gender specific attention and measures

States have the responsibility of ensuring all actors meet the highest standard in their work for and with children, and that all actors do their part in keeping children, including girls, safe in all environments.

All gaps in protection of children from all forms of sexual violence, be it online or off-line, including witnessing sexual and/or domestic violence, should be addressed, monitored and reported by the state authorities and rely on disaggregated data by gender and age.

In addition to the important emphases raised in the state reporting form, and **taking note that Finland has not included comprehensive action to combat sexual violence against children in the Action Plan for Istanbul Convention for 2022-2025, it is crucial to further highlight the sexual abuse of children and the specific needs of child victims.** In Finland, recent research and studies (e.g. [Mielityinen et al 2023](#), [Save the Children Finland 2021](#), [School Health Promotion study 2021](#)) have shown that sexual violence against children is on the rise.

SCF works to prevent and combat child sexual abuse with a focus on the abuse that takes place online. This includes processing reports of child sexual abuse material (CSAM) and activity related to online child sexual abuse, such as the spreading of a child's nude image and online grooming for sexual purposes.

**Reports of online child sexual abuse (not including CSAM), such as grooming, received by SFC's hotline have increased (approx. 40% increase from 2021 to 2022, see more in the [Annual report 2022](#)).** Additionally, more and more of CSAM reports received by the hotline contain material where the child has been pressured, manipulated, or instructed to do sexual acts in front of a web or a mobile phone camera. **The amount of such so-called self-generated CSAM in the reports received by the hotline has increased more than 20-fold since 2021.** Self-generated CSAM is an internationally recognised problem (e.g. [IWF 2022](#)) that poses new challenges for the prevention of child sexual abuse.

**Overall, SCF would like to highlight that the spreading online of images and videos depicting sexual violence is something that can deeply affect any victim, including both children and adults.** The images and videos can be used as a way to blackmail the victim or to keep them silent.

Whether the material is uploaded and spread online, the fear of such actions and the fear of being recognised from their abuse images can follow the victim throughout their life. The online aspect of sexual violence should, therefore, not be seen as something separate from what is happening to the victim in the "physical world", and it should not be left out from the attempts to combat sexual violence.

**There is a clear need for increased efforts to both combat online child sexual abuse and focus on preventative efforts including awareness raising of all children as well as preventative efforts aimed at persons with a sexual interest in children.**

To prevent and combat child sexual abuse, **sufficient resources for authorities are paramount**. In addition to ensuring the capabilities of authorities, efforts are needed to create and maintain cooperation between different actors, including civil society and private sector.

In the reporting form, the efforts made by the government of Finland to facilitate the work of civil society is explained. **However, to sufficiently tackle all sexual abuse, including abuse taking place online, also the private sector action and plans should be included.**

Many children who face sexual abuse do not let anyone know, or only tell a friend (e.g. [Save the Children Finland, 2021](#)). Awareness-raising, therefore, also has the important function of letting children know that what has happened to them is wrong, not their fault, and the responsibility of safe adults to look into. **Awareness-raising needs to focus on encouraging children to disclose** – whether that is to a parental figure, an authority, or a low-threshold reporting service, such as a hotline.

All children should have the opportunity to receive information in their own language, in a way they find easy to understand, and in an age-appropriate manner. Therefore, SCF finds it utmost important that the Ministry of Justice is currently funding an awareness-raising social media campaign for young people about sexual abuse in digital environments that aims to respond to these needs.

## **2. Long-term funding for NGOs should be available**

### **Questions 12 and 14**

Several measures in prevention of violence against women and girls are currently delivered by non-governmental organizations. It is important to pay attention to certain features of NGO funding: currently the national funding is unreliable, short-term and does not enable long-term efforts to prevent and combat violence.

## **3. All forms of FGM should be criminalized in Finland**

### **Question 29**

Female genital mutilation (FGM) comprises of all procedures that involve altering or injuring the female genitalia for non-medical reasons. FGM is a violation of the human rights of girls and women.

The practice is recognized in international human rights conventions, also in the Istanbul Convention, as a form of violence against girls and women and as a violation of human rights from which girls and women must be protected.

SCF supports that the criminalization of female genital mutilation must be specified in the Finnish criminal law in accordance with international obligations. It is extremely important that all forms of female genital mutilation will be punished.

FGM is a form of torture and an extreme form of violence and discrimination against girls and women, rooted in harmful gender norms. The continuation of FGM sustains massive gender inequalities in practicing societies, as it limits opportunities for women and girls to realize their full rights and potential.

#### **4. Reporting on violence against girls**

SCF takes note of the important role and work of GREVIO in monitoring violence against women and girls. In our domestic programme we have a strong emphasis on prevention and protection of children from all forms of violence, including violence in the digital environment.

SCF monitors state efforts and obligations to combat violence against children, including sexual violence against children. We focus our monitoring also on the implementation of the Lanzarote Convention and have been a leading civil society organisation in advocating that Finland should have an Action Plan for the implementation of the Lanzarote Convention.

SCF recommends that Finland will include state plans and measures focusing on girls both as victims and witnesses of violence, including domestic violence, more in detail in its' future reports to CREVIO. We also would like CREVIO under its' mandate to take note of the important work of the Finnish Ombudsperson for Children in monitoring all forms of discrimination and violence girls may experience and witness.

During this government term Finland has approved its' first Action Plan for implementation of the Lanzarote Convention. Finland has also developed a comprehensive and ambitious Action Plan for the Prevention of Violence against Children 2020–2025 (Non-Violent Childhoods). SCF encourages CREVIO to observe the work of these two parallel Action Plans (Istanbul and Lanzarote Convention) in order to have a more holistic overview and understanding of the efforts in prevention and protection of girls from violence.

SCF would also like to draw attention to the national surveys such as The School Health Promotion (SHP) study which monitors the well-being, health and school work of Finnish children and adolescents. The aim of the SHP study is to strengthen the planning and evaluation of health promotion activities at school, municipal and national levels. The SHP study is carried out nationwide every second year in March–April. Nearly 300.000 respondents participated in the survey 2021. The SHP study data collection has been assessed by the ethical committee of the Finnish Institute for Health and Welfare in 2012, 2014, 2016, 2017, 2018, 2020 and 2022.

SCF would also like to give appreciation to the Barnahus project (2019-2025) aiming to mainstream practices compliant with the Barnahus standards in investigation processes of suspected cases of violence against children as well as in support and treatment provided for children who have encountered violence. The Barnahus project is very important in developing the coordination, support and treatment needed by children and families who have experienced violence; and ensuring child-friendly encounters and facilities for all children heard in a legal context; among other Barnahus project objectives. Barnahus project responds to the recommendation of CREVIO for making sure that there are sufficient structures, and multiprofessional coordination and cooperation.

SCF would also like to take notice of the work of combatting violence against children and girls in the National Child Strategy. One of the actions of the National Child Strategy is to implement the Child Victim Survey which purpose is to strengthen the work against child abuse.

The Child Victim Survey is a survey for children and young people based on a nationally representative sample, which extensively examines the experiences of children and young people in different areas of life and living environments. The recent Child Victim Survey was conducted in the Spring 2022 in about 600 schools across Finland. The report was published in February 2023. The Child Victim Survey provides basic information on violence against children which is needed to reduce the phenomenon and to improve related government activities. The Child Victim Survey has provided vital information not only for researchers but also for professionals working with children and young people in different fields.

SCF wishes to highlight that during the implementation of the Government Programme of Prime Minister Sanna Marin's Government, there has been an ambitious plan to move nationally towards a child and family-friendly Finland that spans government terms and crosses administrative boundaries. For this purpose, the National Child Strategy records the current state of the wellbeing and rights of children and young people as well as the key objectives and measures to promote them in the framework of the UN Convention on the Rights of the Child.

The Government has pledged to assess the child impacts of its decisions, improve child budgeting, strengthen knowledge about child wellbeing and foster the inclusion of children and young people. These improvements will also advance the implementation of the Istanbul Convention among other human rights conventions addressing violence against children.

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